



DESIGNING AND DELIVERING  
A SUSTAINABLE FUTURE

## APPENDIX 5

### EIA SCOPING AND CONSULTATION

Appendix 5-1 – A copy of the EIA Scoping Request Letter issued on  
11 September 2023

Appendix 5-2 – A copy of all scoping responses received

Appendix 5-3 – A copy of the meeting minutes associated with  
the Strategic Infrastructure Development (SID) Pre-Planning  
meetings conducted with An Coimisiún Pleanála and the Pre-  
Planning meeting held with Clare County Council

Appendix 5-4 – A copy of the information documents associated  
with the public consultation for the proposed development

## APPENDIX 5.1

A copy of the EIA Scoping Request Letter issued on 11 September  
2023



CONSULTANTS IN ENGINEERING,  
ENVIRONMENTAL SCIENCE &  
PLANNING

# CLOONKETT WIND FARM

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## EIA SCOPING REPORT

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**Prepared for:**  
Greensource Sustainable Developments Ltd.



**Date:** September 2023

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## EIA SCOPING REPORT

### REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

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**Abstract:** This is a scoping report prepared for a proposed wind farm development in Co. Clare. The purpose of the scoping report is to identify the content and extent of the information to be provided in the Environmental Impact Assessment Report for the proposed project.

Please send all responses to: [cloonkettwindfarm@ftco.ie](mailto:cloonkettwindfarm@ftco.ie)

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**By 3<sup>rd</sup> November 2023**

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## 1. INTRODUCTION

### 1.1 General

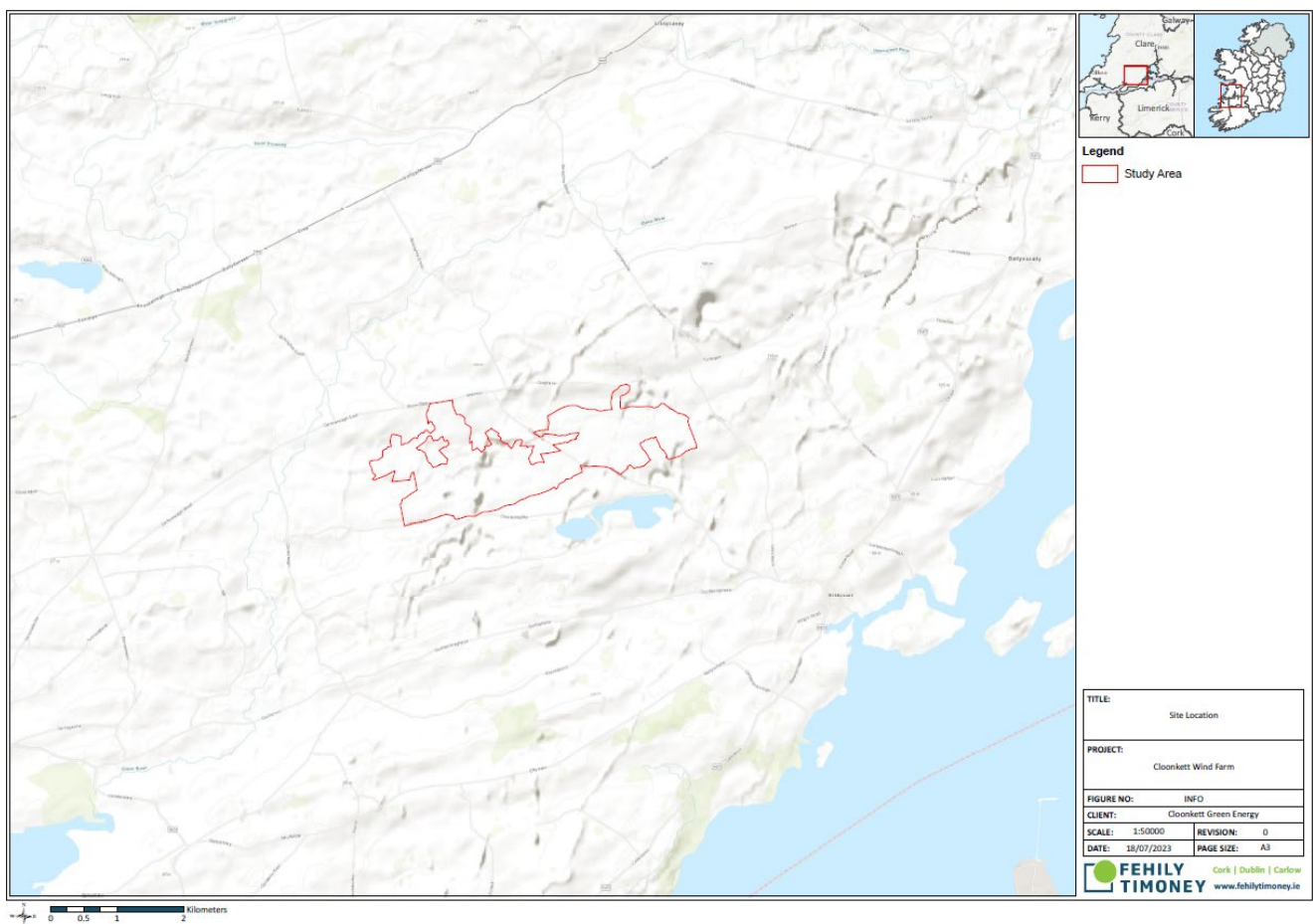
Cloonkett Green Energy Ltd intend to apply for planning consent for a renewable energy development referred to as the Cloonkett Wind Farm (the Project), located in south Co. Clare, near the village of Kildysart. The Project includes lands contained within the townlands of Glenconau More, Craghera and Cloonkett, Co. Clare.

The Project is currently at an early stage of development. Detailed environmental assessments are ongoing to determine the appropriateness of the wind farm infrastructure within its environmental context, as such the final application site boundary is yet to be finalised.

Fehily Timoney & Company have been appointed as Planning and Environmental Consultants for the Project and will ultimately prepare an Environmental Impact Assessment Report (EIAR) and relevant supporting documents, including a Natura Impact Statement (NIS), in support of the planning application. The EIAR will be prepared in accordance with the requirements of the EIA Directive 2011/92/EU, as amended and the NIS will be prepared in accordance with the requirements of the Habitats Directive 92/43/EEC.

This is the Scoping Report prepared for the Environmental Impact Assessment Report (EIAR) for the Project.

A site location map and study area are presented in Figure 1-1:



**Figure 1-1: Site Location**



## 1.2 The Applicant

Cloonkett Green Energy Limited (referred to as ‘the Applicant’), is a subsidiary of Greensource Limited.

Greensource is an Irish renewable energy company that focuses on sustainable power generation. The company has grown and diversified over the last twenty years, having significant expertise in the planning, construction, and operation of renewable energy projects. Working with integrity and care for the local environment, the team has a strong track record, having successfully completed wind energy and other renewable projects in the west of Ireland, playing a significant role in further decarbonising the electricity market in this country.

## 1.3 The Project

At a strategic level, the need for the Project is supported by International, European, and National environmental and energy commitments and policies. On a European level, the European Commission has recently proposed ramping up its Renewable Energy Directive target for the year 2030. The Commission’s proposed target for renewable energy across the electricity, heat, and transport sectors has been increasing from 32% (set in 2018) to 40% (proposed in June 2021) to 45% (proposed in May 2022). Such accelerated and ambitious targets are being proposed in order to deliver urgent emission cuts (at least 55% by 2030) and in light of the energy crisis in Europe. On a national level, the Climate Action Plan 2023 has increased the national targets for renewable electricity from 70% by 2030 to 80% by 2030. This is in the context of substantial and continuing failure by Ireland in meeting climate targets to date. This target is to be achieved partly by the delivery of up to 9GW of onshore wind energy by 2030.

Therefore, the Project will seek to contribute towards addressing Climate Change and the provision of Energy Security in Ireland, to enable Ireland’s transition to a low carbon economy. The Project has potential to play a significant role in providing renewable electricity in the Republic of Ireland.

### 1.3.1 Current Status and Consent Process for The Project

Preliminary analysis suggests that the site can accommodate approximately 17 no. wind turbines however this number could change as the design process commences. It is likely that the project will seek to connect into the existing 400kV Moneypoint Substation located approximately 23km southwest of the proposed wind farm site. The connection will be an underground electrical connection and the route is currently undergoing assessment. The exact Maximum Export Capacity (MEC) of the Project will be dependent on the final wind farm design and selected turbines.

The design of the wind farm will be an iterative process aimed towards the avoidance of impacts insofar as possible, and will be refined through the EIA process, commencing at this Scoping stage. It should be noted that progressive iterations to the wind farm design are unlikely to increase the likelihood of a significant effect, given that the ethos of EIA is for avoidance of significant adverse effects. However, as the design progresses, consideration will be given to the need to ‘scope back in’ to the EIA process any environmental subtopics that were deemed not to have any associated likely significant issues during this Scoping stage.

The Planning and Development Act 2000 was amended in 2006 so that major infrastructure proposals could be made directly to An Bord Pleanála, rather than to the local planning authority. This is known as Strategic Infrastructure Development (SID).

In order to qualify for SID under section 37B of the Planning and Development Act 2000 (as amended), a proposed development must firstly fall within a class specified in the Seventh Schedule to the 2000 Act.



Part 1 of the Seventh Schedule, as amended, specifies, inter alia, the following classes of development:

*“An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts.”*

Thereafter, the Board must satisfy itself that the Project meets one or more of the conditions set out in subsection 37A(2) of the 2000 Act, namely:

*“(a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,*

*(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Spatial Strategy or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate,*

*(c) the development would have a significant effect on the area of more than one planning authority.”*

It is anticipated that the Project will likely have an output of at least 50MW. Should the Project be of this scale, an application will be made to An Bord Pleanála (the Board) seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the Board determine that the development is indeed SID, the planning application will be submitted directly to An Bord Pleanála, under the provisions of Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Clare County Council.

It is noted that a Draft Planning Bill 2022 has been prepared by Government and may be adopted prior to the Project entering the planning process. The Bill once adopted will be reviewed to determine the appropriate planning process for the project as necessary.

#### **1.4 Environmental Impact Assessment Report and the Function of the EIAR**

Under Section 172 of the Planning and Development Act, as amended, a planning application for a development which comes within a class of development specified under Schedule 5 of Part 2 of the Planning and Development Regulations, 2001, as amended must be accompanied by an Environmental Impact Assessment Report (EIAR) in accordance with the EIA Directive 2011/92/EU, as amended in 2014. The purpose of an EIAR is to provide a detailed description of the Project and outline potential impacts associated with the construction, operation, and decommissioning of the project. Where adverse impacts are identified, mitigation measures are proposed, and the residual impacts described.

The prescribed classes of energy developments and thresholds that trigger a mandatory EIA and the provision of an EIAR as set out in Schedule 5 of the Planning and Development Regulations are:

*“Installations for the harnessing of wind power for energy production with more than 5 turbines or having a total output greater than 5 megawatts.”*

The Project will exceed that threshold and therefore an EIA will be required, necessitating the preparation of an EIAR. Furthermore, EIA is mandatory for all Schedule 7, Strategic Infrastructure Development Projects.

This EIA Scoping Report has therefore been prepared to assist the preparation of an EIAR that will comply with the requirements of the EIA Directive, the EIA Regulations, the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001, as amended.



#### 1.4.1 Purpose of Scoping

The purpose of the EIA scoping process is to identify the issues which are likely to be important during the environmental impact assessment and to eliminate those that are not. The scoping process will identify the sources or causes of potential environmental effects, the pathways by which the effects can happen, and the sensitive receptors, which are likely to be affected.

The issues identified in the scoping process will be examined in the EIAR, any potential impacts will be assessed, mitigation measures proposed as required, and residual impacts described. The scoping process will also identify the appropriate level of detail for the information to be provided in the EIAR. Scoping will be carried out through the issue of this report to statutory and non-statutory consultees listed in Section 1.6. Consultees are invited to contribute to the EIAR by suggesting baseline data, survey methodologies and potential impacts that should be considered as part of the impact assessment process and in preparation of the EIAR.

### 1.5 Contributors to the EIA Scoping Report

This Scoping Report has been prepared by Fehily Timoney & Company (FT) on behalf of Greensource. FT is a planning, environmental and engineering consultancy based in Cork, Dublin and Carlow specialising in civil and environmental engineering, environmental science, and planning, and is well established as a leading consultancy in wind farm development in Ireland. FT will prepare a planning application and accompanying EIAR for submission to the planning authority, Clare County Council. Specialist contributors to the EIAR will include:

- WoodrowAPEM contributing to biodiversity;
- Macro Works contributing to landscape and visual; and
- John Cronin & Associates contributing to cultural heritage.

### 1.6 Consultation

The stakeholder consultation process is being carried out in accordance with the Code of Practice for Wind Energy Development in Ireland-Guidelines for Community Engagement (available at: [www.dccae.gov.ie](http://www.dccae.gov.ie)).

This Scoping Report will be distributed to a range of stakeholders who are considered to have appropriate expertise and relevant prior experience of the factors involved, knowledge of the characteristics of the project type and of the sensitivities likely to be present in the receiving environment as well as local knowledge and interest in the area.

Comments on the scope of the EIAR can be submitted by email to [cloonkettwindfarm@ftco.ie](mailto:cloonkettwindfarm@ftco.ie) or returned by post to Fehily Timoney & Company, Core House, Pouladuff Road, County Cork. We ask all consultees to submit responses by the 3<sup>rd</sup> November 2023 to provide adequate time to consider all responses.

The responses from this consultation will inform the ongoing design process in addition to informing the scope of the environmental assessments.

A full list of the consultees issued with this Scoping Report is included in Appendix 1 of this document.



## **1.7 Community & Stakeholder Consultation**

A Community Liaison Officer (CLO) has been nominated for the Project and will act as a key point of contact within the local community. The CLO has been resourced to deal with all queries and will conduct informal local community consultation in the area. Feedback from the CLO will be passed on to the project design team on an ongoing basis in order to allow the consultation process to inform the design process.

A project website will be set up for the project to inform the public of information relating to the Project. The website will be used to notify members of the public of project updates, project timelines, upcoming public consultation and any changes in the design and layout as a consequence of consultations. It will also provide an avenue for the public to contact the project development team directly.

Extensive consultation will be carried out with statutory and prescribed bodies which will include Clare County Council and An Bord Pleanála pursuant to the Strategic Infrastructure Development Pre-Application process.



## 2. PROJECT DESCRIPTION

### 2.1 Introduction

The Project currently consists of a proposed wind farm site which will include turbines and ancillary infrastructure, the grid connection, and the turbine delivery route. As the project develops additional elements of the project may be introduced and considered in the Environmental Impact Assessment Report (EIAR) and associated documents.

### 2.2 Proposed Wind Farm

The Project will comprise of approximately 17 no. wind turbines, however this number could change as the design process commences. In addition to the turbines the wind farm site will require an on-site substation, access tracks, foundations and hardstanding areas at each turbine location, on-site substation, temporary compound area, drainage works, and landscaping.

### 2.3 Grid Connection

The electricity generated by the proposed wind farm will be transmitted by an underground electricity cable that will connect the on-site turbines to the national grid. The likely point of connection will be to the existing Moneypoint 400kV Substation located approximately 23km southwest of the proposed wind farm site. The route of the underground cable is currently undergoing assessment.

### 2.4 Turbine Delivery

A number of components will enter the country via a preferred port including the blades, tower sections and the nacelles. The turbine components will need to be delivered to site for assembly and erection. The turbine components will be delivered to site by flatbed transport vehicles. Numerous routes to site are under consideration and will be surveyed to determine the most appropriate turbine delivery route.

It is envisaged that the turbine delivery route will begin at Foynes Port and travel along the N69, N18, M18 and the N85 to Ennis. From here, turbine delivery will follow the most appropriate route which will be determined pending a detailed engineer's assessment.



### 3. STRUCTURE AND SCOPE OF THE EIAR

#### 3.1 Introduction

This section of the Scoping Report sets out what an Environmental Impact Assessment Report (EIAR) is and then sets out the methodology applied in carrying out an EIAR and its general structure. It will be this methodology and structure that will be applied to the future Cloonkett Wind Farm EIAR.

#### 3.2 Contents of the EIAR - Statutory Requirements

The EIAR will be prepared in accordance with Schedule 6 of the Planning and Development Regulations 2001, as amended, which sets out the contents of an EIAR. In addition, the contents of Directive 2014/52/EU, which was adopted on the 16<sup>th</sup> April 2014 will also be included in the preparation of this EIAR (the 2014 EIA Directive).

The purpose of the EIAR is to provide in particular:

- a) a description of the project comprising information on the site, design, size, and other relevant features of the project;
- b) a description of the likely potential significant effects of the project on the environment;
- c) a description of the features of the project and/or measures envisaged in order to avoid, prevent, or reduce and, if possible, offset likely significant adverse effects on the environment;
- d) a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;
- e) a non-technical summary of the information referred to in points (a) to (d); and
- f) any additional information relevant to the specific characteristics of the wind farm project proposed.

The EIAR will identify, describe, and assess the direct and indirect significant effects of the project on the following factors:

- a) population and human health;
- b) biodiversity, with particular attention to protected species and habitats;
- c) land, soil, water, air, and climate;
- d) material assets, cultural heritage, and the landscape; and
- e) the interaction between the factors referred to in points (a) to (d).



### 3.3 EIAR Methodology

#### 3.3.1 General

The EPA and the European Commission (EC) have published guidelines on the preparation of environmental impact assessment reports, namely:

- Guidelines on the Information to be contained in Environmental Impact Assessment Reports (EPA, 2022);
- Environmental Impact Assessment of Projects - Guidance on Scoping (European Commission (EC), 2018);
- Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report (EC, 2017); and
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning and Local Government, 2018).

The EIAR team will have regard to these guidelines in the preparation of the EIAR.

The team will also have regard to best practice guidance for individual environmental topics. Regard will also be paid to the 'Best Practice Guidelines for the Irish Wind Energy Industry' published by the Irish Wind Energy association and the 'Wind Energy Development Guidelines' published by the Department of Environment, Heritage and Local Government (2006) or the latest adopted revision at the time of application.

There are two different EIAR structures which are commonly used and which the EPA Guidelines accept as equally valid. The structure, which the EIAR team proposes to use for the EIAR for the Project, is the grouped format structure.

Using this structure there is a separate chapter for each topic. The description of the existing environment, the Project and the potential impacts, mitigation measures and residual impacts are grouped in the chapter. The grouped format makes it easy to investigate topics of interest and facilitates cross-reference to specialist studies.

#### 3.3.2 EIAR Report Structure

The structure proposed for the EIAR is as follows:

- Volume 1 - Non-Technical Summary;
- Volume 2 - Main EIAR;
- Volume 3 - Appendices for the EIAR;
- Volume 4 - Photomontages and Visual Maps.

The proposed EIAR chapters within Volume 2 are:

- Introduction;
- Need and Alternatives;
- Planning Policy;



- Description of the Proposed Development;
- EIA Scoping and Consultation;
- Population, Human Health and Material Assets;
- Shadow Flicker;
- Noise and Vibration;
- Telecommunications and Aviation;
- Traffic and Transportation;
- Landscape and Visual Impact Assessment;
- Biodiversity;
- Lands, Soils and Geology;
- Hydrology, Hydrogeology and Water Quality;
- Cultural Heritage;
- Air and Climate;
- Interaction of the Foregoing.

### 3.3.3 EIAR Chapter Structure

The broad methodology framework used in each chapter will include the following:

- Introduction;
- Methodology;
- Existing Environment;
- Potential Impacts;
- Mitigation Measures;
- Residual Impacts.

#### Introduction

This section introduces the environmental topic to be assessed and the areas to be examined within the assessment.

#### Methodology

Specific topic related methodologies are outlined in this section. This will include the methodology used in describing the existing environment and undertaking the impact assessment. It is important that the methodology is documented so that the reader understands how the assessment was undertaken. This can also be used as a reference if future studies are required.

#### Existing Environment

An accurate description of the existing environment is necessary to predict the likely significant impacts of a new development. Existing baseline environmental monitoring data can also be used as a valuable reference for the assessment of actual impacts from a development once it is in operation.



To describe the existing environment, desktop reviews of existing data sources will be undertaken for each specialist area relying on published reference reports and datasets to ensure the objectivity of the assessment. Desktop studies are also supplemented by specialised field walkovers or studies in order to confirm the accuracy of the desktop study or to gather more baseline environmental information for incorporation into the EIAR.

The existing environment will be evaluated to highlight the character of the existing environment that is distinctive and what the evaluation of this is. The evaluation of a specific environmental aspect can be derived from legislation, national policies, local plans and policies, guidelines or professional judgements. The sensitivity of the environment will also be described.

### Potential Impacts

In this section, individual specialists predict how the receiving environment will interact with the Project. The full extent of the Project's effects and emissions before the proposed mitigation measures are introduced is outlined. Impacts from both the construction and operation phases of the Project are outlined. Interactions and cumulative impacts with other environmental topics are also included in this evaluation.

The evaluation of the significance of the impact is also undertaken. Where possible, pre-existing standardised criteria for the significance of impacts will be used in accordance with the guidelines set out in the EPA (2022) Guidelines on the Information to be contained in Environmental Impact Assessment Reports.

Such criteria can include Irish legislation, international standards, European Commission and EPA guidelines or good practice guidelines. Where appropriate criteria do not exist the assessment methodology section states the criteria used to evaluate the significance.

### Mitigation Measures

If significant impacts are anticipated mitigation measures will be devised to minimise impacts on the environment. Mitigation measures by avoidance, by reduction and by remedy can be outlined.

### Residual Impacts

The assessment identifies the likely impact that will occur after the proposed mitigation measures have been put in place. These impacts are described in detail and assessment of their significance undertaken.

## **3.4 Upfront Chapters**

The content of the upfront chapters of the EIAR are set out hereunder.

### 3.4.1 Chapter 1: Introduction

The Introduction Chapter will set out the context of the EIAR including an introduction to the applicant and a short description of the Project. The requirements for Environmental Impact Assessment will be addressed along with the EIAR methodology, structure, and outline of cumulative projects. Contributors to the EIAR will also be detailed in this Chapter along with the relevant expertise.

### 3.4.2 Chapter 2: Background to the Proposed Development

Chapter 2 will set out the context of the Project which will discuss the need for the proposed project with regard to climate change, renewable energy targets and energy security. The policy context will also be discussed in this chapter. Chapter 2 will summarise International, European, National and Local Energy and Planning Policy, in the context of the proposed project.



### 3.4.3 Chapter 3: Consideration of Reasonable Alternatives

The reasonable alternatives, which were considered, when developing the overall configuration of the proposed Wind Farm will be described and the technology options for the project will be outlined in Chapter 3.

The reasonable alternatives studied with respect to the wind farm will be outlined under the following headings:

- Locations – This will include a discussion of the overall project site selection process for the Wind Farm based on the landholding available to the applicant. It will include a summary of the project site selection report which will be included in the EIAR outlining details of the criteria used to determine project site suitability for wind energy development including:
  - Wind resource;
  - Proximity to residential dwellings;
  - Land zoning in County Development Plans;
  - Established and future land-use;
  - Ecological conservation designations;
  - Landscape designations; and
  - Ease of access etc.
- Access – Details of the criteria used to select the network of access tracks that will provide access from the public road network to the project site (and to each turbine within the site) in addition to those that will provide internal connections (as an alternative to using public roads) between turbines will be outlined. This will include information on the availability of existing track, suitable ground conditions, terrain, local road infrastructure etc.
- Connection to the National Grid – Details of the criteria used to select the proposed onsite substation location and grid connection route will be provided. This will include an assessment of alternative grid connection route options, if relevant.
- The environmental and plan-led considerations considered in the selection of the preferred alternatives will be outlined.

### 3.4.4 Chapter 4: Description of the Proposed Development

This chapter will provide a detailed description of the Project including the following:

- Proposed development layout;
- Development components, including all internal infrastructure (roads, hardstands, cable routes, borrow pits etc), grid connection, turbine delivery and associated works;
- Description of the proposed turbines;
- Temporary site facilities and works (construction compounds, accommodation works etc.);
- Community benefit proposals;
- Access and transportation;
- Site drainage;
- Construction phase management and methodologies;
- Operational phase; and
- Decommissioning phase.



A Construction and Environmental Management Plan (CEMP) will be prepared and presented as an Appendix to the EIAR. The control measures that will be implemented to manage the risk of soil and water pollution, emissions of dust and noise, construction waste management and traffic impacts will be explained within this document.



## 4. ENVIRONMENTAL ISSUES TO BE ADDRESSED IN THE EIAR

### 4.1 Population, Human Health and Material Assets

#### 4.1.1 Aspects to be Addressed

The Population and Human Health Chapter of the EIAR will assess the likely significant effects of the Project on population and human health and safety with a particular reference to the topics of population, human health, socio-economic activity, land-use and recreation, amenity, and tourism.

This chapter of the EIAR Scoping Report includes the following:

- Potential for change in population pattern or demographic;
- Identification of and assessment of effects to sensitive receptors;
- Effects on the existing baseline human health profile due to potential changes in air quality, noise, water quality, access to resources/amenities;
- Induced employment and economic effects;
- Alteration of land use; and
- Effects on access to and changes in value of recreation, amenity, and tourism activities.

The study area for Population and Human Health will be at various scales of assessment, including in a local, county and regional context, and will depend upon the issue under consideration: health, population, or socio-economic, and the element of The Project which might have an effect e.g. grid or turbines.

#### 4.1.2 Assessment Methodology

A number of the specialist chapters cover aspects which relate to Population and Human Health, including Landscape and Visual, Noise and Vibration, Air Quality, Climate and Traffic and Transportation. These will be referenced in the Population and Human Health chapter of the EIAR as relevant.

The EIAR will be informed by data sources that will include the following:

- An Bord Pleanála;
- City and County Council Development plans and planning data;
- Central Statistics Office, Small Area Population Statistics, Live Register Data and Census Data;
- Land Cover data from Corine 2018, the Tailte Éireann and the EPA 'New National Land Cover Map for Ireland' if available);
- Eircode data;
- Health Service Executive;
- ESB, EMF and You (2017);
- EirGrid, The Electricity Grid and Your Health (2019);
- Fáilte Ireland data and guidance: Visitor Attitudes on the Environment – Wind Farms, Guidelines on the Treatment of Tourism in an Environmental Impact Statement and Key Tourism Facts 2019; and



- SEAI Statistics.

Consultation will be undertaken with relevant stakeholders to ensure that an accurate baseline is compiled during the EIAR process which will include:

- Fáilte Ireland;
- Teagasc;
- Local Community Groups identified through Public Consultation events (to discuss recreation and amenity facilities and key concerns relating to human health impacts);
- Office of Public Works; and
- City and County Councils.

### Population

The population demographic of the region will be examined using CSO data in relation to inter alia population and labour force trends and projections, household statistics, regional population projections and spatial plans, small area populations and local area plans etc. This data will be examined by electoral division, including the area of the grid route corridor. This data will be compared against county and state trends. Additional data sources will include Eircode data, Geodirectory data, and planning application lists sourced from Clare County Council, An Bord Pleanála and the Department of Housing and Local Government's EIA Portal will be assessed to identify any commercial or residential receptors in proximity to the Project.

### Socio Economic

A socio-economic profile of the region will be established using the CSO live register data and Census (2022) data. Alignment with the West and Mid-west Regional Enterprise Plans to 2024 will be assessed and economic growth, employment and investment opportunities or adversities, alteration of property values as might be associated with The Project will be identified.

### Land Use

Land use in the area will be further examined to determine potential impacts on existing and future usage patterns which may arise as a result of The Project. The land uses will be described using Corine 2018 land cover data (or the Tailte Éireann and EPA 'New National Land Cover Map for Ireland' if available) which classifies landcover nationwide and desktop research. This data will be verified by subsequent walkovers and site surveys.

Regard will be had to National Planning Framework. The potential for effects on community facilities and amenities, access and transport, and current land use practices will be examined.

### Recreation, Amenity and Tourism

A profile of tourism in the region will be established through consultation with key stakeholders and examination of published data e.g. from Fáilte Ireland. Potential impacts as a result of the Project will then be considered in relation to the tourism and recreation activities of the area for both land and marine based activities.

All areas of scenic beauty in addition to heritage, culture and leisure facilities and activities in the study area will be identified. Residential amenities and recreational facilities, such as forestry in public ownership, walking paths, sports facilities, will be recorded and potential impacts assessed.



An assessment will then be conducted for each element of the Project to ascertain any potential impacts that may arise which could directly or indirectly affect recreational activity or an amenity. This assessment will be prepared giving cognisance to other disciplines such as cultural heritage and archaeology, hydrology, and ecology.

A review will be completed of several published studies and surveys which have been conducted both in Ireland by Fáilte Ireland and in the UK on the attitude of tourists to wind farms. A study of the potential impacts that the Project may have on the tourism of the region will be carried out by reviewing Fáilte Ireland surveys, appraising the existing patterns of the tourism within the county, and appraising the impacts that wind farms have on tourism in other counties and countries.

Proposed recreation, amenity and tourism facilities and improvements as part of the Project will be discussed in this section and included as part of the assessment.

### Human Health and Safety

CSO data and reports published by the Department of Health will be examined to establish a baseline health profile of the study area. The assessment on human health and safety will have regard to the Environmental Protection Agency's (EPA US), Institute of Environmental Management and Assessment (IEMA), and World Health Organisation (WHO) guidelines and will assess potential for positive and negative health effects associated with the Project. The assessment considers potential impacts of the construction, operation and decommissioning of the Project.

#### 4.1.3 Receiving Environment

The Project site is located in an area which is predominantly rural in character consisting of one-off houses and clusters of dwellings within a landscape used predominantly for agriculture and fragmented commercial forestry plantations in south Co. Clare, circa 18km southwest of Ennis. Nearby settlements include the village of Kildysart (population 386 in 2016) to the southeast of the site.

#### 4.1.4 Potential Impacts

##### Population

The potential impacts arising from the Project on population numbers and density during construction operation and decommissioning will be assessed.

##### Human Health & Safety

The potential affects arising from the Project which can impact on human health and human safety during construction, operational and decommissioning will be considered in this chapter.

Potential impact on and from the Project due to natural disasters and the risk of major accidents will be examined and summarised.

##### Socio-Economics

The Project will have an impact on the local economy through job creation, local authority commercial rate payments and a Community Benefit Scheme. These will be developed in full and considered in the EIAR.



## Land Use

The Project will require land take for the access tracks, wind turbines bases and adjacent hard-standings and sub-station footprints. The current land uses will remain other than within this land take. Full details will be contained in this chapter of the EIAR.

## Recreation, Amenity and Tourism

The potential impact of the proposed wind farm development on the receiving environment for recreation, amenity and tourism will be assessed in this chapter in relation to the construction, operation, and decommissioning phases. Potential construction impacts include full or partial closure of roads used within the area, for installation of cables and/or delivery of turbine components.

Should the Project create disruption to access routes and walking paths, the disruption will be mitigated where possible by maintaining access for people throughout or rerouting paths, and where this is not possible, in minimising the impact, clearly communicating the timing and scope of works to the local community. This section will also cross reference other technical chapters of the EIAR, for example, to determine potential impact on cultural heritage assets and to determine potential visual impact to tourism or recreation assets during the operational phase. Possibilities for improvements to recreation facilities in the area will also be considered.

