

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

AN COIMISIÚN PLEANÁLA	
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Fee: €	50
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**Submission to An Coimisiún Pleanála
In relation to a proposed Windfarm (Strategic Infrastructure Development)
ABP – 317616-23
ACP case reference number – 323783-25**

Date 20th November 2025

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

Dear Inspector,

I, Sarah Foley, address Clonola, Kildysart Co Clare, wish to formally object to the proposed Cloonkett Wind Farm Development at Cloonkett and Burrenfadda, County Clare.

1. Personal issues and concerns

My home is within one km of the proposed wind farm. I have lived all my life here in an area of peaceful tranquility. If this project goes ahead, as my home is built on a hill, I will be able to see all 14 wind turbines, and I am adjacent to a cluster of them. They will be there for the next forty years, affecting both me and the next generation to come. The sheer scale of the 14 turbines with a ground tip height of 150 meters, hub height 82 meters and a 136 rotor diameter, will dominate the local horizon. The surrounding trees reach a height of 20-30 meters, making the wind turbine 6 to 9 times taller than the nearby Forestry. The tallest building in the republic of Ireland is College Square, an 82-meter residential and office building in Dublin – These are nearly twice as high.

In the next couple of years I will be looking for planning permission to build my forever home; the proposed wind farm may prevent this from happening. The guidelines regarding turbines date back to 2006. The law is now outdated for these new large-scale wind farms and super-size turbines.

On one of their maps my home has been excluded. I have marked an x where it should be. (Copy enclosed) It seems that the company have used outdated maps with quite a few residential houses missing.

I visited Crossmore Wind Farm, which consists of seven turbines with a tip height of 125 meters, 25 meters smaller than the ones that are in planning at the moment. The wind turbine blades can create a stroboscope effect, also known as shadow flicker, as they rotate in front of the sun. This can cause discomfort or annoyance for nearby residents. The aerodynamic noise was very audible and sounded like a whooshing sound. This noise can lead to numerous health issues affecting both the physical and mental aspects of life. Research has shown that individuals living near wind turbines experience a range of problems, including decreased quality of life, stress, sleep disturbance, headaches, anxiety, depression, and cognitive issues. Sound travels faster and is much clearer near water, there are two lakes parallel to this proposed wind farm. (Jeffery, et al., 2013) (Webster & Anor V Meenacloghspar (Wind) Limited)

The proximity of the turbines to residential dwellings will inevitably reduce the property value. This represents an unfair loss to existing residents who have chosen to live in this peaceful rural setting and are forced now to fight against this proposal, causing headache and stress. My house and land will devalue because of the proximity to the proposed wind farm. This would have significant financial consequences to me.

The road infrastructure in the area is not suitable for heavy traffic or large vehicles. I am living in the area for over 18 years and the roads have never been resurfaced. The roads are very narrow, with no road markings, no place for vehicles to pull in, thus, causing great inconvenience for locals who use these roads on a daily basis.

Residents were not consulted before this proposal went into planning. Two years ago a lady from the company came to our door telling us about the proposed windfarm. We were promised a public meeting in our local Community Centre, consultations and to be shown a model of the wind farm. None of this happened. I believe a meeting was held in the West County in Ennis in May of this year but anyone who is negatively affected by the wind farm was not invited. In late September, to my utter dismay we got a letter from the company stating that a planning application has gone to an Coimisiún Pleanála as it is a **Strategic Infrastructure Development**. Our only course of action is to send in a submission.

We applied for acres on our farm and as part of our land borders Gortlass lake, our farm advisor in David Tarpey's was told that I wasn't allowed to claim ACRES on the area beside the lake as it was classified as proposed national heritage site, if this is the case how can a Strategic Infrastructure Development be granted planning in the area.

In West Clare alone there are 115 wind farms permitted, 29 awaiting decisions and 29 proposed, that is 173 in total. It looks like West Clare is a dumping ground for these wind farms.

2. Ecological Sensitivity – Hen Harrier, Marsh Harrier and Curlew

The site lies within a foraging and potential breeding range for both the Hen Harrier (*Circus cyaneus*) and Marsh Harrier (*Circus aeruginosus*), species listed under Annex I of the EU Birds Directive. The developer's EIAR recorded 65 Hen Harrier observations and over 15,500 flight-seconds within the site boundary — yet no flightline mapping or cumulative collision risk analysis was presented. Similarly, there is no dedicated survey for the Marsh Harrier, despite multiple local reports of sightings.

The Curlew (*Numenius arquata*), now red-listed in Ireland and the subject of the National Curlew Conservation Programme, has also been recorded in this bogland. Curlews depend on open peat and wet grassland habitats for breeding and are highly sensitive to disturbance. Its presence alongside the Hen and Marsh Harrier underlines the exceptional avian biodiversity of this landscape a rarity even within Ireland. In recent years I have seen a nest of these in the field beside my house.

