

Yvonne Ranalow
Gortglass Lake
Kilmurry McMahan,
Kilrush
Co Clare
V15 X009

ABP: 317616 – 23

ACP case reference number: 323783 -25

Reference: Clonkett wind farm

I, Yvonne Ranalow, Gortglass Kilmurry McMahan Kilrush Co Clare would like to object to the proposed wind turbine development located within the townlands of Glenconau Mor, Craghera and Clonkett under the following headings:

- Archaeology
- Aquifers
- Raised bog
- Fresh water Pearl Mussel
- Ecological
- Lack of public consultation

I live on the shore of Gortglass lake and am so concerned of the negative impact these turbines will have on an area of such beauty. These turbines are so close to this pristine area and will tower over an area that's so frequently used as an amenity for so people. Below are some of the areas of concern I have regarding the proposed development:

1. Archaeology

There is an ancient Crannog on the island at Gortglass lake and a promontory fort adjacent to the crannog within 1km of the nearest turbine, these do not seem to have been identified or mentioned in the EIAR. These known structures are unlikely to have existed in archaeological isolation. Crannogs typically formed the central habitation point within a wider early medieval settlement landscape, which included landing places, causeways, trackways, field systems, craft areas and outlying habitation or agricultural zones. The proposed wind-farm site lies only approximately 650 m from the lake, placing it well within the crannog's expected archaeological hinterland.

Because many of these associated features are subsurface, underwater, or concealed beneath peat, they would not have been detected through the desktop analysis and limited field-walking described in the EIAR. Excavation for turbine foundations, access roads, drainage, and cable trenches poses a very real risk of disturbing unrecorded settlement activity linked to the crannog.

Thus, the presence of this lake-dwelling significantly heightens the archaeological sensitivity of the entire development area, and a more robust programme of archaeological investigation is required before any ground disturbance takes place.

2. Aquifers

I wish to raise a further concern regarding groundwater protection. There is a spring well located approximately 700 m from the proposed wind-farm site which is not mentioned in the EIAR, although not used domestically, is widely relied upon by local residents as a source of high-quality spring water. This well draws from the same aquifer system that supplies Gortglass Lake, which in turn feeds the local Group Water Scheme reservoir—a critical element of the area’s public water infrastructure, providing water for over 1200 households.

Any disturbance to the aquifer through turbine foundation excavation, road building, deep drainage works, or concrete contamination risks affecting both the public spring well and the lake that supplies the Group Water Scheme. Alteration of groundwater pathways, interception of recharge zones, or pollution of permeable subsoils could have immediate and long-lasting impacts on water quantity and quality.

The EIAR does not adequately address the vulnerability of this aquifer, nor does it assess the hydrological linkage between the turbine footprint, the spring well, and the GWS supply at Gortglass Lake. Given that Group Water Schemes often operate with limited treatment capacity, even minor contamination events could have serious consequences for public health.

I therefore request that a full, site-specific hydrogeological impact assessment be required, including groundwater-flow modelling, identification of recharge areas, vulnerability classification, and protection measures for both the spring well and the GWS reservoir. Without such detailed analysis, the risks to local water supplies remain unacceptably high.

3. Raised Bog

The proposed development site consists of raised bog, a habitat type recognised in both Irish and EU law as being of exceptional ecological significance and requiring strict protection and restoration. Raised bogs function as major long-term carbon sinks, and the United Nations ‘Global Peatland Assessment’ (2022) recommends that peat soils deeper than 10 cm should remain undisturbed to preserve their climate-regulating capacity.

The construction of 14 large wind turbines and over 10 km of access roads would inevitably involve deep excavation, extensive drainage, soil stripping, and the introduction of permanent foundations and hardstanding areas. Such works would significantly disrupt, fragment, and dry out the peatland, leading to irreversible damage to the raised bog ecosystem and substantial loss of stored carbon.