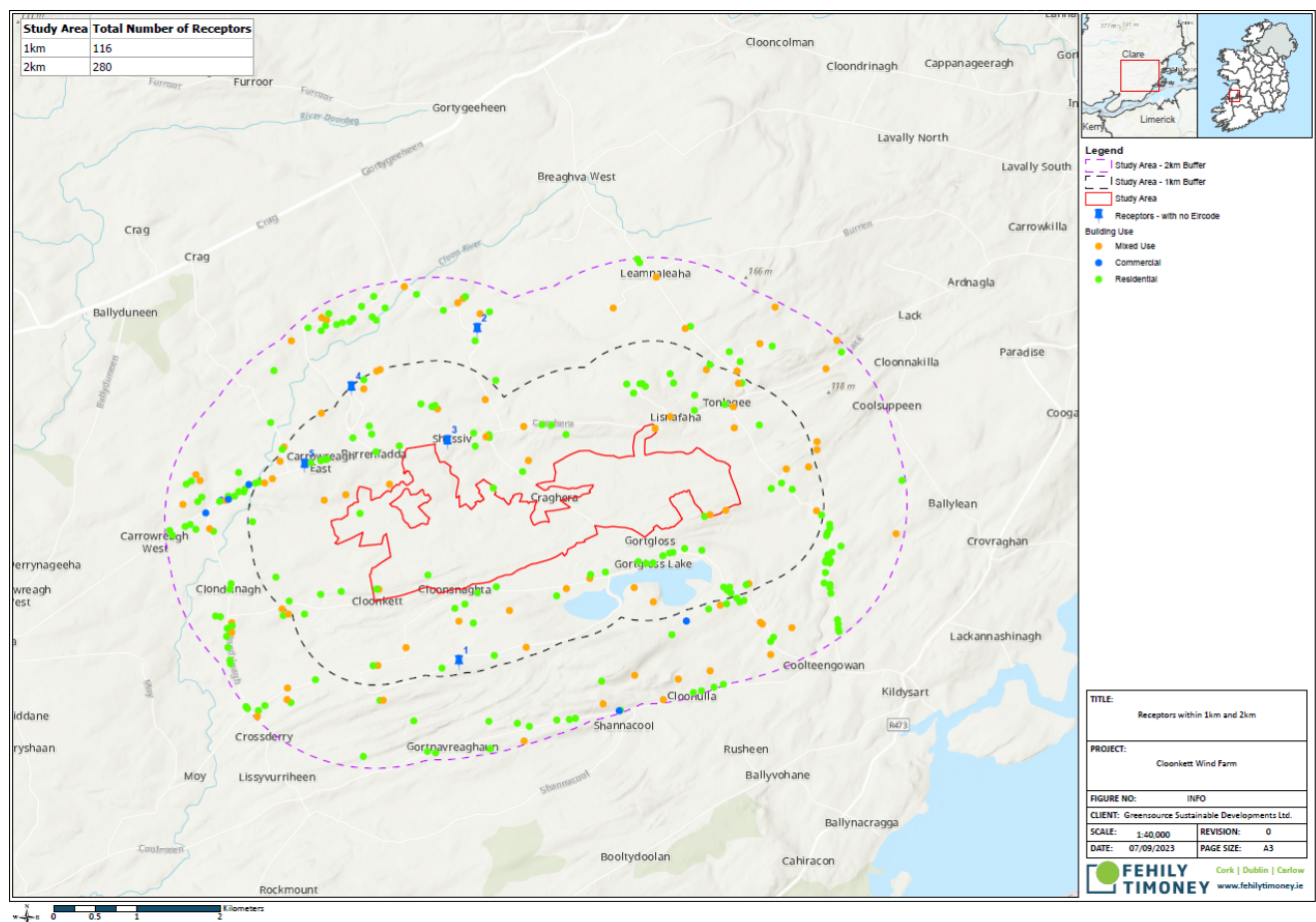


Figure 4-1: Residential Receptors in Proximity to the Wind Farm Site



## 4.2 Shadow Flicker

### 4.2.1 Aspects to be Addressed

This chapter will address the potential effects on human beings of shadow flicker, i.e. the moving shadows cast by the turbine blades in times of direct sunlight. Under certain combinations of geographical position, wind direction, weather conditions, times of day and time of the year, the sun may pass behind the rotors of a wind turbine and cast a shadow over the windows of nearby buildings. When the blades rotate and the shadow passes a window, to a person within that room the shadow appears to 'flick' on and off; this effect is known as 'shadow flicker'. The phenomenon occurs only within buildings where shadows are cast across a window aperture, and the effects are typically considered up to a maximum distance of 10 times the rotor diameter from each wind turbine.

### 4.2.2 Assessment Methodology

A shadow flicker assessment will be carried out using the latest ReSoFT Windfarm Software to predict the time and duration of shadow flicker on windows of habitable or permitted houses and commercial properties within 10 times the rotor diameter from a proposed turbine, as informed by the house and planning surveys.

The methodology used for the shadow flicker assessment will be performed in consideration of the "Wind Energy Development Planning Guidelines" DoEHLG (2006) and the Irish Wind Energy Association (2012) "Best Practice Guidelines for the Irish Wind Energy Industry". This methodology includes:

- Calculation of sunshine factor based on the historical measurements from the closest Met Éireann meteorology station;
- Calculation of shadow flicker levels for the final turbine layout;
- Where exceedances are predicted, detailed mitigation measures, including an outline protocol for potential turbine shutdown will be proposed.

Regard will be had to other guidance and policy documents including 'International Legislation and Regulations for Wind Turbine Shadow Flicker Impact' (Koppen, 2017), the Draft Revised Wind Energy Development Guidelines (2019) and the County Development Plan.

Cumulative impacts of the Project and other third-party schemes will be assessed. IWEA Best Practice Guidelines (2012, Section 6.3.4) states that *"any such wind farm developments within 2 km of the proposed development should be considered in a separate cumulative shadow flicker assessment."* There are no other known proposed, consented or existing wind farms within this distance of the Project.

### 4.2.3 Receiving Environment

The Project is located in a rural part of south Co. Clare. Buildings within the vicinity of the Project are primarily residential or agricultural. Residential and commercial buildings up to ten times the rotor diameter from proposed turbine locations have been considered for the assessment.



#### 4.2.4 Potential impacts

In times of direct sunshine, wind turbine blades could occasionally cast moving shadows on residences in close proximity to the turbines. At certain times of the year, the moving shadows of the turbine blades can periodically reduce light to a room causing the light to appear to flicker. Shadow flicker would not generally have any effect on health or safety but could on limited occasions present a brief nuisance effect.

The effects of shadow flicker can be mitigated by incorporating a shadow flicker monitoring system that will temporarily shut down a turbine when shadow flicker effects are predicted to occur at a dwelling. Therefore, it is possible to eliminate the potential of shadow flicker occurring at dwellings and commercial properties.

### 4.3 Noise and Vibration

#### 4.3.1 Aspects to be Addressed

The chapter will address noise and vibration impacts from the construction, operation, and decommissioning of the proposed wind farm.

#### 4.3.2 Assessment Methodology

The noise assessment will be carried out on each phase of the wind farm:

- Construction phase;
- Operational phase, including turbine and sub-station operations; and
- Decommissioning phase, including dismantling the turbines, and related traffic.

The Wind Energy Development Guidelines (2006) are the current statutory guidelines for carrying out noise assessments for wind energy development in Ireland. Draft Guidelines were published in December 2019; however, these have a number of technical errors, ambiguities and inconsistencies and require further amendment. Until alternative guidelines are implemented, the appropriate guidelines for assessment of operational noise for the Project area. The Wind Energy Development Guidelines (2006). Reference will also be made to the Institute of Acoustics (IOA) 'A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise' the developing the layout and design of the wind farm through the criteria for noise assessment. In addition, noise from the on-site substation will be assessed in line with BS4142 (2014:A1+2019) Methods for rating and assessing industrial and commercial sound.

The noise impact assessment will involve the measurement of background noise levels which will be used to derive noise limits in accordance with the appropriate guidelines. Operational noise will be predicted from the Project in addition to nearby operational and consented developments, as appropriate. In the event that the predicted noise levels exceed the noise limits, mitigation measures will be outlined.

Construction/decommissioning noise predictions will be carried out to determine the noise levels at the nearest noise sensitive locations. Noise predictions will be carried out using British Standard BS 5228-1:2009+A1:2014, Code of practice for noise and vibration control on construction and open sites – Part 1: Noise. Predicted construction noise levels will be compared against noise levels in BS 5228:2009+A1:2014 Part 1. Where the impact significance identifies a requirement for mitigation, mitigation measures will be outlined.



### 4.3.3 Receiving Environment

The site has local roads to the north (L2070) and the south and is north of the Shannon Estuary and west of Shannon Airport. The area is a mix of agricultural and residential, with some commercial. Within 2km of the turbines there are 280 receptors. The number of receptors has been determined from 2023 eircode data and a house survey carried out in October 2022.

### 4.3.4 Potential impacts

Potential operational noise impacts will be addressed at the design stage by locating turbines at sufficient separation distances or by employing reduced turbine noise modes to comply with the noise limits in force at the time of application.

Potential construction noise impacts will be assessed during the design phase. Mitigation may consider local screening of construction activities.

## 4.4 Air Quality and Climate

### 4.4.1 Aspects to be Addressed

The assessment will address the potential impacts on air quality due to construction and decommissioning equipment and activities and to emissions from traffic associated with the construction process. The potential impacts on air quality in the operational phase will also be addressed.

The climate in the immediate local area of a proposed development is known as the micro-climate whereas the climate of a large geographical area (global) is the macro-climate. The potential impacts of the Project on micro-climate and macro-climate will be addressed. The project will also be assessed for compliance with the Climate Action Plan 2023.

### 4.4.2 Assessment Methodology

Air quality monitoring conducted by the EPA at a number of locations in the vicinity of the site will be reviewed and levels compared with the air quality standards. To assess the impacts of construction dust emissions, the approach and assessment criteria outline in the *Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes* (NRA, 2008) will be used.

For the purposes of assessing the impact on air quality of emissions generated by construction traffic, the methodology described in the Design Manual for Roads and Bridges 2007a (UK Highways Agency, May 2007) will be used. Parameters to be assessed will include oxides of nitrogen, particulates PM10 and PM2.5, carbon monoxide and benzene.

The potential micro-climatic impacts of Project will be assessed in relation to the micro-climatic baseline, the scale of the elements of the project and the nature of use of the surrounding environment. For the assessment of macro-climatic effects, the emissions of carbon dioxide (CO<sub>2</sub>) and other greenhouse gases from fossil fuel power generation, which will not be required should the Project become operational, will be quantified, and assessed in terms of Ireland's commitments under EU and international climate change treaties and protocols.

In terms of carbon losses and savings, the Scottish Windfarm Carbon Assessment Tool. will be used to estimate carbon savings as a result of the proposed construction and operation of the wind farm.



#### 4.4.3 Receiving Environment

In terms of micro-climate, the wind farm is located in a predominantly rural area, corresponding to air quality zone D, Rural Ireland, in the Air Quality Regulations SI 180 of 2011, as amended. The air quality is expected to be good. The macro-climatic baseline is the future emission of CO<sub>2</sub> and other greenhouse gases, which would be produced by fossil fuel power generation in the country, in the absence of the Project.

#### 4.4.4 Potential impacts

The assessment will address the potential impacts on air quality due to construction equipment and activities and to emissions from traffic associated with the construction process. The potential impacts on air quality in the operational phase will also be addressed.

The construction phase of the Project has the potential to generate dust emissions, which could give rise to nuisance for local residents. To assess the impacts of construction dust emissions, the approach and assessment criteria outlined in the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority, 2008) will be used.

Construction plant and equipment, and the traffic generated by the construction process, have the potential to give rise to emissions of oxides of nitrogen, benzene, and particulates, which could impact on local air quality. The operation of the Project is not expected to have a negative impact on air quality. The Project is expected to have a positive impact in terms of the nett reduction in emissions of CO<sub>2</sub> and other greenhouse gases as a result of the proposed wind farm. For the assessment of macro-climatic effects, the reduction in emissions of CO<sub>2</sub> and other greenhouse gases from fossil fuel power generation when the Project is operational, will be quantified and assessed in terms of Ireland's commitments under EU and international climate change treaties and protocols.

### 4.5 Biodiversity

#### 4.5.1 Aspects to be Addressed

The assessment will address the potential impacts on biodiversity due to construction, operation and decommissioning of the Project. The objectives of the assessment are to:

1. Produce a baseline study of the existing ecological environment in the vicinity of the Project;
2. Identify likely positive and negative effects of the Project on biodiversity during the construction, operational and decommissioning phases of the Project;
3. Identify mitigation measures to avoid, remediate or reduce likely or significant negative effects; and,
4. Assess likely or significant cumulative effects of the Project as a result of other developments.



#### 4.5.2 Assessment Methodology

Those ecological features which occur within the zone of influence, such as nature conservation sites, habitat or species are then evaluated in geographic hierarchy of importance. The hierarchical categories used for this evaluation are based on those listed in NRA (2009)<sup>1</sup>. Approaches to attributing nature conservation value to species have been previously developed for some groups such as birds and bats. The specific assessment criteria employed for assessing avian and bat populations are detailed below:

- Ornithological impact assessment follows Percival (2003)<sup>2</sup>, which requires that an evaluation is undertaken of the population status and trends for the bird species recorded to determine the nature conservation importance, which is based on links to European Sites (Natura 2000 Sites), Annex 1 status on EC Birds Directive and conservation status as listed on the BoCCI - Bird of Conservation Concern in Ireland - BoCCI 2020-2026 (Gilbert *et al.*, 2021)<sup>3</sup>.
- Specific assessment criteria employed are applied for the assessment of avian and bat populations, including: NatureScot *et al.* (2021) provides guidelines for conducting risk assessment for bat species occurring on wind farms, which is modified slightly to align the assessment methodology with Irish bat populations.

‘Important ecological features’ (also referred to as key ecology receptors – KERs) are defined as those features which are within the zone of influence and are evaluated as being of Local Importance or greater.

In summary the following ecological studies and field surveys are required to inform the ecological impact assessment:

- Desk-based study to compile baseline for ecological records;
- Assessment of potential impacts on designated sites;
- Habitat mapping (Fossitt, 2000), with Annex I habitat assessments where required;
- Invasive species surveys;
- Invertebrate habitat suitability assessment (marsh fritillary, Irish damselfly);
- Aquatic and fisheries assessments, including physio-chemical analysis, Q-values, freshwater pearl mussel (FWPM), crayfish, salmonid and lamprey suitability assessments. Additional surveys will be required for FWPM as the Project is within a FWPM catchment and is upstream of an SAC designated for this species (River Cloon within the Lower River Shannon SAC);
- Amphibian and reptile suitability assessments;
- Bird surveys (compliant with SNH, 2017);
- Terrestrial (non-volant) mammal surveys; and
- Bat surveys (compliant with NatureScot *et al.*, 2021).

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<sup>1</sup> NRA (2009). *Guidelines for Assessment of Ecological Impacts of National Road Schemes*. National Roads Authority. Available at:

<https://www.tii.ie/technical-services/environment/planning/Guidelines-for-Assessment-of-Ecological-Impacts-of-National-Road-Schemes.pdf>

<sup>2</sup> Percival, S. M. 2003. *Birds and wind farms in Ireland: A review of potential issues and impact assessment*. Ecology Consulting, Coxhoe, Durham

<sup>3</sup> Gilbert, G., Stanbury, A. & Lewis, L. (2021). Birds of Conservation Concern in Ireland 2020-2026. *Irish Birds* 9: 523-544



Field surveys conducted to inform the ecological impact assessment are being undertaken with regard to:

- potential for occurrence ecological receptors based on site conditions (e.g. substrate, hydrology) for habitats and habitat suitability/availability for species; and
- the specific sensitivities of ecological receptors in relation to the potential zone of influence of the Project during construction (decommissioning) and operational phases.

The following provides an overview of the study areas that will or are being applied for ecological surveys, along with survey guidelines/methodologies that will or have been adopted:

- A preliminary **desk-based study** for ecology undertaken in 2022 as part of a project scoping exercise, which pulled in data from numerous resources document the occurrence of species and habitats in Ireland. This study identified the protected and potentially sensitive species and habitats recorded in the environs of the proposed project. The desktop survey informed the iterative project design process and enabled an assessment of the likely ecological effects of the Project; and provided information on the species and habitats that could be affected by the Project. These initial desktop surveys also facilitate a targeted approach to ongoing ecological surveying.
- Assessment of potential impacts on **designated sites** will use the National Parks & Wildlife Service (NPWS) Designations Viewer<sup>4</sup> to investigate connectivity (source-receptor pathways) between all aspects of the Project (source) and all sites designated for nature conservation, together with the features of interest for each site (receptors). The assessment will cover Nationally designated sites, including proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), National Parks, Nature Reserves and Wildfowl Sanctuaries; and Internationally designated sites, including Special areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. For Natura 2000 sites (SPAs & SACs) this assessment will incorporate the conclusions of the Natura Impact Statement (NIS) for Appropriate Assessment. Shapefiles and metadata for designated sites have been downloaded and are updated annually for use on local GIS, which allows detailed measurements to be taken and assessment with other data sets, such as the indicative flow network provided by the Environmental Protection Agency (EPA)<sup>5</sup> that is used to investigate hydrological linkages. The potential for the Project to impact any features recognised as locally important for biodiversity, as identified in the County Clare Biodiversity Action Plan 2017-2023 and the Clare County Development Plan 2023-2029, will also be assessed.

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<sup>4</sup> NPWS Designations Viewer online ArcGIS mapping available at:  
<https://dahg.maps.arcgis.com/apps/webappviewer/index.html?id=8f7060450de3485fa1c1085536d477ba>

<sup>5</sup> EPA Geo Portal Data Download Section <https://gis.epa.ie/GetData/Download>



- High level **habitat surveys** were initially undertaken within the lands-made-available for the project to ensure sensitive areas were avoided as part of the design process. These initial surveys will be refined to ensure detailed mapping of the habitats within the Project area. Habitat surveys and mapping was undertaken following Smith *et al.* (2011)<sup>6</sup>, with all habitats classified into recognised communities defined by Fossitt (2000)<sup>7</sup> and cross-referenced to Annex I habitats. Given the higher level of classification required by, and protection afforded to, Annex I habitats, careful consideration was given to species composition, location, and physical characteristics of the surveyed habitats, as described in European Commission (2013)<sup>8</sup>. One of the main outputs of the habitat mapping will be a Fossitt (2000) habitat map for the site that will be submitted as the planning application. This allows direct habitat loss to be quantified and assessed.
- Locations of **invasive non-native species** (INNS) will be mapped within the Project area, including along the turbine delivery and grid connection routes, which being on roads for extended sections, will be likely to have a high prevalence of INNS. Particular attention will be given to accurately identifying the occurrence of non-native species listed on Schedule III Part I of S.I. No. 477/2011 - European Communities (Birds and Natural Habitats) Regulations 2011.
- **Habitat availability for invertebrates** (excluding aquatic species) has been assessed within the land-made-available for the project. The occurrence of devil's-bit scabious (*Succisa pratensis*), which is the food plant of the marsh fritillary butterfly, was identified within the lands-made-available and preliminary surveys located larval webs. Further surveys will identify the full extent devil's-bit scabious within the project area and undertake conditions assessments, as per the methodology outlined in the National Biodiversity Data Centre's (NBDC) Habitat Condition Assessment for Marsh Fritillary<sup>9</sup>. In terms of important habitats for other invertebrate species, several pools and swamps associated with turf cutting were identified within the project area. These wetlands have the potential to support several rare invertebrate species, for example Irish Damselfly (*Coenagrion lunulatum*). Suitable habitat will be surveyed in May and July, the flight period for this species. Surveys will be undertaken between 10:00 and 16:00, targeting days with favourable weather conditions (dry, > 15°C, < 60% cloud cover and wind speeds < Force 4). Surveyors will spend at least 30 minutes surveying each site.
- **Aquatic and fisheries assessments** will cover waterbodies within the Project site and those with downstream hydrological connectivity to the Project area. Surveys will include:
  - a) Water quality will be determined both with a handheld device in situ and through more in-depth analysis at an accredited laboratory. Water quality will be analysed in situ, using a portable, multi-meter probe to provide a baseline profile of pH, temperature (°C), conductivity (µS/cm) and dissolved oxygen (mg/L & percent concentration), conductivity and turbidity. Water samples (1 Litre) will be collected in pre-sterilised sampling bottles and rinsed with river water before the sample is taken. Water samples will be taken from just below the surface ensuring that the riverbed is not disturbed during sampling. Once sample bottles are filled, they will be stored on ice and transported to an accredited laboratory for analysis within the recommended holding time for the selected more detailed water quality parameters.

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<sup>6</sup> Smith G.F., O'Donoghue P., O'Hara K. & Delaney E. (2011). *Best practice guidance for habitat survey and mapping*. The Heritage Council

<sup>7</sup> Fossitt J.A. (2000). *A guide to habitats in Ireland*. The Heritage Council

<sup>8</sup> European Commission (2013) *The Interpretation Manual of European Union Habitats* - EUR28

<sup>9</sup> NBDC form for Habitat Condition Assessment for Marsh Fritillary available at:  
<https://biodiversityireland.ie/app/uploads/2021/11/Marsh-Fritillary-Habitat-Condition-Form.pdf>



- b) Biological scoring of the streams associated with the Project site is being conducted to provide for Q-rating of each watercourse, up and down stream of the works corridor, including the grid connection route. This is undertaken using macro-invertebrate sampling (kick-sampling). As detailed in Toner et al. (2005)<sup>10</sup>, macro-invertebrate samples will be converted to Q-ratings and assigned to WFD status classes.
- c) A Freshwater Pearl Mussel (*Margaritifera*) Stage 1 survey have been carried out according to the standard methodology used by the National Parks and Wildlife Service (NPWS, 2004)<sup>11</sup>. Sections of riverbed within the tributaries of the Cloon River which are hydrologically connected to the Project site were selected for surveys.
- d) An alternative approach to establishing the presence/absence of FWPM using an environmental DNA (eDNA) survey methodology was employed by collecting water samples from the Cloon River and the tributaries of the Cloon River that flow through the site.
- e) Based on the findings of the Stage 1 FWPM surveys and the eDNA study, Stage 2 surveys (NPWS, 2004) will be carried out at locations where FWPM have been found, which will encompass the Cloon River, and tributaries hydrologically linked to the Project.
- f) Based on Article 17 reporting indicating that white-clawed crayfish does not occur on the Loop Head peninsula (NPWS, 2019)<sup>12</sup>, this species is not anticipated to occur within the waterbodies hydrologically linked to the Project. In line with survey methodology recommended by Reynolds et al. (2010)<sup>13</sup> & Gammell et al. (2021)<sup>14</sup>, an absence of white-clawed crayfish has been found during ad hoc hand-searching of potential refuges undertaken while surveyors were completing FWPM surveys.
- g) The guidance published in JNCC (2015)<sup>15</sup> will be applied to lamprey habitat assessments and the approach will follow Natura 2000 guidance for the monitoring of river lamprey *Lampetra fluviatilis*, brook lamprey *Lampetra planeri* and sea lamprey *Petromyzon marinus* (Harvey & Cowx, 2003)<sup>16</sup> and include assessment of habitats using visual mapping of substrates suitable for adult and juvenile lamprey, as detailed in Maitland (2003)<sup>17</sup>.

<sup>10</sup> Toner P., Bowman J., Clabby K., Lucey L., McGarrigle M., Concannon C., Clenaghan C., Cunningham P., Delaney J., O'Boyle S., MacCárthaigh M., Craig M. & R. Quinn (2005). *Water Quality in Ireland 2001–2003*. EPA – Environmental Protection Agency, Johnstown Castle, Co. Wexford

<sup>11</sup> NPWS (2004). *Margaritifera margaritifera*. Stage 1 and Stage 2 survey guidelines. *Irish Wildlife Manuals*, No. 12. National Parks and Wildlife Service, Department of Environment, Heritage and Local Government, Dublin, Ireland

<sup>12</sup> NPWS (2019). The Status of EU Protected Habitats and Species in Ireland. Volume 3: Species Assessments. Unpublished NPWS report. Edited by: Deirdre Lynn & Fionnuala O'Neill

<sup>13</sup> Reynolds, J.D., O'Connor, W., O'Keeffe, C. & Lynn, D. (2010). A technical manual for monitoring white-clawed crayfish *Austropotamobius pallipes* in Irish lakes. *Irish Wildlife Manuals* No 45, National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin.

<sup>14</sup> Gammell, M., McFarlane, A., Brady, D., O'Brien, J., Mirimin, L., Graham, C., Lally, H., Minto, C. & O'Connor, I. (2021). White-clawed Crayfish *Austropotamobius pallipes* survey in designated SACs in 2017. *Irish Wildlife Manuals*, No. 131. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.

<sup>15</sup> JNCC (2015). *Common Standards Monitoring Guidance for Freshwater Fauna (2015)*. Joint Nature Conservation Committee.

<sup>16</sup> Harvey, J.P. and Cowx, I.G. (2003). *Monitoring the River, Brook and Sea Lamprey, Lampetra fluviatilis, L. planeri and Petromyzon marinus*. Conserving Natura 2000 Rivers Monitoring Series No. 5, English Nature, Peterborough.

<sup>17</sup> Maitland P.S. (2003). *Ecology of the River, Brook and Sea Lamprey*. Conserving Natura 2000 Rivers Ecology Series No. 5. English Nature, Peterborough.



- h) Salmonid suitability will assess the watercourses hydrologically linked to the Project. The principal instream physical habitat variables that determine suitability for juvenile salmonids are; water depth, water velocity, streambed substratum and cover (Heggenes 1990)<sup>18</sup>. Information on other factors affecting water quality in the streams will be collected, such as physical barriers to fish migration, areas of excessive erosion (e.g. locations where cattle enter streams), dense bankside vegetation.
- i) Biosecurity - In order to protect the environment, our employees and the public against biological hazards, the APEM Group adopts a robust and comprehensive biosecurity measures which is complied with at all times.
- **Amphibian and reptile** habitat suitability assessments have been undertaken within the lands-man-available and there is the potential for both smooth newt and common lizard to occur. Once the Project area has been defined any suitable pools of standing water within 200m of the developable area will be surveyed for smooth newt. A modified survey methodology proportional to the scale of the Project will be employed based on survey guidelines detailed in NRA (2008)<sup>19</sup>, Meehan (2013)<sup>20</sup>, NIEA (2017)<sup>21</sup>. Two night-time visits to suitable waterbodies will be conducted between mid-March and mid-June and will employ torchlight inspections combined with egg searches prior to the dusk surveys - no live trapping techniques will be utilised. During egg searches the suitability of standing water for newts will be assessed, as detailed in JNCC (2003)<sup>22</sup> and when determining suitability consideration will be given to the suitability of surrounding terrestrial habitat for hibernacula; the size and permanence of the water feature; the water quality; shading; potential presence of waterfowl/fish (predators); proximity to other ponds/ditches; and macrophyte cover. As the site supports potential common lizard habitat, visual searches and searches of artificial refugia will be employed, as outlined in NRA (2008)<sup>23</sup>, Froglife (1999)<sup>24</sup> and NIEA (2017)<sup>25</sup>. Surveys will target suitable habitat within proposed construction corridor to provide samples across all the suitable habitat within the site. A minimum of four visits will be conducted between April and May, with an optional survey window of September. Searches will be conducted in optimal weather (bright sunshine with temperatures between 9 and 18°C, with rainy or windy conditions avoided) and consideration should be given to timing searches depending on the time of the year. On the first visit artificial refugia (0.5 x 0.5m squares of felt) will be placed on the ground in open, sunny locations and these will be checked on subsequent visits. Up to 100 mats will be placed across the proposed works corridor.

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<sup>18</sup> Heggenes, J. (1990). Habitat utilization and preferences in juvenile Atlantic salmon (*Salmo salar*) in streams. *Regulated Rivers: Research & Management*, 5(4), pp.341-354.

<sup>19</sup> NRA (2008) *Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes*. NRA, Dublin. Available at: <https://www.tii.ie/technical-services/environment/planning/Ecological-Surveying-Techniques-for-Protected-Flora-and-Fauna-during-the-Planning-of-National-Road-Schemes.pdf>

<sup>20</sup> Meehan, S.T. (2013) *National Newt Survey 2013 Report*. Irish Wildlife Trust, Dublin. Available at: <https://iwt.ie/wp-content/uploads/2017/09/Newt-Survey-2013.pdf>

<sup>21</sup> NIEA (2017) *Newt Surveys - NIEA Specific Requirements*. Northern Ireland Environment Agency, Belfast. Available at: <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/newt-survey-specifications.pdf>

<sup>22</sup> JNCC (2003). *Herpetofauna Workers Manual*. Joint Nature Conservation Committee. Available at: <https://hub.jncc.gov.uk/assets/9d7da8c4-9d76-4b65-8263-6b925b3433a4>

<sup>23</sup> NRA (2008) *Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes*. NRA, Dublin.

<sup>24</sup> Froglife (1999). *Froglife Advice Sheet 10: reptile survey. An Introduction to planning, conducting, and interpreting surveys for snake and lizard conservation*. Froglife, Halesworth

<sup>25</sup> NIEA (2017). *Common or Viviparous Lizard Surveys NIEA Specific Requirements*. Northern Ireland Environment Agency, Belfast. Available at: <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/common-lizard-survey-specifications.pdf>



- **Ornithological surveys** are ongoing and will provide a two year study compliant with SNH (2017) survey guidelines. A range of different study areas are being applied, including (Note: Initially the buffers were applied to the potential build area):
  - a) 500m turbine buffer: Vantage point watch to assess avian collision risk and site walkover surveys to locate potentially sensitive breeding birds, including waders and raptors;
  - b) 1km turbine buffer: Barn owl surveys - surveys targeting old building and veteran trees potentially utilised by breeding barn owls;
  - c) 1km turbine buffer: Breeding wader surveys focusing on habitats suitable for curlew which historically bred in the wider area;
  - d) 2km turbine buffer: Breeding raptor surveys and hen harrier winter roost surveys targeting suitable habitat;
  - e) 5km turbine buffer: Wider area wintering waterbird surveys conducted on a monthly basis to provide contextual data on local waterbird populations potentially affected by the Project.
- For **terrestrial mammal** surveys species-specific surveys areas will be covered based on receptor sensitivities to Project activities. Scoping surveys that covered the land-made-available will be refined to cover the Project area, ensuring coverage of the proposed works corridor/infrastructural footprint with regard to species-specific sensitivities and habitat availability, including:
  - a) 150m up and downstream of proposed construction works for otter;
  - b) suitable habitat within 100m of proposed construction work for pine marten;
  - c) suitable habitat within 50m of proposed construction work for badger and red squirrel.
- Initial scoping surveys for **bats** assessed habitat availability within the lands-made-available for potential roost features (PRFs) and foraging potential, according to criteria set out in the Bat Conservation Trust (BCT) guidance (Colins, 2016)<sup>26</sup>. The survey area will be refined to cover an area within 300m of proposed turbine locations and within 30m of other proposed infrastructure including substation and access tracks. For proposed infrastructure with a more constrained footprint, such as the grid connection route the survey area may be limited to a buffer of 10m. All PRFs identified have been classed as negligible, low, moderate or high status in terms of potential to support roosting bats. A range of dusk/dawn emergence/re-entry surveys and internal roost inspections have been conducted for PRFs classified as high and moderate with further surveys scheduled for 2023. In 2022 bat activity surveys, as required by NatureScot *et al.* (2021)<sup>27</sup>, to assess potential effects of operational turbines covered the Project area where turbines are proposed. A lesser horseshoe maternity roost was identified within the study area and additional surveys were undertaken, including radial deployment of statics to determine important foraging and commuting locations in relation to the proposal. Further monitoring will be undertaken in 2023.

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<sup>26</sup> Colins, J. (ed.) (2016). *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3rd edn.). The Bat Conservation Trust, London

<sup>27</sup> NatureScot, Natural England, Natural Resources Wales, Renewable UK, Scottish Power Renewables, Ecotricity Ltd, University of Exeter & Bat Conservation Trust (2021). *Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation*.



#### 4.5.3 Receiving Environment

The Project does not occur within any sites designated for nature conservation. The Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA occur downstream of the Project. One of the main concerns is the potential impacts on water quality due to the presence of freshwater pearl mussel populations downstream, which are one of the Qualifying Interests (QI) of this SAC. Other important aquatic features including lamprey, salmonids and otter also occur downstream. Wintering waterbird populations ecologically linked to the River Shannon and River Fergus Estuaries SPA have the potential to be displaced or impacted by collision with turbines, if found to be utilising the Project area at significant levels. In the wider area surrounding the Project site there are several Natura 2000 sites and NHAs designated for lesser horseshoe bats (LHS). To the south, the proposed site may be hydrologically linked via drains to two connected loughs, which are both within proposed Natural Heritage Areas - Cloonsnaghta Lough pHNA and Gortglass Lough pHNA. The main conservation interest for both loughs are the Arctic char (*Salvelinus alpinus*) populations they support.

The receiving environment supports a range of habitats, including agricultural grasslands with associated linear features like hedges, treelines and drains; commercial forestry plantations dominated by Sitka spruce and the remnant of a raised bog which has been subject to turf cutting. In some areas where historical turf cutting has ceased vegetation has recovered. The areas of bog within the site had habitat types with Annex I affiliations. There are several areas with devil's-bit scabious that have been confirmed as supporting marsh fritillary butterflies. Several pools and swamps associated with turf cutting were identified within the project area and these wetlands have the potential to support several rare invertebrate species, such the Irish damselfly.

