

Submission to An Coimisiún Pleanála
In relation to a proposed Windfarm (Strategic Infrastructure Development)
ABP – 317616-23
ACP case reference number – 323783-25

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Date: 26 November 2025

Planning Permission to develop a Windfarm located within the townlands of Glenconauun More, Craghera and Cloonkett, Co. Clare (proximate to Gortglass Lough).

Dear Inspector,

I Jamie Brooks, of Shessive Cranny Co. Clare, hereby make a formal objection to the proposed Cloonkett Wind Farm Development.

My home in Shessive is directly impacted by this development: the proposed site lies in close proximity to **Gortglass Lough**, a sensitive lake system visible from my residence and forming part of the local hydrological, ecological and amenity landscape. This development threatens the environment, the community, aviation safety, and the integrity of the planning process.

I set out my grounds of objection below.

1. Severe Environmental Risk to Gortglass Lough and Surrounding Hydrology

Gortglass Lough is a vulnerable lake system. The Shannon Estuary North Catchment Summary identifies lakes in this region as at risk of **sedimentation, hydromorphological pressure, and pollution** from land disturbance. Large-scale wind infrastructure — including access roads, turbine foundations, deep excavations and concrete bases — would significantly disrupt surface-water paths and groundwater flow.

These concerns are *not hypothetical*. The local area contains:

- **Wet peat soils and groundwater-dependent ecosystems**
- **Steep gradients draining directly into the Gortglass Lough basin**

- **Known breeding/feeding habitats for bird and aquatic species**

Wind-farm construction in peat-rich, water-sensitive areas has previously caused severe environmental damage in Ireland. Without a publicly available EIAR, hydrological modelling, peat stability assessment, or Natura screening report, the Board cannot be satisfied that the development will not cause **long-term, irreversible damage**, contrary to the precautionary principle under the EU Habitats Directive.

2. Landscape, Amenity and Visual Devastation

The proposed turbines — **up to 150 metres high** — would dominate the skyline over Gortglass Lough, Craghera, Burrenfadda and Shessiv.

Their visual impact would:

- Overwhelm the rural landscape
- Degrade residential amenity for nearby households
- Reduce recreational value of the lake for fishing, walking, and water activities
- Undermine local tourism, which is tied to natural scenery

This region currently has a tranquil, unspoilt rural character. Industrial structures of this scale fundamentally conflict with County Clare Development Plan policies protecting the landscape, water-based amenities, and rural character.

3. Aviation Safety Concerns — A Material Planning Consideration

Aviation safety is a frequently overlooked but *critical* issue. Turbines of 150 metres fall squarely within height thresholds requiring:

- **Obstacle lighting**
- **Aeronautical hazard analysis**
- **Consultation with the Irish Aviation Authority**

This site lies in a region where:

- **Low-level aviation**, including Coast Guard rescue operations, is common
- **Agricultural aviation routes**, including low-altitude survey flights, occur
- The proximity to the Shannon Estuary places turbines under occasional **helicopter flight paths**

Wind turbines of this height can create:

- Radar interference
- Obstacles on rescue-flight routes
- Lighting glare hazardous to night operations

A failure to undertake adequate aviation hazard assessments renders a proposal **fatally flawed**. The Board cannot lawfully grant permission without clear evidence demonstrating safety compliance.

4. Deficiency of Environmental Documentation – EIA / NIS Not Publicly Available

As of the most recent public data, the ABP case file does **not** include a publicly accessible EIAR or NIS.

Irish courts have repeatedly struck down wind-farm permissions where environmental assessment was:

- Incomplete
- Inadequate
- Or where information was not available for public participation

Relevant case law includes:

O’Grianna v An Bord Pleanála [2014] IEHC 632

Held that wind farms **cannot be project-split**, and that grid connections and ancillary works must be assessed as part of the same project. Absence of full, integrated assessment is unlawful.

Daly v Kilronan Windfarm Ltd [2017] IEHC 308

Reaffirmed O’Grianna: grid and ancillary works are part of the main project; environmental assessment must include them.

Power v An Bord Pleanála [2024] IEHC 108

Found serious defects in EIA and public consultation, emphasising that environmental information must be complete, transparent, and available to the public.

Grace v An Bord Pleanála [2017] IESC 10

Confirmed that individuals with a sufficient interest have standing in environmental matters. As a resident living near Gortglass Lough, I unquestionably have standing to raise these issues.

The current proposal — lacking publicly available hydrology, peat stability studies, ecological surveys, or aviation-safety assessments — **fails to meet minimum EIA transparency requirements**.

5. Risk of Long-Term, Irreversible Environmental Damage

Wind farms in sensitive rural areas can cause:

- Peat slippage and landslide risk
- Water contamination from sediment and concrete leachate
- Destruction of habitats through noise, vibration, and disturbance
- Loss of bird populations due to blade strike

Gortglass Lough's ecology is *fragile*. Once damaged, it cannot be restored. The landscape will be permanently industrialised, with special habitats lost forever.

6. Negative Impact on Health, Residential Amenity and Property Value

Turbine noise, low-frequency vibration, and shadow-flicker can significantly diminish residential well-being. Homes in Shessiv and surrounding townlands lie well within distances known to suffer:

- Continuous noise intrusion
- Intermittent pulsation effects
- Shadow flicker up to 1.5 km from turbines depending on orientation

These are not minor inconveniences; they represent substantial and long-term quality-of-life impacts.

7. Cumulative Impact and Precedent Concerns

If permitted, this wind farm would:

- Permanently industrialise the Gortglass landscape
- Encourage further encroachment around lakes and sensitive water systems

The cumulative environmental and social impacts would be **significant, lasting, and entirely inappropriate** for this rural, ecologically sensitive region.

Conclusion & Request for Refusal

On the grounds of:

- Severe environmental risk
- Hydrological and ecological vulnerability of Gortglass Lough
- Visual and amenity destruction
- Aviation safety concerns
- Deficiencies in public environmental documentation
- Strong legal precedent requiring full and transparent assessment

I respectfully request that An Coimisiún Pleanála **refuse planning permission in full** for the Cloonkett Wind Farm development.

No amount of mitigation can offset the location's fundamental unsuitability.

Thank you for your consideration.

Yours sincerely,

Jamie Brooks

Shessive Co. Clare

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