

From: [SIDS](#)
To: [Ellen Matthews](#)
Subject: FW: Your Ref: ACP-324270-26
Date: Wednesday 22 July 2026 11:44:51
Attachments: [ACP-324270-26 160726.pdf](#)
[ACP 324270-26 CE Report 060726.pdf](#)
[ACP-324270-26 Windfarm Submission Cllr. M. Shannon.pdf](#)
[Extract from Minutes Clare County Council Meeting 14th July 2026.pdf](#)
[Clare County Council Meeting 14 May 2026 Signed Resolution.pdf](#)

Hi Ellen,

Can you save and acknowledge, can you also do up a letter asking the applicant to respond to this submission they can have 4 weeks to respond.

Thanks,

Lauren

From: Michael Moloney <mmoloney@clarecoco.ie>
Sent: Thursday 16 July 2026 13:45
To: SIDS <sids@pleanala.ie>
Subject: Your Ref: ACP-324270-26

You don't often get email from mmoloney@clarecoco.ie. [Learn why this is important](#)

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 your letter of 8th May 2026 regarding the above-mentioned proposed development and **attach** herewith the following:-

1. Letter from Clare County Council dated 16th July 2026.
2. Chief Executive's Report dated 6th July 2026.
3. Extract from the minutes July Monthly Meeting of Clare County Council.
4. Submission from the Elected Members dated 14th July 2026
5. Copy of the resolution Passed at July 2026 meeting of Clare County Council.

Please note hard copies to follow by registered post.

You might please acknowledge this submission.

Mise le meas,

Michael Moloney
Clerical Officer

Planning, Placemaking & Economic Development

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

T: 065 6846212 **E:** mmoloney@clarecoco.ie | **W:** www.clarecoco.ie



COMHAIRLE CONTAE AN CHLÁIR
CLARE COUNTY COUNCIL

Tá an t-eolas atá sa ríomhphost seo, agus in aon 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 chuid 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.

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COMHAIRLE | CLARE
CONTAE AN CHLÁIR | COUNTY COUNCIL

By Email & Registered Post

Your Ref: ACP-324270-26

16th July 2026

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

Proposed development of 9 No. wind turbines, a permanent extension to the existing 110kV Slievecallan substation at Knocklassa and associated infrastructure and works within the townlands of Tooreen, Fahanlunaghta More, Gelendine North, Curraghodea, Silverhill, Cloghaun More, Letterkelly, Doonsallagh East, Knockalassa, Slievealloghaun and other townlands, Co. Clare

Dear Sir/Madam,

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

1. Chief Executive's Report dated 06th July 2026.
2. Submission from the Elected Members dated 14th July 2026.
3. Copy Resolution passed at the July 2026 monthly meeting of Clare County Council.
4. Extract from the Draft Minutes of the July 2026 monthly meeting of Clare County Council.

Yours sincerely,

**Kieran O'Donnell
Administration Officer
Planning, Placemaking & Economic Development**

Enc.

An Roinn Pleanála
Pleanáil, agus Forbairt Eacnamaíoch, Tuaithe agus Pobail
Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

Planning Department
Planning, Economic, Rural and Community Development
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: 324270-26

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 Slieveacurry Windfarm. The development consists of 9 no. wind turbines with an energy output estimated at up to 54MW, with a 35-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 specific components of the subject development are as follows:

- 9 No. wind turbines with an overall ground-to-blade tip height of 175 metres; rotor diameter of 150 metres; and hub height of 100 metres, and a meteorological mast with a height of 30 metres, and subsequent decommissioning of the wind turbines and meteorological mast, following a thirty five-year operational period from the date of full commissioning of the wind turbines
- Associated wind turbine and meteorological mast foundations and hardstanding areas
- An extension to the existing 110kV substation compound in the townland of Knockalassa (Including the provision of a new control building (floor area of 112.5 sq.m) with welfare facilities, all associated electrical plant and apparatus for an additional 110kV bay, security fencing, underground cabling, underground wastewater holding tank, site drainage and all ancillary works);