Based on ornithological surveys conducted to date high conservation status target species recorded, include:

- Occasional records of hen harriers flying through the site hunting, which were typically below the rotor swept area (<20m). Although there is some potential breeding and roosting habitat within 2km of the Project, all the known breeding territories and winter roost sites are located beyond the 2km buffer. The closest hen harrier breeding sites are to the north within 10-15km of the proposal.
- Curlew possibly breeding in the wider area; however, this was not confirmed and may have been birds on passage.
- Cloonsnaghta Lough and Gortglass Lough support some wintering waterbirds and a flock of c. 20 curlew was recorded near VP3 (south of water works).
- Kestrels regularly forage through the site – this species is at high risk of colliding with turbines and the collision risk model will predict some mortality over the life span of the project.
- Flight time for gull species are relatively high and the collision risk model will predict some mortality over the life span of the project.
- Potential snipe breeding habitat was identified in the site (swampy to marshy, wet areas with tussocky cover that is not rank), especially associate with some of the cut-away bogs. However, limited breeding activity has been recorded to date.



Otters are reported as occurring through the Lower River Shannon SAC and are likely to occur within the Cloon River and utilise watercourses flowing through the Project area. During walkover surveys for ecological constraints, an old otter spraint was recorded which confirmed that otters utilise the Project site, at least periodically. There is potential for breeding sites (holts) to occur within the Project and construction activity could directly (destroy) and indirectly (displacement through disturbance) affect these protected features. As for other species reliant on aquatic habitats, water pollution has the potential to adversely affect otters, including animals ecologically linked to the Lower River Shannon SAC. Other protected mammals likely to occur in the site include badgers, Irish stoats and Irish hares, with the blocks of woodland also having the potential to support pine marten and red squirrel.

In terms of bat habitat suitability, the Project site offers suitable foraging and roosting habitats for the full range of bat species occurring in Ireland. Of particular note is the occurrence of a lesser horseshoe bat maternity roost, which was utilised by c. 50 animals in 2022. No other bats roosts have been located in the area or were identified by the BCI data request.

#### 4.5.4 Potential impacts

Likely Sources of Direct Effects During the Construction Phase, include:

- Clearance of vegetation, soil and rock for access road, hardstands and turbine bases;
- Clearance of woodland around turbines to facilitate Project infrastructure and reduce turbulence;
- Clearance of woodland around turbines to implement 50 m bat feature buffers;
- Creation of temporary infrastructure such as site compound, blade set-down areas and crane pads;
- Excavation trenches for cable ducting; and
- Placement of material arising from infrastructure works.

Likely Sources of Secondary Effects During the Construction Phase, include:

- Stockpiling of materials on-site (run-off, erosion etc.);
- Collection/drainage of surface water runoff;
- Spreading of non-native plant species; and
- Construction activity/noise resulting in avoidance by birds and mammals due to disturbance.

Likely Sources of Direct Operational Phase Effects:

- Collisions or barotrauma risk with turbines for bats; and
- Collisions risk with turbines for birds.

Likely Sources of Secondary Operational Phase Effects:

- Collection/drainage of surface water runoff;
- Operational activities and servicing - though this would be limited to relatively few visits per year and would not be considered to add significantly to existing/background levels of human activity in the area;
- Displacement effect of operating turbines;



- Displacement effects of lighting for substation.

## 4.6 Soil, Geology, Hydrogeology

### 4.6.1 Aspects to be Addressed

The assessment will address soils, bedrock and groundwater underlying the wind farm.

### 4.6.2 Assessment Methodology

The methodology for the soils and geology assessment will be in accordance with the guidelines published by the Institute of Geologists of Ireland in 2013, 'Guidelines for the Preparation of Soils, Geology and Hydrogeology Chapters of Environmental Impact Statements'.

At this stage, it is envisaged that the Preliminary Site Investigation (Phase 1) will consist of:

- Peat probing at turbine, substation, and along access road routes to help determine foundation options and to inform a peat stability assessment of the site;
- Trial pits and/or boreholes, as required, at turbine, substation, and borrow pit locations to determine ground and groundwater conditions. Boreholes at borrow pits will also assess suitability of the underlying bedrock (Central Clare Group) for use as Class 1 General Fill.

The data gathered will be used to inform the final location of all turbines and associated infrastructure. The data will also be used to inform a Geotechnical Assessment Report and Soil Management Report, which will be included as appendices to the Soils, Geology and Hydrogeology Chapter of the EIAR. An earthworks balance calculation will be prepared for the overall Project to assess where excavated material can be beneficially re-used.

### 4.6.3 Receiving Environment

GSI Quaternary Sediments mapping indicates much of the central and eastern portions of the site is underlain by Blanket Peat deposits. These deposits become more sporadic along the sites' southern margin and within the western portion of the site. Isolated and often linear deposits of Till derived from Namurian sandstones and shales are mapped along the northern margin of the site. Large extents of bedrock or subcrop are mapped within the western portion of the site and along the site's southern margin.

GSI 100k Bedrock Geology mapping indicates the entire site is underlain by Carboniferous (Namurian) Central Clare Group (CCG). This is made up of a series of alternating stratigraphic sequences of marine and non-marine sediments (comprising mudstone, siltstone and sandstone).

GSI Groundwater Resource mapping indicates the site is underlain by a Locally Important (LI) Aquifer with bedrock which is productive only in local zones. The site lies entirely within the Kilrush Groundwater Body (EU Code: IE\_SH\_G\_123). There are no recorded karst features in or near the site.



#### 4.6.4 Potential impacts

The potential impacts of the Project of the wind farm on the geology, hydrogeology and slope stability are:

- The excavation and removal of soil and rock and interference with any existing site drainage is a potential direct permanent effect that, without mitigation, could alter the existing hydrogeological balance of the site;
- The construction of the turbines, hardstanding areas, access tracks, and cable trenches has the potential to cause hydrogeological impacts by modifying the natural groundwater levels adjacent to the excavation. This in turn may deprive ditches and streams of their natural supply of water which may lead to reduced base flow and recharge to the bedrock aquifer;
- Areas which are underlain by peat deposits are susceptible to slope stability issues, including peat slides and bursts, when changes are made to topography, hydrogeology and hydrology of the site;
- The use of granular fill and other materials for the construction of the access tracks has the potential to have a permanent impact on the source quarries or borrow pits;
- Excavations have the potential to increase erosion and sediment release that could also have additional impacts on water quality due to sedimentation of water courses;
- Soil compaction may occur due to movement of construction and maintenance traffic;
- Removal of subsoils may result in the exposure of the underlying rock to sources of contamination and may increase the vulnerability of the aquifer, whether or not the rock is exposed;
- Chemical pollution may occur as a result of an accidental spillage or leakage of chemicals, runoff from vehicle washing facilities, unset concrete, storage of fuels or refuelling activities, etc. Chemical pollutants may enter the groundwater and have implications for ecology and any wells in the area, particularly those located down-gradient of the site;
- Sanitary waste arising from temporary construction compounds could lead to contamination of groundwater.

At the substation, the potential impacts are the pollution of groundwater from an oil or fuel spillage during construction. The substation and the construction compound will have staff welfare facilities.

### 4.7 **Water Quality and Hydrology**

#### 4.7.1 Aspects to be Addressed

The assessment will address impacts on hydrology and water quality. The aspects of the hydrological environment that could be affected by the activities associated with the Project will also be addressed.

#### 4.7.2 Assessment Methodology

The emerging design layout will consider the sensitivities of the environmentally designated areas in the proximity of the site. A preliminary site visit will be undertaken to establish the constraints relating to hydrology and noting any hydrological features.



The desk study will involve setting out the principles for surface water management, attenuation, and treatment for the site specific land use at the site. Once the design layout is fixed, a further site visit will be scheduled in to undertake a walkover of the site, to identify all the streams crossed by the proposed layout and examine how overland flow will be accommodated and to identify suitable locations for the treatment of discharges.

Cumulative impacts will be addressed to assess the hydrological impact of neighbouring sites. Taking account of the sensitivity of the receiving environment, the treatment of the surface water run-off will concentrate on Silt Protection Controls (SPCs). Measures will also be considered to avoid any increase in flooding downstream.

The methodology will include the following:

- Study of existing surface water/drainage features in the vicinity
- Study of development plans;
- Study of the sections of forestry, examining details of planting and existing forestry drainage systems;
- Study of planning documents for adjacent developments;
- Catchment mapping and delineation of catchment boundaries;
- Establish constraints
- Examine grid connection route options;
- Assessment of the turbine delivery route (TDR);
- Liaison with in-house Geotechnical department for details on soil conditions on the site;
- Consult with interested bodies, Inland Fisheries Ireland, and relevant Local Authorities;
- Existing Water Quality assessment;
- Forestry felling assessment relevant to hydrology and water quality;
- Site drainage investigation will involve identification of drainage sub-catchments, studying the requirement(s) of cross-drainage works, if any, exploring the infiltration potential of the soils in the area, etc.;
- Design of site appropriate erosion and sediment control measures, development of erosion and sediment control procedures for implementation on site;
- Preparation of Flood Risk Assessment in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities, DoEHLG and OPW, November 2009, including a cumulative assessment with adjacent developments and Surface Water Management Plan in accordance with Greater Dublin Strategic Drainage Study (GSDSDS) and the CIRIA SuDS Manual (C753) including the design of stream crossings;
- History of flooding and status of drainage in the neighbourhood;
- Design of site specific surface water drainage system and drainage infrastructure – to control flow of surface water on site during construction, Sustainable Drainage Systems (SuDs);
- Potential impacts of the Project on hydrology and water quality;
- Outline of mitigation measures for flooding and pollution of receiving waters, and
- Outline of residual impacts.



#### 4.7.3 Receiving Environment

The Project is located in Cloon [Clare]\_SC\_ (010) sub-catchment part of the Shannon Estuary North [WFD 27] catchment. The main hydrology feature is the Cloonkett stream which is running on the southern side of the proposed boundary. This stream joins the Cloon River which runs along the western side of the Project at approximately 1.5km from the edge the proposed boundary line of the site.

#### 4.7.4 Potential impacts

The main potential impact from the construction of the Project is the potential sedimentation of watercourses. Rainfall runoff containing silt could potentially lead to siltation and consequent physical effects on flora and fauna in aquatic habitats.

Sediment has the potential to arise from:

- Temporary spoil heaps from the excavations for the turbine bases; if left exposed, the spoil heaps could lead to an increase in silt-laden run-off draining off site;
- Haulage roads passing close to watercourses could allow the migration of silt-laden run-off into watercourses (crushable stone in site access roads could lead to heavy vehicles creating fines in the stone with a subsequent loss of sediment in the surface water run-off);
- Construction of new culverts and roads;
- Silt carried on the wheels of vehicles leaving the site could be carried onto the public road;
- Tree felling could lead to an increase in sediment in the surface water run-off;
- While the cable trench is open adjacent to a watercourse and at stream crossings, this could lead to an increase in the concentration of suspended solids in the watercourse.

In addition, possible impacts on water quality during construction activity include:

- Concrete operations could contaminate receiving waters;
- Runoff from vehicle washing facilities could lead to contamination of receiving waters;
- Refuelling activities could result in fuel spillages;
- At the temporary compound, the potential impacts are the pollution of surface water from an oil or fuel spillage during construction.

The potential impacts on hydrology and drainage that may arise from the Project of the wind farm site include impacts on localised flooding patterns and downstream structures as well as cumulative hydrological impacts with neighbouring developments.

During the operational phase of the wind farm, potential impacts on water quality will primarily arise from the use of lubricants, coolants, and hydrocarbons in the operations of the turbine transformers as well as routine maintenance of all plant and equipment.



## 4.8 Archaeological, Architecture and Cultural Heritage

### 4.8.1 Aspects to be Addressed

The assessment will address features and sites of archaeological, architectural, and cultural heritage significance. The purpose of the study will be to assess the significance of the receiving cultural heritage environment and to identify and evaluate the magnitude of the impact of the proposed wind farm on the sensitivity of each cultural heritage feature within this environment and on the broader historic character of the landscape. Measures will be proposed to mitigate effects (where possible) so as to allow a fully informed decision to be made by the adjudicating authority.

### 4.8.2 Assessment Methodology

The content of the cultural heritage assessment will be based on current EPA guidelines and relevant national and international best practice guidelines. The assessment will identify the recorded and potential elements of the cultural heritage resource (including archaeology, built heritage, history and folklore) within a study area encompassing the Project areas, grid connection, borrow pits and site access routes.

The EIAR assessment will also include an assessment of any surviving vernacular structures within the site, such as the remains of farm buildings and other structures/features. While not designated as Protected Structures or included in the NIAH, these may form elements of the local cultural heritage resource worthy of preservation by record or preservation in situ.

It is envisioned that site surveys will be undertaken following an initial programme of desk-based research and once a preliminary outline for the Project layout has been made available. The design team will be promptly informed of the location, nature, and extent of any cultural heritage features of significance identified during the site survey and will be consulted in relation to assessment of potential impacts and detailed design responses.

### 4.8.3 Receiving Environment

The majority of the site consists of blanket peat with symbols of marsh, furze, rough pasture and cropping rock. Peat extraction has occurred historically on the site and continues in places to this day. Large areas of agricultural pasture are also present, particularly at the western end of the site. Areas of coniferous forest extend east and west of the north-west to south-east orientated local road dividing the site.

There are no recorded archaeological sites or designated architectural heritage structures (Protected Structures and NIAH-listed features) within the boundary, the nearest example is a ringfort located 780m to the north-west. There is one National Monument in State Care within 10km of the proposed wind farm, and this comprises the remains of a 12<sup>th</sup> century Augustinian Abbey (National Monument no. 195) located on Canon Island in the River Shannon at a distance of circa 7.5km to the southeast.

### 4.8.4 Potential impacts

The predicted impacts of the proposed scheme on either the recorded and potential elements of the cultural heritage resource within and around Project areas will be identified and clearly defined based on EPA criteria. The assessment will also address cumulative impacts and potential inter-visibility and sensitivity analyses of cultural heritage sites within the surrounding landscape.



Appropriate mitigation measures to minimise impacts on the cultural heritage resource will be formulated where required following consultation with both the client and the relevant local and national authorities. These may involve (1) the preservation in situ of identified sites within protected buffer zones and (2) undertaking pre-development site investigations and/or the supervision of ground works during the construction phase. While details on any required mitigation measures will await assessment, it is envisioned that potential impacts will be subject to constant assessment as the design and consultation process progresses.

As statutory consultees the National Monuments Service (NMS) (via the Development Applications Unit) and Clare County Council (CCC) will be consulted in relation to required mitigation measures as part of the formal EIAR consultation process.

## 4.9 Aviation and Telecommunications

### 4.9.1 Aspects to be Addressed

An evaluation of the possible effects that the Project could have on aviation and existing telecommunications networks will be conducted. A study will be undertaken to analyse the impact of the turbines on telecommunications operator's point-to-point microwave radio links. This evaluation will include the generation of GIS based telecommunications constraints mapping for the areas affected.

The purpose of this mapping is to identify potential negative impacts on the telecommunications network and facilitate the selection of optimum sites and turbine locations by avoiding telecommunication links where possible, and thereby limiting any potential negative impacts on service providers in the area.

### 4.9.2 Assessment Methodology

The proposed assessment methodology will include:

- Consultation with Irish Aviation Authority, Commission for the Regulation of Utilities, and emergency services;
- Consultation with telecommunications operators to gather the necessary data;
- Preparation of constraint mapping;
- Analyses of the impact of the turbines on telecommunications operators' point-to-point microwave radio links and apply appropriate buffer distances around links and masts where required;
- Discussions with telecommunications operators identifying potential clashes. Operators to provide feedback on initial assessment and to provide information on the importance of the links identified;
- Further specialist investigations will be carried out if the telecommunications operators identify potential impacts.

Where necessary, mitigation measures to be agreed with operators including:

- Turbine relocation;
- Telecommunications link relocation;
- Underground fibre optic cables to replace microwave link;
- Submission of final detailed layout to telecoms operators;



- Agree any layout alterations following final detailed assessment by telecoms operators or agree suitable mitigation measures if necessary.

Impacts on aviation will be addressed following detailed discussions with the Irish Aviation Authority.

#### 4.9.3 Receiving Environment

In terms of the receiving environment, links will be identified within a suitable buffer distance of the turbines, following consultation with network providers.

#### 4.9.4 Potential impacts

An evaluation of the possible effects that the Project could have on aviation and existing telecommunications networks will be conducted. A study will be undertaken to analyse the impact of the turbines on telecommunications operator's point-to-point microwave radio links. This evaluation will include the generation of GIS based telecommunications constraints mapping for the areas affected.

The purpose of this mapping is to identify potential negative impacts on the telecommunications network and facilitate the selection of optimum sites and turbine locations by avoiding telecommunication links where possible, and thereby limiting any potential negative impacts on service providers in the area.

The Irish Wind Energy Association 2012 guidelines, "Best Practice Guidelines for the Irish Wind Energy Industry", indicate that wind turbines within 20 km of a radio navigation aid have the potential to cause electro-magnetic interference with these signals. Where this could arise, measures can be implemented and undertaken by the developer and provider to mitigate same if required.

### 4.10 Landscape and Visual Impact

#### 4.10.1 Aspects to be Addressed

Landscape Impact Assessment (LIA) relates to changes in the physical landscape brought about by the Project, which may alter its character, and how this is experienced. This requires a detailed analysis of the individual elements and characteristics of a landscape that go together to make up the overall landscape character of that area. By understanding the aspects that contribute to landscape character, it is possible to make judgements in relation to its quality (integrity) and to identify key sensitivities. This, in turn, provides a measure of the ability of the landscape in question to accommodate the type and scale of change associated with the Project without causing unacceptable adverse changes to its character.

Visual Impact Assessment (VIA) relates to assessing effects on specific views and on the general visual amenity experienced by people. This deals with how the surroundings of individuals or groups of people may be specifically affected by changes in the content and character of views as a result of the change or loss of existing elements of the landscape and/or introduction of new elements. Visual impacts may occur from: visual obstruction (blocking of a view, be it full, partial or intermittent) or Visual Intrusion (interruption of a view without blocking).

Cumulative landscape and visual impact assessment is concerned with additional changes to the landscape or visual amenity caused by the Project in conjunction with other developments (associated or separate to it), or actions that occurred in the past, present or are likely to occur in the foreseeable future.



#### 4.10.2 Assessment Methodology

This LVIA uses methodology as prescribed in the following guidance documents:

- Environmental Protection Agency (EPA) publication 'Guidelines on the Information to be contained in Environmental Impact Statements (2022) and the accompanying Advice Notes on Current Practice in the Preparation of Environmental Impact Statements (Draft 2015).
- Landscape Institute and the Institute of Environmental Management and Assessment publication entitled Guidelines for Landscape and Visual Impact Assessment – Third Addition (2013).
- NatureScot Guidance Note: Cumulative Effect of Windfarms (2021).
- Department of the Environment, Heritage and Local Government Wind Energy Development Guidelines (2006/2019 draft revised).
- NatureScot Visual representation of wind farms: Best Practice Guidelines (version 2.2 - 2017).

In addition to the County Development Plan designations and policies, the LVIA will also consider the scheme in the context of the Wind Energy Development Guidelines (2006 / Draft Revised Guidelines 2019). In accordance with these guidelines, the appropriate study area for this proposed wind farm is 20km as the turbines will be greater than 100m tip height.

Relevant receptors for the visual impact assessment will be selected from the following categories:

- Designated Scenic Views;
- Local Community Views;
- Centres of Population;
- Major Route;
- Tourism, Heritage and Recreation features.

Relevant receptors will firstly be identified using Zone of Theoretical Visibility (ZTV), which identifies parts of the landscape (and receptors) within the study area with potential visibility of the proposed wind farm. Thereafter, receptor and representative viewpoint locations are derived through a combination of desktop map analysis and internet searches.

Fieldwork will be undertaken to document the landscape character and features of the study area and to refine the initial, desk-based, viewpoint set. 360-degree photography will be captured at each viewpoint location for later use in the preparation of photomontages. Following fieldwork, a Viewpoint Selection report will be prepared for consultation and agreement with relevant stakeholders and particularly, Clare County Council.

In accordance with the GLVIA 2013 landscape impacts and visual impacts will be assessed separately. The significance of landscape impacts is assessed on the basis of landscape receptor sensitivity (as a resource in its own right) weighed against the magnitude of landscape impacts (scale, nature, extent and duration of change to the physical landscape and to landscape character). Similarly, visual impacts are assessed on the basis of visual receptor sensitivity (people / groups of people engaged in particular activities or resident at particular locations) weighed against the magnitude of visual impacts (scale, nature, extent and duration of visual change).



#### 4.10.3 Receiving Environment

The landscape of the study area contrasts north to south, divided in a northeast/southwest direction (approximately aligned with the N68). The north-western section of the study area consists of broad areas of rolling upland landscape. The eastern side of the study area is dominated by the confluence of the Fergus and Shannon Estuaries, with the surrounding topography gently sloping to water-level, and wide open views across the water. The coastline is complex, with winding river mouths, peninsulas and islands. The northwest and southeast of the study area have a fairly constant overlay of pastoral farmland throughout. The N68 connects two of the three larger settlements within the study area, Ennis (18km northeast of the site), and Kilrush (19.5km southwest of the site). To the direct north of the site, the rolling upland areas are a fine mesh of bog and conifer forestry, and pasture interspersed with loughs and small clusters/ribbons of residences. There are also multiple existing wind farms across a relatively narrow section of the study area in a northwest direction from the site. The main routes through this area are the R474, in the far north of the study area, and the R484, west of the site, off the N68. The R483 runs north/south along the west of the study area, where it joins the N67 in the northwest corner of the study area. The R460 and N58 briefly intersect with the far north of the study area.

Shannon town and airport are located at the study area boundary, on the opposite side of the Fergus Estuary. This section of the study area is more densely developed and overlaid with main routes. The R473 traces the water's edge to the south of the site, connecting with the R486 to the southwest of the site. Both of these terminate at the N67/Kilrush, where it (by means of a ferry) crosses the Shannon. On the opposite (southern) side of the Shannon, the N67 becomes the N69, which exits south of the study area in one direction, and also continues inland along the coastline to the east. At Glin (settlement and industrial estate), the R524 branches off in a southwards direction, and at Foynes (settlement and port), the R521 does the same. In generally, the southern side of the Shannon corridor is highly developed, with multiple heavy industry sites (Tarbert Power Station, Aughinish Alumina, Foynes Port, Roadstone Quarry, and a variety of industrial/commercial estates). On the northeast side of the study area, there is one notable cluster of development at Shannon, which the N19 and N18 pass through, before the N18 becomes the M18 to Ennis. The R472 and R458 run between the N18/M18 and the edge of the Fergus Estuary, briefly crossing into Newmarket on Fergus. While there are also commercial land uses (Shannon Airport, North Atlantic Communications IAA) on the northeast side of the Shannon, the general land use patterns are less industrialised, and more agricultural.

##### *4.10.3.1 Heritage, recreation and amenity sites:*

There is a high density of historic ruins across the study area, including Kildysart Church (4km E), Canon Island Abbey (7.5km E), Beagh Castle (13km SE), Robertstown Church 12km S, Protestant Church at Mount Trenchard, Foynes (8.5km S), Glin Castle (15km southwest), Killone Abbey, Ennis Friary, Clare Abbey Marian Shrine at the intersection of the L2070, 900m north of the site.

Due to the close relationship between the surrounding landscape and the Shannon Estuary, there are a myriad of historic and modified piers and harbours through the study area, concentrated to the south of the site. Ringmoylan Pier (18km east), Beagh Pier (13km SE), Ballysteen Pier 12.5km SE), Killeery Pier (11km south), Glin Pier (14km south), Knock Pier Viewpoint (12km southwest), Labasheeda Quay (8km southwest), Clarecastle Pier (18km northeast), Covraghan Pier (5.2km east), Killadysert Pier (4.3km southeast).

There are nature-based recreation features through the site in the form of the Mid Clare Way, located 6.5km northeast, Lissycasey Cascades Loop 6km to the northeast, Foynes Wood Park (8.5km SE), Glin has a series of heritage trails, along the waterfront and further inland. Ballybeg Woods is located south of Ennis, at the north of the study area. Clare Abbey River Walks are also located at the periphery of Ennis. There are also a series of local walks along the coastline near Shannon.



There are two tourist drives within the study area, the Wild Atlantic Way, where it crosses the Shannon at Kilrush, and the Shannon Estuary Way, which is almost entirely contained within the study area and features 43 'things to see and do'. In addition (albeit with some overlap), there are also 11 identified viewing points, all of which are within the study area. These are as follows:

- (Viewing Point) 1 – Ringmoylan Pier (18km east);
- (Viewing Point) 2 – Ballysteen Pier (12.5km southeast);
- (Viewing Point) 3 – Boland's Meadow (8.5km south);
- (Viewing Point) 4 – Kilteery Pier (11 km south);
- (Viewing Point) 5 – Glin Pier (14km south);
- (Viewing Point) 6 – Knock Pier Viewpoint (12km southwest);
- (Viewing Point) 7 – Labasheeda Quay (8km southwest);
- (Viewing Point) 8 – Killadysert Pier (4.3km southeast);
- (Viewing Point) 9 – Covraghan Pier (5.2km east);
- (Viewing Point) 10 – Clarecastle Pier (18km northeast);
- (Viewing Point) 11 – Tullyglass Point (Shannon) (17km east).

#### 4.10.3.2 Clare County Development Plan 2017 – 2023

Within the Clare County Development Plan there is a Landscape Character Assessment for the County which defines Landscape Character Types (LCT) and Landscape Character Areas (LCA). The site is located at the intersection of three landscape types and contained within two of them. The western section of the site is contained within LCT 9 – 'Farmed Rolling Hills', and to the east LCT – 8 'Farmed Lowland Ridges'. The width of the site to the north is bordered by LCT 22 – 'Moorland Hills'.

Other LCTs within the central study area include of LCT 10 – 'Flat Estuarine Farmland and Islands' to the east, with LCT 20 – 'Low Drumlin Farmland' to the north/northeast.

The site is located at the intersection of three landscape areas (LCAs) and contained within two of them. The western section of the site is contained within LCA 19 – 'Kilrush Farmland', and to the east LCA 18 – 'Shannon Estuary Farmland'. The width of the site to the north is bordered by LCA 17 – 'Slieve Callan Upland'.

To the north and east of the study area there is LCA 14 – 'Fergus Estuary' and LCA 16 – 'Cullenagh River Farmlands', while further north there is LCA 15 – 'Kilnamona High Drumlin Farmland' and LCA 13 – 'Ennis Drumlin Farmland', with small sections of LCA 10 – 'Sixmilebridge Farmland' and LCA 11 – 'East Clare Loughlands' at the periphery of the study area. The majority of the central/western study area is covered by LCAs 17, 18, 19, however across the wider study area to the west there are the sections of LCA 20 – 'Malbay Coastal Farmland' and LCA 21 – 'Loop Head'.

The site is in an area identified as a 'Settled Landscape' described as "Areas where people live and work". This is a more robust landscape designation in landscape policy terms than 'Heritage-landscape' (present around the coastlines of the wider study area), but more sensitive than the other category, being 'Working Landscape' (present to the south and west of the study area).

The site is in an area Identified as 'Acceptable in Principle' for Wind Energy development and with areas identified as 'Open to Consideration' in all directions except for southwest, which is a continuation of the 'Acceptable in Principle'. To the far north there are 'Strategic Areas' and to the far west 'Not Normally Permissible'.



There are two scenic routes to the south of the site, along the border of the Shannon Estuary between Killadysert and Labasheeda along the R473, likely facing south to the open water. In the wider study area, there is a scenic route along a local road on the eastern side of the Fergus Estuary, between Shannon Airport and Sheperton, likely also addressing the nearest open water, which is to the west and aligned with views of the site. To the far north of the study area, there is an east/west route over the R474 between Miltown Malby (outside of the study area), eastwards to Connolly. At the far southwest border of the study area, there is a scenic route along the N67 between Money Point and Cappa – as with the other scenic views along the Estuary, the likely views here will be addressing the waterway to the south.

#### *4.10.3.3 Limerick County Development Plan 2022 - 2028*

The nearest Landscape Character Area in County Limerick (on the far/south side of the Shannon) is the 'Shannon ICZM', with two other areas at the periphery of the study area. To the southwest of the study area is 'Western Uplands', and to the eastern 'Agricultural Lowlands'.

There is an identified view/prospect along the southern face of Shannon in Limerick, which runs along the N69, with an additional loop at Glin, south to Ballycullhane Lower and north back to the N69/Coast Road

#### 4.10.4 Potential impacts

Given that the site is contained in an area that is considered 'Acceptable in Principle' for wind energy development and that designation was derived, at least in part, from the County Landscape Character Assessment, it is not considered likely that there will be significant landscape character effects.

There is potential for significant visual effects some close and/or sensitive viewpoints in the study area due to proximity and scale of the proposed turbines coupled with a sense of enclosure by the broad array of turbines. This will potentially be the case from local residents living within c.1.5km of the turbines. There are also a number of visually sensitive areas where significant visual effects could occur due to a combination of the sensitivity of the receptor coupled with the proximity of proposed turbines.

Whilst there are not any other wind farms in close proximity to the site, there are a number within the north-western portion of the study area. Whilst the Project could lead to an increased sense of dissemination and proliferation of turbines throughout the study area, cumulative impacts are not likely to be significant.

### **4.11 Traffic and Transportation**

#### 4.11.1 Aspects to be addressed

The traffic impact assessment will address the traffic impacts on the road network from the construction, operation, and decommissioning of the Project. The assessment will include the supply of materials, plant and equipment, the turbine elements and the components of the substation. Traffic arising from the construction and operations workforce will also be addressed.

#### 4.11.2 Assessment Methodology

A traffic impact assessment will be conducted in accordance with the Transport Infrastructure Ireland (TII) Traffic and Transport Assessment (TTA) Guidelines, May 2014. Data collected from road traffic surveys will be used in the assessment. Traffic count data shall be obtained from open-source TII traffic counter information, consultation with Clare County Council Roads Department and private automatic traffic count (ATC) data along the delivery route where required.



A route survey will be carried out by a specialist transport consultant between the N69 junction at Foynes and proposed project entrance along the L2070 local road. This survey will identify potential pinch points and locations that may require temporary off-site upgrades to facilitate the safe transport of the turbine components to the Project area.

Autodesk AutoTrack 2022 vehicle swept path analysis (SPA) will be conducted for all potential pinch points along the public road identified in the transport route survey report, to ensure that the delivery of turbine components to the proposed wind farm site can be facilitated while also identifying any mitigation measures that may be required and identifying any third party land requirements. SPA is also completed for the design of proposed site access points and internal wind farm road network as necessary to ensure compliance with turbine manufacturer design requirements.

The methodology for the traffic impact assessment will include a review of the traffic volumes and impacts which will be generated by the construction, operation and decommissioning of the wind farm. The traffic generated by the construction workforce, the transport of materials and equipment as well as future maintenance-related activities will be predicted. The traffic distribution pattern on the local road network during construction will be examined and impacts determined. The potential disruption to the road network during the installation of the cables and the availability of alternative routes will be assessed, where required.

The effects of the project on the existing road network are then considered and described in terms of quality, duration, and significance. Mitigation measures are then proposed followed by identification of residual impacts. The assessment uses a combination of field surveys, data counters, desktop studies and consultation.

The following guidance shall be used during the assessment of traffic and transport (non-exhaustive list):

- TII Publication: Traffic and Transport Assessment Guidelines;
- TII Project Appraisal Guidelines for National Roads;
- EPA Guidelines on The Information to Be Contained In Environmental Impact Assessment Reports;
- TII Project Appraisal Guidelines for National Roads: Estimating AADT on National Roads;
- TII Geometric Design of Junctions (priority junctions, direct accesses, roundabouts, grade separated, and compact grade separated junctions) DN-GEO-03060 April 2017; and
- County Development Plans.

Transport Infrastructure Ireland (TII) shall be consulted through the EIAR scoping process. Clare County Council Roads Department engineers shall also be consulted.

Site access points shall be designed in accordance with TII and County Development Plan requirements for direct access geometric design and visibility sightlines.

Cumulative traffic impacts will be considered at design stage and will be assessed in the EIAR with respect to other planned developments in the area.



