

To;
The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1, D01 V902.

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| AN COIMISIÚN PLEANÁLA | |
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| Time: <u>9:15</u> | By: <u>RSM</u> |

Submission to An Coimisiún Pleanála
In relation to a proposed Windfarm (Strategic Infrastructure Development)
ABP – 317616-23
ACP case reference number – 323783-25

Date: 21st November, 2025

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

Dear Inspector,

I, Thomas Foley of Clonola, Kildysart in the County of Clare wish to make a submission to express my concerns regarding the above proposed Windfarm at Cloonkett, Co. Clare.

I have a great interest in nature and doing what I can do to help protect the magnificent wild environment we have around us, but this development just seems to have the potential to do so much long-term harm to a very important habitat. Planning is sought for:

- 14 x 150-meter (Blade tip height) turbines
- 5.15 ha area for onsite borrow pits,

- 9.51 Km of internal access tracks minimum of 5 meters wide, wider at bends.
- forestry felling 8.4 ha
- new bridge within the site

From collisions to nesting disruptions and habitat displacement, wind farms can certainly have negative impacts on wildlife. Migratory birds and bats are particularly vulnerable, as they may collide with turbine blades. Plus, turbines can cause birds to relocate, disrupting breeding and nesting patterns.

The size and scale of this project is just not acceptable to the people who are living in this area. I live just 1km away from the inner circle. 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. The proposed turbines will be highly visible from my property, significantly altering the character of the rural landscape I choose to live in. The height and the movement of these turbines will dominate the local skyline and negatively affect the visual surroundings.

Wind turbines produce both low-frequency vibration and audible noise which can be particularly disturbing at close distances. I am concerned the noise levels will impact daily life and sleep quality, broadband and phone signals.

We were not informed or consulted before this proposal, we were promised a public meeting in our local Community Centre which never took place (over 2 years ago), as it so happened the people who were for this development had a private meeting which took place elsewhere without consulting the affected residents who they knew would object. These people/developers have no conscious setting neighbour against neighbour.

The road infrastructure around this location is not fit for this large-scale project. The roads are very narrow/boggy with no place for vehicles to pull in, thus, causing great inconvenience for locals who use these roads on a daily basis.

I have turbary rights in O'Donnell's Bog (copy of deed outlining turbary rights attached). We cut turf every year and if this project goes ahead, am I prevented from entering this site? Wind turbines can negatively affect bogs by

causing **carbon emissions** and habitat destruction during construction, including potential bog bursts. Construction disturbs the peat, upsetting the water table and carbon accumulation, leading to the release of stored carbon dioxide (CO₂cap C cap O sub 2). This damage compromises the bog's function as a carbon sink and can be long-lasting.

I have seen wind developments with turbines of this scale but they tend to be located in remote unpopulated areas. This part of Clare is not such a location and the proposed site is wholly unsuitable from a visual and environmental viewpoint. I recognise that the work of the Inspector and the Board is not helped by the lack of up to date guidelines. Similarly the lack of an updated Wind Energy Strategy in the recently adopted County Development Plan does not assist decision makers.

We, the people of this community have a deep sense of place and really value the aesthetics of the rural setting in which we live. We are blessed with lovely walks one of which includes the Gortglass Loop. Gortglass lake is also a popular trout fishing lake and is a great amenity for swimming, paddleboarding, canoeing and is home to the local Currach Club. It also has a crannog (man made island) dating back to the Bronze Age.

This proposed development is located in the pristine blanket bogs of Glenconauun and Cloonkett. These bogs are located 3Km from Kildysart, 2Km from the village of Cranny and 2.5Km from Coolmeen. The development is only 690 meters from Gortglass Lough and 840m from Cloonsnachta Lough, both of these lakes are pNHA's. Gortglass Lough is only 3.5km from the Lower River Shannon SAC (002165), River Shannon and River Fergus Estuaries SPA (site code: 0044077) is 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', Drinking Water supplied by Gortlass will be affected by pollutants from the Turbine posing a risk to the health of the entire community.

The Bog lands where the Turbines are planned also play a key habitat for many 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 with many ducks, swans and geese present in the winter months, as well as many waders such as curlews and Egrets, 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. The swans on the lake are flying to and fro from the Knockalought lake. I happened to be out walking on Sunday last, 16th November and I saw 14 swans – may have been Whoopers flying into the Clonsnaughta Lake – what a spectacular sight to see.

I feel some of the important details are slightly downplayed in the summary reports but can be found deep down in the appendices and that the overview of the area plays down the overall importance of the locality from an ecology and recreational point of view. My concern would be that these developers are very good at submitting information that helps with planning permission but might not highlight some of the important points that will help 'nature's' case. I have attached a picture to see the scale of these giant turbines in such a beautiful serene location (the photo was taken from the developers website www.cloonkettgreenenergyplanning.ie)



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.

Under the Habitats Directive, Water Framework Directive, and Planning and

Development Regulations, the Planning Authority and An Bord Pleanála must apply the precautionary principle and refuse this application outright.

Should the developer wish to resubmit, they must first produce updated and peer-reviewed hydrological and peat stability models, a drinking-water source protection risk assessment, comprehensive avian and bat surveys covering Hen Harrier, Marsh Harrier, and Curlew flightlines, and accurate mapping of all residential dwellings and visual receptors.

Until then, granting permission would breach both EU environmental law and the State's duty of care to public health and biodiversity.

Signed: *Thomas Foley*

Thomas Foley

Dated this 19th day of November, 2025

**Thomas Foley,
Clonola, Kildysart,
Co. Clare.**

Local Registration of Title (Ireland) Act, 1891.

Land Registry of Ireland.

REGISTER OF FREEHOLDERS.

DESCRIPTION OF LANDS.

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MADE...
W.

INDEXED
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OS 59/7

DUPLICATE.

These lands are subject to the restrictions as to sub-division, sub-letting, charging, &c., contained in Section 54 of The Irish Land Act, 1891, and to the restrictions as to the purchase of other holdings and as to timber contained in Section 32 of The Irish Land Act, 1909.

PART of the lands of Wloonulla

containing fifty-nine _____ acres, one roods, and four _____ perches, or thereabouts, statute measure, situate in the Electoral Division of _____, Barony of Clonderalaw and County of Clare.

There is appurtenant to the said lands a right of herbage on part of the lands of Glenconaur More marked 7^B on the Office maps (being portion of the land 7479).

The registration of the ownership of these lands does not extend to the mines or minerals therein, the same being subject to the provisions in that behalf of the Irish Land Act, 1903.

The sporting rights within the meaning of the said Act, to which the Vendor John Bianconi was _____

entitled, exclusive of the Tenant, previously to the sale under the said Act, are reserved to the said Vendor during his life _____

BURDENS.

The lands above described are subject to: _____

An annuity of eight _____ pounds, eight _____ shillings, and _____ pence, beginning on the 1st of December, 1919, and payable half-yearly to the Irish Land Commission, until an advance of £ _____ has been repaid.

CANCELLED 91 CLO 0002

ENTRY NOTE:—These lands are registered subject to the rights or equities (if any) arising from the interest vested in the said Vendor by Fiat of the said Commission, dated the 5th of June, 1919, being deemed to be a graft on his previous interest in the land, or arising in any other manner from the existence of such previous interest.

OWNERSHIP.

The said Bridget Bianconi of Wloonulla, Clonderalaw, County Clare, is registered as owner in fee simple of the lands comprised in this folio.

Raymond Smith
A.R.

Estate of...
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E. C.
L. R.

Registered 77
of Vol. 191

COLLECTION No. _____

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