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Your Ref: ACP-323783-25 - Cloonkett Wind Farm

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From Claire Boohan <cboohan@clarecoco.ie>

Date Tue 12/9/2025 1:30 PM

To SIDS <sids@pleanala.ie>

3 attachments (1 MB)

4073\_001.pdf; 4074\_001.pdf; 4075\_001.pdf;

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

I refer to the above-mentioned proposed development and **attach** herewith the following:-

1. Letter from Clare County Council dated 09<sup>th</sup> December 2025.
2. Chief Executive's Report dated 28<sup>th</sup> November 2025.
3. Extract from the Minutes of the December 2025 Monthly Meeting of Clare County Council.

Please note hard copies to follow by registered post.

You might please acknowledge this submission.

Many thanks.

Mise le meas,

Claire

**Claire Boohan**  
**Clerical Officer**

Planning, Placemaking & Economic Development

Clare County Council, Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2

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COMHAIRLE CONTAE AN CHLÁIR  
CLARE COUNTY COUNCIL



Tá an t-eolas atá sa ríomhphost seo, agus in aon cheangaltán leis, rúnda, agus is d'aird agus d'úsáid an fhaighteora nó na bhfaighteoirí amháin nó eintiteas ainmnithe thuas atá sé. Murar tusa faighteoir beartaithe an ríomhphost seo nó aon chud de, níor chóir duit an teachtaireacht seo a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Más rud é gur trí bhotún a fuair tú an ríomhphost seo cuir sin in iúl don tseoltóir gan mhoill.



COMHAIRLE | CLARE  
CONTAE AN CHLÁIR | COUNTY COUNCIL

**By Email & Registered Post**

**Your Ref: ACP-323783-25**

**09<sup>th</sup> December 2025**

**An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902**

**SID Application known as the Cloonkett Wind Farm for 14 No. Wind Turbines, a permanent 220kV substation and ancillary development in the townlands of Carrowreagh East and West, Cloondrinagh, Cloonkett, Burrenfadda, Shessiv, Craghera, Glenconauun More, Ballyduneeen, Co. Clare**

Dear Sir/Madam,

I refer to the above and **enclose** herewith the following:-

1. Chief Executive's Report dated 28<sup>th</sup> November 2025.
2. Extract from the Minutes of the December 2025 Monthly Meeting of Clare County Council.

Yours sincerely,



**Anne O'Gorman  
Staff Officer  
Planning Department  
Economic Development Directorate**

Enc.



**An Roinn Pleanála  
An Stúirthóireacht Forbairt Gheilleagrach**  
Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

**Planning Department  
Economic Development Directorate**  
Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2





**CLARE COUNTY COUNCIL**  
**PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED)**  
**PLANNING AND DEVELOPMENT (STRATEGIC INFRASTRUCTURE) ACT 2006**  
**CHIEF EXECUTIVE'S REPORT IN ACCORDANCE WITH THE REQUIREMENTS OF**  
**SECTION 37E (4) OF THE PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED)**  
**IN RELATION TO SID WINDFARM APPLICATION**

**ACP REFERENCE: 323783-25**

**1.0 Introduction**

This report has been prepared in accordance with the requirements of Section 37E (4) of the Planning and Development Act, 2000, as amended, following on from the submission of a Strategic Infrastructure Development (SID) to An Coimisiún Pleanála, known as the Cloonkett Windfarm. The development consists of 14 no. wind turbines with an energy output of approximately 63MW with a 40-year operational lifespan. A 10-year permission is sought and the application is accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS). The main components of the development are as follows:

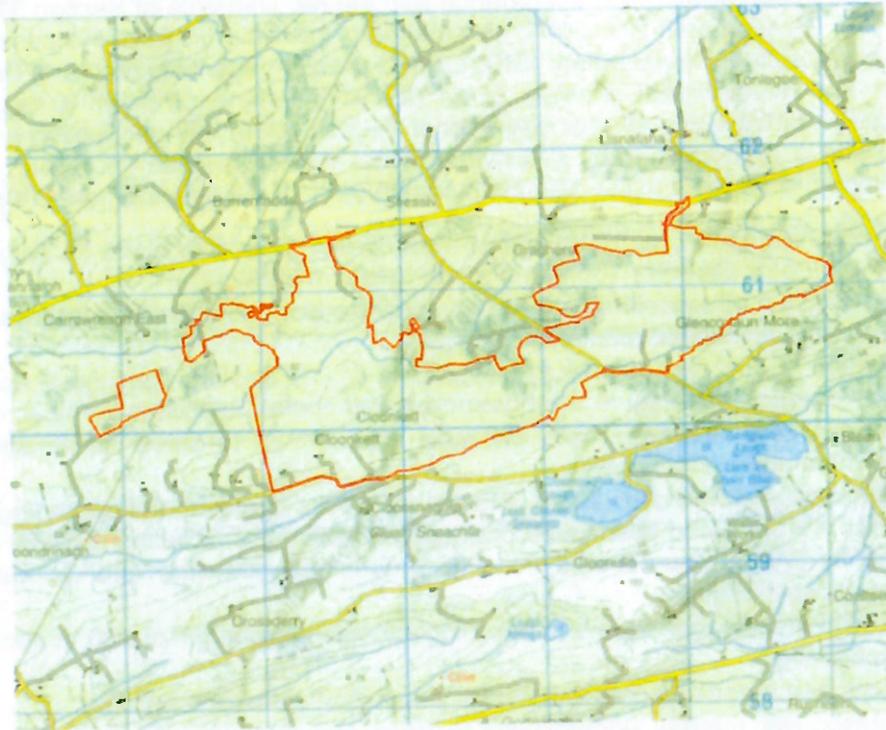
- 14 no. three-blade wind turbines with an overall ground to blade tip height range of 150m, a rotor diameter 136m and a hub height of 82m;
- Construction of associated reinforced concrete foundations, crane pad hard-standing areas and associated plant/switching gear;
- Creation of one new access and upgrading of 1 no existing agricultural access of the local road L 2072 to serve as construction and operation access to the site.
- Creation of 2 accesses onto the local road L6239 to serve as construction and operation access to the site.
- Construction of new permanent, internal site tracks (9.51km) and upgrading of existing tracks (1.43km) and associated drainage infrastructure including a Water framework Directive (WFD) water course crossing comprising a new clean span bridge to replace an existing crossing.
- Erection of 1 no. permanent meteorological mast to a height of 100 m above existing ground level;
- Creation of a dedicated peat and spoil deposition areas and berms.
- All associated internal, underground electrical and communications cabling connecting the wind turbines to an on-site substation;
- Forestry felling of 8.40ha.
- Provision of 1 no. 220kV onsite substation and associated compound including welfare facilities, waste water holding tank, rain water harvesting tank, , associated security fencing, external lighting and lightning protection, and over head line works
- All associated site development works including excavation, earth works, peat and spoil management, and landscaping.