#### 4.11.3 Receiving Environment

The site is currently accessed by the L2070 local road which runs along the northern boundary of the site. The N68 national road is located approximately 4.5km (straight line distance) north of the site. There is a good motorway and national road network surrounding the site with the M18 located approximately 17km (straight line distance) east and the N85 located approximately 17.5km (straight line distance) northeast of the site. The site has a significant amount of existing forestry tracks. The Shannon Foynes Port will be used for the importation of turbines. The port is located approximately 10km south of the project and the turbine delivery route is expected to be approximately 90-100km.

#### 4.11.4 Potential Impacts

A Traffic Impact Assessment will address the traffic impacts on the road network for the construction, operation, and decommissioning of the Project. The assessment will include the supply of materials, plant and equipment, the turbine elements, and the components of the substation. Traffic arising from the construction and operations workforce will also be addressed.

The traffic impact assessment will be conducted in accordance with the Transport Infrastructure Ireland (TII) Traffic and Transport Assessment (TTA) Guidelines, May 2014.

The impact assessment will include a review of the traffic volumes and impacts which will be generated by the construction and operation of the proposed wind farm. The traffic generated by the construction workforce, by the transport of materials and equipment as well as future maintenance-related activities will be predicted. The traffic distribution pattern on the local road network during construction will be examined and impacts determined. The potential disruption to the road network during the installation of the cables and the availability of alternative routes will be assessed, where required. Recommendations will be made to mitigate any potential traffic impacts on the road network.

The greatest potential for traffic impact from the Project is during the construction phase which will give rise to additional traffic on the road network.

The turbines will be delivered to the site in separate parts, typically comprising of loads for each of the tower sections, rotor blades, nacelles, rotor hubs, turbine bases and the electrical components. The delivery route from the port to the proposed wind farm will use the highest grade of road network as much as possible. Modifications may be required to the existing local road network to facilitate the delivery of the oversized loads.

Stone aggregate will be required for the upgrading of existing tracks and construction of new roads as well as the construction of turbine bases and hardstands. All of these activities have the potential to generate significant local traffic volumes.

There will be an increase in local traffic during the construction of the wind farm; staff, including plant operators, electricians, engineers, and trades people, will be commuting to and from the proposed project area each morning and evening. In addition, there is likely to be an increase in local traffic due to onlookers as the turbines are erected.

There will also be temporary traffic impacts from cable laying works within public roads. These impacts will be managed to reduce the nuisance being caused to local road users.

The potential for soiling or damage to public road infrastructure through poor construction practices as well as potential health and safety hazards through poor traffic management will be assessed.



## 5. CUMULATIVE IMPACTS, INDIRECT IMPACTS AND ITERATION OF EFFECTS

### 5.1 Aspects to be Addressed

The cumulative impact of the Project with other projects which are either existing, permitted or pending planning permission, or for which there is information in the public domain, at a sufficient level of detail to allow assessment, will be addressed. Indirect effects and effects in different environmental media will be addressed. The cumulative effects from the construction of the wind turbines, cabling and haul route alterations will also be assessed.

The cumulative effects from the construction of the wind turbines, cabling and haul route alterations will also be assessed.

### 5.2 Cumulative Assessment Methodology

The assessment methodology will be based on the EPA guidance and the EU guidelines, 'Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions', published by the Office for Official Publications of the European Communities in May 1999.

The potential for significant cumulative and indirect impacts will be examined and any such potential impacts will be identified. Where the potential for significant cumulative is identified, such impacts and interaction of impacts will be included in the scope and addressed in the baseline and impact assessment studies for each of the relevant environmental media and aspects of the project. The cumulative impacts will be presented in the chapters of the EIAR which address the most relevant environmental media.

### 5.3 Receiving Environment

Potential cumulative visual impacts will be examined with the existing wind farm in combination with the proposed project. Other planned, permitted, or constructed projects in the area will be considered for potential cumulative impact. Furthermore, significant projects within the region will also be considered for potential cumulative impact, such as future road projects or other infrastructure projects.

### 5.4 Potential Impacts

If other projects of similar scale and type are under construction at the same time as the Project, there would be potential for cumulative impact due to increased construction traffic, increased demand on construction materials and skills as well as potential for increased runoff to local streams, potential for in-combination visual impact and potential for increased noise impacts.

Positive cumulative impacts are also possible, for instance, improvement to air quality as a result of renewable energy projects and achievement of national and international renewable energy generation targets.



## 6. CONCLUSION

This Scoping Report has set out a description of the proposed Cloonkett Wind Farm development (the Project) in County Clare. The methodology and contents of the Environmental Impact Assessment Report (EIAR) have been detailed and different elements of the report have been set out. It is intended that consultees consider the proposed project from their relevant area of expertise. We hope that all consultees will submit comments and inform the EIAR process. If you have comments you would like to share with the EIAR team regarding the assessment of the Project, please forward them to the email address provided below, or by post to Fehily Timoney & Company.

Please send all responses to: [cloonkettwindfarm@ftco.ie](mailto:cloonkettwindfarm@ftco.ie)

or respond by post to:

**Fehily Timoney and Company**

**Core House**

**Pouladuff Road**

**Cork**

**T12 D773**

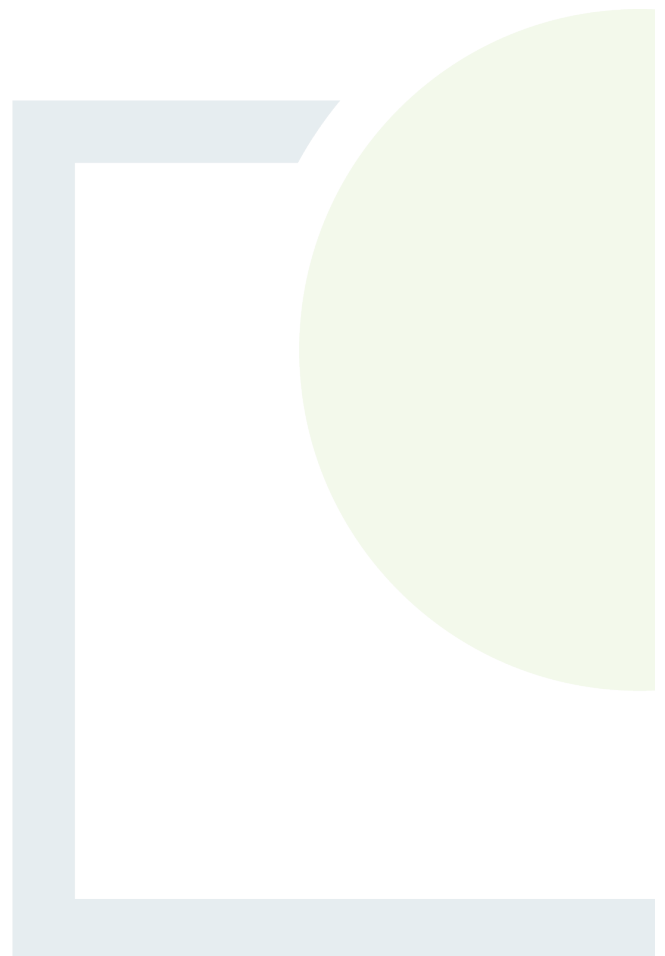
**By 3<sup>rd</sup> November 2023**



CONSULTANTS IN ENGINEERING,  
ENVIRONMENTAL SCIENCE  
& PLANNING

## APPENDIX 1

List of Scoping Consultees



| Government Departments                                       |
|--------------------------------------------------------------|
| Department of Housing, Planning and Local Government         |
| Department of Culture, Heritage and the Gaeltacht (DAU)      |
| Department of Agriculture, Food and the Marine               |
| Department of Communications, Climate Action and Environment |
| Department of Transport, Tourism and Sport                   |
| Department of Defense                                        |
| Minister for Housing, Planning and Local Government          |
| Minister for Agriculture, Food and the Marine                |
| Minister for Environment, Climate & Communications           |
| Other Interested Bodies                                      |
| Clare County Council                                         |
| Inland Fisheries Ireland (IFI)                               |
| Transport Infrastructure Ireland (TII)                       |
| Environmental Protection Agency (EPA)                        |
| The Heritage Council                                         |
| An Taisce                                                    |
| An Chomhairle Ealaíon (Arts Council)                         |
| Fáilte Ireland                                               |
| Irish Water                                                  |
| Commission for Regulation of Utilities (CRU)                 |
| Office of Public Works                                       |
| Health Service Executive (HSE)                               |
| Geological Survey Ireland (GSI)                              |
| Southern Regional Assembly                                   |
| Biodiversity Ireland                                         |
| Irish Wildlife Trust                                         |
| Butterfly Conservation Ireland                               |
| Birdwatch Ireland                                            |
| National Parks and Wildlife Service (NPWS)                   |
| Irish Environmental Network                                  |
| Teagasc                                                      |
| Gas Networks Ireland                                         |
| The Irish Meteorological Service (Met Éireann)               |

|                                               |
|-----------------------------------------------|
| Eirgrid                                       |
| ESB Networks                                  |
| Sustainable Energy Authority Ireland          |
| National Transport Authority                  |
| Geographical Society of Ireland               |
| An Garda Siochána (Local Station - Kildysart) |
| Environmental Sciences Association of Ireland |
| Forestry Service                              |
| Angling Council of Ireland                    |
| National Monuments Service                    |
| Bat Conservation Ireland                      |
| Irish Community Rapid Response (ICRR)         |
| Irish Aviation Authority                      |
| Air Navigation Ireland                        |
| Shannon Airport Authority                     |
| Ireland West Airport (Knock)                  |
| Irish Air Corps                               |
| Commission for Communications Regulation      |

Telecom providers have been consulted separately for this project.



**CONSULTANTS IN ENGINEERING,  
ENVIRONMENTAL SCIENCE  
& PLANNING**

**[www.fehilytimoney.ie](http://www.fehilytimoney.ie)**

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 **Cork Office**

 **Dublin Office**

 **Carlow Office**



## APPENDIX 5.2

A copy of all scoping responses received



Fehily Timoney and Company  
Core House  
Pouladuff Road  
Cork, T12 D773

25 October 2023

**Re: Cloonkett Windfarm EIA Scoping Report Consultation**

**Your Ref: n/a**

**Our Ref: 23/260**

Dear Sir/Madam,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data is made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases this data is a baseline or starting point for further site specific assessments.

With reference to your email received on the 11 September 2023, concerning the Cloonkett Windfarm EIA Scoping Report Consultation, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

**Geoheritage**

A national inventory of geoheritage sites known as County Geological Sites (CGSs) is managed by the Geoheritage Programme of Geological Survey Ireland. CGSs, as adopted under the National Heritage Plan, include sites that are of national importance which have been selected as the very best examples for NHA (Natural Heritage Areas) designation. NHA designation will be completed in partnership with the National Parks and Wildlife Service (NPWS). CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The audit for Co. Clare was completed in 2005. The full report details can be found [here](#). **Our records show that there are no CGSs in the vicinity of the proposed wind farm.**

**Groundwater**

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#) which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.

**The Groundwater Data Viewer indicates an aquifer classed as a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' underlies the proposed wind farm development. The Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.**



[GWClimate](#) is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the [Map viewer](#).

Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. **The Groundwater Protection Response overview and link to the main reports is here:** <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx>

### **Geological Mapping**

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found [here](#), in your future assessments.

**Please note we have recently launched QGIS compatible bedrock (100K) and Quaternary geology map data, with instructional manuals and videos. This makes our data more accessible to general public and external stakeholders. QGIS compatible data can be found in our downloadable bedrock 100k .zip file on the [Data & Maps](#) section of our website.**

### **Geohazards**

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated [Map Viewer](#). Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.

Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.

### **Natural Resources (Minerals/Aggregates)**

Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#).

We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed development are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.

### **Guidelines**

The following guidelines may also be of assistance:

- Institute of Geologists of Ireland, 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.
- [EPA, 2022](#). Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)



### **Other Comments**

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>, 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to the Geological Survey Ireland Planning Team at [GSIPlanning@gsi.ie](mailto:GSIPlanning@gsi.ie).

Yours sincerely,

### **Geoheritage and Planning Programme**

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.



Ms. Alison Delahunty  
Fehily Timoney & Company  
Core House  
Pouladuff Road  
County Cork  
T12 D773  
25<sup>th</sup> October 2023

**Re: Cloonkett Windfarm\_EIA Scoping Report\_Consultation**

The Department of Transport makes the following comments on the Environmental Impact Assessment Scoping Document for a Wind Farm at Cloonkett, County Clare. It should be noted that the Department considers the construction involved in providing this development and especially, the connection cables to the national grid may have effects on both the environment and the Regional and Local Road network.

Where the developer proposes the placement of any cables (or additional cables) in one or more trenches within the extents of the (regional and local) public road network, it is necessary to consider the following:

- Their presence within the public road could significantly restrict the Road Authority in carrying out its function to construct and maintain the public road and will likely add to the costs of those works.
- Their installation within the lands associated with the public road may affect the stability of the road. In particular where the road is a “legacy road” (where there is no designed road structure and the subgrade may be poor or poorly drained) the design needs to take account of all the variable conditions and not be based on a sample of the general conditions.
- The possible effect on the remaining available road space (noting that there may be need to accommodate other utilities within the road cross-section in the future).



- The necessity to have the power in the cables switched off where the Road Authority considers this necessary in order to carry out its function to construct and maintain the public road.

The Department consider it important that the examination of the proposal should include consideration of the following:

- Examination of options other than the routing of cables along the public road,
- Examination of options for connection to the national grid network at a point closer to the wind farm in order to reduce the adverse impact on public roads.
- Details of where within the road cross section cables are to be placed so as to minimise the effect on the Roads Authority in its role of construction and maintenance,
- Examination of details of any chambers proposed within the public road cross section so as to minimise the effect on the Roads Authority in its role of construction and maintenance,
- Examination of the possible elimination of jointing bays to protect the integrity of the road structure for the safety of those driving on the public road by eliminating hard spots and also preserve the road width for other utilities and,
- Rationalisation of the number of cables involved (including existing electric or possible future cables) and their diversion into one trench, in order to minimise the impacts on the road network and the environment along the road boundary (hedgerows).

The Department considers the following should be considered when applying conditions to any approval.

1. A condition requiring the specific approval of the local authority to the detail of the final route of cables through the public road space. If during construction there is a need to deviate from the detailed design then the approval of the local authority would again be sought. This would assist in minimising the impact on the public road.
2. A condition requiring the developer to comply with all appropriate standards and, inter alia the Guidelines for Managing Openings in Public Roads, 2017 in order to ensure orderly development.



3. A condition requiring that the location of the cables would be recorded as exactly as possible (maybe using BIM type technology) so as to facilitate the further use of road space for utilities and the maintenance/construction of the public road by the Roads authority. This record should be lodged with the local authority and with the ESB Networks for retention on their records.
4. A condition to require the elimination of jointing bays from under the road pavement to protect the integrity of the road structure, thereby improving safety for those driving on the public road by eliminating hard spots and preserving the road width for other utilities.
5. A condition requiring the developer to route cables away from bridge structures and specifically preventing the developer from attaching cables to road bridges. This would allow for the future maintenance of bridges without interruption of the electricity supply along the cables.
6. A condition requiring the developer to notify the Roads Authority of the owner of the cables (Owner) and the controller (Power Controller) of the power transmitted along the cables. In addition, the condition should require Owner and Power Controller to notify the Roads Authority of any change in ownership of the cables or change of Power Controller transmitting power along the cables. In all instances the Owner and Power Controller should be required to maintain an agreed contacts list with the Roads Authority.

*Central Policy, Coordination and Reform*

**An Roinn Iompair**

*Department of Transport*

**Lána Liosain, Baile Átha Cliath, D02 TR60**

Leeson Lane, Dublin, D02 TR60

T +353 (0)1 604 1177

[gcu@transport.gov.ie](mailto:gcu@transport.gov.ie) [www.gov.ie/transport](http://www.gov.ie/transport)



Butterfly House,  
Pagestown,  
Mulhussey,  
Maynooth,  
Co. Kildare.  
Phone 01 610 6693  
conservation.butterfly@gmail.com

November 23rd 2023

Dear Mr. Clarke,

**Re: Cloonkett Wind Farm**

Thank you for your reminder.

We note the contents of the scoping report, in particular the following:

*Habitat availability for invertebrates (excluding aquatic species) has been assessed within the land-made-available for the project. The occurrence of devil's-bit scabious (Succisa pratensis), which is the food plant of the marsh fritillary butterfly, was identified within the lands-made-available and preliminary surveys located larval webs. Further surveys will identify the full extent devil's-bit scabious within the project area and undertake conditions assessments, as per the methodology outlined in the National Biodiversity Data Centre's (NBDC) Habitat Condition Assessment for Marsh Fritillary.. In terms of important habitats for other invertebrate species, several pools and swamps associated with turf cutting were identified within the project area. These wetlands have the potential to support several rare invertebrate species, for example Irish Damselfly (Coenagrion lunulatum). Suitable habitat will be surveyed in May and July, the flight period for this species. Surveys will be undertaken between 10:00 and 16:00, targeting days with favourable weather conditions (dry, > 15°C, < 60% cloud cover and wind speeds < Force 4). Surveyors will spend at least 30 minutes surveying each site. (CLOONKETT WIND FARM EIA SCOPING REPORT, p.23)*

Butterfly Conservation Ireland is concerned about any development that can impact Lepidoptera, especially the Marsh Fritillary *Euphydryas aurinia* protected under Annex I of the EU Habitats Directive 1992. The current national status of the species should be considered.

During the period 2008-2021, considerable activity to compile records for The Atlas of Ireland's Butterflies 2017-2021 was undertaken.

Despite this increased attention, the number of 10km squares in which the Marsh Fritillary was recorded (one individual of any life stage constitutes a record), declined. In the period before 2010, it was recorded in 355 10 km squares compared with 352 10 km squares occupied from 2010 to 2021. In the case of several of the recently recorded squares, there was a single record of an individual butterfly, suggesting the species is over-represented in the most recent distribution map. One individual is not

evidence of the presence of a species that exists colonially. This data is known to me in my role as Atlas editor.

Butterfly Conservation Ireland does not support any development that damages the habitat occupied or unoccupied, of the Marsh Fritillary. We do not support translocation of larval nests and or habitat as a mitigation method for a species with specialised ecological requirements. In our experience, translocations fail, some immediately, such as occurred during pre-construction work on the Ennis Bypass in 2004.

It is important to note that habitat must retain current moisture levels and remain unshaded, open and managed to maintain the habitat as described by Harding (2021)<sup>1</sup> and the NBDC form for Habitat Condition Assessment for Marsh Fritillary<sup>2</sup>.

Although the land on which the proposed development is undesignated, the Marsh Fritillary remains a key ecological receptor which must be protected from impacts. The best protection is avoidance of impacts.

Please do not hesitate to contact me if you require any further information.

Yours sincerely,

Jesmond Harding  
Conservation Officer  
Butterfly Conservation Ireland

Directors: Michael Jacob, Jesmond Harding, Kieran Buckley, Richella Duggan, Joseph Harding.

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<sup>1</sup> Harding, J. (2021) *The Irish Butterfly Book. A Complete Guide to the Butterflies of Ireland*. Privately published, Maynooth.

<sup>2</sup> NBDC form for Habitat Condition Assessment for Marsh Fritillary available at:  
<https://biodiversityireland.ie/app/uploads/2021/11/Marsh-Fritillary-Habitat-Condition-Form.pdf>

Fehily Timoney  
Core House  
Pouladuff Road  
Cork  
T12D773

02<sup>th</sup> October 2023

**Re: Scoping Request for proposed Cloonkett Windfarm near Kildysart, Co Clare.**

Dear Sir/Madam,

The following are the comments from this Division in relation to the proposed development:

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department before trees are felled or removed. A Felling Licence application form can be obtained from **Felling Section, Department of Agriculture, Food and the Marine, Johnstown Castle Estate, Co. Wexford**. Email: [felling.forests@agriculture.gov.ie](mailto:felling.forests@agriculture.gov.ie) or Web [gov.ie](http://gov.ie) - [Tree Felling Licences \(www.gov.ie\)](http://gov.ie)

A Felling Licence granted by the Minister for Agriculture, Food and the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and/or to thin a forest for silvicultural reasons. The Act prescribes the functions of the Minister and details the requirements, rights and obligations in relation to felling licences. The principal set of regulations giving further effect to the Forestry Act 2014 are the Forestry Regulations 2017 (S.I. No. 191 of 2017).

The developer should take note of the contents of **Felling and Reforestation Policy** document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; [gov.ie](http://gov.ie) - [Tree Felling Licences \(www.gov.ie\)](http://gov.ie) As this development is within forest lands, particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands.

In order to ensure regulated forestry operations in Ireland accord with the principles of sustainable forest management (SFM), as well fulfilling the requirements of other relevant environmental protection laws, the Department (acting through its Forest Service division) must undertake particular consultations, and give certain matters full consideration during the assessment of individual Felling Licence applications. This includes consultation with relevant bodies, the application of various protocols and procedures (e.g. Forest Service Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

Consequently, when the Forest Service is considering an application to fell trees, the following applies:

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);

2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: [gov.ie - Felling Licence Applications \(www.gov.ie\)](http://gov.ie - Felling Licence Applications (www.gov.ie))
3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published online at: [gov.ie - Felling Licence Decisions \(www.gov.ie\)](http://gov.ie - Felling Licence Decisions (www.gov.ie))

It is important to note that when applying to a **Local Authority**, or **An Bord Pleanála**, for planning permission where developments are:

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
  - b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
  - c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;
- and
2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanála, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.
  3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)

Yours sincerely,

---

**Catherine Boyce**  
**Felling Section**  
**Department of Agriculture, Food and the Marine**

**Johnstown Castle**  
**Co Wexford**

**From:** [Defence Property Management Planning](#)  
**To:** [Cloonkett Wind Farm](#)  
**Cc:** [Gillian Holden \(Defence\)](#); [Sarah Kelly \(Defence\)](#)  
**Subject:** FW: Cloonkett Windfarm\_EIA Scoping Report\_Consultation  
**Date:** Wednesday 20 December 2023 12:07:43  
**Attachments:** [image003.png](#)  
[image004.png](#)

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## **Without Prejudice**

Dear Mr. Clarke,

I refer to your e-mail below, dated 23 November 2023, in relation to the proposed Cloonkett Windfarm project located in south Co. Clare, near the village of Kildysart.

I wish to advise at the outset that any determination in relation to a planning consent is solely a matter for the planning authorities and/or ABP, as appropriate. Therefore, the following observation is made on a non-prejudicial basis, and is not intended to be used to rely on for a prospective planning application, nor is this observation to be relied on in the event of any commercial transaction pertaining to such lands and it is not to be relied on in the event of any contract exchange pertaining to same.

As a matter of practice, the Department of Defence does not provide observations or advice in the scoping process, except where the relevant parties have been directed by a planning authority to seek the Department's views.

Following consultations with the subject matter in the Irish Air Corps and based on the information supplied, the Department of Defence wishes to make the following observations:

- All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting should be incandescent or, if LED or other types are used, of a type visible to Night Vision equipment. Obstacle lighting used must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.
- Any Irish Air Corps (IAC) requirements for are separate to Irish Aviation Authority (IAA) requirements.

We would appreciate if you could keep us informed on any progress relating to this proposed development.

Nothing in the above observation shall be taken as a binding response by the Minister for Defence in the event that a planning application is made. The Minister reserves the right to comment on an actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code.

Please contact me if you have any queries in this regard.

Best regards  
Don  
**Don Watchorn**

*Property Management Branch*

**An Roinn Cosanta**  
*Department of Defence*

**Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.**

Station Road, Newbridge, Co.Kildare, W12 AD93.

T +353 (0)45 452199

---

**From:** Defence Property Management Planning <PropertyManagementPlanning@defence.ie>  
**Sent:** Friday 24 November 2023 16:27  
**To:** Cloonkett Wind Farm <cloonkettwindfarm@ftco.ie>  
**Cc:** Gillian Holden (Defence) <Gillian.Holden@defence.ie>; Eoin McDonnell (Defence) <Eoin.McDonnell@defence.ie>  
**Subject:** RE: Cloonkett Windfarm\_EIA Scoping Report\_Consultation

Dear Mr. Clarke,

The Department of Defence wishes to acknowledge receipt of your below e-mail and the attached documentation re: Cloonkett Windfarm.

We will consult with our Military colleagues and will revert in due course.

Could you please confirm if your e-mail dated 11 September 2023 was issued to [propertymanagementplanning@defence.ie](mailto:propertymanagementplanning@defence.ie) as we have no record of it at that e-mail address.

Please contact me if you have any queries.

Best regards  
Don  
**Don Watchorn**

*Property Management Branch*

**An Roinn Cosanta**  
*Department of Defence*

**Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.**

Station Road, Newbridge, Co.Kildare, W12 AD93.

T +353 (0)45 452199

---

**From:** Cloonkett Wind Farm <[cloonkettwindfarm@ftco.ie](mailto:cloonkettwindfarm@ftco.ie)>  
**Sent:** Thursday 23 November 2023 15:55  
**To:** Defence Property Management Planning <[PropertyManagementPlanning@defence.ie](mailto:PropertyManagementPlanning@defence.ie)>  
**Subject:** FW: Cloonkett Windfarm\_EIA Scoping Report\_Consultation

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Dear Sir/Madam,

We are following up on the below email sent to you on 11<sup>th</sup> September 2023 in relation to a renewable energy development referred to as Cloonkett Wind Farm.

We would be interested in receiving any comments you may have on the proposed development, relevant to your area of expertise. If you have no comments to make on the proposed project, we would be grateful if you would please communicate same as part of your acknowledgment receipt of this correspondence.

If you should require any further information, please do not hesitate to contact us at the above email.

Yours faithfully,



**Aaron T Clarke**  
Principal Geologist

---

**Fehily Timoney and Company**

Unit 6, Bagenalstown Industrial Park, Royal Oak Road, Muine Bheag, Co. Carlow, R21 XW81  
t: +353 59 972 3800 / +353 89 424 7732

[www.fehilytimoney.ie](http://www.fehilytimoney.ie)  

I am working in a hybrid manner. My normal hours are 0900 to 1730 (Monday to Thursday) and 0900 to 1430 (Friday)

---

**From:** Alison Delahunty  
**Sent:** Monday, September 11, 2023 3:05 PM  
**Subject:** Cloonkett Windfarm\_EIA Scoping Report\_Consultation

Dear Sir/Madam,

Cloonkett Green Energy Limited intend to apply for planning consent for a renewable energy development referred to as Cloonkett Wind Farm, located in south Co. Clare, near the village of Kildysart.

This email, and enclosed EIA Scoping Report, is being issued to you as part of the consultation process for the project's Environmental Impact Assessment Report (EIAR). As part of the consultation process, we would be interested in receiving any comments you may have on the proposed development, relevant to your area of expertise.

We respectfully ask that you forward all responses by Friday the 3<sup>rd</sup> November 2023 to provide adequate time to consider all material. Your response may be forwarded by email or by post to the below:

By Email: [cloonkettwindfarm@ftco.ie](mailto:cloonkettwindfarm@ftco.ie)

By Post: Fehily Timoney & Company, Core House, Pouladuff Road, County Cork, T12 D773

If you have no comments to make on the proposed project, we would be grateful if you would please communicate same as part of acknowledgment receipt of this correspondence.

If you should require any further information please do not hesitate to contact us at the above email.

Yours Sincerely,  
Alison Delahunty

for and on behalf of **Fehily Timoney and Company**



**Alison Delahunty**  
Senior Geotechnical Engineer  
Working Hours: 8:30-5:30 Monday-Thursday

---

**Fehily Timoney and Company**

Unit 6, Bagenalstown Industrial Park, Royal Oak Road, Muine Bheag, Co. Carlow, R21 XW81  
t: +353 59 972 3800

[www.fehilytimoney.ie](http://www.fehilytimoney.ie)  

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## Kate Buckley

---

**From:** planning applications <planning.applications@failteireland.ie>  
**Sent:** Tuesday 17 October 2023 09:52  
**To:** Cloonkett Wind Farm  
**Subject:** FW: Cloonkett Windfarm\_EIA Scoping Report\_Consultation  
**Attachments:** Fáilte Ireland EIAR Guidelines 2023.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** planning applications <planning.applications@failteireland.ie>  
**Sent:** Tuesday, October 17, 2023 9:44 AM  
**To:** Alison Delahunty <alison.delahunty@ftco.ie>  
**Subject:** RE: Cloonkett Windfarm\_EIA Scoping Report\_Consultation

Hello Alison,

Thank you for your email and scoping report regarding for the proposed renewable energy development referred to as Cloonkett Wind Farm, located in south Co. Clare, near the village of Kildysart.

Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Regards & thanks,

Yvonne

**Yvonne Jackson**

Product Development-Environment & Planning Support | Fáilte Ireland

88-95 Amiens Street, Dublin 1, D01 WR86  
M +353 (0)86 0357590



[LinkedIn](#) | [Twitter](#) | [YouTube](#) | [Facebook](#)



**From:** Alison Delahunty <[alison.delahunty@ftco.ie](mailto:alison.delahunty@ftco.ie)>  
**Sent:** Monday, September 11, 2023 3:05 PM  
**Subject:** Cloonkett Windfarm\_EIA Scoping Report\_Consultation

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Dear Sir/Madam,

Cloonkett Green Energy Limited intend to apply for planning consent for a renewable energy development referred to as Cloonkett Wind Farm, located in south Co. Clare, near the village of Kildysart.

This email, and enclosed EIA Scoping Report, is being issued to you as part of the consultation process for the project's Environmental Impact Assessment Report (EIAR). As part of the consultation process, we would be interested in receiving any comments you may have on the proposed development, relevant to your area of expertise.

We respectfully ask that you forward all responses by Friday the 3<sup>rd</sup> November 2023 to provide adequate time to consider all material. Your response may be forwarded by email or by post to the below:

By Email: [cloonkettwindfarm@ftco.ie](mailto:cloonkettwindfarm@ftco.ie)

By Post: Fehily Timoney & Company, Core House, Pouladuff Road, County Cork, T12 D773

If you have no comments to make on the proposed project, we would be grateful if you would please communicate same as part of acknowledgment receipt of this correspondence.

If you should require any further information please do not hesitate to contact us at the above email.

Yours Sincerely,  
Alison Delahunty

for and on behalf of **Fehily Timoney and Company**



**Alison Delahunty**  
**Senior Geotechnical Engineer**  
Working Hours: 8:30-5:30 Monday-Thursday

**Fehily Timoney and Company**  
Unit 6, Bagenalstown Industrial Park, Royal Oak Road, Muine Bheag, Co. Carlow, R21 XW81  
t: +353 59 972 3800  
[www.fehilytimoney.ie](http://www.fehilytimoney.ie)  

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**Our Ref:** G Pre00219/2023

*(Please quote in all related correspondence)*

31 October 2023

Fehily Timoney & Company  
Unit 6  
Bagenalstown Industrial Park  
Royal Oak Road  
Muine Bheag  
Co Carlow  
R21 XW81

Via email to: [cloonkettwindfarm@ftco.ie](mailto:cloonkettwindfarm@ftco.ie)

|                                                                                              |
|----------------------------------------------------------------------------------------------|
| <b>Proposed Pre Planning Development: Cloonkett Windfarm EIA Scoping Report Consultation</b> |
|----------------------------------------------------------------------------------------------|

Dear Sir or Madam,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated headings.

**Archaeology**

The National Monuments Service of the Department of Housing, Local Government and Heritage welcomes the opportunity to comment at a pre-planning consultation stage of this proposal. The following are the initial observations of this Department with regards to ensuring the protection of the archaeological heritage in the planning and design of this proposed development.

It is acknowledged and welcomed that the EIA Scoping report provides for Archaeological, Architecture and Cultural Heritage and these have been scoped in for EIA. National policy as detailed in *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland, 1999) is that there should always be a presumption in favour of avoiding developmental impacts on the archaeological heritage. Additionally, given the scale and location of this proposed wind farm development, it is possible that previously



unrecorded archaeological features/deposits may be encountered during site preparation and construction works that require ground disturbance.

### **Planning and Design**

In order to assess the impacts of this extensive wind farm development, this Department recommends that Archaeological Impact Assessment (AIA) should be carried out at an early stage of planning and design. The AIA must incorporate all lands on which development may be proposed, including but not limited to, access areas, haul roads, temporary compounds, borrow areas, cable array/connection routes, etc.

The Archaeological Impact Assessment must include:

- A baseline archaeological and historical study comprising site inspection/s by a suitably qualified Archaeologist and documentary research including reviews of historical, cartographic and aerial photography sources.
- A comprehensive programme of archaeological geophysical survey where terrain and ground conditions allow.
- Based on the results of geophysical survey and consultation with NMS, a programme of archaeological test excavation.
- An Archaeological/Historic Landscape study.
- Visual Impact Assessment.

