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Gortglass Lake
Glenconanmore
Kilrush
Co Clare
11/11/2025

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ABP: 317616 - 23

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To whom it may concern,

I, Keith Ranalow wish to lodge a submission concerning the proposed development of 14 wind turbines and associated works by Cloonkett green energy in the areas of Glenconan More and Cloonkett on the following grounds:

1. Environmental impact on biodiversity and habitats
2. Impact on scenic & recreational area
3. Lack of consultation & community engagement
4. Mapping issues
5. Source of PWS within 750 of turbines and 450 meters of development site

1. Environmental impact on biodiversity and habitats

I farm adjacent land to the development and share a boundary with the proposed windfarm site, the nearest turbine is only 220 meters from the land I am farming. I take a keen interest in nature and on a daily basis would see a range of species on the farm and on the adjacent lands of the proposed site.

The proposed development site is a lowland site (50-100m altitude above sea level) mainly made of peatland habitats of various conditions including actively cutover raised bog, revegetating cutover and turf banks, several intact raised bog remnants, and heathlands. The remainder of the site consists of commercial conifers, semi natural grasslands, and scrub mosaics. The site is surrounded by various habitats from intensively farmed grasslands to extensively managed farmland and from mature coniferous woods to areas of mature broadleaf woodlands. The EIA report lists 'three habitats on the site were identified as having an ecological value assessed of national importance, namely; wet grassland (6410 quality); active raised bog (7110 priority quality); and transition mire and quaking bog (7140)'. This all points to a range of habitats that can house a wide range of varied species.

Freshwater pearl mussel is present in the Cloon river, 2.4 km west downstream of the site, the two streams flow through the site and feed this river. The report states that 'no fresh pearl mussel were present in either stream but that eDNA results and habitat assessment suggest the potential for the species to be present, therefore the streams within the Proposed Development Boundary are considered to potentially contribute to a freshwater pearl mussel population of international importance'. Four burrow pits are planned to be dug out adjacent to where one of the tributaries of the Cloon river flows.

The development is only 690 meters from Gortglass Lough and 840m from Cloonsnachts Lough, both of these lakes are pNHA's, there is also an ancient Crannog on the island in Gortglass Lough. Gortglass Lough is only 3.5km from the Lower River Shannon SAC (002165), River Shannon and River Fergus Estuaries SPA (site code: 0044077), these wetlands are considered the most important coastal wetland site in Ireland and supports 50,000 wintering waterfowl (NPWS, 2012), many avian species move between the lakes and the SAC throughout the year, these include many migratory bird species. The report states 'given the proximity to the River Shannon and River Fergus estuaries, habitat suitability for upland breeding waders is high in wider areas and therefore wader species like golden plover and dunlin are highly likely to breed in the area' and 'the 500 m turbine buffer area holds areas of plantation and associated

scrub that have the potential to support breeding woodcock’, woodcock breeding populations are considered red-listed since the Irish breeding range was reduced (Gilbert et al., 2021), the report also states ‘the study area is considered to provide a mosaic of suitable habitats for wintering waders’.

The Bog lands where the Turbines are planned also play a key role as a habitat for many other bird species, the two streams Cloonkett stream (EPA Code 27C12) and the Carrowreagh East stream (EPA Code 27C49) flow either side of the site and often flood (fig 1) with many ducks, swans and geese present in the winter months, as well as many waders such as curlews and Egrets, the report makes no mention of how the streams regularly flood. Another common sight is the presence of grey heron along the lower stream on the Cloonkett side of the bog, unfortunately some of the proposed turbines are at the southern side of the bog meaning birds have to fly past the turbines to reach the bog from the lakes. The report states ‘based on SNH (SNH, 2017) guidelines, migratory populations of wintering geese and swans are notably sensitive to wind farm developments’.



Fig 1. photo of flooded Cloonkett stream (taken on 14/11/25)

The EIA report from www.Cloonkettgreenenergyplanning.ie shows the diverse range of species present in these sensitive habitats. 74 species of birds were found within the site and the 500-meter buffer. They recorded 9 red listed bird species and 23 amber listed birds with 8 of these Annex 1 species. As a keen bird watcher I would feel we have

even more species that were not recoded and are not present on those lists such as King fisher, Swift, short eared owl and the Barn Owl to name a few.

