

## **Objection to Cloonkett Wind Farm (An Bord Pleanála SID Application)**

**Submitted by:** Peter Ranalow,  
Gortglass Lake, Cranny, Kilrush, Co.Clare.

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**Planning Case Reference:** # 323783 / Cloonkett Wind Farm

I wish to make an appeal to the planned development under the below headings.

### Group Water Scheme

The proposed development is located approximately 800 m from a Group Water Scheme lake that supplies drinking water to the local community. Although the EIAR states that the lake is not directly hydrologically connected to the development site, this assessment fails to account for the presence of natural springs and historic drinking wells surrounding the lake. These features indicate an active and sensitive groundwater system that may not be fully mapped or understood within the EIAR.

Wind farm construction including deep excavations for turbine foundations, access road cuttings, and grid infrastructure has the potential to alter local groundwater flow paths, particularly in areas where bedrock is shallow or fractured. Even minor changes to groundwater direction or turbidity can pose a serious contamination risk for springs that feed into the Group Water Scheme. The EIAR does not provide sufficient hydrogeological modelling or spring-source mapping to demonstrate that these risks have been adequately assessed.

Furthermore, GWS schemes in Ireland are especially vulnerable to pollution due to their reliance on surface water and shallow groundwater and the fact that many operate without the same level of multi-stage treatment as larger public systems. Any siltation event, fuel spill, concrete washout, or change in groundwater pressure during construction could compromise drinking water safety for the community.

In the absence of a robust, site-specific hydrogeological risk assessment that addresses the lake's springs, historic wells, and potential subsurface flow routes from the turbine locations, the precautionary principle should apply. The developer has not demonstrated that the proposed works pose no risk to the safety, quality, or reliability of the local drinking water supply.

### Ecology

The proximity of the proposed wind farm to the local lake system and, further south, the Shannon Estuary raises significant concerns regarding wildlife impacts, particularly for birds that depend on both inland wetlands and coastal habitats. The lake south of the site supports feeding and roosting species and acts as an ecological corridor linking inland habitats with the estuary. Birds travelling along this route would be required to pass directly through the turbine envelope, yet the EIAR fails to properly acknowledge or assess this movement pattern.

Of particular concern are Hen Harrier and Barn Owl, both of which are present in the wider region and are highly vulnerable to wind turbine collision and habitat disruption. Hen Harriers frequently hunt over open upland and marginal farmland—the very landscape in which the turbines are proposed and may travel considerable distances between feeding grounds. Barn Owls rely on low-level flight paths along field margins and hedgerows, often travelling between inland wetlands and coastal areas at night when turbine blades are difficult to perceive. The EIAR's survey effort is insufficient to determine the true level of activity of these species or the scale of risk posed.

In addition, the wetland and spring-fed habitats around the lake provide ideal foraging grounds for bats, which are also sensitive to turbine proximity. The interaction between these water features, woodland edges, and the nearby Shannon Estuary creates a complex ecological network that has not been adequately evaluated.

Given the importance of these species and habitats, and the lack of a comprehensive, seasonally representative assessment, the proposed development presents an unacceptable risk to Hen Harrier, Barn Owl, and other wildlife dependent on the lake-estuary corridor.

The proposed development poses a significant risk to the Freshwater Pearl Mussel populations located downstream of the site. This species is one of Ireland's most endangered aquatic organisms and is highly sensitive to even minor increases in sediment, turbidity or nutrient loading. The construction of approximately 10 km of new site roads, along with excavation for turbine foundations, cable trenches and drainage infrastructure, creates a substantial potential for soil disturbance and sediment runoff. Even with best-practice measures, road building at this scale in an upland/rural setting presents a well-documented risk of fine silt entering downstream watercourses.

The EIAR does not demonstrate, through hydrological modelling or a site-specific sediment transport assessment, that construction activities will not alter water quality in rivers and streams supporting downstream Pearl Mussel habitat. The species requires exceptionally clean, stable, low-nutrient water conditions; any increase in suspended solids can smother juvenile mussels and disrupt adult respiration. Given the species' protected status under the EU Habitats Directive and the critical conservation objectives set for Irish Pearl Mussel catchments, the precautionary principle must apply. The applicant has not provided adequate evidence that the proposed 10 km of

internal roads and associated groundworks will avoid adverse impacts on this highly sensitive species and its downstream habitat.

## Amenity

Gortglass Lake, located less than 800 metres from the proposed wind farm site, is an important recreational amenity for the local community. It is regularly used by rowing and fishing clubs, by local walkers, and small sailing dinghies. The lake provides a valued natural setting for sport, leisure, and community activity, and forms part of the wider rural character of the area. The EIAR fails to adequately assess how the construction and operation of the proposed wind farm particularly the scale and visual prominence of the turbines overlooking the lake will impact this amenity.

The introduction of large industrial structures in such close proximity risks undermining the tranquillity and landscape quality that make the lake suitable for recreation. Increased noise, visual dominance, and disruption during construction may significantly diminish the experience for users and deter participation in outdoor activities. Recreational lakes in rural areas are scarce and their protection is specifically supported in local planning policy. The failure to assess or safeguard the amenity value of Gortglass Lake represents a substantial deficiency in the application and a material basis for objection.

## Communtiy engagement

Despite statements in the applicant's EIAR and planning documents, the level of consultation carried out in relation to the Cloonkett Wind Farm has been wholly inadequate for a project of this scale and impact. While the developer refers to a number of "public information clinics" and newspaper notices, many residents including those living in closest proximity to the proposed turbines were never informed directly, were unaware of these events, or were not provided with any accessible method to engage in the process. The consultation clinics referenced were limited in number, held on restricted dates, and poorly publicised locally. No widespread leaflet-drop, door-to-door outreach, community meeting, or direct notification was undertaken that would reasonably ensure that affected residents were aware of the proposals or had an opportunity to voice concerns in a timely manner.

The use of a single newspaper notice in the *Clare Champion* is insufficient to constitute effective public engagement for a development of this magnitude, particularly in rural areas where readership is variable and many residents rely on community networks for information. Meaningful consultation requires two-way engagement, accessible information, and adequate notice none of which were provided here. The failure to proactively engage with the community undermines the credibility of the

consultation process and does not meet the spirit or intent of proper public participation as envisaged under national planning guidelines and the Aarhus Convention.

For these reasons, I submit that the applicant has not demonstrated genuine or adequate public consultation and that this deficiency should weigh heavily in the assessment of this application.

Faithfully

Peter Ranalow