## **2.0 Site Location**

The subject site (Figure 1 below), is located within a rural area approximately 19km south west of Ennis, 20km north east of Kilrush and east of Cranny village. The site includes lands in the townlands of Cloondrinagh, Cloonkett, Burrenfadda, Shessiv, Glenconau More, Ballyduneeen, and Carrowreagh West.

The site is located in a lowland area (50 to 100m altitude above sea level) comprising a mixture of peatland habitats, including cut over raised bogs, revegetating cutover and turf bank, several intact raised bog remnants, and heathland. The site has pockets of commercial conifer plantation with extensive drainage, semi natural and intensely managed improved agricultural grass land and scrub mosaic. The rural landscape surrounding the site is dominated by managed agricultural land and sporadic housing and agricultural developments.

The development boundary of the site incorporates two areas - the eastern development area incorporating 14 no. turbines and the western development area is a biodiversity management area. The area proposed to accommodate the 14 turbines is bisected by a narrow local tertiary road. Access to the site for construction and materials is proposed via the N68 and the L6180 and L2072 local roads.



*Figure 1: Site Location (taken from submitted EIAR)*

## **3.0 Planning Policy Context**

### **3.1 National Planning Framework (2025)**

National Policy Objective 70:

Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.

### 3.2 Wind Energy Development Guidelines – DHPLG – June 2006

These guidelines state that the assessments of individual wind energy development proposals need to be conducted with a “*plan led*” approach. Areas should be identified that are considered suitable or unsuitable for wind energy development. In areas identified as suitable for wind energy development there will be an assumption that such development will be acceptable in principle to the Planning Authority. The guidelines seek to assist Planning Authorities in their assessment of wind energy applications in terms of location, design, spatial context and technical considerations.

### 3.3 Draft Revised Wind Energy Development Guidelines DHPLG - December 2019.

At time of writing, the Draft Revised Guidelines have not yet been adopted, and the relevant guidelines remain those published in 2006.

### 3.4 Regional Spatial & Economic Strategy for the Southern Region (Southern Regional Assembly)

The Regional Spatial & Economic Strategy for the Southern Region came into effect on the 31<sup>st</sup> January 2020. Section 8.2 “Strategic Energy Grid” states that “There is significant potential to use renewable energy across the Region to achieve climate change emission reduction targets. With costs actively driven down by innovation in solar, onshore and offshore wind in particular, the renewable industry is increasingly cost competitive. The RSES supports renewable industries and requirements for transmission and distribution infrastructure”. Regional Policy Objective RPO 99 ‘Renewable Wind Energy’ states:

It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.

### 3.5 Clare County Development Plan 2023-2029

Development Plan Objective: **CDP6.17** Energy Supply

It is an objective of Clare County Council:

To contribute to the economic development and enhanced employment opportunities in the county by:

- i. Enabling the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for the county;
- ii. Facilitating the county to become a leader in the production of sustainable and renewable energy for national and international consumption through research, technology development and innovation; and
- iii. Supporting on-land and off-shore renewable energy production in line with CDP Objective 3.3

Development Plan Objective: **CDP8.12** Renewable Energy Development

It is an objective of Clare County Council:

To support the implementation of the *National Renewable Energy Action Plan* (NREAP), the *Clare Wind Energy Strategy* and the *Clare Renewable Energy Strategy* to facilitate the development of renewable energy developments in rural areas to meet national objectives towards achieving a low carbon economy by 2050 subject to the requirement of the RES SEA Environmental Report and the mitigation measures arising from the CDP Appropriate Assessment as contained in Volume 10(a).