Red Listed:

- Curlew
- Golden Plover
- Grey Wagtail
- Kestrel
- Lapwing
- Meadow Pipit
- Snipe
- White Tailed Eagle
- Woodcock

Annex 1:

- Golden Plover
- Hen Harrier
- Little Egret
- Mediterranean Gull
- Merlin
- Peregrine
- White Tailed Eagle
- Whooper Swan

Amber listed:

- Black headed gull
- Common gull
- Cormorant
- Hen harrier
- Mallard
- Mediterranean gull
- Merlin
- Mute swan
- Shelduck
- Teal
- Tufted duck
- Whooper swan
- Herring gull
- Lesser black-backed gull
- Passerines include: goldcrest, house martin, house sparrow, linnnet, skylark, sand martin, swallow, starling, and willow warbler.

The site is considered of national significance for two species: hen harrier and kestrel; it is of country (regional) importance for a further six bird species, all associated with water or wetland habitat: snipe; black headed gull (wintering), curlew, golden plover, grey heron and lesser black backed gull (breeding) The Hen Harrier was the 5th most spotted species in their report, both male and female were recorded a combined 65 times, hen harrier activity was observed during the VP watches, site walkovers and wider area surveys as seen in fig 2. The hen harrier has become a relatively common site in the bogs around the proposed development, with both male and female seen on many occasions year-round. Hen harrier nest searches only took place in 2023 and no permission was sought from many landowners for walk over surveys within the 500meter buffer.

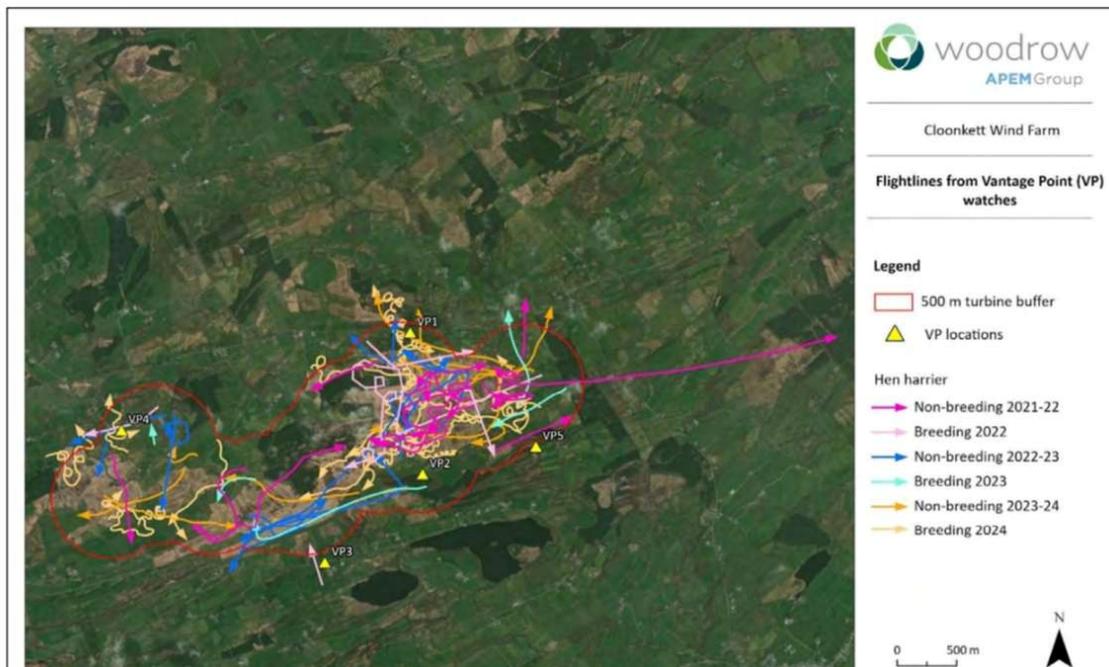


Fig 2. Hen harrier activity

Kestrel was the most active raptor species with 223 flights recorded as can be seen in fig 3, and although no nesting site was located ‘at least one breeding pair is thought to have bred within the 2km turbine buffer and the breeding season home range of these birds falls within the 500m turbine buffer’. The distribution of the red listed kestrel populations and breeding numbers have declined significantly (Lewis et al, 2019) and the EIA report states ‘based on flight behaviour which results in low avoidance rates, kestrel is a species that is notably susceptible to collisions with turbines’ and the collision risk model predicted 45.6 collisions would occur over the 40 year lifetime of

the turbines, the magnitude of this effect would be assessed as significant on local populations’.