The omission of adequate survey data for these species represents a material deficiency in the EIAR and breaches from the Birds Directive, the Wildlife Acts, and the standards established under Article 6(3) of the Habitats Directive.

In their ecology report, they have named 9 red listed birds, 23 amber listed (hen harrier is a amber listed) 8 of those species are also listed as annex 1 requiring EU member states to take special conservation measure in relation to their habitats. The white eagle was also spotted 4 times. They also fail to mention any connection between the lake and the bog habitats even though both Gortlass lake (001015) and Cloonsnaghta lake (001004) are proposed national heritage areas.

3. Peatland Integrity, Hydrology and the Lower River Shannon SAC

The proposed turbines and access routes are sited on deep blanket peat that drains via surface and subsurface flows into tributaries leading directly to Gortglass Lough and the Lower River Shannon SAC. This creates a clear hydrological connectivity between the construction area, the drinking-water reservoir, and the SAC, which supports the Freshwater Pearl Mussel (*Margaritifera margaritifera*) — a qualifying interest species dependent on pristine water quality and low sedimentation.

Any peat excavation, drainage, or silt disturbance poses a direct threat to this hydrological balance. The EIA provides no calibrated peat stability model, no quantitative hydrological assessment, and no downstream sediment or nutrient transport model. This failure contravenes the Habitats Directive and lessons from the Derrybrien Wind Farm (C-215/06; C-261/18), where poor peat management led to catastrophic slope failure and EU infringement fines against Ireland.

Given the sensitivity of the peatland and its downstream receptors, permission cannot lawfully be granted without conclusive evidence that no adverse effect on the SAC will occur — a test the developer's documentation clearly fails.

4. Turbine Blade Erosion and Microplastic Pollution

Modern turbine blades are manufactured from glass-fibre and epoxy resin composites with polyurethane coatings. Over time, their leading edges erode due to wind, rain, and particulate abrasion — releasing microplastic and polymer particles into the surrounding environment. Peer-reviewed research estimates losses between 8–50 grams per blade per year, with larger modern turbines releasing more. These fragments are chemically stable, buoyant, and capable of travelling long distances through surface-water runoff.

Given the hydrological link between the turbine sites and Gortglass Lough, these microplastics could enter the public water supply and the aquatic ecosystem of the Lower River Shannon SAC. The EIAR provides no assessment of this risk — an omission inconsistent with the precautionary principle and with national obligations to safeguard water resources.

The recycling of the wind turbine blades remains a challenge due to the complex composition of composite materials, such as fiberglass. Currently, there is no widely adopted and economically viable solution for their recycling.

5. Public Drinking Water Supply – Gortglass Lough

Gortglass Lough serves as the public water abstraction point for the Kildysart Public Water Supply, operated by Uisce Éireann. This lake provides treated drinking water to over one thousand two hundred homes in the Kildysart and Coolmeen areas. The river draining the Cloonkett bog feeds into this lake, meaning that any sediment, chemical, or pollutant runoff from turbine construction, peat disturbance, or maintenance will flow directly into the drinking-water catchment.

Under the Water Framework Directive and EU Drinking Water Directive (2020/2184), Ireland is required to prevent deterioration of surface-water quality at public abstraction points. The precautionary principle therefore mandates that no project be permitted where such contamination cannot be ruled out beyond reasonable scientific doubt.

6. Fisheries and Recreational Amenity

Gortglass Lough is also a popular angling and recreational lake, regularly stocked with fish and used by the local community. It is home to a family of swans, numerous ducks, otters, and near the cliffs is home to the bats. Any decline in water quality — through increased turbidity, chemical leaching, or microplastic contamination — would directly harm fisheries and recreational use, diminishing local amenity value and tourism potential. The EIAR's Landscape and Visual Impact Assessment completely omits any assessment from the perspective of Gortglass Lough, despite its ecological, social, and scenic importance.

When you google things to do in Kildysart, the following comes up *“Kildysart is blessed with some lovely walks, one of which includes the Gortlass loop. Gortlass Lake is also a popular trout fishing lake and is a great amenity for swimming, paddleboarding, canoeing and is home to the local Curragh club. It is also has a crannog dating back to the Bronze age.”* There is an annual swim held on Christmas Day and throughout the year there are Yoga retreats.

7. Visual and Landscape Impact

The proposed turbines would dominate the visual landscape, particularly from Gortglass Lough, where they would intrude on the open natural views across the lake and surrounding bogland. The developer’s Visual Impact Statement is superficial, based on limited and selectively chosen viewpoints, and fails to provide any realistic photomontages from key public vantage points. Given the importance of this landscape for biodiversity, recreation, and local identity, the proposed wind farm would cause permanent and irreversible landscape degradation.

Attached please see photo montage from their planning application, the picture has been taken strategically as the pole hides two of the towering turbines.

