

FORMAL OBJECTION TO THE PROPOSED CLOONKETT WIND FARM, COUNTY CLARE

The Secretary,
An Coimisiún Pleanála,
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25/11/2025

Re: Formal Objection to the Proposed Cloonkett Wind Farm, County Clare

Dear Sir/Madam,

I, **Elena Chepukova**, hereby submit a formal objection to the proposed **Cloonkett Wind Farm** in County Clare. This objection is made pursuant to the **Planning and Development Act 2000 (as amended)**, the **Planning and Development Regulations 2001 (as amended)**, the **EU Habitats Directive (92/43/EEC)**, the **EU Birds Directive (2009/147/EC)**, the **Environmental Impact Assessment Directive (2014/52/EU)**, and all relevant Irish and EU environmental legislation. I request that An Coimisiún Pleanála refuse permission for the development for the reasons set out below.

1. Inadequate Assessment of Impacts on the Lower River Shannon SAC (Site Code: 002165)

The proposed development lies within the hydrological catchment of the **Lower River Shannon Special Area of Conservation**, designated under the Habitats Directive for the protection of Annex I habitats and Annex II species including Otter, Lamprey species, Salmon, and alluvial forests.

The Natura Impact Statement fails to establish, *beyond reasonable scientific doubt*, that:

- Peat disturbance will not lead to sedimentation of downstream watercourses;
- Groundwater pathways will not be altered by excavation, turbine foundations, and road construction;

- Surface water runoff will not affect protected habitats.

Inadequate hydrological modelling and the absence of detailed peat stability assessment contravene the requirements of **Article 6(3) of the Habitats Directive**, which mandates a clear demonstration of no adverse effects on site integrity.

2. Environmental Risks to Gortglass Lake and its Wetland System

Gortglass Lake is located adjacent to the proposed development & services my home in Shessive, providing clean drinking water. It is a sensitive freshwater body supporting diverse ecological communities including overwintering birds, bats, riparian vegetation, and aquatic species. It forms part of the hydrological system feeding into the Lower Shannon.

The Environmental Impact Assessment does not sufficiently address:

- Potential eutrophication from construction sediment;
- Disruption to bird species using the lough for feeding, staging, and breeding;
- Changes to local water tables and runoff patterns;
- Cumulative impacts with existing nearby developments.

This lack of thorough assessment breaches the requirements of the **Environmental Impact Assessment Directive**, which demands comprehensive evaluation of cumulative and long-term hydrological impacts.

3. Non-Compliance with the Planning and Development Act 2000 (as amended)

Under the Act, An Coimisiún Pleanála must consider the proper planning and sustainable development of the area, environmental protection, and the safeguarding of residential amenities. The proposal fails to meet these obligations in the following ways:

- It threatens the ecological stability of a hydrologically sensitive landscape;
 - It creates significant noise, shadow flicker, and visual impacts affecting nearby residents;
 - It fails to integrate appropriately with existing land use and settlement patterns.
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4. Significant Landscape and Visual Impact

The Cloonkett area comprises upland rural landscape with open panoramic views toward Gortglass Lake and the Lower Shannon. The proposed turbine heights and density would create:

- Dominant industrial features competing with natural skyline;
- Irreversible alteration of scenic rural vistas;
- Undue visual intrusion contrary to County Clare's landscape protection policies.

Photomontages provided do not reflect worst-case visibility or cumulative scenarios, and therefore fail to meet accepted visual assessment standards.

5. Impacts on Birds, Bats, and Protected Species

The Cloonkett–Gortglass area supports species protected under the Habitats and Birds Directives, including:

- **Whooper Swan (Annex I)**
- **Hen Harrier (Annex I)**
- **Otter (Annex II)**
- **Multiple bat species**

Survey coverage for avian and bat activity is incomplete, and mitigation measures lack detail or enforceability. The risk of collision, displacement, and habitat fragmentation remains high.

6. Impacts on Residential Amenity and Community Wellbeing

The siting of large turbines in close proximity to homes raises concerns relating to:

- Excessive noise including amplitude modulation;
- Shadow flicker exceeding recommended thresholds;
- Visual dominance impacting quality of life;
- Health concerns linked to low-frequency noise exposure;
- Construction-phase traffic, dust, and disturbance.

These impacts conflict with statutory obligations under **Section 143** of the Planning and Development Act concerning community welfare.

7. Insufficient Public Consultation

The consultation process appears limited, lacking transparency and meaningful engagement with the directly impacted community. Standards of public participation under Irish law and the **Aarhus Convention** have not been met.

8. Conflict with Clare County Development Plan 2023–2029

The proposed development contravenes multiple key policies of the Clare County Development Plan, including:

8.1 Biodiversity 1 – Natura 2000 Sites

Requires strict protection of European Sites.

Conflict: Insufficient demonstration of no adverse effects on the Lower River Shannon SAC.

8.2 Water 1 – Water Quality Management

Requires protection of lakes, wetlands, and groundwater.

Conflict: Hydrological impacts on Gortglass Lake and connected water systems inadequately assessed.

8.3 Landscape 1 – Protection of Landscape Character

Protects visually sensitive and upland landscapes.

Conflict: Proposed turbines will dominate and degrade local landscape character.

8.4 Scenic Routes 1

Protects key scenic views from intrusive development.

Conflict: Visibility from nearby scenic routes not adequately assessed or mitigated.

8.5 Renewable Energy Objective RE2 – Wind Energy Development

Requires wind farms to avoid significant environmental or residential impacts.

Conflict: Project fails to meet criteria on noise, shadow flicker, landscape, biodiversity, and cumulative effects.

8.6 CDP 15.1 – Residential Amenity

Requires safeguarding of residential amenity.

Conflict: Predicted impacts on nearby residents unacceptable and inadequately mitigated.

Conclusion

For the reasons detailed above — including inadequate environmental assessment, risks to Gortglass Lake and the Lower River Shannon SAC, conflicts with Clare County policies, landscape degradation, biodiversity threats, and community impacts — I respectfully request that An Coimisiún Pleanála **refuse planning permission** for the proposed Cloonkett Wind Farm.

Thank you for considering this submission.

Yours faithfully,
Elena Chepukova

APPENDIX A – SCIENTIFIC, LEGAL & POLICY REFERENCES

A1. Irish Legislation and Policy

- Planning and Development Act 2000 (as amended)
 - Planning and Development Regulations 2001 (as amended)
 - Clare County Development Plan 2023–2029:
 - Biodiversity 1
 - Water 1
 - Landscape 1
 - Scenic Routes 1
 - Renewable Energy Objectives RE1 & RE2
 - CDP 15.1 Residential Amenity
 - NPWS Conservation Objectives for Lower River Shannon SAC (002165)
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A2. European Legislation

- Habitats Directive (92/43/EEC), Article 6(3)
 - Birds Directive (2009/147/EC)
 - Environmental Impact Assessment Directive (2014/52/EU)
 - Water Framework Directive (2000/60/EC)
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A3. National Guidance

- Wind Energy Development Guidelines for Planning Authorities (2006; Draft 2019)
 - EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (2022)
 - Bat Conservation Ireland survey and mitigation guidance
 - BirdWatch Ireland sensitivity maps and species guidance
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A4. Scientific Literature

- Drewitt & Langston (2006, 2008) — *Birds and wind farm collision/displacement impacts*
 - Rocha et al. (2017) — *Impact of wind farms on bat populations*
 - Dykes, A. (2002) — *Peatland slope instability*
 - Evans et al. (2014) — *Water quality impacts from peat disturbance*
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