

To; The Secretary,  
An Coimisiún Pleanála,  
64 Marlborough Street,  
Dublin 1, DO1 V902.

**Submission to An Coimisiún Pleanála**

**In relation to a proposed Windfarm (Strategic Infrastructure Development)**

**ABP – 317616-23**

**ACP case reference number – 323783-25**

**Planning File Number: PC03.317616**

Date 25th November 2025

**Planning Permission to develop a Windfarm located within the townlands of Glenconauun More, Craghera and Cloonkett, Co. Clare.**

Dear Inspector,

We, Michael Kirrane and Mary Brown, of the townland of Crossderry, Kilmurry Mc Mahon, Kilrush Co Clare V15F978 wish to formally object to the proposed Cloonkett Wind Farm Development at Cloonkett and Burrenfadda, County Clare and I am appealing to you not to grant planning permission to this wind farm proposal for the following reasons,

The proposed wind farm development in the townlands of **Glenconauun More, Craghera, and Cloonkett** poses a significant threat to the ecological integrity of the region. The area supports a rich natural heritage, including habitats for **endangered, protected, and conservation-priority species**. Based on ecological principles, Irish and European environmental regulations, and the known impacts of wind energy infrastructure on wildlife, the development should not proceed due to the **unacceptable risk of permanent and irreversible damage to local biodiversity**.

The following points should be considered when deciding to grant/not grant permission.

**1. INADEQUATE PEATLAND & HYDROLOGICAL ASSESSMENT**

**1.1 No comprehensive peat-depth survey across turbine footprints and road alignments**

- The project website and Addendums do **not** include a full peat-depth map with verified probing at each turbine, crane pad, substation, and road location.
- This is a mandatory requirement for upland peat sites because peat depths can vary dramatically (often >2 m), and failures to characterise peat depth contributed to disasters such as the **Derrybrien peat slide**.

### **1.2 Absence of a full *Peat Stability / Bog-Slide Risk Assessment***

- No stability modelling or Factor of Safety calculations have been provided.
- Given the **sloped peatland terrain of Glenconnaun More and Craghera**, this omission is significant and represents a major environmental and public-safety risk.

### **1.3 Inadequate hydrological baseline**

- No detailed water-table monitoring, hydrological connectivity mapping, or analysis of drainage consequences is included.
- Peatland wind farms require long-term water-level data due to the risk of peat drying, drainage, and downstream pollution events.

### **1.4 No mitigation plan for peat erosion & sediment runoff**

- The risk to local watercourses is not addressed.
- Peat-silt contamination is a major ecological hazard, especially for salmonid streams and protected aquatic species.

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## **2. INSUFFICIENT SURVEYING FOR BIRDS (ESPECIALLY HEN HARRIER, CURLEW & MERLIN)**

### **2.1 Breeding-season survey detail is missing or incomplete**

- The Addendums do not show evidence of multi-year breeding bird surveys.
- Species such as Hen Harrier and Curlew require **multiple years** of data due to inter-annual variation.

### **2.2 No clear vantage-point study data for collision-risk modelling**

- Standard VP survey methodology requires 36+ hours of observation per VP per season.
- No such data tables, flight-path maps, or vantage-point vantage geometry are included in the public documentation.

### **2.3 Lack of wintering bird surveys**

- Winter usage by Curlew, Whooper Swan, and Golden Plover is not addressed.
- Winter is the most collision-sensitive season for large, heavy-bodied birds.

### **2.4 No displacement-impact assessment**

- The application does not apply proven displacement distances (e.g., 500 m to several km for Hen Harrier; >200 m for Golden Plover).
- Consequently, habitat-loss calculations are **invalid or incomplete**.

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## **3. INADEQUATE BAT SURVEYING (INCLUDING LESSER HORSESHOE BAT)**

### **3.1 No full-season acoustic survey data provided**

- NPWS guidance requires **April–October** detector coverage, including high-elevation transects.
- This data is missing or not presented.

### **3.2 No bat-flight line modelling**

- There is no mapping of hedgerow, treeline, or valley corridor commuting routes — crucial for preventing turbine placement in flight paths.

### **3.3 No assessment of barotrauma risk**

- Turbines proposed at ~150 m pose high barotrauma risk for bats, yet the Addendums do not address this.

Given that the **Lesser Horseshoe Bat** is Annex II and present in East Clare, this omission is particularly serious.

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#### **4. NO CUMULATIVE IMPACT ASSESSMENT (A LEGAL REQUIREMENT)**

##### **4.1 No regional study of other wind farm developments**

- The Addendums do not provide a cumulative mapping of existing or proposed turbines in East Clare / Slieve Bearnagh / Slieve Aughty.
- Hen Harrier, Merlin, bats, and Curlew are *landscape-level* species — cumulative impacts are essential.

##### **4.2 No analysis of forestry, peat extraction, and other pressures**

- Forestry plantations and past clear-fell areas between Cloonkett and Slieve Bearnagh compound species disturbance.
- The Addendums ignore these interacting land-use pressures.

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#### **5. INCOMPLETE HABITAT MAPPING AND ECOLOGICAL DESCRIPTION**

##### **5.1 Lack of detailed habitat-mapping (Phase 1 or Fossitt Level 3)**

- No complete mapping of blanket bog, wet heath, flushes, or bog-pool systems.
- These habitats are **Annex I priority habitats** requiring heightened legal protection.

##### **5.2 No mapping of riparian zones or protected aquatic habitats**

- Upland watercourses are highly sensitive to peat-silt runoff; however, no aquatic baseline is included.

##### **5.3 No identification of potential Curlew nesting or feeding sites**

- Curlew are Critically Endangered in Ireland and *any* suitable habitat in these townlands must be assessed explicitly — but the application provides no such study.

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#### **6. DEFICIENT NOISE, SHADOW-FLICKER & HUMAN IMPACT ANALYSIS**

##### **6.1 No complete mapping of shadow-flicker zones**

- No evidence that modelling accounts for local topography or worst-case sun angles.

##### **6.2 Noise modelling not supported by verified baseline measurements**

- In upland areas, atmospheric conditions amplify noise and vibration; baseline sound data are therefore essential.

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#### **7. ABSENCE OF A FULL APPROPRIATE ASSESSMENT (AA) SCREENING REPORT**

##### **7.1 Key Natura 2000 sites are omitted or insufficiently analysed**

Relevant sites include:

- Slieve Bearnagh Bog SAC
- Slieve Aughty SPA (Hen Harrier)
- Lower River Shannon SAC (Otter, Lamprey)

These require an **AA Screening at minimum**, and likely require **full AA** due to hydrological connectivity and bird-flight paths.

**7.2 No hydrological linkage analysis to these Natura sites**

- Peatland drainage can travel kilometres; without modelling, AA screening is incomplete.

The planning application and Addendums contain multiple significant omissions, including (but not limited to) inadequate peatland assessment, incomplete bird and bat surveys, missing hydrological modelling, the absence of mandatory cumulative-impact analysis, and an incomplete AA Screening. These omissions mean the applicant has failed to demonstrate compliance with the EU Birds Directive, the EU Habitats Directive, and the Wildlife Acts. As such, the application must be refused.

Thank You

Regards

Michael Kirrane & Mary Brown