Comprehensive assessment is required in order to fully characterise the archaeological potential of the lands proposed for development and allow a clear and comprehensive archaeological impact statement to be made. The results of the AIA process should be included in the Cultural Heritage chapter of the EIAR and submitted as part of any planning application. The AIA/EIAR must include an archaeological impact statement and present appropriate mitigation to ensure the protection of the archaeological heritage.

### **Assessment of Potential for Impacts – Physical**

The AIA and subsequent EIA Chapter must include assessment of potential for impacts on the archaeological resource, including previously unrecorded archaeological remains which may have no above-ground expression. The results of comprehensive geophysical survey, where appropriate, and archaeological test excavation will assist in this regard.



### **Assessment of Potential for Impacts – Landscape, Setting and Amenity**

In addition to mitigating potential for physical impacts on the archaeological heritage, careful consideration should also be given in design to the potential for impacts on the setting and amenity of recorded monuments and the landscape/s in which they are situated. A detailed Archaeological/Historic Landscape Study and Visual Impact Assessment should be prepared as part of the Archaeological Impact Assessment process. These should set out the key characteristics of the Recorded Monuments and their surroundings (including inter-visibility, commonality, etc.) that contribute to their setting and the degree to which these elements are integral to the significance and appreciation of the monuments. They should then assess the effects of the development – both positive and negative – on these key characteristics. The development should be considered in terms of its location and siting relative to the monuments as well as its form, appearance and permanence. The assessment should be supported by appropriate illustrations of the monuments, their settings and the proposed development.

Further guidance is available in the national policy document *Framework and Principles for the Protection of the Archaeological Heritage*, as referenced above, together with *Archaeology in the Planning Process* (OPR Planning Leaflet No. 13, 2022) and *Archaeology & Development: Guidelines for Good Practice for Developers* (Heritage Council of Ireland, 2000).

### **Nature Conservation**

The following nature conservation observations are made at pre-planning stage, and are intended to assist you in addressing the obligations that arise in relation to European sites and biodiversity in general in the context of this project. The observations are not exhaustive, and are made without prejudice to any recommendation that may be made by this Department in the future. Data collected and surveys carried out in connection with this proposed development may raise other issues that have not been considered here.

The Department notes the scope of ecological surveys set out in the Environmental Impact Assessment Report (EIAR) scoping document (including an NIS) provided by Fehily Timoney & Company, and welcomes the extensive surveys in the Biodiversity chapter. The Department recommends the following general scoping points for consideration:

- Bird surveys for all species should cover bird usage and facilitate assessment of potential collision risk, habitat loss, barrier effect and displacement for these species and should



be based around the daily and seasonal activity patterns of the species being surveyed. Survey work should cover year-round site use and should cover a minimum of two years to allow for an accurate determination of site usage. Hinterland surveys should include breeding raptor surveys, including roost watches, surveys for nocturnal species and other species-specific surveys as appropriate. Vantage point surveys should be done in a manner that ensures sufficient data is collected to allow an assessment of the importance of all the flight paths into, out of and between sites and assess migratory movements. Consequently, the Department recommends that a visibility analysis of topography and vegetation is used in the selection of vantage points for ornithological surveys. Technological solutions should also be considered in conjunction with VPs surveys to ensure sufficient data is compiled for assessment. Results for species need to be referenced back to the overall populations and their dynamics as, in some cases even a small risk to a population of a species could be considered significant. Cumulative impact on birds from surrounding sites needs to be considered in the assessment. It is important that bird migration routes (day and night) are assessed as well as the flight lines (day and night) of bird species travelling between roosting and feeding areas. Limitations in guidance documentation, used in the analysis and discussion of results from any bird surveys, should be acknowledged, e.g. species that are covered by the guidance, data gaps and application to the Irish environment. Surveys should be designed to also include an assessment of improved agricultural lands. These types of intensified landscape features have the potential to provide feeding habitat and attract wintering wildfowl species (e.g. whooper swan and GWF Goose).

- The West Clare Uplands are known to be important for the Birds Directive Annex I species, Hen Harrier, and is within an 'Important Bird Area' for this species (Crowe *et al.*, 2009<sup>1</sup>). Knowledge of Hen Harrier distribution and activity is necessary to determine the risks to the species as a result of habitat loss, displacement and collision arising from the proposed windfarm on its own, and in combination with other windfarm, afforestation, including forestry management and harvesting, and land reclamation in this general area. Knowledge of Hen Harrier nesting and foraging habitat availability is also required to assess the risks. Existing data from EISs should be reviewed and included in the assessment of indirect and cumulative impacts. It must be demonstrated, including through landscape modelling over the lifespan of the windfarm, that there will be sufficient habitat for the Hen Harrier population in the event that all permitted windfarms are constructed and as conifer plantations mature, and undergo successive rotations. The report should include proposals for future monitoring of Hen Harriers as required.

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<sup>1</sup> Crowe, O., Tierney, N. and Wheeldon, R. 2009. *Distribution, extent and status of Ireland's Important Bird Areas*. BirdWatch Ireland



- The proposed site is located within the Cloon Freshwater Pearl Mussel (FWPM) catchment and is a qualifying interest the Lower River Shannon SAC. A Conservation Objective in the Lower River Shannon SAC is 'To restore the favourable conservation condition of Freshwater Pearl Mussel in the Lower River Shannon SAC'. This species is extremely sensitive to changes in water quality (physico-chemical parameters, including as a result of siltation and contamination) and water quantity (hydrological regime and flow variability). Freshwater Pearl Mussel is also protected under the Wildlife Acts, 1976-2000, and is a 'protected species' under the Environmental Liability Directive.
- Bat roosts may be present in trees, buildings and bridges. Bat species are protected under the Wildlife Act, 1976 to 2021, and are subject to a regime of strict protection pursuant to the requirements of the Habitats Directive (92/43/EEC) as transposed in Irish law in Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended). Therefore, damage/disturbance to any such roosts must be avoided in the first instance. While the Minister may grant a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011-2015, a licence can only be granted once a number of strict criteria have been met (see Regulation 54). An assessment of the impact of the proposed wind farm on bat species should be carried out noting recent guidance available, "*Bat and Onshore Wind Turbines: Survey, Assessment and Mitigation, 2019*" published jointly by Scottish Natural Heritage and Bat Conservation Trust and other stakeholders. The Department would like to highlight new research on patterns of bat activity in upland wind farms<sup>2</sup> which indicates it is more appropriate to use 30 day survey periods with static automated detectors, in each season, and in different weather conditions to reduce sampling bias and to accurately determine when the curtailment mitigation is required during the operational phase. This survey should include use of detectors at different heights. Any proposed bat friendly lighting should be proven to be effective and follow up-to-date guidance.
- Wetlands are important areas for biodiversity and ground and surface water quality should be protected during construction and operation of the proposed development. The EIAR should include a detailed assessment of the hydrological impacts on wetlands from the proposed development. Any watercourse or wetland which may be impacted on should be surveyed for the presence of protected species and species listed on Annexes II and IV of the Habitats Directive. For example, these species could include Otter (*Lutra lutra*) which are protected under the Wildlife Acts and listed on Annex II and IV of the Habitats Directive, Salmon (*Salmo salar*), Lamprey (three species in Ireland) listed on

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<sup>2</sup> <https://cieem.net/resource/cieem-webinar-patterns-of-bat-activity-at-upland-windfarms-implications-for-sampling-and-mitigation/>



Annex II of the Habitats Directive, Freshwater Pearl Mussel (*Margaritifera* species) and White-clawed Crayfish (*Austropotamobius pallipes*) which are both protected under the Wildlife Act and listed on Annex II of the Habitats Directive, Frogs (*Rana temporaria*) and Newts (*Trituris vulgaris*) protected under the Wildlife Acts and Kingfishers (*Alcedo atthis*) protected under the Wildlife Acts and listed on Annex I of the Birds Directive (Council Directive 79/409 EEC). Further to potential impacts on the species listed above, for example, one of the main threats identified in the threat response plan for otter is habitat destruction. A 10m riparian buffer on both banks of a waterway is considered to comprise part of the otter habitat. Therefore, any proposed development should be located at least 10 metres away from a waterway and should consider movements between waterways and waterbodies by otters.

- A detailed hydrological assessment should be carried out in terms of the potential impacts arising from the proposed development on Natura 2000 sites which has direct hydrological links as well as other sites including NHAs and pNHAs within the zone of influence; noting that designated sites at some distance can be intrinsically linked and supported by the surrounding habitats (e.g. agricultural fields) and hydrological processes. A detailed site drainage map will be required and should show all existing watercourses, drainage ditches, flushes, lakes or ponds; new drainage ditches; all outfall points to watercourses or lakes; and all settlement ponds.
- The Department notes that the proposed development site contains a number of peatland habitats. Peat stability should be assessed where required. Potential loss of these habitats should be considered in light of their ecological significance and importance as wetland habitats and the associated environmental services that they provide with regard to waterflow/flood regulation. As such, there should be full consideration of the amount of peat to be excavated, stored, and disposed/recovered. A detailed plan for the safe storage, disposal and rehabilitation of excavated or disturbed peat should form part of the report. Excavated or exposed peat should not pose any threat to surface waters and water quality, or natural or semi-natural habitats. Any proposals to combine peat disposal with habitat restoration or rehabilitation measures will require a detailed plan to show the location, nature and area of lands in question, and provide details of how such areas will be reinstated, managed and improved for habitats and/or species, together with proposals for monitoring and reporting.
- Marsh fritillary surveys should be carried out as per standard Marsh Fritillary Larval Web Survey methodology.



- Hedgerows and scrub should be maintained where possible, as they form wildlife corridors and provide areas for birds to nest in. Hedgerows provide a habitat for woodland flora, roosting places for bats and Badger setts may also be present. The EIAR should provide an estimate of the length/area of any hedgerow/scrub that will be removed. Where it is proposed that trees or hedgerows will be removed there should be suitable planting of native species in mitigation incorporated into the EIAR. Hedgerows, trees, scrub and uncultivated vegetation (including semi-natural habitats) should ideally not be removed during the nesting season (i.e. 1 March to 31 August), noting the protection afforded under the Wildlife Act 1976-2021.
- The EIAR should also address the issue of invasive alien plant and animal species such as *Rhododendron ponticum* and Japanese Knotweed, and detail the methods required to ensure they are not accidentally introduced or spread during survey and or construction.
- If tree felling is required at this site, it should be included as an intrinsic element of the overall development and should be assessed fully in the report. The extent of tree felling should be mapped, and the future use and management of all cleared areas should be specified. The impacts of tree felling on wildlife, habitats and surface waters (e.g. water quality) should be assessed, including the risk of Phosphate mobilisation from peat soils as a result of tree clearance and ground disturbance. Tree felling is licensed and regulated by the Forest Service; any additional requirements in respect of this element of the proposed development, including any obligations to replant on other lands, should be made known at the planning application stage.
- Any associated improvement or reinforcement works required for access and transport along the proposed haul route(s) should be included in the EIS and NIS, as appropriate, and subjected to ecological impact assessment with the inclusion of mitigation measures where necessary.
- Along with the standard National Parks and Wildlife Service data requests which is recommended, other sources of habitat and species information beyond those already identified include (but are not be limited to): the National Biodiversity Data Centre ([www.biodiversityireland.ie](http://www.biodiversityireland.ie)), Inland Fisheries Ireland ([www.fisheriesireland.ie](http://www.fisheriesireland.ie) ), BirdWatch Ireland ([www.birdwatchireland.ie](http://www.birdwatchireland.ie) ), Irish Raptor Study Group, Golden Eagle Trust and Bat Conservation Ireland ([www.batconservationireland.org](http://www.batconservationireland.org) ). Data may also exist at a County level within the Planning Authority. Some guidance and reference documents are provided in the Appendix to this letter. To note that the local ESB offices



may be able to provide useful information with regard to collision/strikes of birds to power lines in the locality.

- If applicants are not in a position to state the exact location and details of cable routes at the time of application, then they need to consider the range of options that may be used within their assessment. Should the exact height and rotor diameter of the turbines not be known at EIAR stage then the assessment of impacts must be applicable to a variety of turbine heights and rotor diameters which could be used. This should be made clear in the EIAR. The scoping document states the project will likely seek to connect into the existing 400 kV Moneypoint Substation located approximately 23 kilometres southwest of the proposed wind farm site. The Department notes the presence of a Lesser Horseshoe Bat roost at Moneypoint.
- All potential cumulative, in-combination and ex situ impacts must be assessed.
- Complete project details including Construction Management Plans (CMPs) need to be provided in order to allow an adequate EIAR (and appropriate assessment) to be undertaken. CMPS should contain sufficient detail to avoid any post construction doubt with regard to the implementation of mitigation measures, timings and roles and responsibilities for same. Any mitigation needs to be included in detail and if being relied upon to reach conclusions must be proved to be achievable and likely to be effective in any given scenario it is needed. Proof of effectiveness will be required with examples of where similar techniques have been employed previously. Applicants need to be able to demonstrate that CMPs and other such plans are adequate, all mitigation is included and effective and supported by scientific information and analysis and that they are feasible within the physical constraints of the site. The positions, locations and sizes of construction infrastructure and mitigation such as settlement ponds, disposal sites and construction compounds may significantly affect European and other designated sites, habitats and species in their own right and could have an effect for example on, drainage, water quality, habitat loss, and disturbance. If these are undetermined at time of the assessment all potential effects of the development on the site are not being considered.
- Such developments, given their scale and duration, can be an opportunity for ecological enhancement. Enhancement measures have been included in similar projects in Ireland. However, any proposed enhancement measures must have sufficient information to be implemented effectively. It is suggested that a Habitat Management Plan (HMP) is carried out, outlining specific enhancement measures to be undertaken, the timescale for implementation, objectives to be achieved and ecological monitoring requirements.



- The National Biodiversity Action Plan aims to conserve and restore Ireland's biodiversity. A key objective of the plan is to achieve no net contribution to biodiversity loss arising from development projects occurring within the lifetime of the plan. The EIAR should outline how the project will avoid a net loss of biodiversity.
- In order to carry out the AA screening, and/or prepare a Natura Impact Statement (NIS), information about the relevant European sites including their conservation objectives will need to be collected. Details of designated sites and species and conservation objectives can be found on <http://www.npws.ie/>. Site-specific, as opposed to generic, conservation objectives are now available for many sites. Each conservation objective for a qualifying interest (QI) is defined by a list of attributes and targets and is often supported by further documentation. Where these are not available for a site, an examination of the attributes that are used to define site-specific conservation objectives for the same QIs in other sites can be usefully used to ensure the full ecological implications of a proposal for a site's conservation objective and its integrity are analysed and assessed.

#### **General guidance and useful references:**

- EU Guidance on Wind Energy Developments and Natura 2000.
- The Departmental Wind Energy Planning Guidelines.
- Windfarms on Peatland (2008-2010) Mires and Peat volume 4.
- Best Practice guidance for Habitat Survey and Mapping by George F Smith, Paul O'Donoghue, Katie O'Hora and Eamon Delaney, 2011. The Heritage Council.
- Pearce-Higgins, James W., Stephen, Leigh, Langston, Rowena H. W., Bainbridge, Ian P. and Bullman. Rhys (2009). "The distribution of breeding birds around upland wind farms". *Journal of Applied Ecology*, 46, 1323-1331.
- Johnson, Gregory D. and Arnett Edward 8. "A Bibliography of Bat Fatality Activity and Interactions with Wind Turbines" (June 2004 updated February 2010) Bat Conservation International.
- Pearce-Higgins, James W., Stephen, Leigh, Douse, Andy, and Langston, Rowena H. W. (2012). "Greater impacts of wind farms on bird populations during construction than subsequent operation: results of a multisite and multi-species analysis". *Journal of Applied Ecology*. 49.386-394.



- Rodrigues, Let ai, (2014). "Guidelines for consideration of bats in wind farm projects". Eurobats Publication Series NO.6 UNEP and Eurobats.
- The Departmental guidance document on Appropriate Assessment which is available on the NPWS web site at <https://www.npws.ie/protected-sites/guidance-appropriate-assessment-planning-authorities>
- The EU Commission guidance entitled "Assessment of plans and projects significantly affecting Natura 2000 sites, Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" which can be downloaded from [http://ec.europa.eu/environment/nature/natura2000/management/guidance\\_en.htm](http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm).
- Bat Conservation Ireland (2012) Wind Turbine/Wind Farm Development Bat Survey Guidelines. Version 2.8, December 2012.
- Drewitt, Allan Land Longston Rowena H. W. (2006) "Assessing the impacts of wind farms on birds". Ibis 148. 29-42.
- CJEU and Irish case law should also be consulted.

The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority/authorities, in his/her role as statutory consultee under the Planning and Development Act, 2000, as amended.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie)

Yours faithfully,

A handwritten signature in dark ink, appearing to be 'BB' followed by a flourish.

---

Brian Bone  
Development Applications Unit  
Administration



COMHAIRLE  
CONTAE AN CHLÁIR

CLARE  
COUNTY COUNCIL

**FEHILY TIMONEY & Co.**

Distribution **AC/JH**

**22 NOV 2023**

Job No: **P22-125**

Correspondence No: **1**

Comment:

**21<sup>st</sup> November 2023**

**Fehily Timoney and Company**  
**Core House**  
**Pouladuff Road**  
**Cork**  
**T12 D773**

**Our Ref: Scope 2023-3**

**Applicant: Cloonkett Green Energy**  
**Development: Proposed Windfarm at Glenconaun More, Craghera and Cloonkett, Co. Clare**

Dear Sir/Madam,

I refer to the above mentioned scoping request received by the Planning Authority on the 11<sup>th</sup> September 2023.

The planner's report has indicated the following finding:

In addition to the issues as set out in the EIA Scoping reports the Planning Authority advises that the following information is considered in the preparation of the EIAR.

### **Water Quality**

- The aquifer vulnerability within the site ranges from Moderate to Extreme. The site is located within a designated Freshwater Pearl Mussel Catchment Area. The proposal site accommodates a number of watercourses (and associated designated flood risk areas) which flow in a generally westerly direction towards the Cloon River (Lower River Shannon Special Area of Conservation). It is also in close proximity to and may have hydrological connectivity to Gortglass Lough proposed Natural Heritage Area (pNHA) and Cloonsnaghta Lough pNHA. The Cloon River flows into Clonderalaw Bay (Lower River Shannon SAC, River Shannon and River Fergus Estuaries SPA and Clonderalaw Bay pNHA). Derrygeeha Lough pNHA is also located to the west of the Cloon River. As such the EIAR should take into consideration the potential for impacts on water quality both within the site and its wider environs. All stages of the development should be considered in compiling information regarding the interactions of the development with surface water and groundwater. Impacts on downstream receptors shall be identified.

**An Roinn Pleanála**  
**An Stiúthóireacht Forbairt Gheilleagrach**  
Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

**Planning Department**  
**Economic Development Directorate**  
Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2



## **Noise & Vibration**

- Acoustics and vibration should be considered in relation to noise and vibration arising from the proposed development. Noise should be assessed in the context of site preparation, ongoing operation and any restoration required. Baseline readings at all noise-sensitive locations (e.g. houses, schools etc) should be obtained. The noise reports should also provide an assessment of the potential impacts on sensitive receptors arising from the activities associated with the proposed borrow pit(s).

## **Habitat Protection**

- The EIAR must fully assess the impact of the proposal on habitats within and surrounding/connected to the site.

## **Adjacent Land Uses & Sensitive Receptors**

- With respect to the proximity to sensitive receptors (e.g. from shadow flicker, noise etc) the EIAR should take into account permitted dwellings and other sensitive developments that may not as yet be constructed.

## **Visual Amenities**

- The visual impact of the windfarm must be assessed, with particular emphasis on views towards the site from the N68 national road to the north, and the local roads to the north, south, east and west south of the site, settlements in the area (including Lissycasey, Cranny, Coolmeen and Kiladysert), historical or tourist related features in the area, and from potential views from designated scenic routes (as per the Clare County Development Plan 2023-2029. Finally, intervisibility between the proposed wind farm and existing/permitted wind farm developments from these views should also be assessed. Photomontages that are to be provided with the application should be in the context of clear blue skies.

## **Cumulative Impacts**

- The cumulative impact of the proposed development and the current/permitted wind farms and other developments in the wider area must be assessed in all assessment chapters contained within the EIAR.

## **Grid Connection**

- Details on the location and design of the proposed grid connection(s) to be included and adequately assessed within the EIAR. The Planning Authority notes that the proposal site is at a significant remove from the proposed grid connection at Moneypoint.

## **Ground Conditions**

- A peat stability assessment and landslide susceptibility modelling are recommended on any areas within the site which may have significant level changes. The model should show areas at risk of landslide based on peat depth, slope, altitude, aspect and curvature.

### **Major Accidents**

- The EIAR must include the expected effects from the vulnerability of the project to risks of major accidents and/or disasters that are relevant to the project.

### **Traffic and Transportation**

- Traffic management information relating to the proposed number, composition, routes etc for traffic associated with the construction, operational and decommissioning phaseS of the development is required.

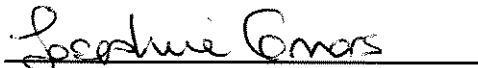
### **Cultural Heritage**

Full assessment of the potential for direct and indirect impacts on the cultural heritage assets of the area to be adequately assessed within the EIAR.

### **Conclusion**

The information set out within this response is provided in good faith and a full assessment of all of the issues would be carried out by the Planning Authority of Clare County Council at planning application stage. The information outlined relates to the considerations to be assessed in the EIAR and does not provide opinion on the actual planning merits of the proposed development. You are advised that the Planning Authority is available to provide further feedback on the EIAR scoping process on request.

**Yours faithfully**



**Josephine Connors**  
**Staff Officer**  
**Planning Department**  
**Economic Development Directorate**

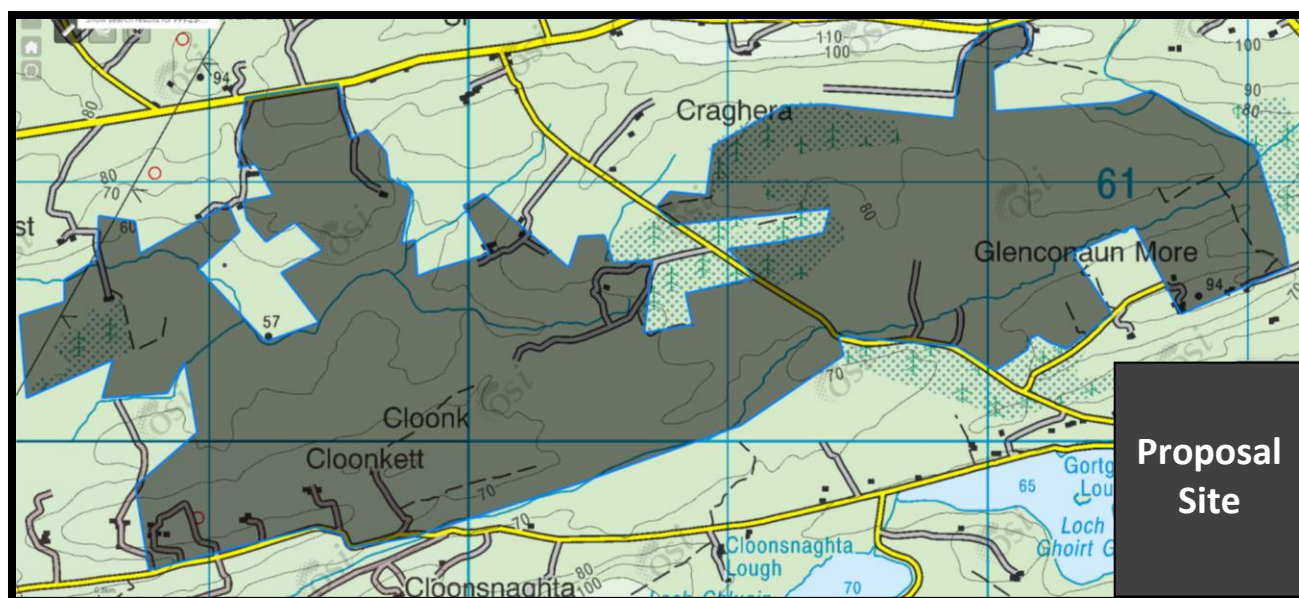
## CLARE COUNTY COUNCIL PRE-PLANNING REPORT

|                       |                                                         |
|-----------------------|---------------------------------------------------------|
| <b>File Reference</b> | PPI-23-150                                              |
| <b>Applicant</b>      | Cloonkett Green Energy                                  |
| <b>Development</b>    | Wind Farm – Approximately 17 Turbines with 50+MW output |
| <b>Location</b>       | Glenconaun More, Craghera, and Cloonkett, County Clare  |
| <b>Date</b>           | 24 <sup>th</sup> November 2023                          |



### Introduction

Further to the pre-planning application received on the 06<sup>th</sup> September 2023 please see the relevant pre-planning information as set out in this report. This report should be read in conjunction with EIA scoping report reference Scope 2023-3 as previously issued by the Planning Authority.



### Nature and Extent of Development

The Planning Authority notes that the project is in the early stages of development and therefore the level of information received with regard to the particulars of the project are limited. However, from the information received, the proposal would comprise of:

- Approximately 17no. 4.5MW wind turbines with an estimated megawatt output of in excess of 50 MW.
- Connection to the 400kv Moneypoint substation via an underground cable (route not finalised).
- Turbine foundations and hardstanding areas.
- New access tracks & upgrading existing access tracks.
- Onsite 110kv substation and underground electrical and communication cabling.
- Drainage and sediment controls.
- Tree felling.
- Temporary construction compound.

- Alterations to the public road to facilitate delivery of the turbine components.

The Planning Authority notes that as the proposed megawatt output capacity would be in excess of 50MW the relevant planning application process would be a Strategic Infrastructure Development application to An Bord Pleanála.

### **Wind Energy Strategy**

In accordance with Circular PL20-13, the previous “Clare Wind Energy Strategy 2017-2023” was not reviewed as part of the preparation of the Clare County Development Plan 2023-2029. The Strategy is set out in Volume 6 of Clare County Development Plan 2023-2029. The site is located in a rural area where the principle of wind energy developments is “Acceptable in Principle”.

### ***WES Nine: ‘Acceptable in Principle’***

*These areas are considered suitable for wind farm development because of:*

- *Sufficient wind speeds ,*
- *Access to grid network, and*
- *Established patterns of inquiries.*

*Projects within these areas must:*

- *Demonstrate conformity with existing and approved wind farms to avoid visual clutter.*
- *Designed and developed in line with the Planning Guidelines in terms of siting, layout and environmental studies.*
- *Provide a Habitats Directive Assessment under Article 6 of the Habitat Regulations if situated in proximity to a Special Area of Conservation or Special Protection Area will require.*

*Target wind energy generation from Acceptable in Principle areas is 150 MW*

### **Landscape Character Area**

The site is located within the Shannon Estuary (Kilrush Farmland) Landscape Character Area. Outlined below is the relevant extract from Table 4(a) “Strategic Guidance on Landscape Capacity for Wind Energy”.

| LCA             | Overall Sensitivity to Wind Farm Developments | Appropriate size of wind farms (turbine numbers) | Capacity                                                                                                                                                                                                          | LCTs in Co. Clare, LCA and Corresponding LCTs in 2006 Planning Guidelines | Cumulative Advice from 2006 Planning Guidelines       |
|-----------------|-----------------------------------------------|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|-------------------------------------------------------|
| Shannon Estuary | Medium to Low                                 | Large to medium                                  | This LCA has some capacity for large to small wind farms in part due to the quite industrial nature of the area close to Moneypoint and the capacity of the ridged hills to accommodate wind energy developments. | Farmed lowland ridges<br>Planning Guidelines:<br>Hills and Flat farmland  | Acceptable depending on appropriate siting and design |

## Scale of Development

Section 1.4 of the WES classifies the size of wind farms (turbine numbers) as follows:

- Small            1 to 5 turbines
- Medium        6 to 10 turbines
- Large           11 to 25 turbines
- Very large     More than 25 turbines

It should be noted that the WES was prepared in 2009 when turbine heights were assumed to be between 75 to 125 metres in height. The achievement of a 50mw output from 17 proposed turbines would require each turbine to produce 4.5mw and the available information indicates that such turbines would be significantly greater than the heights assumed by the Planning Authority in designating this area as *“Acceptable in Principle”* for wind energy developments. However, the WES does recognise *“that turbine heights are increasing and there is no prescription in relation to turbine heights. Each application will be assessed on its own merits against planning policy, objectives and legislation”*.

## Planning Considerations

Annex A of the WES outlines the general considerations for wind energy developments in the County including compliance with the Section 28 Wind Energy Guidelines and other relevant guidelines, EIA, ecological, and AA requirements, biodiversity, flora and fauna, water, soil and geology, landscape, cultural heritage, population and human health, air and climate, material assets (transport, waste management, energy use and noise), aviation safety and navigation, and the cumulative impacts of wind farms.

Any proposal would be assessed in accordance with the Wind Energy Development Guidelines for Planning Authorities 2006. The Planning Authority notes that the draft Revised Wind Energy Development Guidelines were published in 2019 but have not yet come into effect. Separately the existing WES has been in place since 2009 and has been carried forward into subsequent Development Plan. This WES will not be reviewed until such time as the new guidelines are in place. It is considered that two of the main planning issues are:

### Visual Impact

Within areas that are designated as being *“Acceptable in Principle”* for wind energy developments applicants are required to demonstrate that new proposals avoid visual clutter. Having regard:

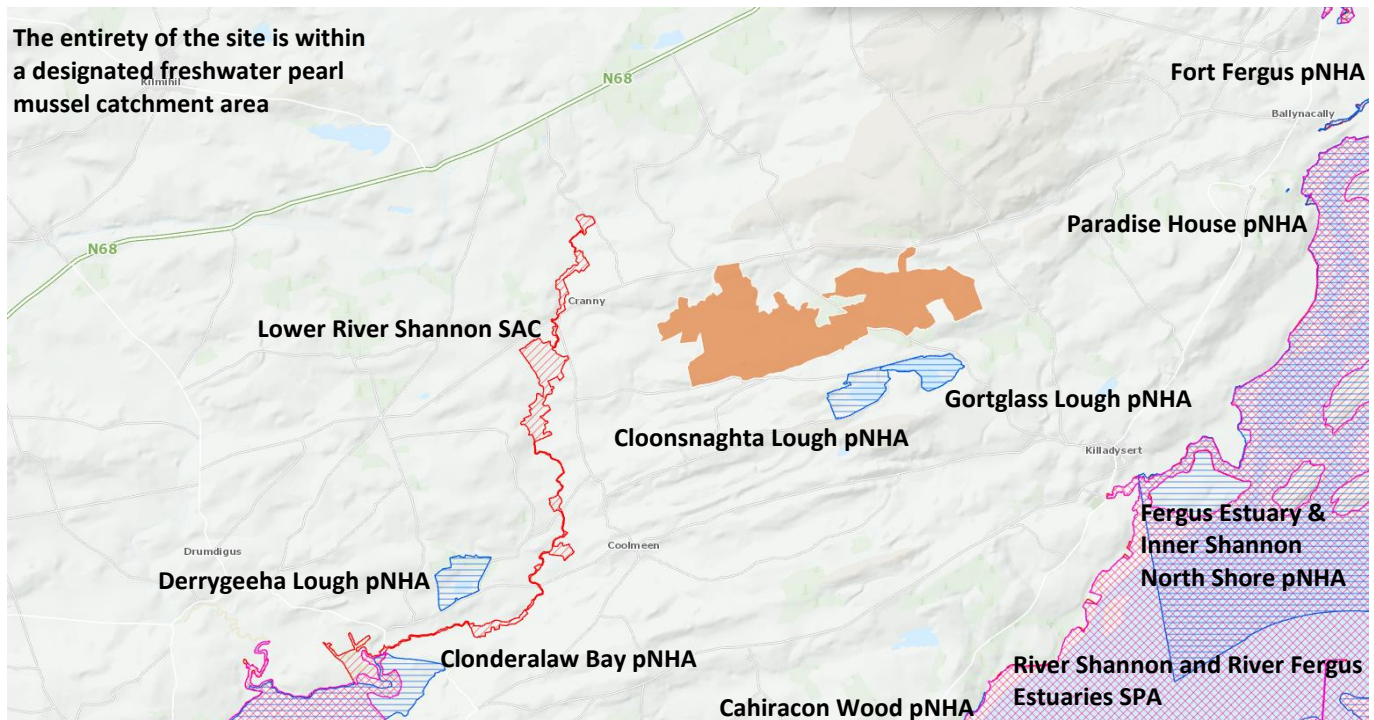
- The quantum of existing and permitted wind energy developments in the area and its wider environs,
- The intervisibility between these wind energy developments,
- The scale and large footprint of the development as proposed,
- The proposed location of the development to the south of the N68 national road (and in relatively close proximity to same),

it is considered that incongruity with the natural landscape cannot be avoided, that the cumulative impact of the proposed development with existing and permitted wind farm developments would be significant, with landscape and visual impacts greatly increased as proposed turbines encroach further to the south of the N68 national road, that the proposal would result in a visual corridor of wind turbines on both sides of the national road, and that there are serious concerns pertaining to the potential for adverse impacts on the visual amenities of the area and the character of this *“Settled Landscape”*. Potential views of the turbines from the Shannon Estuary are also be of concern and should be examined as part of the application process.

