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<b>AN COIMISIÚN PLEANÁLA</b>	
LDG-	<u>257-049-26</u>
ACP-	_____
18 MAY 2026	
Fee: €	<u>50</u> Type: <u>CP4</u>
Time:	<u>12:48</u> By: <u>David</u>

## **Application ACP-324155-26, Cahermurphy West Wind Farm**

I would like to thank An Coimisiún Pleanála for this opportunity to submit an observation on the proposed Cahermurphy West Wind Farm application ACP-324155-26

I would like to formally **Object** to this application.

### **Introduction**

Contrary to its name, this is in fact an **Industrial Power Plant** capable of generating 50 MW of electricity. The development consists of **8 Industrial** sized turbines of 185 metres high (600 feet) located, in a number of cases, on raised land over 100 metres (330 feet) dominating the local countryside and Atlantic coast from all sides.

The immediate landscape already has **4 industrial turbines**, with 2 distinctive designs and blade lengths, to which this addition of **another 8 larger** turbines of fresh design and blade length will not only dominate the landscape but cause significant intrusion and distraction.

I am fully aware that this application sits within an area designated by Clare County Council 20 years ago as a strategic wind area (when turbines were 90-100 metres high) – However, I believe that **'Under Irish planning law, climate benefit does NOT override local environmental harm'**.

### **Local and strategic context**

The proposed site is 5 km North of Kilmihil, 5-7 km from the Coast, the Wild Atlantic Way and Mid-Clare Coast SPA and Special Area of Conservation. It is 6km from

Mullagh, which itself is on a hill and **will be level with this dominating development** - as seen on Photomontage No VP01-Mullagh. Taken from opposite my home.

The development is located on forestry, bog and grassland, all of which currently provide habitat for a vast range of plants, animals and birds, many protected.

The history of the location must be considered. This is not a 'new' site. The Cahermurphy II Wind farm, containing 10 Industrial turbines, planned for the same location, has previously been refused by both Clare County Council and An Board Pleanála.

This development is, in fact, still awaiting a further decision by An Coimisiún Pleanála following an unchallenged Judicial Review. ACP-318525

The strong previous key reasons for objection include:

- Negative Impact on hen harrier (protected species)
- Negative Visual Impact
- Cumulative impacts with other wind farms- the area already has 176 turbines in the area (includes, operational, in planning and proposed)

## **Ornithology & Protected Species**

The EIAR does not assure or prove that **there will be no** adverse impact on protected birds - especially the hen harrier, who is an EU protected species.

The EIAR does identify a loss of 63 ha of habitat but relies on mitigation rather than avoidance. The mitigation takes no account of the length of time the habitat will need to become ideal or the fact that it is already hen harrier habitat.

The mitigation measures proposed rely totally on third parties and therefore cannot be considered as relevant – as they give no certainty.

The monitoring of the effect of cumulative windfarms in West Clare and their effect on the Hen Harrier population is weak. The cumulative impact of yet another 8 industrial turbines is not able to be assessed and therefore the impact cannot be measured or mitigated against.

The inability of the applicant to protect the Hen Harrier – should be reason enough to refuse this application.

The applicant has paid scant attention to biodiversity including birds on the red list, such as Kestrels, regularly seen locally and mammals such as red squirrels, bats and badgers as well as butterflies and moths again all regularly seen. From my own exploration of the EIAR, I have concluded that there are inadequate survey durations and seasonal gaps.

I, therefore, conclude that the applicant **though its EIAR** has not ensured that this development will have no adverse impact on biodiversity in this currently biodiversity rich area.

### **Cumulative Impact and effect on Tourism**

The EIAR does not consider fully the **cumulative landscape** and ecological pressure.

As previously stated, the West Clare area has **176 Industrial turbines** of increasing size. These are either in operation, in **construction** or at planning stage.

The area of West Clare, within which **this application sits**, is already saturated with turbines. There has been a steady creep of **individual developments** over the past 10 years. The small area around **Miltown Malbay** in addition to the 29-turbine farm on Mount Callan and Cahermurphy 1 Wind farm, **currently** has 5 applications at varying stages of the planning process. A number of these are on their third, fourth or fifth iteration, with developers unable to take **NO for an answer**.

Should this application be approved by **An Coimisiún Pleanála**, it will complete a horseshoe of turbines around **Miltown Malbay**, **completely** destroying its landscape, character and residential amenity.