Development Plan Objective: **CDP11.44** Energy Security

It is an objective of Clare County Council:

To promote and facilitate the sustainable development, maintenance and upgrading of electricity and gas network infrastructure, to integrate renewable energy sources, thereby creating a secure and efficient energy supply and storage system for County Clare which is ready to meet increased demand as the regional economy grows.

Development Plan Objective **CDP11.47**: Renewable Energy

It is an objective of Clare County Council:

- a To encourage and to favourably consider proposals for renewable energy developments, including community owned developments, and ancillary facilities in order to meet national, regional and county renewable energy targets, and to facilitate a reduction in CO<sub>2</sub> emissions and the promotion of a low carbon economy;
- b To assess future renewable energy-related development proposals having regard to the Clare Renewable Energy Strategy 2023-2029 in Volume 5 of this plan and associated SEA and AA;
- c To support the sustainable development of renewable wind energy (on-shore and offshore) at appropriate locations and of its related grid infrastructure in County Clare, in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment and protected habitats and species, and to assess proposals having regard to the *Clare Wind Energy Strategy* in Volume 6 of this plan and the associated SEA and AA, or any subsequent updated adopted strategy and to national Wind Energy Guidelines;
- d To prepare a new and updated updated Wind Energy Strategy for County Clare during the lifetime of this Development Plan, subject to the publication of the update to the *Wind Energy Development Guidelines for Planning Authorities 2006*;
- e To strike an appropriate balance between facilitating renewable and wind energy-related development and protecting the residential amenities of neighbouring properties;
- f To support and facilitate the development of new options and technological advances in relation to renewable energy production and storage, that may emerge over the lifetime of this Plan;
- g To support the integration of indigenous renewable energy production and grid injection;
- h To ensure that all proposals for renewable energy developments and ancillary facilities in the County are in full compliance with the requirements of the SEA and Habitats Directives and Objective CDP3.3 of this plan; and
- i To promote and market the County as a leader of renewable energy provision;

Development Plan Objective **CDP 14.2** Settled Landscape

It is an objective of Clare County Council:

To permit development in areas designated as 'settled landscapes' to sustain and enhance quality of life and residential amenity and promote economic activity subject to:

- Conformity with all other relevant provisions of the Plan and the availability and protection of resources.
- Selection of appropriate sites in the first instance within this landscape, together with consideration of the details of siting and design, are directed towards minimising visual impacts.
- Regard being given to avoiding intrusions on scenic routes and on ridges or shorelines.

Developments in these areas will be required to demonstrate:

- That the site has been selected to avoid visual prominence.
- That the site layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, water bodies, public amenities and roads.
- That design for buildings and structures reduce visual impact through careful choice of forms, finishes and colours, and that any site works seek to reduce visual impact.

Development Plan Objective: **CDP15.3 European Sites**

It is an objective of Clare County Council:

- a) To afford the highest level of protection to all designated European sites in accordance with the relevant Directives and legislation on such matters;
- b) To require all planning applications for development that may have (or cannot rule out) likely significant effects on European sites in view of the site's Conservation Objectives, either in isolation or in combination with other plans or projects, to submit a Natura Impact Statement in accordance with the requirements of the EU Habitats Directive and the Planning and Development Act, 2000 (as amended); and
- c) To recognise and afford appropriate protection to any new or modified SPAs or SACs that are identified during the lifetime of this development plan, through the planning application process, bearing in mind proposals for development outside of a European site may also have an indirect effect.

Development Plan Objective **CDP15.12 Biodiversity and Habitat Protection**

It is an objective of Clare County Council:

- a) To protect and promote the sustainable management of the natural heritage, flora and fauna of the county both within protected areas and in the general landscape through the promotion of biodiversity, the conservation of natural habitats and the enhancement of new and existing habitats, and through the integration of Green Infrastructure (GI), Blue Infrastructure and ecosystem services including landscape, heritage, biodiversity and management of invasive and alien species into the Development Plan;
- b) To promote the conservation of biodiversity through the protection of sites of biodiversity importance and wildlife corridors, both within and between the designated sites and the wider Plan area;
- c) To support the implementation of the All Ireland Pollinator Plan, National Biodiversity Action Plan and National Raised Bog SAC Management Plan;
- d) To ensure there is no net loss of potential Lesser Horseshoe Bat feeding habitats, treelines and hedgerows within 2.5km of known roosts;
- e) To implement and monitor the actions as set out in the Clare County Biodiversity Plan; and
- f) To promote biodiversity net gain in any new plans/projects/policies to promote development that leave biodiversity in a better state than before.

Development Plan Objective **CDP16.8** Sites, Features and Objects of Archaeological Interest  
It is an objective of Clare County Council:

- a) To safeguard sites, features and objects of archaeological interest generally;
- b) To secure the preservation (i.e. preservation in situ or in exceptional cases preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological and historical interest generally.
- c) In securing such preservation, to have regard to the advice and recommendations of the Department of Culture, Heritage and the Gaeltacht;
- d) To have regard to the government publication 'Framework and Principles for the Protection of the Archaeological Heritage 1999' in relation to protecting sites, features and objects of archaeological interest;
- e) To advocate for greater financial assistance for the maintenance and improvement of features of archaeological interest in County Clare.