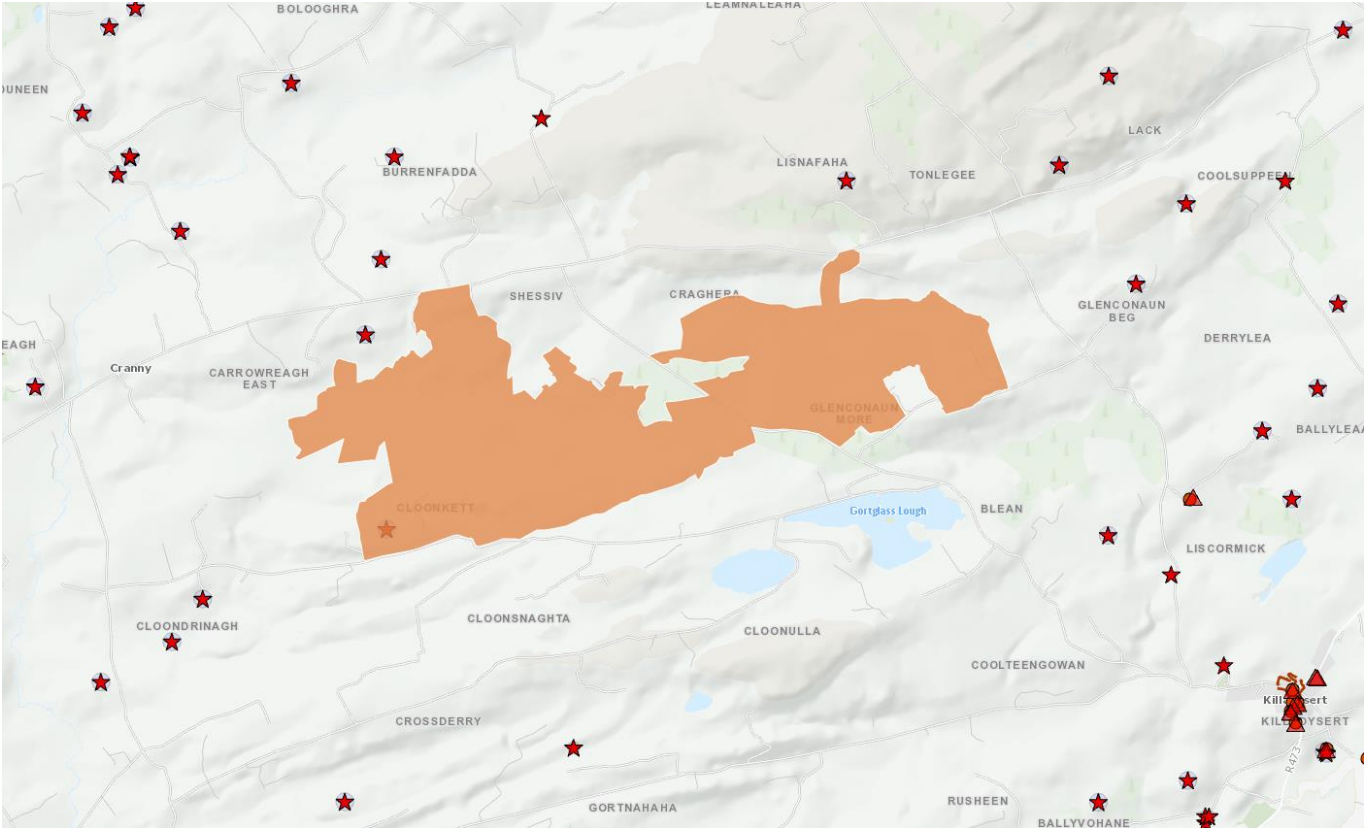
## Freshwater Pearl Mussel

The extent of groundworks required to accommodate the proposed development would be significant and in this regard it is noted that the site is within a designated Freshwater Pearl Mussel catchment area and is in relatively close proximity to the Cloon River and tributaries of same. Significant mitigation would be required at construction stage to ensure the protection of receiving waters. Also, concerns are expressed with regard to potential impacts on ongoing groundwater and surfacewater regimes in the area post the construction of the development.

## Natural Heritage Designations

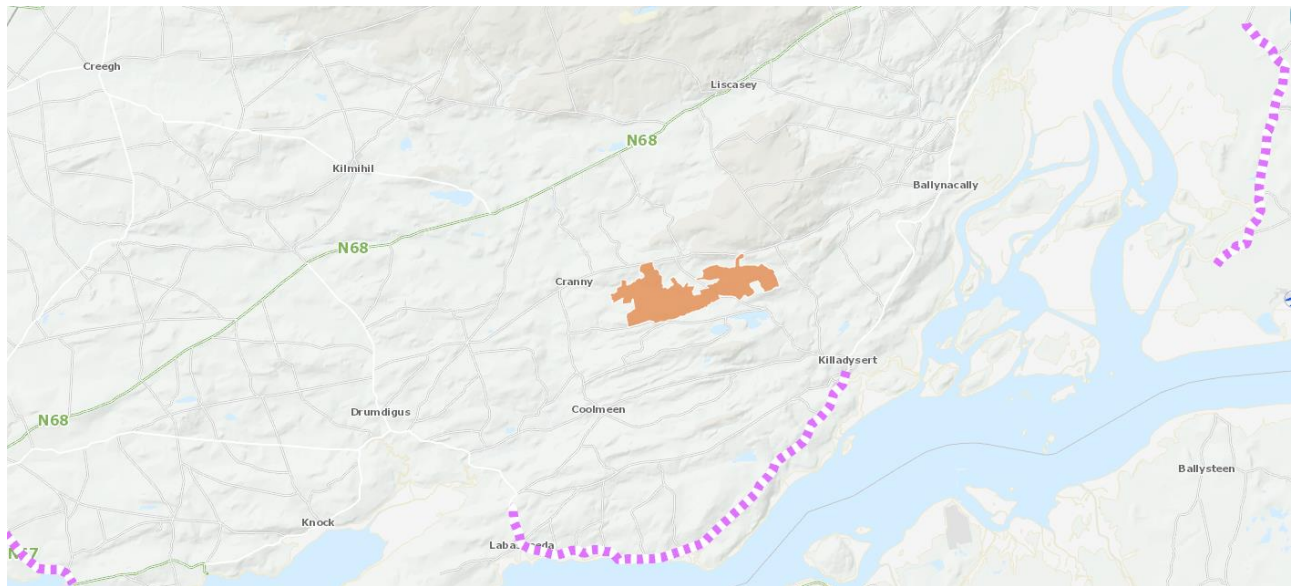


Archaeological and Architectural Heritage Designations

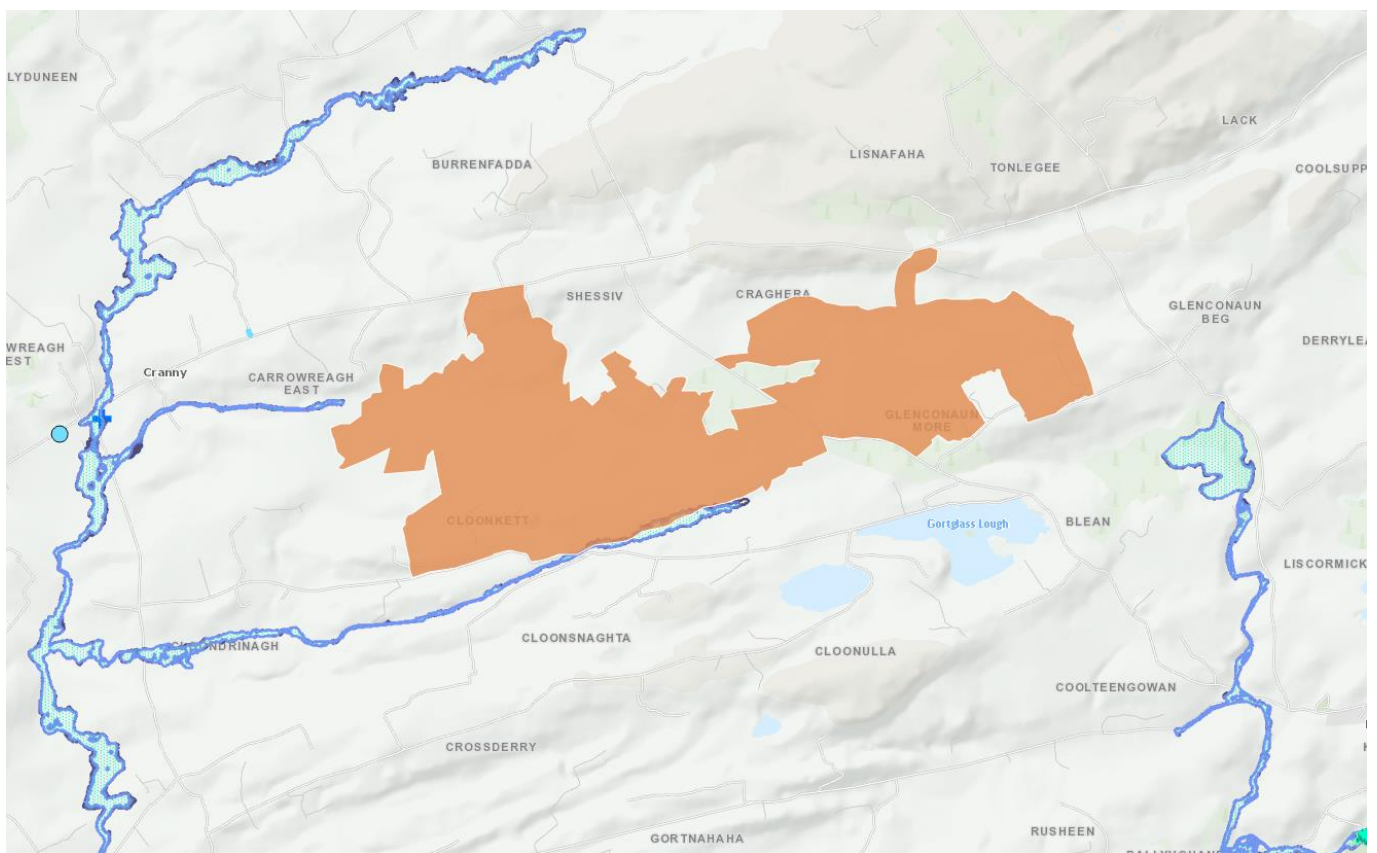


-  Recorded Monument
-  Protected Structure
-  National Inventory of Architectural Heritage
-  Architectural Conservation Area

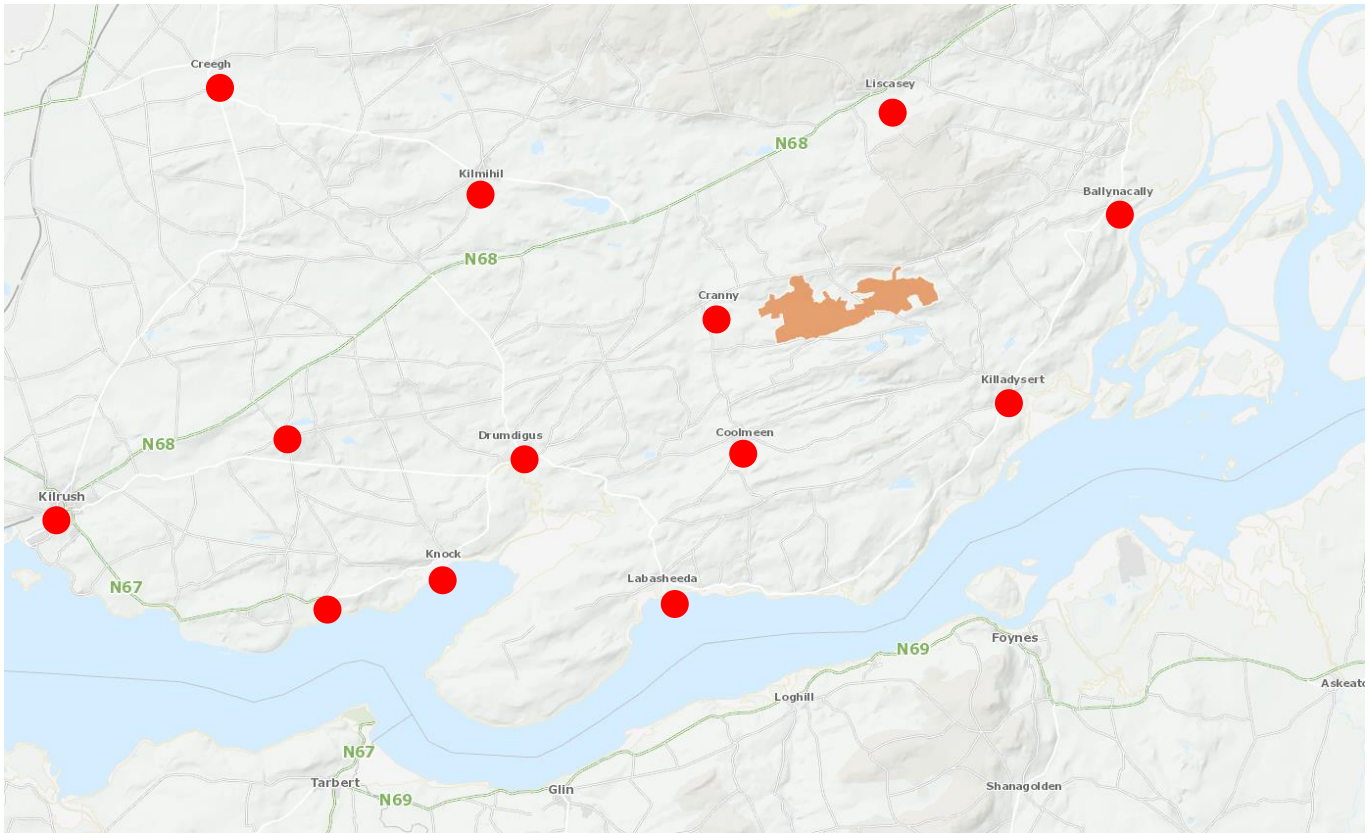
## Scenic Routes



## Flood Risk Mapping



## Settlements in the Area



## Conclusion

The information set out within this response is provided in good faith and a full assessment of all of the issues would be carried out by the Planning Authority should same be submitted to the Council or alternatively comments will be provided to the Board in due course.

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Senior Executive Planner  
24/11/2023

## Kate Buckley

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**From:** Alison Delahunty  
**Sent:** Tuesday 3 October 2023 07:48  
**To:** Cloonkett Wind Farm  
**Subject:** FW: TII Ref: TII23-124384 - Cloonkett Windfarm\_EIAR Scoping Report Consultation Clare

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**From:** INFO <Information@tii.ie>  
**Sent:** Friday, September 29, 2023 3:01 PM  
**To:** Alison Delahunty <alison.delahunty@ftco.ie>  
**Subject:** TII Ref: TII23-124384 - Cloonkett Windfarm\_EIAR Scoping Report Consultation Clare

**Dear Ms. Delahunty,**

Thank you for your correspondence of 11 September 2023 regarding the above. Transport Infrastructure Ireland's (TII's) position in relation to your enquiry is as follows.

TII will endeavour to consider and respond to planning applications referred to it, given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at [www.tii.ie](http://www.tii.ie).

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals, following the examination of any valid planning application referred.

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. In addition, Chapter 7 'Enhanced Regional Accessibility' of the National Development Plan, 2021 – 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. This requirement is further reflected in the publication of the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.

The developer/scheme promoter should have regard, inter alia, to the following:

- Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to locations of existing and future national road schemes.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, including the potential haul route.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.

- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).
- The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the 'Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes' (National Roads Authority (NRA), 2006).
- The EIAR/EIS should consider the 'Environmental Noise Regulations 2006' (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Guidelines for the Treatment of Noise and Vibration in National Road Schemes' (1st Rev., NRA, 2004)).
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, TII's 'Traffic and Transport Assessment Guidelines' (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of TII's TTA Guidelines, which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed, as TII will not be responsible for such costs.
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. It is noted that Section 2.4 of the EIAR Scoping Report advises that the turbine delivery route will begin at Foynes Port and travel along the N69, N18, M18 and the N85 to Ennis, and from that point will follow the most appropriate route, which will be determined pending a detailed engineer's assessment.

In relation to the proposed haul route, where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required. All national road structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

In addition, the haul route should be assessed to confirm capacity to accommodate abnormal 'length' loads and any temporary works required are identified.

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII.

The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses, to ascertain any operational requirements, including delivery timetabling, etc., to ensure that the strategic function of the national road network is safeguarded.

Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of turbine components to site, the applicant/developer shall contact [thirdpartyworks@tii.ie](mailto:thirdpartyworks@tii.ie) in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.

Additionally, any damage caused to the pavement on the existing national road, arising from any temporary works due to the turning movement of abnormal loads (e.g. tearing of the surface course, etc.), shall be rectified in accordance with TII Pavement Standards, and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

- It is noted that the grid connection to Moneypoint is proposed in the EIAR Scoping Report though no grid connection route is identified. Please note, any grid connection and cable routing proposals should be developed to safeguard proposed road schemes, as TII will not be responsible for costs associated with future relocation of cable routing, where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

In the context of the existing national road network, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the National Development Plan, the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

There is around 99,000km of roads in Ireland, the national road network, which caters for strategic inter-urban travel, consists of only approx. 5.4% of this. There is a critical requirement to ensure the strategic capacity and safety of this national road network is maintained and significant Government investment already made in the national road network is safeguarded.

The provision of cabling along the national road network represents a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network, and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy, and therefore avoid grid connection routing proposals along national roads.

Other consents or licences may be required from the road authority for any trenching or cabling proposals crossing the national road. TII requests referral of all proposals agreed and licensed between the road authority and the applicant, which affect the national road network.

Where grid connection involves proposals to cross a motorway, Works Specific Deeds of Indemnities, arrangements for third party access or consent from TII in accordance with Section 53 of the Roads Act, 1993, is required. Arrangements for third party access are also likely to be required. Contact should be made to 'thirdpartyworks@tii.ie' to progress this element, when proposals for the crossings have been developed.

General requirements for directional drilling under a motorway include:

- The launch and reception pits for the crossing are located outside the Motorway boundary.
- The cabling will be installed at such depth so as not to conflict with the drainage for the Motorway.
- Neither the works nor the cable crossing will damage or interfere with the Motorway.
- Any maintenance and/or future planned upgrades of the cabling at the crossing location can be carried out, without access to the motorway boundary.
- There are no bolted joints in that part of the crossing within the motorway fence-line.
- A pre and post construction survey shall be required along the length of the crossing over the extents of the motorway boundary.
- Specific requirements may also arise for these proposed works.

Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII. Any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.

Notwithstanding any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practise.

I hope that this information is of assistance to you.

**Yours sincerely,**

**Andrew Moore**  
**Senior Regulatory & Administration Executive**

---

**From:** Alison Delahunty <[alison.delahunty@ftco.ie](mailto:alison.delahunty@ftco.ie)>  
**Sent:** Monday, September 11, 2023 3:05 PM  
**Subject:** Cloonkett Windfarm\_EIA Scoping Report\_Consultation

You don't often get email from [alison.delahunty@ftco.ie](mailto:alison.delahunty@ftco.ie). [Learn why this is important](#)

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Dear Sir/Madam,

Cloonkett Green Energy Limited intend to apply for planning consent for a renewable energy development referred to as Cloonkett Wind Farm, located in south Co. Clare, near the village of Kildysart.

This email, and enclosed EIA Scoping Report, is being issued to you as part of the consultation process for the project's Environmental Impact Assessment Report (EIAR). As part of the consultation process, we would be interested in receiving any comments you may have on the proposed development, relevant to your area of expertise.

We respectfully ask that you forward all responses by Friday the 3<sup>rd</sup> November 2023 to provide adequate time to consider all material. Your response may be forwarded by email or by post to the below:

By Email: [cloonkettwindfarm@ftco.ie](mailto:cloonkettwindfarm@ftco.ie)

By Post: Fehily Timoney & Company, Core House, Pouladuff Road, County Cork, T12 D773

If you have no comments to make on the proposed project, we would be grateful if you would please communicate same as part of acknowledgment receipt of this correspondence.

If you should require any further information please do not hesitate to contact us at the above email.

Yours Sincerely,  
Alison Delahunty

for and on behalf of **Fehily Timoney and Company**



**Alison Delahunty**  
**Senior Geotechnical Engineer**  
Working Hours: 8:30-5:30 Monday-Thursday

---

**Fehily Timoney and Company**  
Unit 6, Bagenalstown Industrial Park, Royal Oak Road, Muine Bheag, Co. Carlow, R21 XW81  
t: +353 59 972 3800  
[www.fehilytimoney.ie](http://www.fehilytimoney.ie)  

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Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag <https://scanner.topsec.com/?d=2349&r=show&u=https%3A%2F%2Fwww.tii.ie%2Fabout%2Fabout-tii%2FData-Protection%2F%3Fset-lang%3Dga&t=1bed96c524b25db2ed35183935ca047dda63171b>

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For the attention of Alison Delahunty  
Fehily Timoney & Company,  
Core House,  
Pouladuff Road,  
County Cork,  
T12 D773

**By Email:** [cloonkettwindfarm@ftco.ie](mailto:cloonkettwindfarm@ftco.ie)

**Date:** 18<sup>th</sup> September 2023

**Uisce Éireann**  
Bosca OP 6000  
Baile Átha Cliath 1  
D01 WA07  
Éire

**Uisce Éireann**  
PO Box 6000  
Dublin 1  
D01 WA07  
Ireland

**T:** +353 1 89 25000  
**F:** +353 1 89 25001  
**[www.water.ie](http://www.water.ie)**

**Re: EIA Scoping Request** – Proposed windfarm in located in south Co. Clare, near the village of Kildysart which includes lands contained within the townlands of Glenconaun More, Craghera and Cloonkett, Co. Clare.

Dear Alison Delahunty,

Uisce Éireann has received notification of your Environmental Impact Assessment (EIA) scoping request relating to Cloonkett Green Energy Ltd.'s forthcoming planning application for a windfarm in Co Clare.

Please see attached, Uisce Éireann's scoping opinion in relation to Water Services. On receipt of the planning referral, Uisce Éireann will review the finalised Environmental Impact Assessment Report (EIAR) as part of the planning process.

Queries relating to the terms and the EIA scoping opinions below should be directed to [planning@water.ie](mailto:planning@water.ie)

PP. *Ali Robinson*

---

**Yvonne Harris**

Connections and Developer Services

## Uisce Éireann's Response to EIA Scoping Requests

At present, Uisce Éireann does not have the capacity to advise on the scoping of individual projects. However, in general the following aspects of Water Services should be considered in the scope of an EIA where relevant;

- a) Where the development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann's Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of the report.
- b) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- c) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Uisce Éireann network.  
  
All pre-connection enquiry forms are available from <https://www.water.ie/connections/connection-steps/>.
- f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.
- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network.

- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.
- i) Any physical impact on Uisce Éireann assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- j) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to [datarequests@water.ie](mailto:datarequests@water.ie)
- k) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- l) Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- m) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (*and resultant potential impact on the capacity of the source*) or the potential of the development to influence / present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report.
- n) Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a "protected"/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report.
- o) Mitigation measures in relation to any of the above ensuring a zero risk to any Uisce Éireann drinking water sources (Surface and Ground water).

*This is not an exhaustive list.*

**Please note;**

- Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from Uisce Éireann ahead of any planning application.
- Uisce Éireann will not accept new surface water discharges to combined sewer networks.

## APPENDIX 5.3

A copy of the meeting minutes associated with the Strategic Infrastructure Development (SID) Pre-Planning meetings conducted with An Coimisiún Pleanála and the Pre-Planning meeting held with Clare County Council

**Our Case Number:** ABP-317616-23

**Your Reference:** Cloonkett Green Energy



An  
Coimisiún  
Pleanála

Fehily Timoney & Company  
Rita Mansfield  
Core House  
Pouladuff Road  
Cork  
Co. Cork  
T12 D773

**FEHILY TIMONEY & Co.**

Distribution

**12 AUG 2025**

Job No:

Correspondence No:

Comment:

**Date:** 11 August 2025

**Re:** Proposed wind farm development  
located in the townlands of Glenconauun More, Craghera and Cloonkett, Co. Clare.

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above-mentioned pre-application consultation request.

Please find enclosed a copy of the written record of the meeting of the 17<sup>th</sup> July 2025.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission.

Please quote the above-mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Lauren Murphy  
Executive Officer  
Direct Line: 01-8737275

PC07

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1 AUG 2004

Joe Kelly

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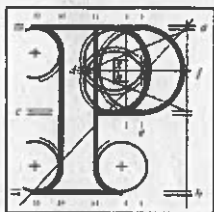
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An  
Coimisiún  
Pleanála

**Record of 3<sup>rd</sup> Meeting**  
**ABP-317616-23**

|                                                                                  |                              |                   |        |
|----------------------------------------------------------------------------------|------------------------------|-------------------|--------|
| <b>Case Reference / Description</b>                                              | ABP-317616-23                |                   |        |
| <b>Case Type</b>                                                                 | Pre-application consultation |                   |        |
| <b>1<sup>st</sup> / 2<sup>nd</sup> / 3<sup>rd</sup> / 4<sup>th</sup> Meeting</b> | 3 <sup>rd</sup> Meeting      |                   |        |
| <b>Date</b>                                                                      | 17 <sup>th</sup> July 2025   | <b>Start Time</b> | 2:30pm |
| <b>Location</b>                                                                  | MS Teams                     | <b>End Time</b>   | 3:40pm |

|                                                    |
|----------------------------------------------------|
| <b>Representing An Coimisiún Pleanála</b>          |
| Una Crosse, Assistant Director of Planning (Chair) |
| Liam Bowe, Senior Planning Inspector               |
| Fiona Patterson, Ecologist & Environmentalist      |
| Lauren Murphy, Executive Officer                   |

|                                               |
|-----------------------------------------------|
| <b>Representing the Prospective Applicant</b> |
| Jim Hughes, Fehily Timoney Company            |
| Evan Rossiter, Fehily Timoney Company         |
| Trevor Byrne, Fehily Timoney Company          |
| David McDonnell, Greensource                  |

|                            |
|----------------------------|
| Noreen Layden, Greensource |
| Emmeline Cosnett, APEM     |

## **Introduction**

The Meeting commenced at 2:30pm.

The Commission referred to the letter received from the prospective applicant on the 24<sup>th</sup> of June 2025, requesting a third pre-application meeting under section 182E of the Planning and Development Act 2000, as amended, and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Commission; it also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters that it wished to receive advice on from the Commission. The Commission's representatives mentioned the following general procedures in relation to the pre-application consultation process:

- The Commission will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Commission once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- The Commission will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Commission and public consultations may also be directed by the Commission.
- The Commission may hold consultations in respect of the proposed development with other bodies.

- The holding of consultations does not prejudice the Commission in any way and cannot be relied upon in the formal planning process or in any legal proceedings.

**Presentation made by the prospective applicant:**

The prospective applicant began the presentation by providing a brief introduction of the applicant, agent and supporting consultants working on the project.

The prospective applicant provided a detailed outline of development updates since the beginning of the consultation, with a revised layout of 14 number wind turbines with an estimate of 63MW maximum export capacity.

Following on the prospective applicant presented a finalised red line boundary for the proposed development complaining it to the previously presented red line boundary.

The prospective applicant presented a drawing and discussed in detail the proposed turbine delivery route (TDR), discussing the proposed route and temporary works needed to facilitate the TDR.

The prospective applicant discussed consultations to date in relation to the proposed development and discussed feedback received from prescribed bodies such as Inland Fisheries Ireland, National Parks and Wildlife Services, Eigrid, Clare County Council Roads Department and Clare County Council.

The prospective applicant provided clarification in relation to the meeting record issued following the previously held meeting consultation held in March 2025.

The prospective applicant concluded the presentation by raising queries in relation to the submission of the planning application, these queries were addressed during the meetings discussion.

## **Discussion:**

- The Commission's representatives began the discussion by clarifying the points raised by the prospective applicant. They clarified that the Commission would accept a formal closure request of the pre application consultation once the meeting record for this meeting has been issued.
- The Commission's representatives also advised that it is required that 2 hard copies and 8 soft copies of the planning application are submitted to the Commission when making a Strategic Infrastructure Application. The Commissions representatives also clarified that they recommend the public submission period to begin a minimum of 5 working days after the planning application is submitted.
- The Commissions representatives clarified that the presented drawing scales within the meeting presentation are acceptable.
- The Commission's representatives advised the prospective applicant to ensure that the 6 number masts are presented and addressed within the Landscape and Visual Impact Assessment along with the wind turbines.
- Following a query raised by the prospective applicant in relation to protected species, the Commission's representatives advised that all documentation submitted as part of the planning application must be made publicly available.
- The Commission's representatives sought clarity from the prospective applicant in relation to derogation of species, the prospective applicant clarified that there is no derogation of species on the proposed development site.
- Following clarity sought from the Commission's representatives the prospective applicant advised that they have assessed horseshoe bat foraging routes and foraging habitats and the impact for potential loss of foraging habitats. The prospective applicant also advised that the works done to protect the onsite Horseshoe bat roost have already been carried out and will be included in the appendix of the Environmental Impact Assessment Report (EIAR) of the planning application documentation.
- The Commission's representatives advised the prospective applicant to ensure any surveys of temporary works are covered in the EIAR and ensure they are using best practice guidelines and ensure their survey data is up to date.

- Following on the Commission's representatives advised the prospective applicant to ensure there are no connections of the Horseshoe bats on site to Special Area of Conservations.
- The Commission's representatives note that the prospective applicant has received feedback from the National Parks and Wildlife Services and advised that all issues are ironed out prior to submission of the planning application.
- The Commission's representatives advised the prospective applicant to ensure they are addressing site specific objectives such as Special Protection Areas and Special Areas of Conservation located in proximity of the proposed development site.
- Following on the Commission's representatives advised the prospective applicant to ensure other developments which are currently in commission or currently in the planning process with the Commission and the Planning Authorities are addressed in the cumulative impacts.
- The Commission's representatives advised the prospective applicant to ensure that roads and townlands are clearly identified, and the red line boundary is consistent across all drawings submitted as part of the planning application.
- Following on from a query raised by the prospective applicant, the Commissions representatives advised that they can't advise on the process of the Renewable Energy Directive III as it has not yet been enacted.

**Conclusion:**

The Commission's representatives advised that the record of the instant meeting will be issued to the prospective applicant following the closure of the meeting and that on receipt of the record the prospective applicant can submit any comments it may have in writing. The Commission's representatives also stated that the timeline around the determination of the request was with the Commission, that there was no requirement for the prospective applicant to formally request closure of the consultation process and that it would give the Commission clarity if the prospective applicant could inform the Commission if it had any comments on the draft record. The Meeting concluded at 3:40pm.

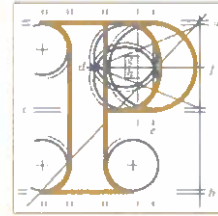


**Una Crosse**

**Assistant Director of Planning**

**Our Case Number:** ABP-317616-23

**Your Reference:** Cloonkett Green Energy



An  
Bord  
Pleanála

Fehily Timoney & Company  
Rita Mansfield  
Core House  
Pouladuff Road  
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T12 D773

**FEHILY TIMONEY & Co.**

Distribution **TB.**

**18 MAR 2025**

Job No: **P22-125**

Correspondence No:

Comment:

**Date:** 14 March 2025

**Re:** Proposed wind farm development  
located in the townlands of Glenconaun More, Craghera and Cloonkett, Co. Clare.

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer further to the above-mentioned pre-application consultation request.