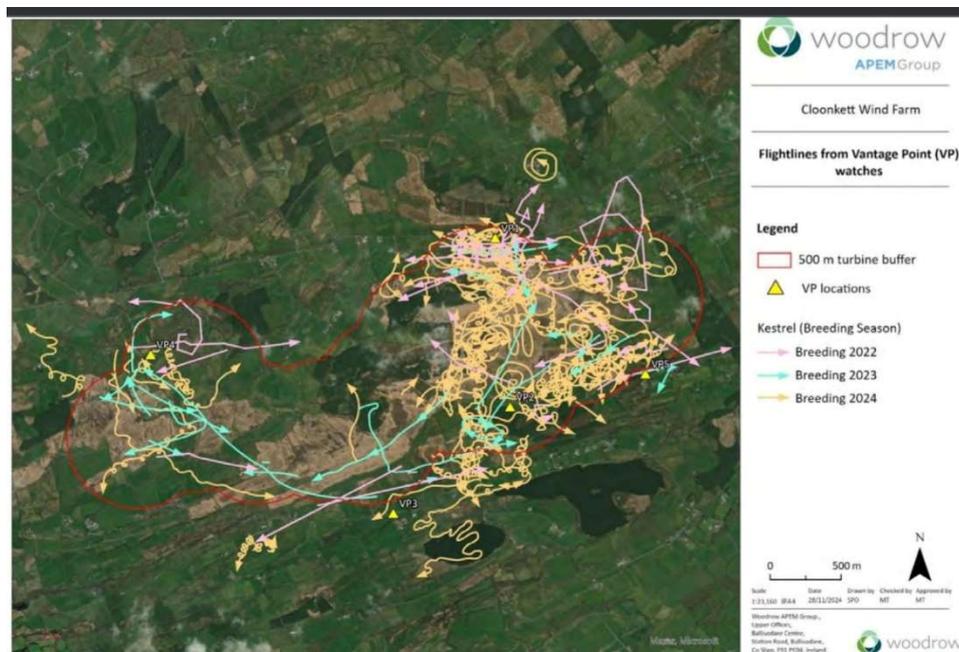


Fig 3. Kestrel activity

There are two sentences in the appendices that show further assessment is required: ‘the kestrel population associated with the proposed development site, is assessed as important at the national level and further assessment for this species is required’ and ‘based on the high recorded usage over the study period, the proposed development site is likely to be utilised by hen harriers, this site is assessed as being of national importance and further assessment for this species is required’.

Breeding behaviour was observed for sparrowhawk with ‘two potential sparrowhawk breeding sites occurring within and adjacent to the site, but no nest was identified’. Regarding raptor species the report highlights the ‘habitat is considered potentially suitable for breeding kestrel and barn owl, the habitat is suitable for upland breeding species, including hen harrier, merlin and short eared owl, the habitat was assessed as adequate and these species are considered as likely to occur in the area’. The report states ‘based on exceptionally low recorded usage over the three years, no significant impact assessment is required for four birds of prey that were only recorded a few times’, this includes the barn owl. Since the 20/10/25 I have kept my own record and have spotted the barn owl on 13 occasions while checking cattle at dusk and another

brown coloured owl (either a long-eared owl or long earned owl?) on two occasions. The barn owl seen was hunting over the hedgerows on the farm and all occasions came from the direction of the proposed development site.

Mute swans were only briefly mentioned in the report as being seen twice on Gortglass lake, this is slightly alarming as the male and female mute swans are present on the lake year around, rearing a clutch of cygnets annually. The male swan often is seen chasing other mute swans and geese off the lake. My house is situated between the lake and the 7 turbines at the eastern side of the bog. It's a regular occurrence to hear the commotion on the lake from the wildfowl and to see birds leaving the lake and flying over the house towards to the bog, unfortunately if this development goes ahead, they will have to fly through/over/under the turbines to reach the streams and wetlands in Cloonkett and Glenconanmore. At the time of writing roughly 15 whooper swans have landed on the lake which is common sight at this this time of year and usually spend the winter here.

It is interesting to note that the report states some of the survey limitations:

- 'the number of breeding walk sand dusk surveys recommended by SNH (SNH, 2017) were not accomplished in the 2021 and 2022 breeding seasons'
- 'The number of breeding raptor surveys recommended by SNH (SNH, 2017) were not accomplished in the 2021 and 2022 breeding seasons'
- Access to the full ornithological study area for walkover surveys which could only be carried out on lands where permission had been granted

I would also note some other limitations regarding the surveys.

