

Patricia and Christopher Collis

Boulaveg

Drummin

Mullagh, Co Clare

V95 R7F8

An Coimisiún Pleanála

64 Marlborough Street,

Dublin 1,

D01 V902

<b>AN COIMISIÚN PLEANÁLA</b>	
LDG- <u>082950-26</u>	
ACP- _____	
<b>18 MAY 2026</b>	
Fee: € <u>50</u>	Type: <u>CA</u>
Time: <u>12:46</u>	By: <u>fcw</u>

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

We are residents of West Clare, living within the vicinity of the proposed wind farm Cahermurphy West. We are strongly opposed to this proposed development.

We want to be clear at the outset that we support renewable energy and recognise its importance in addressing climate change. Like many in this community, we have actively contributed to Ireland's transition, including through the adoption of our own solar energy. However, our support does not extend to developments that are poorly planned, inadequately assessed, or likely to cause lasting harm to the local environment, landscape, and community.

In our view, this proposal represents not a typical wind farm, but an industrial-scale power plant consisting of eight turbines up to 185 metres high, located on elevated ground and dominating the surrounding countryside and coastal landscape.

This is also not a new or untested site. Previous large-scale wind farm proposals (Cahermurphy II) in this area have been refused, by Clare County Council and by An Bord Pleanála, due to concerns around ecological impact, visual intrusion, and cumulative effects. We believe those concerns remain valid, and in most respects have intensified.

## **Key Grounds for Objection**

### **Inadequate Environmental Impact Assessment (EIAR)**

Having reviewed the EIAR, we do not believe it meets the required standards under the EU Environmental Impact Assessment Directive, the Birds Directive, or the Habitats Directive.

There are clear inconsistencies, errors, and gaps in the data presented, which significantly undermine confidence in its findings. In particular, the EIAR fails to accurately assess cumulative impacts in a region that is already heavily developed with wind energy infrastructure.

In our view, the information provided is insufficient for An Coimisiún Pleanála to carry out its statutory assessment obligations.

### **Impact on Protected Species and Biodiversity**

We are particularly concerned about the impact on biodiversity, especially the hen harrier (*Circus cyaneus*), which is a protected species under EU law and known to inhabit this area.

The applicant through its EIAR

- Acknowledges habitat loss (approx. 62 hectares)
- Relies on mitigation rather than avoidance.
- Depends on third-party actions that cannot be guaranteed.
- Contains gaps in survey data and seasonal coverage.

From our own reading, we do not believe the applicant has demonstrated that there will be no adverse impact on the hen harrier or other species such as bats, red squirrels, badgers, kestrels, and other wildlife regularly observed in the area.

This failure alone should be sufficient grounds for refusal.

### **Cumulative Impact and Overdevelopment**

West Clare is already saturated with wind energy development. There are approximately 176 turbines in the wider west Clare area, either operational, permitted, or proposed.

The EIAR does not adequately assess the cumulative ecological, visual, or social impact of adding a further eight turbines.

There has been a gradual but persistent overdevelopment of this landscape over the past decade. This proposal would significantly intensify that impact and further erode the character of the area.

## **Location Inequality**

The west coast of Ireland, including County Clare generates a significant share of the country's wind energy, currently estimated at almost 50%. This highlights a clear location inequality.

While rural coastal communities host the infrastructure and bear the environmental and social impacts, the greatest demand for electricity is concentrated in urban areas such as Dublin, as well as along the wider east coast.

This imbalance is increasing due to the rapid growth and development of energy-intensive data centres. As a result, communities in areas like ours are disproportionately affected, while the primary benefits of that energy are realised elsewhere.

## **Visual and Landscape Impact**

The proposed turbines, at 185 metres in height, will be dominant industrial structures visible across a wide area.

We have serious concerns that:

- The photomontages are incomplete and unreliable.
- The final turbine design is unknown.
- Visibility is underestimated, particularly in winter.
- The removal of forestry is not accurately reflected.
- Key viewpoints and scenic routes are omitted.

Based on our own experience of existing turbines in the area – Cahermurphy Wind Farm, (1.3km away) the visual impact is already significant. Adding turbines of greater height and differing design will only worsen this effect and fundamentally alter the landscape.

Currently there are turbines of two differing sizes and rotor diameters, rotating at differing speeds. The addition of further turbines of larger size, rotor diameter and speeds will undoubtedly cause significant disruption and distraction in the landscape.

## **Human Health Concerns**

We are deeply concerned about the potential impact on human health, particularly in relation to noise and low-frequency sound.

The EIAR relies heavily on modelling and does not include:

- A proper assessment of low-frequency noise
- Worst-case scenario analysis
- Long-term health monitoring commitments

From personal experience, we are aware of the impact of turbine noise, including blade “swish,” and I do not believe the applicant has demonstrated that this development will not have adverse effects on residents, including children.

Most concerning is the lack of any assessment of low-frequency noise. There is increasing scientific evidence that noise from turbines can have health impacts, as recognised by researchers such as Prof. Ken Mattsson and Dr. Ursula Bellut-Staack, as well as by the European Parliament.

The absence of this consideration contributes to a democratic deficit in the decision-making process. It is essential that An Coimisiún Pleanála fully considers the health of local residents—especially the development of children in the Cahermurphy area—when making its decision on this application.

### **Hydrology, Peat Stability, and Landslide Risk**

The site is located on peatland and forestry, which raises serious concerns about:

- Sediment run off and water pollution
- Impacts on local waterways and aquatic species
- Peat instability and risk of bog slides

The EIAR does not provide sufficient evidence to rule out these risks, particularly given the scale of excavation required.

### **Grid Connection and Project Uncertainty**

We are also deeply concerned that the proposed grid connection is not adequately defined and relies on elements that are described as “indicative” or “to be agreed.”

This makes it impossible to accurately assess the full impacts of the development. A project of this scale should not be considered where key components remain uncertain.

### **Procedural and Consultation Issues**

We found the consultation process to be inadequate and difficult to engage with.

Issues include:

- Limited and poorly timed consultation
- Overreliance on online materials
- Difficulty accessing documentation.
- Refusal to provide requested materials such as photomontages.

This has made it unnecessarily difficult for residents, particularly older members of the community, to participate meaningfully.

## Traffic, Infrastructure, and Aviation Concerns

The construction phase will involve a significant volume of heavy vehicle movements, causing disruption to local roads and communities. The 16,000 journeys predicted of heavy-duty lorries travelling through the small village of Kilmihil is unfathomable.

We are also concerned that the potential impact on aviation safety, including emergency services such as Rescue 115, has not been accurately assessed.

## Conclusion

Based on all of the above, we passionately believe this development is unsuitable for the Cahermurphy area.

We are 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, we have faith in that 'Under Irish planning law, climate benefit does NOT override local environmental harm.'

In summary, our key objections are based on:

- Inadequate environmental assessment
- Failure to protect biodiversity, particularly the hen harrier – protected under EU Law
- Excessive cumulative impact in an already saturated area
- Location inequality
- Significant visual and landscape damage
- Insufficient consideration of human health
- Democratic deficit
- Risks to water quality and peat stability
- Lack of clarity regarding the grid connection
- Deficiencies in consultation and process

The EIAR fails to adequately assess cumulative ecological impacts, particularly on protected species and human health, in a landscape that is already under significant pressure.

For these reasons, we respectfully request that **An Coimisiún Pleanála refuse permission** for the proposed Cahermurphy West Wind Farm.

Yours faithfully



Patricia Collis

16/5/26.



Christopher Collis

16/5/26