### 3.6 Clare Wind Energy Strategy

The subject site being within the Shannon Estuary Landscape Character Area is designated as 'acceptable in principle' for wind energy development, and which under the strategy can accommodate medium to large scale windfarms. Section 3.3 of the strategy with regard to same states:

*'WES Nine Acceptable in Principle*

*These areas are considered suitable for wind farm development because of :*

- *Sufficient wind speed*
- *Access to grid network*
- *Established patterns of enquiry*

*Projects within these areas must:*

- *Demonstrate conformity with existing and approved wind farms to avoid visual clutter*
- *Designed and developed in line with the Planning Guidelines in terms of siting, layout and environmental studies.*
- *Provide a Habitat Directive Assessment under Article 6 of the Habitat Directive if situated in proximity to a Special Area of Conservation or Special Protection Area will be required.*
- *Target wind energy generation from Acceptable in principle areas is 150MW.*

These areas are considered to be suitable for wind farm development in areas designed as acceptable in principle have the following characteristics

- *Viable wind speeds*
- *Proximity to Grid*
- *Slopes less than 15 degrees*
- *Excludes cSAC's, and SPA's and avoids most NHA's.*
- *Low population density.*

The subject site is located in the Shannon Estuary Landscape Character Type (LCT) where the overall sensitivity to wind farm development is considered medium to low. The appropriate size of the wind farms (turbine numbers) is large to medium. The strategy states that this LCT has some capacity for large to small wind farms in part due to the quite industrial nature of the area close to Moneypoint and the capacity of the ridged hills to accommodate wind energy development. The landform in the area comprises prominent ridges and linear hills becoming increasingly flat towards the estuary and Kilrush. The landscape character type in the WES is Farmed Lowland Ridges. This type corresponds to 'Hills and Flat Farmland' in the Planning Guidelines. The cumulative advice from the 2006 Planning Guidelines is acceptable depending on appropriate siting and design.

The location of the subject site relative to the 'Acceptable in Principle' designation is set out in Figure 2, below.

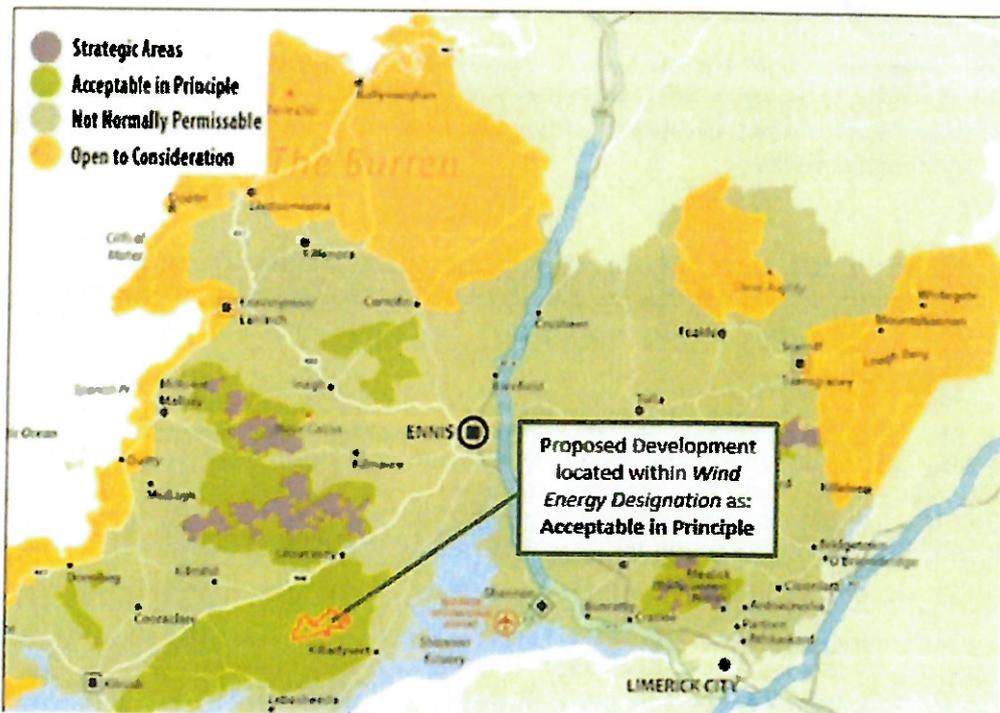


Figure 2: Site location relative to Wind Energy Strategy Designations

#### 4.0 Relevant Planning History

There has not been any previous windfarm applications on this site. The nearest windfarm is the Crossmore Windfarm approximately 5km to the west of the site:

09-123 – Granted - for development which will consist of seven wind turbines with hub height of 80m and blade diameter of 90m, construction of access roads, substation and associated works. An Environmental Impact Statement has been submitted with this application.

19-388 – Granted - Energia Renewables ROI Ltd - to Extend the Appropriate Period of Planning Permission P09/123 for proposed development which will consist of Seven wind turbines with a hub height of 80m and blade diameter of 90m, construction of substation, access roads and associated works.

20-824 – Granted - Energia Renewables ROI Limited - for development comprising an increased wind turbine blade length and associated reduction in turbine hub height, creation

of a splayed junction, and all associated cabling, services and ancillary works at land at the site of the consented Crossmore Wind Farm. The application is seeking a ten-year planning permission and 30-year operational life from the date of commissioning of the renewable energy development.