These impacts run contrary to Ireland’s national commitments to peatland conservation and rewetting, the EU Habitats Directive’s requirements for protecting raised bog habitats, and international climate guidance emphasising the preservation of peat as a carbon store. Disturbing such a sensitive peatland landscape at this scale cannot be considered environmentally sustainable

or compatible with national biodiversity and climate objectives. Accordingly, the proposed development represents an unacceptable level of impact on a protected and irreplaceable habitat.

4. Fresh water Pearl Mussel

I wish to raise serious concerns regarding the potential impact of the proposed borrow pits on the Clonkett Stream, which is known to host populations of the freshwater pearl mussel (*Margaritifera margaritifera*), a species listed as critically endangered and protected under the EU Habitats Directive. The proposed excavation of 100,000 cubic meters of rock within approximately 100 metres of this stream presents a high risk of increased sedimentation, turbidity, and potential chemical contamination. Pearl mussels are extremely sensitive to fine sediments, which can suffocate juveniles, reduce oxygen availability, and degrade spawning habitat.

The proximity of the borrow pits, combined with heavy machinery, stockpiling, and drainage alteration, could alter the hydrology and water quality of the stream, with long-term impacts on this protected species. Standard mitigation measures such as silt fences or temporary sediment ponds may be insufficient to prevent adverse effects.

I therefore request that the planning authority require a comprehensive freshwater pearl mussel impact assessment, including hydrological modelling, sediment transport analysis, and expert ecological mitigation planning, prior to any approval. Without this, the risk to a critically endangered and legally protected species is unacceptable.

5. Ecological

I wish to raise serious concerns regarding the potential impact of the proposed wind turbines on sensitive bird species in and around the site. The EIAR acknowledges observations of mute swan, hen harrier, and kestrel within the development area, but the documentation does not appear to include detailed counts or records of all local bird activity. In particular, the barn owl, which is regularly observed on the south side of the proposed site, is not adequately represented in the survey results.

Given that barn owls are nocturnal and highly sensitive to disturbance, the lack of specific survey data raises concerns that the risk to this species has been underestimated. Other sensitive species, including hen harrier and kestrel, are also at risk from collision, displacement, and habitat disturbance associated with turbine construction and operation.

I request that the planning authority require a comprehensive, species-specific assessment, including both diurnal and nocturnal surveys, detailed flight and habitat usage data, and targeted mitigation measures. Without such assessment, the potential impacts on these legally protected and sensitive species remain uncertain and unacceptable. The EIAR acknowledges that further assessment is required both Kestrels and Hen Harriers as both are very active in the area and likely to be nesting within the site or the 500-meter buffer.

6. Lack of public consultation

I wish to raise a concern regarding the level of community engagement and consultation undertaken by the applicant. The company had previously communicated that local consultations would be held in the community hall to inform residents about the proposed development. However, these meetings did not take place, leaving many local residents unaware of the full scope, impacts, and potential risks associated with the proposal.

This lack of direct consultation has resulted in the community being left in the dark, undermining transparency and preventing meaningful public input at an early stage. Effective and genuine community engagement is essential for developments of this scale, particularly those with significant environmental, cultural, and social impacts. The failure to provide promised local consultations raises concerns about whether the community has had sufficient opportunity to raise a concern regarding the level of community engagement and consultation undertaken by the applicant. The company had previously communicated that local consultations would be held in the community hall to inform residents about the proposed development. However, these meetings did not take place, leaving many local residents unaware of the full scope, impacts, and potential risks associated with the proposal.

I feel the development of these massive 150 meter (blade tip height) and number of turbines in such a pristine habitat will have the potential to do so much unknown and unreversible damage in an area that's so important from an ecological point of view. My property is only 450 meters from the nearest turbine yet the EIAR states the no turbine is within 4 X blade tip height (therefore 600meters) from the nearest landowner, surely the construction of these structures so close to people's property warrants further attention and consultation.

Yours Sincerely,

Yvonne Ranalow