8. Conclusion

The proposed Cloonkett Wind Farm presents unacceptable risks to protected species, public drinking water, peatland stability, biodiversity, and community wellbeing. The new information concerning Gortglass Lough as a drinking-water source and the presence of the Freshwater Pearl Mussel and Curlew only amplifies the case for refusal. The EIAR is materially incomplete, its mapping outdated, and its hydrological assessment inadequate.

Yours Sincerely


Sarah Foley



(V95 D883)

Photomontage

Page 1 of 2



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Fans look on from a nearby vantage point during the Harty Cup Round 3 game at Clarecastle.

Photograph by John Kelly

West Clare locals say wind turbines may be too close to their houses

Sharon Dolan D'Arcy

A MEETING organised in Kildysart last week by a group of local residents concerned about a proposed 14-turbine wind farm at Cloonkett and Burrenfadda attracted up to 40 attendees.

Some local residents who attended have formed a group called Kildysart-Cranney, Cloonsnaghta and Coolmeen Action Group, and are making a submission to An Coimisiún Pleanála in relation to the proposed wind farm ahead of submissions closing next week.

Members of the group have formally objected to the proposed Cloonkett Wind Farm Development at Cloonkett and Burrenfadda, County Clare.

Cloonkett Wind Farm Development Ltd have applied for planning permission to develop a wind farm to be located within the townlands of Glencouaun More, Craghera and Cloonkett.

A spokesperson for Kildysart/Cranney/Cloonsnaghta & Coolmeen Action Group told *The Clare Champion* residents' concerns centre around the sheer

magnitude of the wind farm, comprising 14 wind turbines with a tip height of 150 meters, hub height of 82m, and a 136m rotor diameter, which they say is in close proximity to homes.

They also highlight the site is close to Gortglass Lake, a water reservoir for the local area including Kildysart, and say the turbines will be visible from the loough, which is adjacent to a cluster of turbines.

They say the site is in an area of natural beauty, and beside both Gortlass and Cloonsnaghta lakes, which are proposed national heritage sites.

Group members are unhappy with the lack of information from the company claiming local residents were given letters around two years ago and were told there would be community engagement but this did not happen, and plans were submitted without any proper engagement.

They also say a meeting was held last May at an Ennis hotel however, they claim none of the residents living within one kilometre of the proposed development were informed about it.

"The company called to some

of our doors approximately two years ago, telling us about the proposed wind farm.

"We were promised consultations, group meetings and to be showed models of the project.

"The only communication we got was a letter late September to say that it was gone into planning to An Coimisiún Pleanála," a spokesperson said.

They have expressed their concern the guidelines for wind turbines date back to 2006, saying this law is now outdated for these new large scale wind farms and super-size turbines.

They quote Cloonkett Wind Farm Development's report, which says "following completion of layout optimisation, a separate distance of 600m (four times tip height) was achieved from the closest landowner".

However, the action group claims there are numerous landowners near the 600 buffer.

Concerns exist too about the aerodynamic noise, which they maintain will be very audible.

The visual effect and flicker is also an issue, and they believe these can effect both physical and mental health.

The group is also concerned the local road infrastructure is not suitable for heavy traffic or large vehicles to facilitate the construction of the wind farm.

In terms of the physical beauty and tourism attraction of Kildysart, the area is fortunate to have some lovely walks, one of which includes the Gortglass Loop.

Gortglass Lake itself is a popular trout fishing lake and is an amenity for swimming, paddle boarding and canoeing, and is home to the local curragh club. It also has a crannog dating back to the Bronze Age.

The group also quotes the ecology report, which named nine red listed birds, 23 amber listed including the hen harrier, and eight of those species are also listed as requiring EU member states to take special conservation measure in relation to their habitats. The report also detailed the white eagle was also spotted four times.

Furthermore, according to the group the report fails to mention any connection between the lake and the bog land habitats, despite both Gortglass and Cloonsnaghta lakes being proposed national

heritage sites.

"In West Clare alone, there are 115 wind farms permitted, 29 awaiting decisions and 29 proposed, that is 173 in total. It seems like West Clare is a dumping ground for these wind farms," the spokesperson said.

Cloonkett Green Energy is an Irish-owned and managed renewable energy company, and they say the proposed project potentially could provide clean power for up to 35,000 homes offset carbon emissions by approximately 62,000 tonnes of carbon dioxide per year, and generate up to €280,000 in community funding to the local area every year.

They also promise to create over 70 jobs on the project, saying they will work with local suppliers where possible.

Wind energy is one of the most efficient technologies to generate electricity in a safe and environmentally sustainable way, and on-shore wind energy projects form a key part of the Government's plan to enhance clean electricity generation, reduce CO2 emissions, and meet the country's environmental targets.

Prison term for Ennis man with €98,000 of cannabis

Article dated 20.11.25 printed in Clare Champion