20-977 – Granted - Energia Renewables ROI Limited - for the erection of a meteorological mast in the townland of Crossmore, Co Clare at the location of the consented Crossmore Wind Farm (planning Ref: 09/123).

21-1057 – Granted - XMR Energy Ltd. - 1. A 38kV electrical connection over a total of approximately 11km, from the permitted Crossmore Wind Farm (planning ref: P09/123, as extended under planning ref: 19/388 and altered by P20/824) to the existing 110kV Booltiagh substation. This connection will consist of approximately 10km of overhead line and associated 97 no. wooden polesets (single, double and triple structures with approximate heights between 14-19 metres), and approximately 1km of underground cabling.

23-290 – Granted – XMR Energy Ltd - 1. Amendment to item (1) of Permitted Development Pl. Ref: 21/1057 to install a 38kV electrical connection over a total length of approximately 11km, from the permitted Crossmore Wind Farm to the entrance to the existing Booltiagh 110kV electrical substation.

## **5.0 Views of the authority on the effects of the proposed development on the environment and the proper planning and sustainable development of the area of the authority**

### **5.1 Planning Policy**

Under the Clare Wind Energy Strategy (WES) the subject site is located within an area designated as 'Acceptable in Principle' for wind energy being located within the Shannon Estuary Landscape area. The Strategy recognises the potential for this area for large to medium sized windfarms based on its topography and noting the proximity to Moneypoint. The development as proposed would facilitate approximately 63MW of power.

The Commission is advised that the existing Wind Energy Strategy was originally prepared in 2009 and incorporated into the then 2005 - 2011 Clare County Development Plan by means of a variation on the 14<sup>th</sup> December 2009. This strategy was then incorporated into the 2011 – 2017 Development Plan and in line with Circular Letter PL 20-13, the strategy was also incorporated, unchanged, into subsequent Development Plans including the current (2023-2029) Development Plan. The Planning Authority await the publication of the finalised Section 28 wind energy guidelines, before preparing any new or updated wind energy strategy (CDP Objective 11.47 (d)). It should be noted therefore that the existing wind energy strategy has been in place for over 15 years and remains the planning policy framework that guides wind energy developments.

Specifically, with regard to the subject site location, the Shannon Estuary, the strategy states that:

*'This LCT has some capacity for large to small wind farms in part due to the quite industrial nature of the area close to Moneypoint and the capacity of the ridged hills to accommodate wind energy development'*

Thus, solely from a planning policy perspective, the Planning Authority recognises that the development as proposed would be in compliance with the designations as set out in the current County Development Plan and associated Wind Energy Strategy noting also European, national and regional level policy objectives with respect to renewable energy. It should be noted that since the adoption of the WES there has been advancements in turbine technology in terms of their energy output and also in terms of their height and scale, whereby

it is noted in this instance the tip height of the turbines is 150m. There is a concern that the existing Section 28 guidelines do not account for such heights and scale of turbines.

Furthermore the Planning Authority notes the extent of windfarm developments both existing and permitted in the West Clare area (figure 3 below). Of particular concern is the adhoc approach to windfarm developments and the resulting implications for the cumulative assessment of same in terms of visual and residential amenity, landscape impacts, construction/road impacts and impacts on wildlife/biodiversity. Notwithstanding the designations in the Wind Energy Strategy, it is considered that the proposal would lead to a proliferation of turbines at this location.

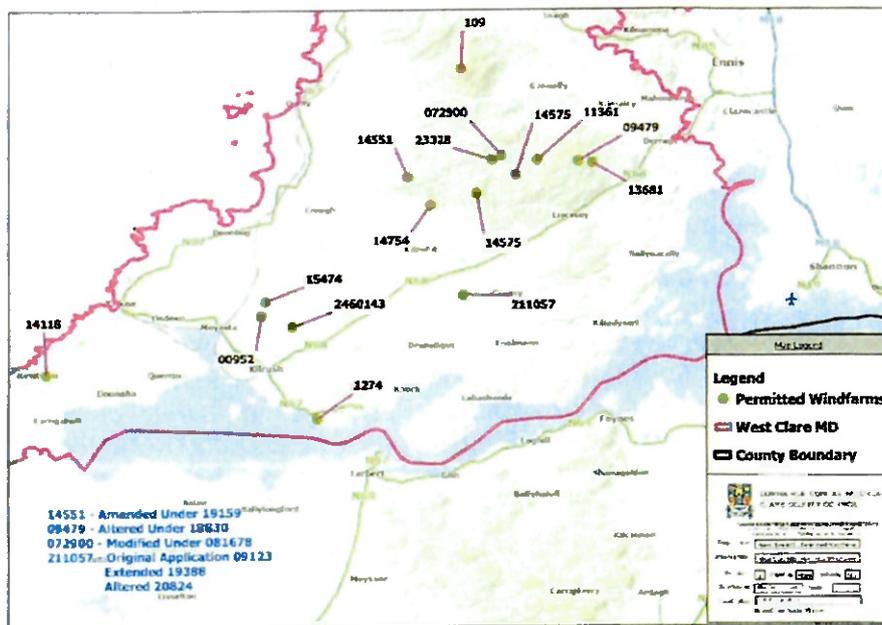


Figure 3: Windfarm Developments in West Clare

Overall it is an objective of the Planning Authority as set out under CDP 11.47 to encourage and to favourably consider proposals for renewable energy developments to meet national, regional and county renewable energy targets, and to facilitate a reduction in CO<sub>2</sub> emissions and the promotion of a low carbon economy. In this instance however in the absence of updated Section 28 guidance, the cumulative impacts of windfarm developments in the wider area, the adhoc approach to the development of windfarms is of concern.