Please find enclosed a copy of the written record of the meeting of the 4<sup>th</sup> March 2025.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

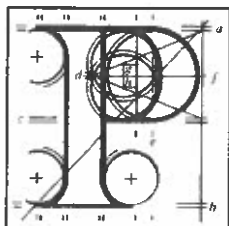
  
\_\_\_\_\_  
Lauren Murphy  
Executive Officer  
Direct Line: 01-8737275

PC07

|                    |         |                                                        |
|--------------------|---------|--------------------------------------------------------|
| Tel                | Tel     | (01) 858 8100                                          |
| Glao Áitiúil       | LoCall  | 1800 275 175                                           |
| Facs               | Fax     | (01) 872 2684                                          |
| Láithreán Gréasáin | Website | <a href="http://www.pleanala.ie">www.pleanala.ie</a>   |
| Ríomhphost         | Email   | <a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a> |

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| Baile Átha Cliath 1  | Dublin 1              |
| D01 V902             | D01 V902              |





An  
Bord  
Pleanála

## Record of 2<sup>nd</sup> Meeting ABP-317616-23

|                                                                                  |                              |                   |        |
|----------------------------------------------------------------------------------|------------------------------|-------------------|--------|
| <b>Case Reference / Description</b>                                              | ABP-317616-23                |                   |        |
| <b>Case Type</b>                                                                 | Pre-application consultation |                   |        |
| <b>1<sup>st</sup> / 2<sup>nd</sup> / 3<sup>rd</sup> / 4<sup>th</sup> Meeting</b> | 2 <sup>nd</sup> Meeting      |                   |        |
| <b>Date</b>                                                                      | 4 <sup>th</sup> March 2025   | <b>Start Time</b> | 2:30pm |
| <b>Location</b>                                                                  | MS Teams                     | <b>End Time</b>   | 3:40pm |

### Representing An Bord Pleanála

Una Crosse, Assistant Director of Planning (Chair)

Liam Bowe, Senior Planning Inspector

Fiona Patterson, Ecologist & Environmental Specialist

Lauren Murphy, Executive Officer

### Representing the Prospective Applicant

Jim Hughes, Fehily Timoney Company

Trevor Byrne, Fehily Timoney Company

Aaron Clarke, Fehily Timoney Company

David McDonnell, Greensource

Noreen Layden, Greensource

|                            |
|----------------------------|
| Nadine Walsh, Greensource  |
| Michael Dobson, APEM       |
| Emmeline Cosnett, APEM     |
| Richard Barker, MacroWorks |
| Peter Connell, MacroWorks  |

## **Introduction**

The Board referred to the letter received from the prospective applicant on the 7<sup>th</sup> of February 2025, requesting a second meeting for pre-application consultations under section 37B of the Planning and Development Act 2000, as amended, and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board; it also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters that it wished to receive advice on from the Board. The Board's representatives mentioned the following general procedures in relation to the pre-application consultation process:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or in any legal proceedings.

**Presentation made by the prospective applicant:**

The prospective applicant's presentation, which is on file, outlined that the proposed development site is located within an area designated as 'Acceptable in Principle' for wind energy developments in the Clare County Development Plan 2023-2029.

The prospective applicant provided an update on the proposed development by providing a site location drawing and comparing the proposed development discussed at the first meeting in 2023 and the revised proposed development as of 2025. The updated proposed development is intended to have a total Maximum Export Capacity of 63MW.

The prospective applicant presented drawings of the proposed site layout plan including the locations of the turbines, ancillary development and the proposed on-site 220kV loop in loop out substation.

The landscape and visual assessment studies to date were discussed presenting a drawing of the 20km radius from the perimeter of the turbine array, following on with photomontage samples from Viewpoints 6-8.

The prospective applicant discussed the ecological surveys carried out to date and the important ecological features that have been assessed in detail in relation to the proposed development. The prospective applicant described the proposed biodiversity enhancement and management plan (BEMP) as noted in the prospective applicant presentation. They also discussed in detail their surface water quality monitoring programme 2024-2025.

The prospective applicant concluded their presentation by discussing their community engagements to date and the proposed project next steps.

#### **Discussion:**

- The Boards representatives began the discussion by asking the prospective applicant to further discuss the refinement of the red line boundary which was discussed during the presentation. The prospective applicant advised that the red line boundary shown in the presentation is the Environmental Impact Assessment study area and some elements may be refined. The Boards representatives advised that the application boundary is submitted to the Board prior to seeking closure of the pre-application process.

- The Boards representatives asked the prospective applicant to clarify the number of masts which will be included as part of the development of the proposed 220kV line which was clarified as 5-6 masts with 4 double circuit pylons located on the site.
- The prospective applicant clarified that since the 1<sup>st</sup> pre application meeting they have since been in discussions with EirGrid. The prospective applicant advised that they no longer propose to connect to Moneypoint substation, and that a new on-site substation is now proposed.
- Following a query from the Boards representatives the prospective applicant clarified that the Landscape and Visual Assessment Viewpoints will be submitted, in the correct scale in accordance with the guidelines set out for visualisation of wind farms.
- The Boards representatives referenced the NIS being prepared, noting the hydrological connection from the proposed development site to the Cloon River and the Lower River Shannon Special Area of Conservation (Site Code: 002165) and advised the prospective applicant to ensure that their surveys follow best practice guidelines and that sufficient data relevant to the SAC qualifying interests is collected to ensure a thorough assessment can be carried out. In particular, a robust Water Quality Management Plan would be required given the presence of freshwater pearl mussel in the Cloon river downstream of the proposed development site.
- Following on from a query raised by the Boards representatives the prospective applicant advised that the proposed NIS and the BEMP will include mitigation measures to ensure negative impacts from the proposed development are minimised/avoided.
- In response to a query on other species or habitats within or surrounding the proposed development site, not yet addressed including salmon and otters, the prospective applicant clarified that whilst electro fishing has not been undertaken, fish habitat studies indicate a good population of brown trout rather than salmon. In relation to otters, no evidence has emerged of same within the site, but they may use tributaries within the area.
- The Lesser Horseshoe Bat (LHSB) roost within the site was discussed with the prospective applicant clarifying that this roost is a maternity roost and not a

winter hibernation route and the nearest LHSB SAC Special Area of Conservation (SAC) is also a maternity roost which leads the prospective applicant to believe that there is minimal connection between both. The prospective applicant also advised that they are in consultation with the National Parks and Wildlife Services (NPWS) in relation to the proposed LHSB Conservation Plan.

- The prospective applicant clarified that there have been a number of bat species identified, which will be addressed in the biodiversity chapter of the EIAR submitted with the planning application.

The prospective applicant advised that there is fragmented raised bog located on the proposed development site. The prospective applicant advised that they have carried out peat probing surveys on site with the deepest peat depth noted as 6.8 metres. A Peatland Management and Enhancement Plan is being prepared to identify areas on the proposed development site which are suitable for peat deposition and enhancement.

- Following on from a query raised by the Boards representatives, the prospective applicant stated that they do not have the exact dimensions of the proposed onsite 220kV substation but noted that the tallest proposed building compound is approximately 18 metres tall and that they would have transformers located on site.
- The prospective applicant clarified that there will be no blasting carried out during the construction phase of the proposed development however there will be piling required at the location of one turbine.
- The prospective applicant advised that the proposed development site is located approximately 16km from Shannon Airport and is located on the periphery of their zone of interest, but they have still engaged with both AirNav or Shannon Airport.
- The Boards representatives advised the prospective applicant to consider the proposed development within the context of the wider policies and objectives in the County Development Plan.
- The prospective applicant confirmed that a Battery Energy Storage System is not proposed as part of the proposed development.

- The Boards representatives noted that the Board have previously accepted applications incorporating both the wind energy and grid connection proposals under s.37, however the final decision on the most appropriate way to present the application was for the prospective applicant informed by their own advisers. It was clarified that to submit an application for the grid connection under Section 182B would require separate consultations are undertaken under Section 182E.
- The Boards representatives also referenced the impending transposition of the Renewable Energy Directive (RED III), which limits the Boards ability to seek further information necessitating that the application is robust.

**Conclusion:**

The Board's representatives advised that the record of the instant meeting will be issued to the prospective applicant following the closure of the meeting and that on receipt of the record the prospective applicant can submit any comments it may have in writing which would be attached to the file. The Board would await the applicants request to either seek another meeting or request closure of the process and following the closure request that a determination would be made by the Board following receipt of the Inspectors report.

The Meeting concluded at 3:40pm.



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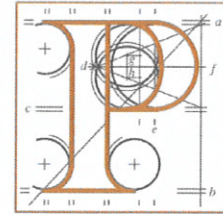
**Una Crosse**

**Assistant Director of Planning**



**Our Case Number:** ABP-317616-23

**Your Reference:** Cloonkett Green Energy



An  
Bord  
Pleanála

Fehily Timoney & Company  
Core House  
Pouladuff Road  
Cork  
Co. Cork  
T12 D773

**Date:** 18 October 2023

**Re:** Proposed wind farm development  
located in the townlands of Glenconaun More, Craghera and Cloonkett, Co. Clare.

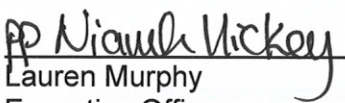
Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer further to the above-mentioned pre-application consultation request.

Please find enclosed a copy of the written record of the meeting of the 5th October 2023.

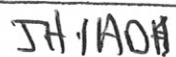
If you have any queries in the meantime, please contact the undersigned officer of the Board or email [sids@pleanala.ie](mailto:sids@pleanala.ie) quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,

  
Lauren Murphy  
Executive Officer  
Direct Line: 01-8737275

PC07

**FEHILY TIMONEY & Co.**

Distribution 

19 OCT 2023

Job No:

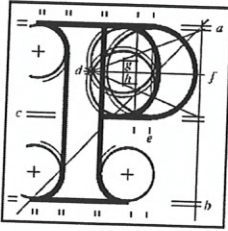
Correspondence No:

Comment:

|                    |         |                                                        |
|--------------------|---------|--------------------------------------------------------|
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| Glaio Áitiúil      | LoCall  | 1800 275 175                                           |
| Facs               | Fax     | (01) 872 2684                                          |
| Láithreán Gréasáin | Website | <a href="http://www.pleanala.ie">www.pleanala.ie</a>   |
| Ríomhphost         | Email   | <a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a> |

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An  
Bord  
Pleanála

## Record of 1<sup>st</sup> Meeting ABP-317616-23

|                                                                                  |                                                                                                                                |                   |            |
|----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-------------------|------------|
| <b>Case Reference / Description</b>                                              | ABP-317616-23 - Proposed wind farm development located in the townlands of Glenconaun More, Craghera and Cloonkett, Co. Clare. |                   |            |
| <b>Case Type</b>                                                                 | Pre-application consultation                                                                                                   |                   |            |
| <b>1<sup>st</sup> / 2<sup>nd</sup> / 3<sup>rd</sup> / 4<sup>th</sup> Meeting</b> | 1 <sup>st</sup>                                                                                                                |                   |            |
| <b>Date</b>                                                                      | 05/10/2023                                                                                                                     | <b>Start Time</b> | 11:00 a.m. |
| <b>Location</b>                                                                  | Virtually                                                                                                                      | <b>End Time</b>   | 12:30 p.m. |

|                                                      |
|------------------------------------------------------|
| <b>Representing An Bord Pleanála</b>                 |
| <b>Staff Members</b>                                 |
| Paul Caprani, Assistant Director of Planning (Chair) |
| Liam Bowe, Senior Planning Inspector                 |
| Niamh Hickey, Executive Officer                      |

|                                               |
|-----------------------------------------------|
| <b>Representing the Prospective Applicant</b> |
| Nadine Walsh, Greensource                     |
| Noreen Layden, Greensource                    |
| David McDonnell, Greensource                  |
| Imelda Barry, Greensource                     |
| Alison Delahunty, Fehily Timoney              |
| Jim Hughes, Fehily Timoney                    |
| Michael Dobson, Woodrow APEM                  |

## Introduction

The Board referred to the letter received from the prospective applicant on the 20<sup>th</sup> July 2023, requesting pre-application consultations under section 37B of the Planning and Development Act 2000, as amended, and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board; it also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters that it wished to receive advice on from the Board. The Board's representatives mentioned the following general procedures in relation to the pre-application consultation process:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or in any legal proceedings.

### **Presentation made by the prospective applicant:**

The prospective applicant gave a brief overview and background of the applicant's company, it is an Irish renewable energy company based in Adare, Co. Limerick and it mainly focuses on onshore wind development. The proposed development's goal is to provide clean wind energy to up to 50,000 households.

The prospective applicant introduced the agent Fehily Timoney and the other companies that will be working on the proposed development such as Collett, TNEI, John Cronin and Associates, Woodrow APEM Group and Macroworks APEM Group.

The prospective applicant spoke about the targets of the National Climate Action Plan 2023 and noted that in 2020 only 42% of all electricity generated was from renewable sources. The proposed development has the potential to provide up to 67.5MW of renewable electricity or power for up to 45,000 homes which would contribute to more than 1% of the 6GW national onshore target for 2025. Regarding the Clare County Development Plan, the prospective applicant demonstrated on the map presented that the proposed development was in an 'Acceptable in Principle Area'.

The prospective applicant provided a summary of the proposed development which will consist of up to 17 turbines, with a tip height of 150m and power rating of 4.5MW. The exact maximum export capacity will depend on the design and type of turbines selected. There will be a 110kV substation as part of the proposed development and the grid connection is proposed to be underground to the 400kV Moneypoint substation. The prospective applicant also noted there will be new internal roads and ancillary civil and electrical infrastructure.

The prospective applicant showed a map of the proposed location. It is approximately 21km southwest of Ennis and 20km northeast of Kilrush. It is located in the townlands of Glenconauun More, Craghera, Cloonkett and the Electoral Divisions of Killadysert and Kilfiddane. The prospective applicant also presented a

map of the preliminary site layout. The prospective applicant stated that in the initial design process 16 turbines were chosen, this was then further refined to 17 turbines. Based on the outcome of geological, hydrological, and ecological surveys, and archaeological and noise monitoring assessments, the turbines were reduced to 15 turbines. Surveys are still ongoing in regard to the design process.

The prospective applicant stated that it has 5 indicative grid route options, all of which are underground. A constraint's assessment was carried out which identified 2 preferred grid route options. Regarding the turbine delivery route, 2 preferred options are also being considered. Environmental and archaeology surveys are both ongoing for the 2 grid route options and the two turbine delivery route options.

The prospective applicant discussed the progress of the application to date.

The prospective applicant stated that there are 58 receptors in a 1km radius of the proposed development and 169 receptors within a 2km radius of the proposed development. The prospective applicant stated that it is committed to achieving a 4x tip height buffer to all dwellings, except for landowners involved in the project.

The prospective applicant discussed the landscape and visual impact of the proposed site. The prospective applicant stated that the visual impact was assessed within a 20km radius of the turbine array. The site is set within farmland, conifer forestry, bog and residences. The nearest scenic route is the R473 between Killadysert and Labasheeda, approximately 4km south of Turbine T13. Viewpoints are currently being assessed.

The prospective applicant stated that the noise model is being carried out in accordance with the Wind Energy Development Guidelines 2006. If revised guidelines are issued prior to the submission of the application, a second model will be produced. Baseline noise monitoring at noise assessment locations was carried out between April and May 2023. Noise modelling is currently underway.

The prospective applicant noted that the proposed site does not attract any nature conservation designations, but the Lower River Shannon Special Area of Conservation (SAC) and the River Shannon and River Fergus Estuaries Special Protection Area (SPA) have downstream hydrological connections with the proposed site. Regarding significant effects on these, there are ongoing bird studies for the River Shannon and River Fergus SPA which will investigate how regularly the birds utilise the area. For the Lower River Shannon SAC, studies will be carried out on how downstream water quality and how highly sensitive aquatic species such as freshwater pearl mussel may be affected by the proposed development.

The prospective applicant gave a summary of the survey progress to date, including bird and bat surveys, protected mammals, avifauna, marsh fritillary, habitat surveys and aquatic surveys.

The prospective applicant also gave an overview of the hydrology, geology and hydrogeology of the proposed site.

A project website was set up in August. Letters and leaflets were issued to all residents within 2km of the proposed site. Door to door consultations were then carried out with residents 1km from the proposed development. The overall feedback has been positive. There is a phone line and email address that is monitored daily. A community event is proposed to be held once the surveys have been completed.

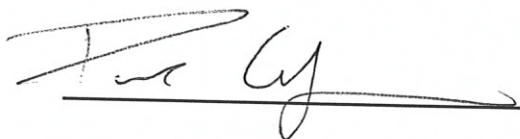
The prospective applicant provided an overview of the next steps in the application and gave their view that the proposed development constitutes strategic infrastructure development.

## Discussion:

- The Board's representatives gave their preliminary view that the proposed development may be considered strategic infrastructure development but noted that the final decision would be a matter for the Board. The Board's representatives also requested the prospective applicant to provide clarity to the Board once they have finalised the number of turbines for the proposed development. The Board's representatives noted that if the proposed development would fall below the 50MW threshold for strategic infrastructure development following the completion of the peat surveys, it would fail to qualify as strategic infrastructure. The prospective applicant stated that it will keep the Board up to date in this regard and may require a second meeting.
- The Board's representatives queried if the prospective applicant has followed the advice regarding surveys from the National Parks and Wildlife Services (NPWS). The prospective applicant has adopted the best practice guidelines regarding surveys. The prospective applicant has had discussions with the NPWS also.
- The Board's representatives highlighted the importance of engaging with the NPWS and Clare County Council.
- The Board's representatives advised the prospective applicant that there is a designated scenic route on the Limerick side of the Shannon Estuary from Foynes to Glin that was not noted by the prospective applicant and that this should be included in any visual impact assessment.
- The Board's representatives advised the prospective applicant to have regard to the 2019 Draft Windfarm Guidelines in relation to noise. The prospective applicant stated that it focuses on best practice guidelines in relation to Noise.
- The Board's representatives advised that the cumulative impacts regarding surrounding windfarms are to be fully addressed.

**Conclusion:**

The Board's representatives advised that the onus is on the prospective applicant to either request a further meeting or formal closure of the instant pre-application consultation process. The Board's representatives advised that the record of the instant meeting will be issued in the meantime and that the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting.

A handwritten signature in black ink, appearing to read 'Paul Caprani', is written over a horizontal line.

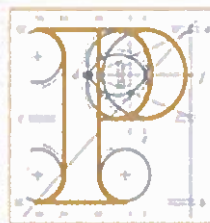
**Paul Caprani**

**Assistant Director of Planning**



**Our Case Number:** ABP-317616-23

**Your Reference:** Cloonkett Green Energy



An  
Coimisiún  
Pleanála

Fehily Timoney & Company  
Rita Mansfield  
Core House  
Pouladuff Road  
Cork  
Co. Cork  
T12 D773

**FEHILY TIMONEY & Co.**

Distribution TB /HH

18 SEP 2025

Job No: P22-125

Correspondence No:

Comment:

**Date:** 17 September 2025

**Re:** Proposed wind farm development  
located in the townlands of Glenconau More, Craghera and Cloonkett, Co. Clare.

Dear Sir / Madam,

Please be advised that following consultations under section 37B of the Planning and Development Act, 2000 as amended, the Commission hereby serves notice under section 37B(4)(a) that it is of the opinion that the proposed development falls within the scope of paragraphs 37A(2)(a), (b) and (c) of the Act. Accordingly, the Commission has decided that the proposed development would be strategic infrastructure within the meaning of section 37A of the Planning and Development Act 2000, as amended. Any application for permission for the proposed development must therefore be made directly to An Coimisiún Pleanála under section 37E of the Act.

Please also be informed that the Commission considers that the pre-application consultation process in respect of this proposed development is now closed.

Attached is a list of prescribed bodies to be notified of the application for the proposed development.

1. Minister for Housing, Local Government and Heritage (DAU)
2. Minister for Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media
3. Minister for Agriculture, Food and the Marine
4. Minister for the Climate, Energy and the Environment
5. Minister for Transport
6. Clare County Council
7. Environmental Protection Agency
8. Transport Infrastructure Ireland
9. The Southern Regional Assembly
10. Irish Aviation Authority
11. An Taisce
12. Fáilte Ireland
13. The Heritage Council
14. An Chomhairle Ealaíon

Tell  
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Facs  
Láithreán Gréasáin  
Ríomhphost

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Email communications@pleanala.ie

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FEHLY TIMONEY & CO.

Distribution

18 SEP 2002

Job No.

Comments

Comments

15. Fáilte Ireland
16. Uisce Éireann
17. Commission for Regulation of Utilities, Water and Energy
18. Inland Fisheries Ireland
19. Office of Public Works
20. GSI
21. HSE
22. Limerick County Council
23. Kerry County Council
24. Southern Regional Assembly

Further notifications should also be made where deemed appropriate.

In accordance with section 146(5) of the Planning and Development Act, 2000 as amended, the Commission will make available for inspection and purchase at its offices the documents relating to the decision within 3 working days following its decision. This information is normally made available on the list of decided cases on the website on the Wednesday following the week in which the decision is made.

The following information relates to challenges to the validity of a decision of An Coimisiún Pleanála under the provisions of the Planning and Development Act 2000, as amended.

#### **Judicial review of An Coimisiún Pleanála decisions under the provisions of the Planning and Development Acts (as amended).**

A person wishing to challenge the validity of a Commission decision may do so by way of judicial review only. Sections 50, 50A and 50B of the Planning and Development Act 2000 (as substituted by section 13 of the Planning and Development (Strategic Infrastructure) Act 2006, as amended/substituted by sections 32 and 33 of the Planning and Development (Amendment) Act 2010 and as amended by sections 20 and 21 of the Environment (Miscellaneous Provisions) Act 2011) contain provisions in relation to challenges to the validity of a decision of the Commission.

The validity of a decision taken by the Commission may only be questioned by making an application for judicial review under Order 84 of The Rules of the Superior Courts (S.I. No. 15 of 1986). Sub-section 50(7) of the Planning and Development Act 2000 requires that subject to any extension to the time period which may be allowed by the High Court in accordance with subsection 50(8), any application for judicial review must be made within 8 weeks of the decision of the Commission. It should be noted that any challenge taken under section 50 may question only the validity of the decision and the Courts do not adjudicate on the merits of the development from the perspectives of the proper planning and sustainable development of the area and/or effects on the environment. Section 50A states that leave for judicial review shall not be granted unless the Court is satisfied that there are substantial grounds for contending that the decision is invalid or ought to be quashed and that the applicant has a sufficient interest in the matter which is the subject of the application or in cases involving environmental impact assessment is a body complying with specified criteria.

Section 50B contains provisions in relation to the cost of judicial review proceedings in the High Court relating to specified types of development (including proceedings relating to decisions or actions pursuant to a law of the state that gives effect to the public participation and access to justice provisions of Council Directive 85/337/EEC i.e. the EIA Directive and to the provisions of Directive 2001/12/EC i.e. Directive on

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Website [www.pleanala.ie](http://www.pleanala.ie)  
Email [communications@pleanala.ie](mailto:communications@pleanala.ie)

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D01 V902

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Dublin 1  
D01 V902



the assessment of the effects on the environment of certain plans and programmes). The general provision contained in section 50B is that in such cases each party shall bear its own costs. The Court however may award costs against any party in specified circumstances. There is also provision for the Court to award the costs of proceedings or a portion of such costs to an applicant against a respondent or notice party where relief is obtained to the extent that the action or omission of the respondent or notice party contributed to the relief being obtained.

General information on judicial review procedures is contained on the following website,  
[www.citizensinformation.ie](http://www.citizensinformation.ie).

Disclaimer: The above is intended for information purposes. It does not purport to be a legally binding interpretation of the relevant provisions and it would be advisable for persons contemplating legal action to seek legal advice.

If you have any queries in the meantime, please contact the undersigned officer of the Commission or email [sids@pleanala.ie](mailto:sids@pleanala.ie) quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,



Lauren Murphy  
Executive Officer  
Direct Line: 01-8737275

PC09

**Teil**  
**Glaó Áitiúil**  
**Facs**  
**Láithreán Gréasáin**  
**Ríomhphost**

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**Website**  
**Email**

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## **PPI – 25-17 – Cloonkett Green Energy Ltd.**

### **MS Teams Meeting at 12pm on the 25<sup>th</sup> June 2025**

Proposal for 14 no wind turbines, access tracks, substations, borrow pits and cabling.

#### In attendance:

##### Clare County Council

- Garreth Ruane – Senior Executive Planner
- Sheila Downes – Environmental Assessment Officer
- Brian Murphy – Road Design Office
- Alan Kennelly – West Clare Municipal District Engineer

##### Applicants:

- Evan Rossiter
- David McDonnell
- Jim Hughes
- Nadine Walsh
- Noreen Leyden
- Richard Barker
- Trevor Byrne

#### Issues discussed:

Applicants gave an overview of the project:

- 14 no. turbines, 150m in height, 4.5MW per turbine, output of 63MW.
- Vestas V136 turbines proposed
- No connection to Moneypoint – on site loop-in/loop-out
- 5 Borrow pits on site
- 27 Viewpoints – local points considered – designated as ‘Acceptable in Principle’ in the Dev Plan

Biodiversity (CIEEM) 2018

Lesserhorse shoe bats on site

Habitats mapped on site

FWPM – population in the Cloon River – some at the confluence of the Cloonkett Stream and Cloon River

Peatland – 73.5ha

1 WFD river crossing on site

SD:

- Proposal located along the catchment of the Clondrinagh River which flows into the Cloon River which is designated as part of the Lower River Shannon SAC for the presence of the Freshwater Pearl Mussel.
- This is one the 27 SACs for the species in Ireland and is currently at unfavourable conservation status. The Draft Cloon Sub-Basin Management Plan identified this upper reaches of the catchment as predominately peat substrate which pose a significant risk in terms of future development and in particular wind farm developments which require the excavation of considerable depths of soil.
- The Freshwater Pearl Mussel Regulations 2009<sup>1</sup> require that there are no artificially elevated levels of siltation present at the pearl mussel habitat. Given the location of the proposal which is located upstream of the known pearl mussel records and habitats, careful consideration as to the appropriateness of the application in this location in the context of the pearl mussel regulations, the sub-basin management plan and the recently published “Guidance on assessment and construction management in *Margaritifera* catchments in Ireland”<sup>2</sup> should be undertaken.
- Freshwater pearl mussel are extremely sensitive to changes within the catchment and therefore maintaining the equilibrium of the habitat (especially in the upper reaches of the catchment) with stable substrate, high velocity, and low levels of fine sediment and nutrients is essential and relies on sustaining a natural hydrological regime through the catchment. Demonstrating this ability will be key to any future application.

AK:

Route identification – bridges/culverts to be surveyed beforehand

- L-6180 is narrow in parts
- Concrete trucks will still be required
- Not going underground with cables is positive
- If underground new Circular/Guidance on grid connections
- Any roads to be reinstated as currently exist.

GR

- Site is designated as ‘acceptable in principle’ in the Development Plan.
- Noted that the Wind Energy Strategy has been in place for sometime however not be changed until the Wind farm Guidelines have been published.
- Noted also however the Climate targets at national and EU level.
- Application will be made directly to ACP as an SID application – meeting with ACP to occur shortly.

---

<sup>1</sup> [S.I. No. 296/2009 - The European Communities Environmental Objectives \(Freshwater Pearl Mussel\) Regulations 2009](#)

<sup>2</sup> [Margaritifera-Guidance\\_Ireland\\_Final-1.pdf](#)

- Some concerns re proliferation of windfarms in West Clare and adhoc development of turbines in the wider area.
- Visual impact – some concern re views from the estuary. Noted that windfarms presently located to the north of the N68 – proposal would be to the south of the N68 -
- Concerns also in terms of proliferation of windfarms and relevant Development Plan policies in respect of protecting amenities.
- Noted that 25 landholders involved.
- Cumulative impact of the development needs to be considered in particular in terms of the visual impact and existing/permitted windfarms.
- Importance of public consultation
- Application, if SID, will be made directly to ACP and the Council will provide a report to the Commission as part of any such process.



---

Garreth Ruane  
Sen Executive Planner  
25<sup>th</sup> June 2025

## APPENDIX 5.4

A copy of the information documents associated with the public consultation for the proposed development

# COMMUNITY ENGAGEMENT REPORT



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## Report Objective

The purpose of this report is to set out the method by which Cloonkett Green Energy initiated and carried out meaningful community consultation and engagement in the geographical area surrounding the site of the proposed development. This consultation process represents Cloonkett Green Energy's continued commitment to actively engaging with the community, valuing their contributions and involvement, and ensuring their views and queries are taken into consideration during the planning for the proposed development.

## Community Engagement Guidelines

In relation to national guidance on community engagement and consultation for wind energy developments, the Wind Energy Development Guidelines (Department of Environment, Heritage and Local Government, 2006) state that, "While it is not a mandatory requirement, it is strongly recommended that developers of a wind energy project should engage in active consultation and dialogue with the local community at an early stage in the planning process, ideally prior to submitting a planning application". The Draft Revised Wind Energy Guidelines (Department of Housing, Planning and Local Government, 2019) build on this recommendation, and state that, "It is essential that local communities are properly involved in the planning process, as early inclusion improves confidence in the openness and fairness of the planning process". They further suggest that to promote best practice, "planning authorities should require applicants to prepare and submit a Community Report with their planning application" and that "a condition on any subsequent planning permission should require developers to carry out the development in accordance with the approved Community Report". Both the 2006 Wind Energy Development Guidelines and the 2019 Draft Revised Wind Energy Guidelines have been taken into consideration in the approach to community consultation for the proposed development in Cloonkett, County Clare. The way in which the consultation was implemented is aligned with the 'Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement'. The code's fundamental objectives are to engage with the community in an open, honest, and transparent manner, and to provide clear and understandable information to the community for meaningful feedback that can, in turn, inform the design and development process.

## Project Overview

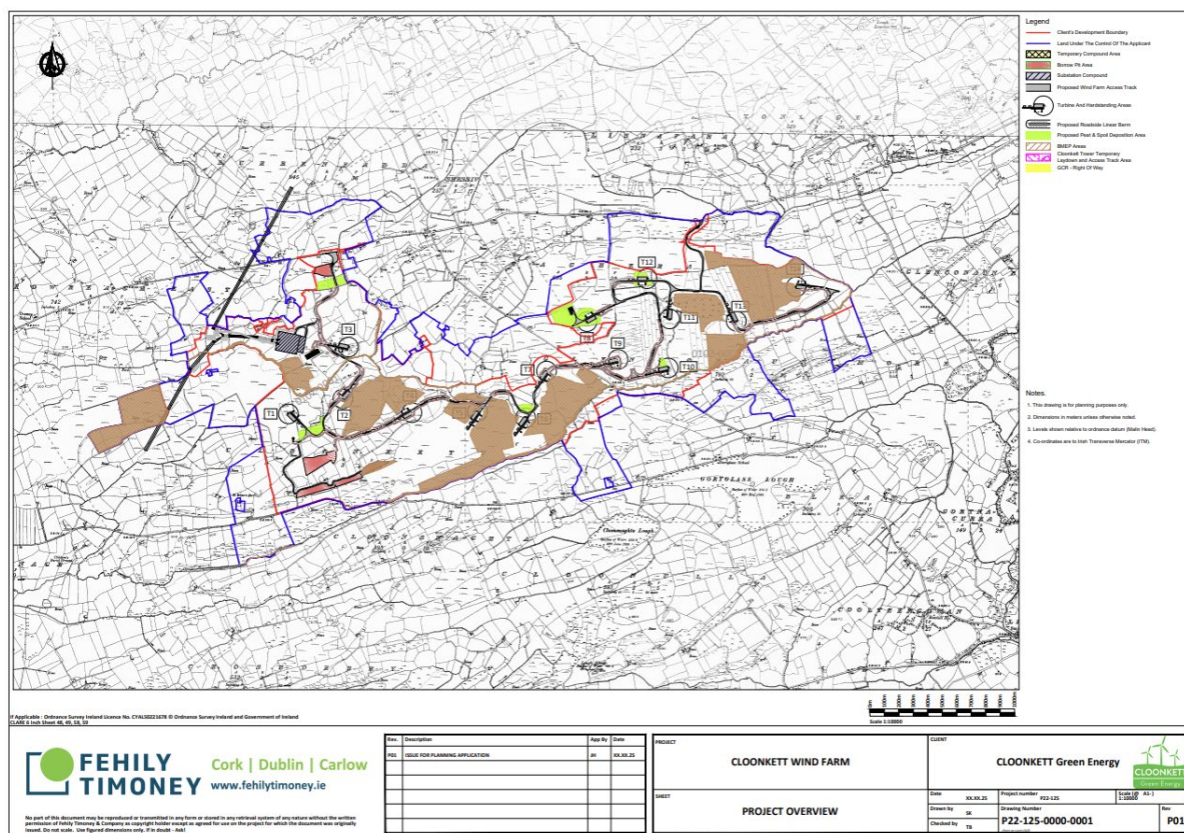
The proposed development is located (see **Figure 1**) in the townlands of Carrowreagh East, Cloondrinagh, Cloonkett, Burrenfadda, Shessiv, Craghera, and Glenconau More, near Kilrush, County Clare. The Proposed Grid Connection (GC) is wholly located within the site and includes lands in the townlands of Carrowreagh East, Cloondrinagh, and Burrenfadda. The site is located approximately 19 km south-west of Ennis, approximately 20 km north-east of Kilrush as indicated on the map in the site location section.