- During the breeding bird surveys in 2021 & 2022, no dusk or dawn surveys were carried out
- The breeding birds survey in 2023 took place over 6 days throughout the 6 months, just one day a month.
- Winter Walkover surveys during the non-breeding season within the 500 m turbine buffer account for just 24.75 hours over 3 years, that's averaging just over 8hrs per year.
- Raptor surveys during the breeding seasons of 2021 and 2022 only took place over 2 days per season
- Hen harrier nest searches only took place in the 2023 breeding season

- I farm adjacent lands which border the site boundary, and no permission was sought or given to conduct walkover surveys on these lands. From talking to other landowners within permission was neither sought or given for walkover surveys of lands within the 500meter buffer.

Bats were also regularly recorded on the site with seven species mentioned in the EIAR. Bats are common sight on the lands around the bogs and the lakes and they play an important role for pollination, food security and biodiversity. Studies show the spinning blades of turbines are said to be invisible to the bats echolocation resulting in 100,000's of casualties annually (Laila, A 2025) The EIA report states 'hedgerows and drains run perpendicular to the stream and likely form an important network of habitat features for commuting and foraging bats'. The bat species recorded included:

- Common pipistrelle
- Soprano pipistrelle
- Nathusius' pipistrelle
- Lesser horseshoe bat
- Leisler's bat
- Mytois spp
- Brown long eared bat

Other species found in the site area of local, county or national importance include and recorded in the EIAR report include:

- Smooth newt
- Blue-tailed damselfly
- Azure damselfly
- Four spotted chaser
- Emperor dragonfly
- Large red damselfly
- Common frog
- Common lizard
- Marsh fritillary butterfly

'Red squirrel transects, and pine marten surveys were not possible due to access into mature coniferous plantation on deep peat with extensive drainage, but it is considered likely these species may occur', Surely with such a big development planned is it not worth taking the extra time to conduct these surveys? Over the past six weeks alone I have recorded pine marten, hare, badgers, foxes, and an otter on a wildlife camera I situated on the lands I am farming near the site boundary.

As part of a 'farming for nature' initiative called the 'horses' mouth' an ecologist visited the farm and noted an active badger sett in the lands adjacent to the proposed development site and likely signs of otter activity between the stream on the southern side of the bog and the stream that has a link to Gortglass lake only 500 meters away. In the past few years, I have noticed the presence of a white tailed eagle in the areas of Cloonkett and Glenconau More (seen 4 times during VP watches), it's very exciting to see these flag ship species in the skies around and shows the success of the reintroduction program. Unfortunately, white tailed eagles are at risk of collision with wind turbines, leading to fatalities

I believe that the area is unsuitable for such a large-scale development in such a delicate ecosystem, this amazing habitat is home to numerous protected species of flora and fauna, much of the bog is untouched by humans for generations as only a few active banks are used by locals for turf and the much of the land is unsuitable for conventional farming. I feel the area requires further assessment to determine the importance of the habitats contained within the site and the importance of protecting such a range of vulnerable and valued species of flora and fauna. From reading other EIA reports from other developments, I really feel the numbers of rare species in the Cloonkett area are particularly high and need protecting. Over the past month I have been looking for post construction EIA type reports to see how this type of development affects sensitive habitats but have been unable to find any findings on the matter or much scientific research on the habitats in Ireland once these windfarms are operational.

2. Impact on scenic & recreational area

The nearest turbine is within 700 meters of Gortglass Lough and 840m from Cloonsnachts Lough, both lakes are pNHA's. There is also an ancient Crannog on the island in Gortglass Lough, there is no mention of the crannog in the EIAR. Gortglass lake is a very popular attraction as an amenity area, it is commonplace to see walkers, runners and people looking to unwind and relax in this beautiful environment. The lake is only 2.5 Km from Kildysart and when one googles 'things to do in Kildysart', the loop walk at Gortglass lake is the top recommendation.

The lake area is also promoted by the 'Estuary Way', this very successful initiative to promote the areas either side of the Shannon Estuary. On the homepage of the estuary way website there is an image of Gortglass lake with paddleboarders out on the water as seen in fig 4.



Fig 4. Image form homepage of www.estuaryway.ie

The area is not mentioned in the report as an area for amenity or as a scenic location. The lake area is very natural picturesque location, and I believe the turbines so close to such a beautiful area will have a detrimental effect. On my farm in recent years, we have hired out meadows to be used as a retreat space for a local company 'retreatyourself'. These retreats allow guests to unwind in nature and enjoy the peace and tranquillity of such a marvellous space. I would worry that future Agri tourism initiatives will be harmed if this development goes ahead so close to the lake and adjacent farmland to

the turbines. The photomontage in fig 5 taken from cloonkettgreenenergyplanning.ie shows the negative impact these massive turbines have on such a beautiful area of such importance to the local area.



