

Sarah Keane  
105, Ballinacurra Gardens  
Ballinacurra,  
Limerick, V94 PW7P

Formal Objection to the proposed Cloonkett wind farm within in the townlands of Glenconauun More, Craghera and Cloonkett, County Clare.

ABP – 317616-23  
ACP – 323783-25

Dear Sir / Madam,

I wish to formally object to the proposed Cloonkett Wind Farm, which includes 14 turbines, a substation, grid connection, and related infrastructure. This objection is based on significant environmental and planning vulnerabilities, supported directly by the EIAR documentation submitted by the applicant.

My family home is located approximately 600 meters from the nearest proposed turbine, near Gortglass and Cloonsnaghta Lough. These areas function as ecologically sensitive wetland, freshwater lakes, bogland, and rural amenity landscapes.

The EIAR categorises the site as part of a “settled landscape” capable of accommodating large-scale wind energy (LVIA, pp. 23–27). However, the LVIA itself describes:

- “Gently rolling rural environment... mosaic of peatland, pastoral farmland, commercial forestry, and dispersed rural dwellings” (p.18)P22-125-Chapter-15-Landscape-Visual
- Presence of boglands, lakes, hedgerows, remnant glacial landforms, and small-scale pastures (p.17–18) P22-125-Chapter-15-Landscape-Visual

These characteristics match Medium–High sensitivity landscapes, not low-sensitivity “working landscapes.” Furthermore, the Clare CDP identifies: Heritage landscape sensitivity along the Shannon Estuary (LVIA p.27) and Landscape Character Areas (LCAs) that explicitly emphasise high sensitivity to large-scale development due to enclosed ridges, drumlins, bogland patterns, and rural heritage

The EIAR repeatedly downplays this sensitivity to justify turbine height and density. This creates a material contradiction between Clare CDP Landscape Character Assessment (LCA 18 & 19) and The EIAR’s “low sensitivity” conclusion.

The turbines proposed have a tip height of 150meters, the Draft Wind Energy Development guidelines SPPR2, 2019 requires a setback of four times the tip height of the turbine or a mandatory

minimum of 500m, whichever is greater. And the Wind Turbine regulation Bill 2025, section 6, proposes a significantly more protective standard of 7.5 times turbine height, in this case 1,125 meters height.

In this situation, my parents' home is 600 meters from the planned T6 turbine with an additional 20 meters of curtilage of front lawn and garden. Including a further unobstructed view of 700 meters to the current forestry site from their home. The proposal meets only the absolute minimum requirement, with zero buffer for visual amenity or noise/flicker mitigation and no screening. Contrary to the intent of SPPR2, which is to avoid dominance or intrusion in rural residential settings. Their farmland lies significantly closer of 300meters from the T6 turbine. This land is actively used for silage cutting twice a year and routine cattle grazing. Therefore, the development fails SPPR2.

The applicant's LVIA acknowledges that setback guidance applies (LVIA p.24–25 referencing SPPR2) but does not justify deviation or obtain consent from affected landowners and shows no reference to the wind turbine regulation bill 2025. This demonstrates that the proposed layout is incompatible with both current national guidance and the clear policy direction toward increased safety, amenity protection and precautionary siting.

The LVIA repeatedly relies on subjective impressions: "*The majority of visitors appear not to notice the majority of development*" p.11) while ignoring its own evidence showing clear theoretical visibility across the Central Study Area (ZTV map, p.32), Visibility from multiple receptors, including rural dwellings, lakesides, and road networks and Turbines forming dominant and co-dominant features within 5 km.

Yet, the LVIA concludes negligible or low impacts for many receptors without adequate justification. Given the density (14 turbines), the height (150 m), the flat peatland context (open views, no screening), the LVIA underestimates both the magnitude of change and the sensitivity of the receptors.

The applicant claims low cumulative impact, yet the LVIA's own maps acknowledge wind farm proliferation along uplands & lowlands within 20 km, High theoretical cumulative visibility (LVIA p.58, cumulative ZTV) and presence of existing and permitted wind energy within the same landscape character types.

The NatureScot 2021 methodology, quoted by the LVIA, states that cumulative effects occur where turbines become defining landscape features. 14 turbines are clustered near two lakes in a flat, open, rural landscape, with visibility across 20 km, not including windfarms already present in the same area. The conclusion that cumulative impacts are "not significant" is not credible and contradicts both WEDG 2006 & NatureScot cumulative assessment principles.

The EIAR recognises (LVIA p.17) that two lakes lie within 690–840 m of the turbines. The area consists of peatland with drainage feeding into the Shannon Estuary. This hydrological and ecological context is highly vulnerable.

Wind farms in peatland–lake mosaics risk:

- Altered water flows
- Sedimentation
- Disturbance to the freshwater mussel habitat in the nearby rivers
- Loss of wetland edges used by birds and bats

The EIAR does not address:

- Protected species surveys
- Flight path assessments
- Habitat displacement
- Peat stability impacts on lake ecosystems.

These omissions constitute material information deficiencies in the EIA under the EU EIA Directive.

The LVIA and EIAR acknowledge the turbine delivery route (TDR) but fail to assess the type of roads in the area. These include single-lane boreens with hedgerows that limit passing opportunities, soft verges, a lack of structural capacity for abnormal loads, the need for hedgerow removal, and long-term maintenance and traffic impacts.

The applicant uses generic statements, but no road survey, no swept-path analysis, and no hedgerow loss quantification. This contradicts Clare CDP transport policies, EIAR scoping requirements for linear infrastructure, and WEDG 2006 guidance on minimising route impact.

The Clare CDP requires developments in Settled Landscapes (LVIA p.24):

- Avoiding intrusions on scenic routes
- Avoid visually prominent locations.
- Use of topography & vegetation to screen

The LVIA admits the area is flat to gently undulating (no screening). Turbines will be visible across wide-open landscapes, and Lakeshores and elevated local viewpoints will see them clearly. Despite this, it concludes compliance without demonstration.

Two turbines are proposed at approx. 600 m from an occupied dwelling. The LVIA itself recognises that residents at home are the “most sensitive visual receptors” (LVIA p.10). Given the blade sweep, shadow flicker angles, and complete lack of screening in open peatland. Residents would be subject to dominant turbine presence, Rotational movement, Shadow flicker during low-sun periods over the lakes, nighttime aviation lighting and ongoing visual disruption.

This constitutes a material and unreasonable interference with residential amenity, inconsistent with Draft WEDG SPPR2 Clare CDP Objective C (prevent visual dominance over residential areas), General principles of orderly rural development.

In Conclusion, the proposed Cloonkett Wind Farm contains multiple significant environmental and planning vulnerabilities, including:

- Misapplication of landscape sensitivity classifications
- Non-compliance with Draft WEDG 2019 SPPR2 and Wind Turbine regulation Bill 2025
- Underestimation of visual and cumulative impacts
- Inadequate roads and traffic assessment for turbine delivery
- Significant ecological risks to Gortglass & Cloonsnaghta Lough's and surrounding area
- Failure to demonstrate compliance with Clare CDP landscape policies
- Adverse residential amenity impact on the closest dwellings

For these reasons, I respectfully request that An Coimisiun Pleanála refuse permission for the proposed development.

Yours sincerely,  
Sarah Keane