## 5.2 Visual Amenity

The subject site is located within a 'settled landscape' where Objective CDP 14.2 applies. Under this designation, developments are required to demonstrate the sites have been selected to avoid visually prominent locations, that layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, water bodies public amenities and roads; and that design for buildings and structures reduce visual impact through careful choice of forms, finishes and colours.

The landscape type here is similar to that identified in the Departmental Guidelines as 'Mountain Moorland' or 'Transitional Marginal Landscapes' which recognise that given the typical extensive areas of continuous unenclosed ground, larger wind energy developments may be accommodated because they correspond in terms of scale. The guidelines for these landscape areas advise that a random layout with irregular spacing and high turbines may be appropriate for these areas also. The turbines as proposed in this instance are to have a total tip height of up to 150m. Under the landscape character assessment of the wind energy strategy, this area is considered to have capacity to accommodate small to large windfarms.

In support of the application the applicants have carried out a detailed landscape impact assessment and have included a number of photomontages from surrounding areas. Given the spatial extent of the site, together with the height and overall scale of the development it is considered that the proposal would significantly alter the overall character and appearance of this landscape. The montages as carried out have been considered and viewpoints of note include localised impacts at Gort Glass Lake, views along the L2072 and along the L6038, where it is considered that the visual impact would be significant. Long range montages of the development are also noted including those across the estuary in Co. Limerick. There is a particular concern that the development will constitute a prominent feature in the landscape and alter the character of same in particular when viewed from the estuary - the photomontage from Ballysteen Pier is noted in this regard.

The Planning Authority recognise that the majority of the site is designated as 'Acceptable in Principle' in the wind energy strategy, and the proposal being sited within same, and utilising land so designated would appear in principle to comply with the strategy. However, it is clear to the Planning Authority that the proposal would significantly alter the landscape character at this location. Given the spatial extent of the site, the height, scale and number of the turbines as proposed, it is considered that the proposal would be injurious to the visual amenities of the area and would have a significant visual impact, both locally and over greater distances from houses, roads, and amenity locations (in particular Gort Glass).

### **5.3 Residential Amenity**

In respect of residential amenity issues, the Commission is advised that it is an objective of the Development Plan as set out under CDP 11.47 to strike an appropriate balance between facilitating renewable and wind energy-related development and protecting the residential amenities of neighbouring properties.

The Planning Authority notes the analysis in terms of shadow flicker and noise as carried out in the EIAR where it is noted that there will be some exceedances of flicker and noise levels. The mitigation measures for same are noted and it would appear subject to the implementation of same then any issues may be addressed. However there is a concern in respect of reliance on mitigation measures to address impacts to local properties. It is considered that if the Commission are minded to grant permission in this instance, then it is respectfully recommended that full details of the mitigation measures are clarified before permission is granted and how same will be implemented in order to address any concerns arising from local residents at the operational stage.

### **5.4 Traffic**

The main traffic implications that may arise in respect of this development are during the construction period. The EIAR outlines the extent of traffic movements associated with the development whereby there would be approximately 3696 traffic movements per month at the peak construction period. The Planning Authority has serious concerns in respect of the impact of this development on the public road network, and in particular the local roads serving the site.

The haul route for the turbines is from M18, onto the N68 and along the local roads to the site (L6180 and L2072). The main implications for this development arise along the local roads serving the site. At present these roads are poor in terms of capacity and width and the subject development will inevitably give rise to impacts on the structure of the road. In addition there is a concern that any road closures will have a knock-on impact on the wider road network by reason of diversions and use of other roads which may not have capacity for the level of traffic generated. Furthermore, the EIAR also indicates that the route along the L2072 to the northeast towards Ballynacally will also be used for construction and operational access. Noting same and noting also that the source (quarry) of materials is not fully known at this stage, the Planning Authority has serious reservations in respect of the wider impacts of this development on the area road network.

In the event that the Commission decide to grant permission for this development then appropriate conditions should be attached to incorporate the following:

#### Road Opening Licenses

- Road Opening licences will be required for the overall Grid Connection and any other works proposed along the public road.
- Road Opening License fees will automatically be calculated by Map Road Licensing.
- A Bond to cover any reinstatement works shall be required
- A Clerk of works will be required to supervise the works from Clare County Council, the applicant shall bear these costs
- The applicant is to provide a community relations officer.

#### Road Reinstatement

- All Junctions with Opening and Changes in Direction of routes at Junctions with require Full Junction reinstatement in compliance with Standard Drawing SD4 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017
- Launch And received pits from Directional drilling will require reinstatement in compliance with Standard Drawing SD4 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017
- Any cabling laid on Local roads shall receive Double Surface dressing on 100mm paved CI.806 full road reinstatement, Surface dressing to be carried out by an approved contractor, works to be completed within the surface dressing season in compliance with Standard Drawing SD5 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017 and in compliance with the IAT Guidelines for Surface Dressing.