The towns and villages in West Clare **rely heavily on tourism**. This may be visiting families, music festivals such as the **Willie Clancy Summer School**, or Golf in Lahinch and Doonbeg, surfing or cycling the **EuroVelo** routes. Alongside this are the thousands of people travelling the **Wild Atlantic Way** every year. The cumulative impact of these massive **Industrial turbines and power plants** is undoubtedly having a negative effect. This is not only having a **negative financial effect** locally but also on supply chains to the tourism Industry.

I was horrified recently when taking **relatives to visits** the Cliffs of Moher. The dominating conversation throughout **the visits was not** about the beauty of the Cliffs and the amazing views, but of the number of **turbines** they could see. They were extremely disappointed and questioned **Ireland's planning** process to allow this.

### **Landscape and Visual Impact**

It is certain that 185m/ 600 feet dominant **industrial structures** will dominate the landscape. In addition to this they **will have moving blades** which will draw the eye.

The applicant is unable to say what the **industrial turbines** design and look will be. As previously stated, the 8 turbines within **the proposed project** will sit alongside Cahermurphy 1 Wind Farm.

Cahermurphy 1 contains 3 matching **turbines and 1** which has been added within the last year. The fourth turbine is of a **larger size, specification** and design. More

importantly the blades are considerably **bigger**. **The visual effect** is horrific. Due to the blades being different dimensions **the visual effect** is of the turbine turning at a different speed, creating a totally **distracting visual effect**.

I would urge the Inspector to visit the **area to experience** this visual intrusion on the landscape.

Adding 8 further industrial turbines to **this geographical ridge** will introduce a third element of size and spin. It is **inconceivable to imagine** what distraction and negative impact on the landscape this will cause.

It must be noted that the photomontages **are only a vague** representation and do not provide any reassurance of the final **visual effect on the landscape**.

- The design of the turbines is **not known**, so the montages are a best-case scenario.
- The pictures are taking in the **summer months** and so underrepresent the visibility in winter.
- The montages include the **56-58 ha of forest** that will be removed as part of the construction, exposing the **newly erected industrial structures**.
- Exclude key locations in the **community**.
- Do not show the negative **landscape impact on scenic routes** and tourism.

The Cahermurphy II windfarm, on the **same site was previously** refused by both Clare County Council and An Board **Pleanála** **refencing** scale, height and negative visual impact. It must surely follow that **as these turbines** are 10 metres higher, with significantly larger blades, that An Coimisiún **Pleanála** have no alternative but to refuse this application.

## **Noise and Shadow Flicker**

There is no doubt that there will be **noise pollution from the 8 industrial turbines**.

There is also no doubt that the EIAR is **only making predictions**, which may not reflect real world conditions, and **many more houses will be affected** and more acutely than has been predicted.

In terms of noise, the applicant has **used modelling rather** than actual noise measurements. There have been no **worst wind scenarios** explored, or any calculations of blade swish. I have **experienced blade swish** from Cahermurphy 1 Wind Farm and its akin to a **torture mechanism**.

Most worryingly there has been no **Low Frequency Noise** assessment. There is growing scientific evidence of the **health concerns associated** with Low frequency noise generated from turbines. This **has been acknowledged** by the scientific community and within Europe Parliament. Ref : **Prof. Ken Mattsson** (Uppsala University, Sweden), **Dr. Ursula Bellut-Staeck** (Germany).

It is inconceivable that in making a decision about this application that An Coimisiún Pleanála and its representatives will not consider the health of the residents and in particular children's healthy development within the Cahermurphy area when making their decision on this application.

The applicant has not assessed the impact of noise sufficiently to ensure that the erection and operation of 8 Industrial turbines will have no long-term detrimental effect on human health.

An Coimisiún Pleanála must refuse this application as the applicant has not demonstrated beyond reasonable doubt that the noise, in particular low frequency noise, will not be detrimental to health and children's normal development.

### **Hydrology & Water Quality**

I am not a hydrology or water expert, however as the construction of this development is on peat and forestry land it is logical that the pollution risks are high.

There will inevitably be sediment run off, impacting on fisheries, protected species, such as pearl mussel. There will be extensive risks during excavation and cable trenching. The site has a plethora of small rivers, streams and waterways and there is little confidence that the applicant has adequately assessed the impact within the EIAR. It is clear that the applicant has underestimated the effects on all the watercourses and therefore cannot state that they are able to protect the water quality and all that rely on it.