Fig 5. Photomontage from www.cloonkettgreenenergyplanning.ie

The photomontage images submitted as part of the planning process leave out any image of how the turbines are seen from Kildysart village, one image is included from Kildysart quay but the turbines aren't visible as the image is the quay is at sea level whereas the village of Kildysart is slightly elevated at approximately 35 meters above sea level. The turbines will be seen from the main approach road into Kildysart but no photomontage of this was included in the report.

3. Lack of consultation & community engagement

We have had little engagement from the company behind this planned development. My house is 650m from the nearest turbine and the only contact I have had is one A5 size leaflet left in my letterbox over 2 years ago, the leaflet had no mention of turbine height. Once I found out via a neighbour that planning was applied for in September 2025, I contacted the Cloonkett green energy's office in Adare to find out when the 'promised' 'community engagement session' was going to be held, I was informed it had taken place last May in the West County Hotel in Ennis. I was not informed about this community engagement session, and I am yet to meet anyone who was informed about the meeting or any person who attended the meeting.

Upon hearing that planning permission was being sought for the proposed development, Cloonkett green energy were contacted and invited to meet with locals in the local community hall to outline their plans and address any questions the local community may have, unfortunately our offer was declined and we were informed that they would not be attending any event to address our concerns. Surely a development of this size requires the developer to engage in serious and meaningful engagement with the local community who will be impacted by the proposed turbines for the next 30 years and beyond.

4. Mapping issues

Within the application the applicant has a map of properties within 2km of the project, this map seems to leave out many houses, even a drive along the Gortglass road it is clearly visible to see how many properties have not been included in the map. The cottage (fig 6) is 567 meters from the nearest turbine, this dwelling house is not on the map of properties. The report states ‘following completion of layout optimisation, a separation distance of 600m (4 times tip height) was achieved from the closest landowner’ and ‘potential for effect on residential amenity due to noise, vibration, and dust during the construction phase, and operational phase in the form of visual effects, noise and shadow flicker would be anticipated if an appropriate setback distance was not applied’. With this property in fig 6 and many other landowners within the 600 meters surely it can’t be fair for the affected property owners to have to live under such massive wind turbines?



Fig 6

5. Source of PWS within 750 of turbines

I was disappointed to see no mention of Kildysart/Coolmeen Group water scheme in the EIAR, the site boundary is only 480 meters from Gortglass lake and only 700 meters from the nearest turbine. Gortglass lake is the water source for 1200 homes in the local area (900 supplied by KCGWS and 300 by Uisce Eireann) from the nearest turbine. The altitude of the lake is 64 meters and the proposed site area is between 50 – 100 meters altitude. The lake is spring fed with the groundwater emerging under natural pressure, this type of system is very sensitive to surface disturbances, even small shifts can affect water clarity, flow rate, contamination levels and seasonal lake levels. There are also many wells that are not included in the EIAR, many of these are within 1km of the nearest turbine.

Conclusion

In summary , the proposal to construct fourteen 150-meter wind turbines in our area raises serious concerns that cannot be overlooked. While renewable energy development is important, it must not come at the expense of fragile ecosystems or the well being of the community that depends on them. The potential disruption to protected species such as the hen harrier and kestrel, the risks poised to our local water source, the clear deficiencies in some of the mapping, and the lack of meaningful consultation all highlight significant shortcomings in the current plan. Beyond these environmental and procedural issues, the project threatens to diminish a landscape that holds deep recreational, aesthetic, and cultural value for many people. For these reasons, it is essential that further assessment, transparency, and genuine community engagement takes place before any development proceeds, ensuring that environmental protection and local voices are placed at the heart of the decision-making process.

Yours sincerely,

Keith Ranalow

Bibliography

Laila, L. 2025. The dark side of wind turbines — 800,000 bats perish yearly, but new U.S. tech may reverse it. Available at: [The dark side of wind turbines — 800,000 bats perish yearly, but new U.S. tech may reverse it](#). Accessed on: 16/11/2025

Fig 1. https://cloonkettgreenenergyplanning.ie/wp-content/uploads/2025/09/20250918_Cloonkett_Formatted_Montages_Book1-Web.pdf