#### Road Closures

- Road closures are to be advertised in advance of works with key dates provided taking account of diversion routes.
- Road closures and diversion routes are to be agreed with the Kilrush Municipal District Office.

#### Bridges/Culverts/Pipelines

- Pre-condition survey to be carried out on all Bridges/Culverts and pipelines along the route to the site.
- Damage to any structure will require immediate notification to the Kilrush Municipal District Office - full replacement will be required to damaged structures and pipelines
- Post works surveys of each Bridge/Culvert structures will be required.

### Wind Turbine/Blade Delivery:

- Proposed routes to be agreed with the Kilrush Municipal Districts in County Clare
- Land take/land dedications are the responsibility of the applicant.
- Road Opening License will be required if the road network is to be temporarily altered.
- Transport times and dates to be agreed with Local Gardai and Local Authority

### Bond:

The figures below represents the estimated costs of remedial works to the road network. It is also recommended that any planning condition attached includes this specific amount.

Cloonkett Windfarm SID - Road remediation costs - ESTIMATE						
Road Segment	Length	Width	Cost	%age damage	Cost	Reference
N68 (Ennis to Ballyduneeen)	21,700	5	€ 100	1	€ 108,500	Turbine Haul Route - N68
	21,700				€ 108,500	
R473 (Ennis to Ballynacally)	13,000	5	€ 100	25	€ 162,500	Turbine Haul Route - N68
	13,000				€ 162,500	
L-2072 (near six cross roads)	4,400	3.5	€ 80	50	€ 616,000	Turbine Haul Route
	4,400				€ 616,000	
L-2072 Six cross roads to Ballynacally - rest of the way	15,000	3.5	€ 80	50	€ 2,100,000	Turbine Haul Route - N68
	15,000				€ 2,100,000	
<b>Road Remediation Costs</b>					<b>€2,987,000</b>	

## 5.5 Natural Heritage

### 5.5.1 Freshwater Pearl Mussel

The freshwater pearl mussel *Margaritifera margaritifera* is an extremely sensitive species that can be impacted in a number of ways by construction activity which have the potential to exert a high level of pressure on the species and its catchment. This species is included on the International Union for the Conservation of Nature and Natural Resources Red List of Threatened Species and is rated as 'critically endangered' throughout Ireland. In County Clare there is one Special Area of Conservation (SAC) with a freshwater pearl mussel population for which the river catchment is protected. This is the Cloon River system. This is located on the north shore of the Shannon Estuary and feeds into the Estuary in Clonderalaw Bay at its downstream end.

The freshwater pearl mussel population in the Cloon is currently at unfavourable conservation status. It is currently ranked as 15th out of the 27 Freshwater Pearl Mussel SAC populations in the Country based on population status, habitat condition, and current pressures. There is an absence of juveniles and a rarity of small mussels throughout the Cloon where suitable habitat is found. The population is failing due to the deterioration in habitat quality which is evident from the high levels of siltation and macrophyte growth. In recent years, climate change is having a serious effect on the catchment. The impacts of low flows have reached crisis level, with the in-combination effects of uneven precipitation levels and ongoing catchment drainage.

The Clare County Development Plan contains a specific objective for the protection of this species CDP Objective 15.17 which states:

*a) To have regard to the potential impacts of developments within or in close proximity to the Cloon River freshwater pearl mussel catchment including impacts arising downstream within the Shannon Estuary and Clonderalaw Bay;*

*b) To have regard to the Cloon Freshwater Pearl Mussel Sub Basin Management Plan in the assessment of planning applications;*

The Cloonkett Windfarm will be located directly within the Cloon Freshwater Pearl Mussel catchment. Drainage from the site by the Carrowreagh and Cloonkett streams can potentially have an impact on the area occupied by the highest densities of this species in the River Cloon. Furthermore, while no mussels were recorded from the streams within the site boundary, a precautionary approach assumes their presence immediately downstream on both streams. This is on the basis of a positive eDNA results from the Carrowreagh East and suitable habitat recorded on the Cloonkett, both within a kilometre downstream of the site, a positive eDNA result on the Cloonkett within 2km of the site and live mussels located on the Cloonkett within 3km of the site near the confluence with the Cloon.

For SAC populations such the Cloon catchment the burden of scientific proof is based on Conservation Status of a species and is defined as "favourable" by the Habitats Directive when:

- the population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitat
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future
- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis

The results of the field surveys to inform the assessment of the Windfarm, clearly demonstrate that the Cloon catchment is not currently achieving favourable conservation status. It is therefore difficult to determine how a development which proposes the clearance and removal of soil and peat substrate together with rock for access roads and hardstand areas, construction of a new bridge crossing over the Carrowreagh East Stream will allow for the population to be "restored" to favourable Conservation Status in the future as is required by the Habitats Directive. While it is not for the Windfarm project to provide for this restoration the status quo of the catchment in terms of drainage and intensity of impacts which is currently taking place does not allow for this restoration to be achieved therefore by extension a development of this scale directly within the pearl mussel catchment which has such sensitivities in terms of peat substrate could only serve to compound the issues.

### 5.5.2 Avi Fauna

The proposed development is located in proximity to both Glenconnaun and Cloonkett blanket bogs. These bogs are located 3km from Kildysart, 2km from the village of Cranny and 2.5km from Coolmeen. The development is 700 meters from Gortglass Lough and 800m from Cloonsnachta Lough, both of which are lakes which are designated as pNHAs. Gortglass Lough is only 3.5km from the Shannon Estuary SAC and Lower River Shannon SPA with many avian species moving between the lakes and the SPA throughout the year, these include both wintering/migratory and breeding bird species.