### **Peat Stability & Landslide Risk**

Given the location of the Wind Farm on peat and forestry and the extensive, excavation that will be required, this is surely an area that deserved extensive assessment.

Again, I am not an expert, but having studied the EIAR, the only conclusion that can be made is that there have been inadequate peat depth surveys undertaken and a lack of a worst-case failure model.

I also have arrived at the conclusion that there is a significant risk of bog slide during construction, which has not been adequately addressed by the applicant.

The EIAR provided by the applicant does not prove beyond reasonable doubt that there is no risk to peat stability and landslide and therefore An Coimisiún Pleanála should refuse permission for this application.

## **Human Health & Community Impact**

Human health has already been considered in relation to Noise, including Low Frequency.

The EIAR has not considered health and the **social impacts** sufficiently in their EIAR. The applicant has an over reliance on **WHO thresholds** and has made no commitments to long term monitoring of **human, animal** or plant health.

There is a 'location inequality' for the **communities who** live in the Cahermurphy area. Residents have a constant threat to **their quality** of life, long term wellbeing and during application processes extreme **stress and cost**.

The applicant has paid no attention to **the impact their** continuous string of application for the last 10 years has **had on the local** community.

Long term depopulation and sterilisation of **the landscape** as a result of these massive industrial turbines is a **firm reality**.

## **Consultation & Procedural Issues**

Public Consultation has been woefully **poor**. **The applicant** has relied on last minute notice of a clinic during holiday period and **last-minute** notice of the application being submitted to An Coimisiún Pleanála.

The availability of information has been **heavily reliant** on being online – not much use to my 93-year-old grandmother!

Requested hard copies of the photomontages **have been** refused by the applicant.

The documents available on An Coimisiún Pleanála's own portal are all unopenable. Staff at An Coimisiún Pleanála referred **residents to the** applicant's web sites, claiming that as they can open them, **there is not a** problem.

The applicant has provided 2 web sites **one for the** wind farm and one for the Grid network route, but beyond this it is **exceedingly difficult** to access information.

## **Delivery route**

Having experienced the delivery of the 4<sup>th</sup> Turbine for Cahermurphy 1 Wind Farm, last year, I am not totally convinced that **the delivery route** outlined in the applicant's submission is detailed enough or in **fact feasible**.

The delivery of these massive industrial **turbine parts**, at least 6 per turbine, will cause serious disruption for the **local community**.

## **National Guidelines**

To say that the national guidelines for the wind energy sector are outdated is an understatement.

It is inconceivable that any planning application for turbines of the size they now are – in this case soaring 1000 feet or more over the community, can be given permission by An Coimisiún Pleanála, when there are no appropriate national guidelines in place.

The risks to human and all biodiversity health from noise pollution, in particular Low Frequency Noise, is scientifically known and must be considered at a national level with appropriate guidance put in place before any further turbines are granted permission.

## **Associated Grid route**

I am sadly unable to submit a further objection to the associated grid route and ACP-324156-26

However, as it forms part of this application and shares an EIAR, I would like to make a brief comment.

The EIAR elements for the proposed grid route have not been sufficiently defined by the applicant and relies on deferred and evolving mitigation and fails to meet the requirements of Directive 2011/92/EU (EIA Directive) and Directive 92/43/EEC (Habitats Directive).

The application documentation repeatedly describes key elements of the development as “indicative,” “to be agreed,” or “subject to detailed design,” such that the project assessed for this application is not the project that would be constructed.

I would ask An Coimisiún Pleanála to refuse permission for the Grid Connection route and therefore for the Cahermurphy West Wind Farm as the grid connection is an integral part of the project, albeit a separate application.

## **In conclusion**

My key objections to this application are:

- Lack of protection for the Hen Harrier, a protected species.
- The detrimental impact on human health, in particular from low frequency noise.
- Cumulative impact, an already saturated landscape.

- The visual intrusion on the **landscape of industrial** sized turbines.
- The hydrology and peat risks.
- Lack of appropriate **National Guidelines**.
- Poorly defined and assessed **grid connection route**.

"The EIAR fails to adequately assess **cumulative ecological** impacts, particularly on hen harrier and human health, in an **already saturated** wind energy landscape, contrary to previous refusal decisions and **EU Birds Directive** obligations."

And I would respectfully ask An Coimisiún Pleanála to **Refuse** Permission for the Cahermurphy West Wind Farm.

Your Faithfully

A handwritten signature in black ink, appearing to read 'D. P. Heally Collis', written in a cursive style.

David Patrick Heally Collis