The Proposed Development is comprised of 14 no. turbine wind farm and associated infrastructure including internal access tracks, hard standings, permanent meteorological mast, onsite 220 kV substation and associated grid connection infrastructure, internal electrical and communications cabling, temporary construction compounds, drainage infrastructure, biodiversity enhancement measures, temporary accommodations works along the proposed Turbine Delivery Route (TDR) and all associated works related to the construction of the Proposed Development (see EIAR Chapter 2, Section 2.4).

A 10-year planning permission and 40-year operational life from the date of commissioning of the Proposed Wind Farm is being sought. This reflects the lifespan of modern-day turbines.

A permanent planning permission is being sought for the Grid Connection and onsite 220 kV substation as these will become an asset of the national grid under the management of EirGrid and will remain in place upon decommissioning of the Proposed Wind Farm

## Site Location



**Figure 1:** Proposed Cloonkett Green Energy Wind Farm Location (Source: Fehily Timoney and Company, 2025.)

## Supporting the Clare County Development Plan 2023 - 2029

The Clare County Development Plan 2023-2029 (CDP) outlines policies and objectives for sustainable growth, including initiatives focused on renewable energy. The Clare Wind Energy Strategy (contained in the Clare County Development Plan 2023 – 2029 as Volume 6) identifies the location of the proposed development as an area designated as "Acceptable in Principle" for wind energy (see **Figure 2**). Additionally, the Clare County Development Plan 2023 – 2029 (CDP), Clare Wind Energy Strategy (WES) (Volume 6 of the CDP), and Clare Renewable Energy Strategy (Volume 5 of the CDP) include several general objectives to guide wind energy development within the county, promoting sustainable energy solutions in line with national and regional policies (please refer to EIAR Volume II, Chapter 4 – Planning Policy for further information).

## Supporting the Clare Wind Energy Strategy 2023- 2029

Clare County Council aims to reduce greenhouse gases within its operations by 51% by 2030. The plan sets out key actions that will support County Clare in its transition to becoming a climate-resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy by 2050. The Clare Wind Energy Strategy (WES) 2023-2029 includes seven general objectives to guide wind energy development within the county, promoting sustainable energy solutions in line with national and regional policies.

## County Objectives

The proposed Cloonkett Green Energy wind farm project aligns with several key goals of the Clare Local Economic and Community Plan (LECP) 2024-2030 and the Clare Community Action Programme 2024 (CCAP)

### 1. Clare Local Economic and Community Plan (LECP)

#### **Goal 3: A County with Sustainable Retail, Industry, Manufacturing, and Services**

The LECP emphasises fostering sustainable industries that contribute to economic growth while minimising environmental impact. By developing a wind energy project with up to 14 turbines in the townlands of Carrowreagh East, Cloondrinagh, Cloonkett, Burrenfadda, Shessiv, Craghera, and Glenconaun More, near Kilrush, County Clare, Cloonkett Green Energy supports the establishment of a renewable energy sector, creating employment opportunities during both construction and operational phases, and promoting sustainable industrial development in the county.

#### **Goal 5: A Sustainable and Resilient County**

This goal focuses on promoting environmental sustainability and resilience to climate change. The proposed project contributes directly by generating clean, renewable energy, thereby reducing reliance on fossil fuels and lowering carbon emissions. This initiative aligns with Ireland's broader objective of transitioning to a low-carbon economy by 2050 and enhances the county's resilience against climate change impacts.

#### **Goal 6: A Collaborative, Diverse, Innovative County**

The LECP encourages collaboration and innovation across various sectors. Cloonkett Green Energy exemplifies this by engaging extensively with local landowners and communities during the pre-planning stage. This collaborative approach ensures that the benefits are shared locally and that community feedback informs the development process, fostering local ownership and partnership within the county.

In summary, the proposed development embodies the principles outlined in the Clare LECP 2024-2030 by promoting sustainable economic development, environmental stewardship, and community collaboration.

### 2. Community Climate Action Programme (CCAP)

The proposed project also aligns with the objectives of the County Clare Community Climate Action Programme<sup>1</sup> (CCAP) by contributing to the development of low-carbon, sustainable communities and supporting national climate and energy targets.

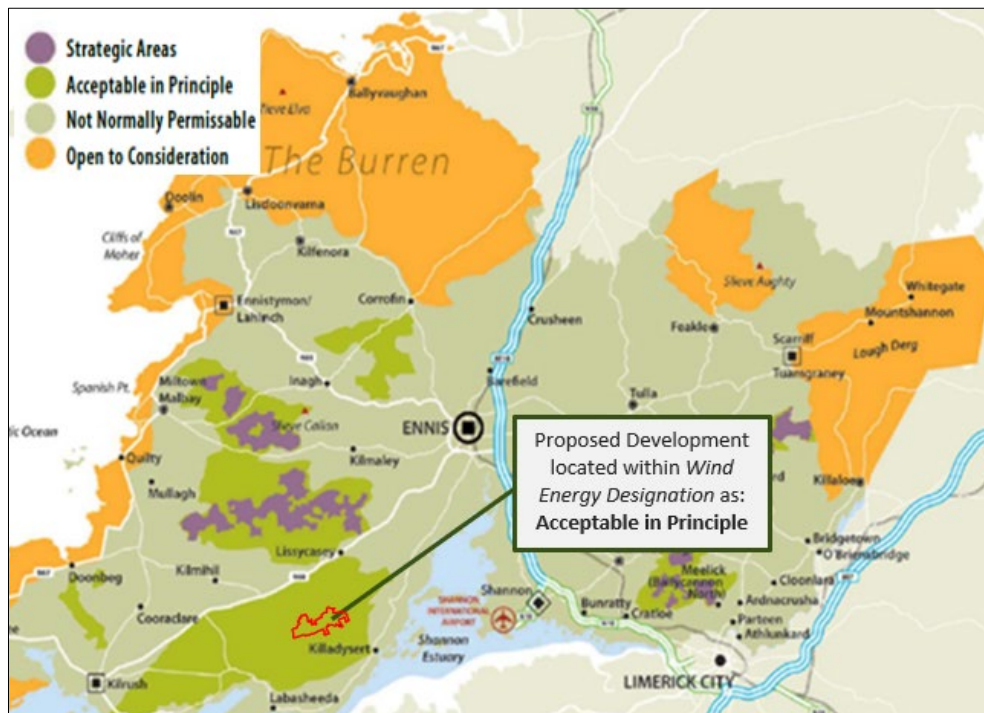
The CCAP emphasises community involvement in climate action, focusing on areas such as community energy initiatives. This initiative supports the CCAP's emphasis on community energy projects by generating clean, renewable electricity and reducing carbon emissions.

Furthermore, the CCAP encourages community engagement in climate-related projects. Cloonkett Green Energy Ltd has engaged extensively with local landowners and local residents during the pre-planning stage, ensuring that the project reflects local interests and promotes community participation.

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<sup>1</sup> [https://www.clare.ie/sites/default/files/2024-06/CCAP%202024-2027.pdf](#)

In summary, the proposed development reflects the principles of the Clare Community Climate Action Programme by advancing renewable energy development, reducing carbon emissions, and fostering community engagement in climate action initiatives



**Figure 2:** Clare County Development Plan and Proposed Site Location

## Community Benefits

- **Environmental:** Based on the current project scope, the proposed development has the potential to displace 3,476,840 tonnes of CO<sub>2</sub> over the proposed forty-year lifetime of the Proposed Development which equates to over 86,921 tonnes of CO<sub>2</sub> each year and provide the capacity to power in the region of 45,000 homes.
- **Employment:** The development will support employment in the energy supply and construction/maintenance sectors, creating approximately 76 jobs during the Construction and Decommissioning Phase with additional indirect benefits through local sourcing of materials and demand. The team is committed to working with local suppliers where possible to source engineering works, materials, equipment hire and catering.
- **Financial:** In line with the Community Benefit Fund Guidelines, as governed by the Sustainable Energy Authority of Ireland (SEAI), and based on the current project scope, the development is estimated to generate a Community Benefit Fund of €4.3 million over the first 15 years of operation. This amounts to approximately €290,000 per annum. Cloonkett Green Energy will work in partnership with local residents to form a committee to oversee the administration of the Community Benefit Fund. The committee will be established once the project has successfully completed the planning consent process and the necessary grid connection process. The value of the annual fund will be dependent upon energy production; a worked example of the community benefit fund is shown in **Figure 2** below:.

| Description                                                                               | % of Fund | Annual Amount                                                                                                                                                     |
|-------------------------------------------------------------------------------------------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Initiatives and projects that support Sustainable Development Goals within the local area | 40%       | €116,000                                                                                                                                                          |
| Local clubs, societies and near neighbours                                                | 50%       | €145,000<br>(shared between those closest to the project and the balance will be allocated to local clubs, societies and near neighbours within 2km of a turbine) |
| Administration                                                                            | 10% (Max) | €29,000                                                                                                                                                           |

**Figure 3:** Worked example of how the Community Benefit Fund is allocated

### Strategy Objectives

The primary aim of the community engagement strategy is to share project information related to the proposed development, thereby providing the community with the necessary information to form well-informed opinions about the development. It was also important to share information regarding the current climate crisis and how this development can contribute to building a more sustainable community for future generations.

### Methodology

Cloonkett Green Energy strives for transparent and interactive engagement with the communities surrounding the proposed development. The aim is to develop a wind farm that will address the four pillars of sustainability: human, social, environmental, and economic. Cloonkett Green Energy endeavours to develop these benefits in cooperation with local communities throughout the stages outlined in **Table 1** below.

**Table 1.** Summary of the Stages of Community Engagement by Cloonkett Green Energy.

| TYPE                          | STAGE 1                                                                  | STAGE 2                                                   | STAGE 3                                                            | <b>Planning<br/>Application<br/>Submission<br/>&amp; Validation</b> | STAGE 4                                                  |
|-------------------------------|--------------------------------------------------------------------------|-----------------------------------------------------------|--------------------------------------------------------------------|---------------------------------------------------------------------|----------------------------------------------------------|
| <b>Online</b>                 | Website Launch                                                           | Website updates section added with e-resources and survey | Website update with further informational materials including maps |                                                                     | Website update with notification of Planning application |
| <b>Offline</b>                | Letter & Leaflet 1                                                       | Invitation to Community Clinic                            | Letter relating to planning application                            |                                                                     | Print materials are posted where requested               |
| <b>In-Person</b>              | Door to Door                                                             | Community Clinic                                          | 1-1 Meetings                                                       |                                                                     | Additional 1-1 meetings where requested                  |
| <b>Press/<br/>Advertising</b> | Advert 1 & Press Release                                                 | Advert 2 & Press Release                                  | Advert 3: Notice of submission                                     |                                                                     | Press Statement                                          |
| <b>Print Materials</b>        | Leaflet 1                                                                | Climate Action Brochure                                   | Leaflet 2                                                          |                                                                     | Project update newsletter                                |
| <b>Community Engagement</b>   | Landowner meetings & calls to local representatives to introduce project | Email and posted invitation to Community Clinic           | Follow up on community feedback                                    |                                                                     | Continued engagement                                     |

## Community Engagement Phases

Community Engagement was undertaken in three key phases as follows:

### Phase One: Research

- **Housing Registrar:** Mapping of the area to identify houses within 2km of the project.
- **Electoral District:** Research was conducted to identify elected public representatives, including County Councillors, Government Ministers (TD's) and Senators that represent the local area.
- **Community Overview:** Using social media and online research, key community groups were identified, including schools, religious organisations, sports clubs, local charities, and businesses.

### Phase 2: Engagement



**Figure 4.** Community/ key Stakeholder communication and Engagement Channels

Our approach to community and stakeholder engagement aims to reach all community members at multiple touchpoints, from initial design stages through the pre-planning process and life span of the proposed development (i.e., construction, operation and decommissioning). **Figure 4** provides a summary of the eight key communication channels that are used, to build and maintain relationships with the local community. We will review these channels and take on board stakeholder feedback to optimise the engagement process and ensure it continues to evolve and remain relevant life cycle of the proposed development. The aim of this eight-point interaction process is to provide residents and other key stakeholders with multiple means of communication, and numerous opportunities to share their feedback or discuss the proposed development with our community engagement team. Information on the proposed development is shared in various ways, including face-to-face meetings, video calls (upon request), phone or email contact, through the dedicated website, post/mail, or at the community clinics.

### Phase 3: Review

At each stage of the engagement process, our team reviews the feedback (suggestions, requests, etc.) from local residents and community stakeholders to help inform/ optimise the next step. This included publishing further details on topics on the frequently asked questions (FAQ) page on the Cloonkett Green Energy website, conducting additional one-to-one meetings or responding to telephone calls/queries.

### Community Engagement Activity Summary

The Community Team comprised the Project Manager, Dr. Noreen Layden, Communications Manager Nadine Walsh and the Community Liaison Officer (CLO), Dr. Susan Byrne. Dr. Byrne and Nadine Walsh responded to all incoming queries via phone, email, and face-to-face interactions with the community residents.

**Table 2** below provides a timeline and description of the consultation undertaken to date by the community team.

| Date                     | Description of Activity                                                                                  |
|--------------------------|----------------------------------------------------------------------------------------------------------|
| <b>2023</b>              |                                                                                                          |
| 05/09/2023               | Project Website Launched                                                                                 |
| 07/09/2023               | Letter and Brochure posted to each household within 1 km of the project                                  |
| 07/09/2023               | Letter and Brochure posted to each household within 2 km of the project                                  |
| 07/09/2023               | Emails to all local representatives informing them on the proposed project                               |
| 07/09/2023               | Advert in Clare Echo & Clare Champion                                                                    |
| 11/09/2023 to 15/09/2023 | Door-to-door visits to all households within 1 km of the site                                            |
| September & October 2023 | Additional one-to-one meetings between the community team and residents                                  |
| 01/12/2023               | Website update on community consultation                                                                 |
| <b>2024</b>              |                                                                                                          |
| 01/9/2024                | Website update on project progress                                                                       |
| 20/12/24                 | Website update thanking the community for their input                                                    |
| <b>2025</b>              |                                                                                                          |
| 1/3/2025                 | Website update on project progress                                                                       |
| April 2025               | Community Clinic Invitation                                                                              |
| May 2025                 | A Community Clinic in the West County Hotel                                                              |
| September 2025           | A letter was issued to residents within 1km to advise them of the planning application submission letter |

## Online Communication

The proposed development's website, [www.cloonkettgreenenergy.ie](http://www.cloonkettgreenenergy.ie), went live in September 2023. This represented the launch of the community engagement programme. The website serves as the key information hub, providing comprehensive information on all aspects of the development, including company details, contact information, project-specific details, and insights into renewable energy and climate change. The website was developed with access for both mobile and desktop viewing. Additional measures were taken to support community members without access to the internet/ website, or who preferred alternative mediums of communication. Resources were created with larger fonts and enlarged images and provided to the residents in print. Full support was also offered via phone and in person.

### Cloonkett Green Energy Website - Key pages:

- **Overview** - Includes the "When, Where and Why" of the project, including a proposed timeline, project details and area map.
- **Community** - Sharing the potential benefits, including the community benefit fund, carbon offset details, and the number of homes that could be powered by the proposed development.
- **FAQs** - Any inbound query received was addressed, and a response added to the online Frequently Asked Questions site for residents to review.
- **Education** - Detailed information on climate change and Ireland's key renewable energy targets.
- **Updates** - A notification of any project updates, events, related press, etc.

## Resources

Materials were circulated in the community by Cloonkett Green Energy and made publicly available on the project website, including project leaflets, maps and information on Climate Change. Resources were also distributed directly to local people during various phases of the public consultation process, during door-to-door engagement and at the community clinics. Printed copies of all materials were also available upon request, and the project's key information leaflet was sent by post to residents within a 2-Km radius of the project area.

The list of resources included two leaflets with project information, a brochure detailing the effects of climate change and Ireland's renewable energy targets, and maps of the project area, turbine layout, setback distance from dwellings, and the Clare County Development Plan 2023-2029.

## Press

An advertisement was placed on the 7<sup>th</sup> of September 2023, in both the Clare Champion and Clare Echo Newspaper to announce the commencement of the community consultation for the proposed project. Please note the image shown in **Figure 5** is a copy of the printed advert circulated in 2023 and does not reflect the updated project details shared with the community in 2025.



**Figure 5.** Copy of the first Newspaper Advert (07/09/2023)

### Mail /Post

On the 7th of September 2023 a letter and brochure were posted to households within an approximate distance of 2Km of the proposed project with an accompanying leaflet.

### Information Leaflet

**Figure 6** shows a copy of the leaflet that was delivered to each household within an approximate distance of 2 Km of the proposed project via post. It was also available to download from the Cloonkett Green Energy website.



**Figure 6.** Version 1 (2023) – Cloonkett Green Energy Project Leaflet

In March 2025, a revised, updated version of the project leaflet (see **Figure 7**) was created to reflect updates and changes to the proposed project. This revised leaflet includes the latest project details and has been made available on the project website to ensure transparency and keep the community informed.



**Figure 7.** Version 2 (2025) – Cloonkett Green Energy Project Leaflet

## Door-to-Door

Over several days in September of 2023, the Community Liaison Officer and the community team visited 57 residential properties located within approximately one kilometre (1Km) of a proposed turbine. The team spoke to 24 residents and left contact details in the form of an information pack in 33 occupied properties.

A leaflet outlining climate change, renewable energy and government targets was provided to residents who requested further information. In addition, a tour of an operational wind farm was offered to those who expressed interest in attending the public exhibition, providing an opportunity to gain an understanding of wind energy and experience an operational wind turbine up close.

## Engagement with Local Representatives

Personal emails and phone calls to all local representatives, including councillors and TDs, in September of 2023, and communication remains open with all representatives.

## Community Clinics

In May 2025, Community Clinics were held to provide all members of the community with an opportunity to engage directly with the project team regarding the proposed development. **Figure 8** shows a copy of the letter of invitation sent to local residents. Residents were able to book appointments to review the progress, examine updated maps, and ask any questions they had about the development. The clinic aimed to ensure transparency and facilitate open dialogue, allowing community members to voice their concerns, seek clarifications, and gain a better understanding of the project's impact. All homes within 1Km of the proposed project received an invitation via post.

The clinics were held at the West County Hotel in Ennis in May of 2025. A key topic of discussion was the issue of turbary plots, traditionally used for turf cutting, which are located near or within the proposed development area. The team outlined how the iterative site design process avoided turbary plots as much as possible, and worked with the landowners to include some of their uncut turbary as part of the Biodiversity Management and Enhancement Plan (see EIAR Volume III, Appendix 9.5.)



**Cloonkett Green Energy**  
**Address:** Station Road, Adare, Co. Limerick  
**Telephone:** +353 (0)61 975 200  
**Email:** [info@cloonkettgreenergy.ie](mailto:info@cloonkettgreenergy.ie)

April 11<sup>th</sup> 2025.

Dear Resident

We are writing to provide you with an update on the proposed Cloonkett Green Energy project. The survey works are progressing, and we can confirm the proposed project will include 14 wind turbines. This marks an important step forward as we continue to design and develop this renewable energy project in line with best environmental practices and community feedback.

Furthermore, the Cloonkett Green Energy team will be hosting a series of Community Clinics in your area throughout the month of May. These clinics are an opportunity for local residents like yourself to meet with our Community Engagement Team to find out more about this sustainable energy project.

Each clinic will be held by appointment and is designed to provide a one-on-one setting where you can:

- Learn more about the proposed project
- Ask questions
- Share your thoughts and feedback

To schedule an appointment, please contact us by emailing [info@cloonkettgreenergy.ie](mailto:info@cloonkettgreenergy.ie) or by calling Tel. 061 975 200.

We look forward to meeting you.

Yours sincerely,

**Nadine Walsh,**

The Community Team at Cloonkett Green Energy

[www.cloonkettgreenergy.ie](http://www.cloonkettgreenergy.ie)

**Figure 8.** Copy of the Letter of invitation to Community Clinics issued to local residents

## Telephone Consultation

A dedicated telephone number (061 975 200) was opened in September of 2023 with business hours of Monday to Friday from 9am – 5 pm for the community to discuss the proposed development with the Community Liaison Officer (CLO). This telephone number is published on the website and it is included on all printed materials; this service remains open and is attended by the Cloonkett Green Energy Community Team.

## Email Consultation

A dedicated email address, [info@cloonkettgreenenergy.ie](mailto:info@cloonkettgreenenergy.ie), is managed and monitored daily by the project's community team. All emails received were responded to in a timely manner. Additionally, telephone and in-person consultations were offered to those seeking additional support.

## Ongoing Contact with the Community

From the initial design stages and throughout all pre-planning stages of the proposed development, the dedicated community team was contactable by telephone and email. The frequency and nature of interactions and communications varied. Additionally, as the design and pre-planning stages progressed, status updates were posted on the project website.

Engagement with the local community through house visits and community clinics provided the project team with a detailed insight into the primary concerns of near neighbours and the wider community. Additionally, the project team has assessed all feedback from the community and endeavoured to incorporate it into the project design.

One-to-one engagement by house visits, telephone calls, email correspondence and the public consultation was of significant benefit to the project team in understanding the local area, its terrain and biodiversity.

## Queries & Local Community Feedback

Details are outlined below regarding specific issues raised by residents prior to submission of the Planning Application:

**Noise:** Some residents questioned how the proposed development might impact them from a noise perspective, particularly at night and queried potential noise mitigation measures that could be applied. The project team assured residents that Cloonkett Green Energy is committed to complying with all relevant noise limits. We will ensure the project is constructed and operated in compliance with the planning consent and any related conditions. Extensive surveys have been conducted during the pre-planning process to demonstrate that the proposed turbines will adhere to industry standards and Best Practice Guidelines, and will not exceed legislated noise levels. See EIAR Volume I, Chapter 8. Noise and Vibration for more details.

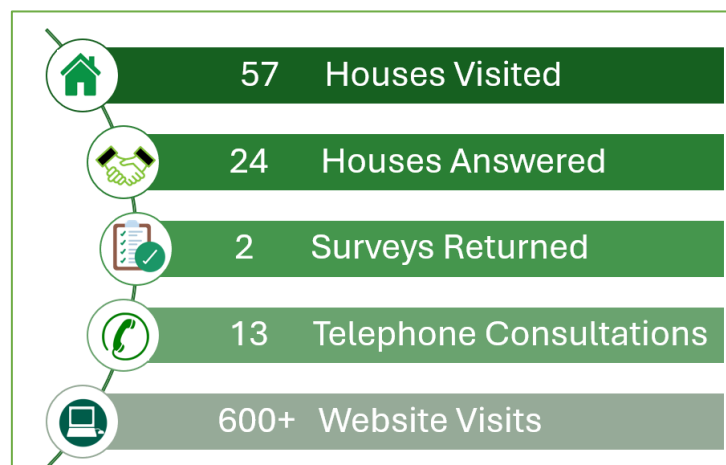
**Shadow flicker:** Residents and members of the public raised queries about the potential impact of shadow flicker. As described in EIAR Volume I, Chapter 12. Shadow Flicker, and in Cloonkett Green Energy has committed to no a shadow flicker policy. The design process,

setback distances and mitigation measures ensure there will be no instance of shadow flicker at residential properties or community facilities.

**Turf (Turbary):** During the community consultation process for the proposed development, some residents expressed concerns regarding the proximity of the development site to their turf-cutting areas. Assurances were provided to residents that the project would not interfere with their turf-cutting activities. The Cloonkett Green Energy community team remains committed to maintaining open communication with the community to ensure that traditional practices are respected and unaffected for the life span of the proposed development.

## Community Engagement Analysis

As summarised in **Figure 9**, the community team visited 57 houses within a 1km radius of the proposed development. Twenty-four residents engaged directly with the Community Team during the initial face-to-face meetings. This was further supported by email, telephone calls and additional door-to-door visits. An online survey was available, and printed feedback forms were circulated at the Community Clinic. Where residents were unable to access the website, printed versions of all documents were posted directly to them and, in some cases, hand-delivered to the requestee.



**Figure 9.** Summary of Engagement by the Community Liaison Team.

In addition to the above, the CLO has conducted numerous face-to-face and phone conversations with residents to date, ensuring that all project information has been shared with the community.

## Website Analytics

The project website has received over 600 visitors to date, with the average user spending just over 1 minute 20 seconds on the site reviewing details of the proposed development.

## Project Survey

A project survey was also available on the site for users to provide feedback on the information reviewed on the site. The survey is viewable via this link: <https://forms.gle/99nWy3VhRSTZJBts9>. Two positive responses have been received to date. One respondent said, 'I am in favour of the project.' The other 'I'm delighted to see a local project going ahead in my area.'

## Public Opinion

Public opinion on wind farms in Ireland remains overwhelmingly positive, particularly among those living in close proximity to a development. According to the SEAI RESS National Survey (May 2023), a significant 73% of respondents who reside within 1 Km of a RESS1 wind project hold positive or very positive attitudes towards wind energy. Furthermore, 65% of these respondents believe that Ireland has too few wind farms, indicating a strong local support for the expansion of wind energy infrastructure. The survey can be accessed via this link: <https://www.seai.ie/publications/SEAI-RESS-National-Survey.pdf>

## Conclusion

Community engagement has been ongoing for over 24 months prior to the Planning submission, with a dedicated CLO, who performed door-to-door house calls, issued information letters and leaflets, and was available via phone and email, to ensure that residents were thoroughly informed of the proposed development.

Additionally, a dedicated website serves as a central information hub, offering downloadable versions of all circulated materials. The project website will continue to act as the key information source. It will be updated to keep the community informed of any relevant progress with the proposed development.

The structure of the engagement process and methods used have allowed for open engagement between the residents and the project team.

Cloonkett Green Energy has complied with the requirements of the 2006 guidelines and has also followed industry best practice by preparing and submitting this Community Report as part of this planning application. Both the current Wind Energy Development Guidelines (DoHLE, 2006) and the Draft Revised Wind Energy Guidelines (DoHPLG, 2019) have been taken into consideration in the approach to community consultation for the proposed development.

The communication efforts summarised herein demonstrate the considerable commitment to engaging with the local residents, and community throughout the pre-planning process. By proactively engaging with residents through various media, Cloonkett Green Energy has demonstrated a genuine commitment to open dialogue with the community. Cloonkett Green Energy's responsiveness to community input and feedback underscores our commitment to transparency and accountability.

Through the availability of all information via print and online resources, community clinics, one-to-one meetings, surveys, and other engagement initiatives, we have offered multiple opportunities for residents to express their thoughts, queries, and aspirations.

We welcome continued engagement with residents as the planning application progresses.

## REFERENCES

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# BUILDING WIND ENERGY, POWERING SUSTAINABLE COMMUNITIES

## ABOUT THE PROJECT

The proposed project is located in the townlands of Glenconau More, Craghera and Cloonkett, Cranny, Kilrush, Co.Clare. The project has the capacity for up to 14 turbines.

The project has the potential to:

- Provide clean power for up to 35,000 homes
- Offset carbon emissions by approximately 62,000 tonnes of carbon dioxide per year
- Generate up to €290,000 in community funding to the local area each year
- Create over 70 jobs, working with local suppliers where possible

## DID YOU KNOW?

In 2024, wind accounted for 32% of Ireland's energy!

source: RTE.ie & windenergyireland.com

## ABOUT US

Greensource is an Irish owned and managed renewable energy company. We have specialised in the development of renewable energy projects for over ten years and have been working with communities like those around Cloonkett from pre-planning to operation and have created long-lasting local partnerships along the way. We pride ourselves on working with integrity and care for the local environment.

## WHY WIND ENERGY?

Onshore wind energy projects form a key part of the Government's plan to enhance clean electricity generation, reduce carbon dioxide emissions, meet Ireland's environmental targets and move towards a more secure energy future. We believe that wind energy will play a central role in Ireland's transition to a low-carbon economy by 2050.

## THE ENVIRONMENT

Environmental studies, surveys and assessments relating to Ecology, Archaeology and Cultural Heritage, Geology and Soils, Landscape and Visual, Traffic and Transport, Noise and Vibration are currently being undertaken. The environmental assessments will be used to inform the project's Environmental Impact Assessment Report (EIAR).

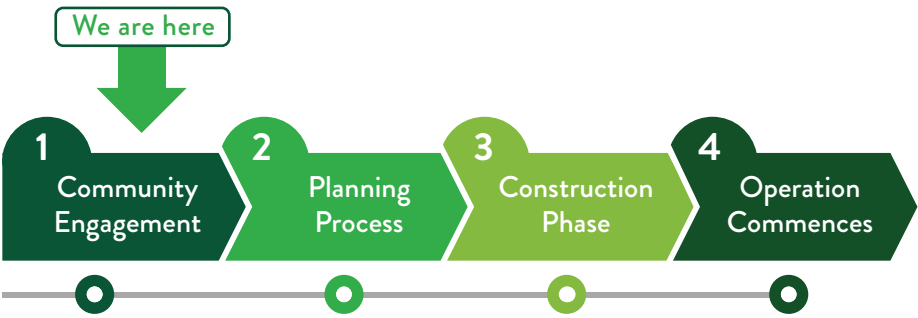
# THE COMMUNITY BENEFITS

In line with Community Benefit Fund Guidelines, governed by the Sustainable Energy Authority of Ireland (SEAI), and based on the current project scope, Cloonkett Green Energy will generate a Community Benefit Fund estimated at €4 million over the first 15 years of operation. This amounts to approximately €290,000 per annum. The fund will administered by a locally elected committee. There will be opportunities for you to join a new community committee to assist in the allocation of this Community Benefit Fund.

| Description                                                                               | % of Fund | Annual Amount                                                                                                                                                     |
|-------------------------------------------------------------------------------------------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Initiatives and projects that support Sustainable Development Goals within the local area | 40%       | €116,000                                                                                                                                                          |
| Local clubs, societies and near neighbours                                                | 50%       | €145,000<br>(shared between those closest to the project and the balance will be allocated to local clubs, societies and near neighbours within 2km of a turbine) |
| Administration                                                                            | 10% (Max) | €29,000                                                                                                                                                           |

# COMMUNITY ENGAGEMENT

We are currently at the community engagement phase of the project. Here is where we will engage directly with the local community to gather feedback on the proposed project.

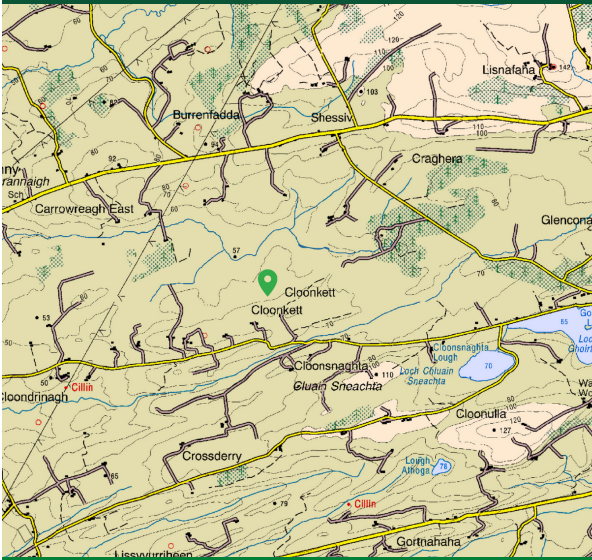


To share your feedback, please visit our website and complete the survey.

# LET’S DISCUSS

Our dedicated community team are available to discuss the project with you. Should you wish to arrange a personal consultation, please feel free to contact us:

- 061 975 200
- info@cloonkettgreenenergy.ie
- www.cloonkettgreenenergy.ie





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