The bog habitats which are located within the area in which the turbines are proposed to be located also play a key role as habitat for many bird species. Table 9.18 of the EIAR identifies the importance of these pNHAs and their lakes for the presence of the species Arctic Char with Gortglass Lough recognised as an Area of Scientific Interest for its presence. The assessment considers that there is no Source-Pathway Receptor connectivity identified, hydrological or otherwise, and therefore the sites and their features are not considered further.

It is noted that some of the turbines are to be located at the southern side of the bog meaning bird species have to fly past the turbines to reach the bog from the lakes as the lakes provide important foraging and resting places for a diverse range of bird species recorded on site. The surveys which have informed the EIAR recorded 9 red listed bird species and 23 amber listed with 8 of these Annex 1 species.

Both male and female Hen harriers were recorded a combined 65 times throughout the 3 years of survey effort, the results conclude that as a Hen harrier nest was not found the area is suitable for development. However Hen Harrier can fail to successfully breed on any given year for a number of reasons. Given the presence of the species across the county and in particular to the north of this site where a number of wind farms have been developed over the past number of years there is increasing pressure on this species in terms of their available habitat for foraging, breeding and commuting given the proliferation of Wind farms in West Clare.

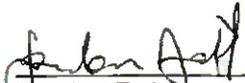
The in-combination and cumulative effect on this species from the high number of wind farms already developed in conjunction with this wind farm has not been assessed in the context of it being a protected raptor, listed in Annex I of the EU Birds Directive and as such, Member States are obligated to protect and conserve the species as opposed to their being a Special Protection Area for the species within the Zone of Influence and therefore it being a Special Conservation Interest.

## **6.0 Conclusion**

The above report sets out the views of the Planning Authority in accordance with Section 37E (4) of the Planning and Development Act, 2000, as amended. It is respectfully requested that the Commission take the above issues into consideration in the assessment of this application.

In summary the Planning Authority notes that the proposal is broadly supported by the designations in the existing Wind Energy Strategy and the Development Plan noting however that there has not been any updated national Section 28 guidelines. In this instance there is a concern in respect of the visual impact of this development having regard to the number of turbines and the spatial extent of the development. In addition there are serious concerns in respect of the impact of the development on the carrying capacity of the road network in the area by reason of the extent of vehicle movements proposed. Impacts on residential amenity are highlighted noting CDP 11.47 which seeks to strike an appropriate balance between facilitating renewable and protecting residential amenity. The impact of the development on natural heritage is also of concern.

In the event that the Commission decide to grant of permission it is recommended that appropriate conditions are attached for a windfarm development of this scale including residential amenity (noise/shadow flicker levels), construction management and oversight, road network (as set out in Section 5.4 of this report), protection of water quality, bond conditions, and relevant community gain conditions.

  
Gordon Daly  
Chief Executive  
28<sup>th</sup> November 2025

**Extract from the Minutes of the December 2025 Monthly Meeting of Clare County Council**

**Item 10: Chief Executive Report in accordance with Section 37E (4) and (5) of the Planning & Development Act 2000, as amended, in relation to the Cloonkett Windfarm application.**

Report from Gordon Daly, Chief Executive dated 28<sup>th</sup> November, 2025 was circulated with the agenda. The Chief Executive report is in accordance with the requirements of Section 37E (4) and (5) of the Planning and Development Act, 2000, as amended following on from the submission of a Strategic Infrastructure Development (SID) to An Coimisiún Pleanála, known as the Cloonkett Windfarm.

The development consists of 14 no. wind turbines with an energy output of approximately 63MW with a 40-year operational lifespan. A 10-year permission is sought and the application is accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS). The main components of the development are as follows:

- 14 no. three-blade wind turbines with an overall ground to blade tip height range of 150m, a rotor diameter 136m and a hub height of 82m;
- Construction of associated reinforced concrete foundations, crane pad hard-standing areas and associated plant/switching gear;
- Creation of one new access and upgrading of 1 no existing agricultural access of the local road L 2072 to serve as construction and operation access to the site.
- Creation of 2 accesses onto the local road L6239 to serve as construction and operation access to the site.
- Construction of new permanent, internal site tracks (9.51 km) and upgrading of existing tracks (1.43km) and associated drainage infrastructure including a Water framework Directive (WFD) water course crossing comprising a new clean span bridge to replace an existing crossing.
- Erection of 1 no. permanent meteorological mast to a height of 100 m above existing ground level;
- Creation of a dedicated peat and spoil deposition areas and berms.
- All associated internal, underground electrical and communications cabling connecting the wind turbines to an on-site substation;

- Forestry felling of 8.40ha.
- Provision of 1 no. 220kV onsite substation and associated compound including welfare facilities, waste water holding tank, rain water harvesting tank, , associated security fencing, external lighting and lightning protection, and over head line works.
- All associated site development works including excavation, earth works, peat and spoil management, and landscaping.

The Chief Executive report was approved having been proposed by Cllr. M. Shannon, seconded by Cllr. I. Lynch and agreed by the members present.