- Underground electrical (33kV) and communications cabling connecting the proposed wind turbines and meteorological mast to the 110kV substation extension via proposed and existing private access road/tracks and the R460 regional road;
- Temporary accommodation works to facilitate the delivery of turbine components and other abnormal sized loads on the L6230, L1076, L2118 and L1074 local roads
- Upgrade and widening works to the L6230 local road and access junction off the L6230 local road
- Upgrade of existing tracks/roads and new site access roads and hardstanding areas
- A borrow pit
- 2 no. temporary construction compounds (including site offices and welfare facilities, with a combined floor area of 202.5 sq.m);
- Peat and Spoil Management;
- Site Drainage;
- Tree felling and vegetation removal
- Biodiversity Management and Enhancement Plan measures (including hedgerow planting, peatland, marsh fritillary and hen harrier habitat enhancement areas);
- Operational stage site signage; and
- All associated site development works and apparatus

2.0 Site Location

The Site is located approx. 7km south of Ennistymon and 8km west of Inagh. Miltown Malbay is located approximately 5.8km west of the nearest proposed turbine (T07). The site is located in an upland setting comprising predominantly cutover bog with areas of commercial forestry, agricultural land and low density residential properties. The nearest Natura 2000 site to the Site is the Inagh River Estuary SAC located approximately 6.2km north of the Site.

Elevations within the site range from ~120mOD (metres above Ordnance Datum) in the south to ~250m in the centre of the site. The planning application provides for the installation of underground cabling connecting the proposed turbines to a proposed extension to the existing Slievecallan 110kV substation in the townland of Knockalassa, Co. Clare. The underground cabling route of approximately 7.1 km will be located along existing and proposed forestry and wind farm tracks, agricultural lands, and within the public road corridor. Current land-use on the site comprises coniferous forestry, agriculture, wind farm, turf cutting and public road corridor. Land-use in the wider landscape comprises a mix of agriculture, low density housing, renewable energy and commercial forestry. The proposed turbines are located within an area designated in the Clare County Development Plan 2023- 2029, as varied, as 'Strategic' for wind energy development.



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.

National Policy Objective 71:

Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.

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 31st 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 (as varied)

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 CO₂ 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 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: **CDP 14.7** Scenic Routes

It is an objective of Clare County Council:

- a) To protect sensitive areas from inappropriate development while providing for development and change that will benefit the rural community;
- b) To ensure that proposed developments take into consideration their effects on views from the public road towards scenic features or areas and are designed and located to minimise their impact;
- c) To ensure that appropriate standards of location, siting, design, finishing and landscaping are achieved

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.

3.6 Clare Wind Energy Strategy

The subject site is primarily within the 'Strategic' designation for windfarm developments (7 turbines), as well as being within an area 'Acceptable in Principle' (1 turbine), as set out in the Wind Energy Strategy.

Under the Wind Energy Strategy, 'Strategic Areas' are considered to be eminently suitable for wind farm development and are of strategic importance because of:

- Good/excellent wind resources
- Access to grid
- Distance from properties and
- Outside any Natura 2000 sites

Projects within these areas must:

- Demonstrate conformity with existing and approved wind farms to avoid visual clutter.
- Be designed and developed in line with the Wind Energy Development Guidelines, Guidelines for Planning Authorities (DoEHLG, 2006) in terms of siting, layout and environmental studies.
- Provide a Habitats Directive Assessment under Article 6 of the Habitat Regulations if the site is located in close proximity to a Special Area of Conservation or Special Protection Area.
- Be developed in a comprehensive manner avoiding the piecemeal development of the areas designated as 'strategic'.

Target wind energy generation from strategic areas is 400 MW.

The windfarm is primarily located in the Slieve Callan Uplands Landscape Character Area (LCA). The proposed turbines are sited in marginal upland characterised by commercial forestry, agricultural and bog lands. The landscape in this LCA has a medium to low landscape sensitivity rating to wind energy.

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

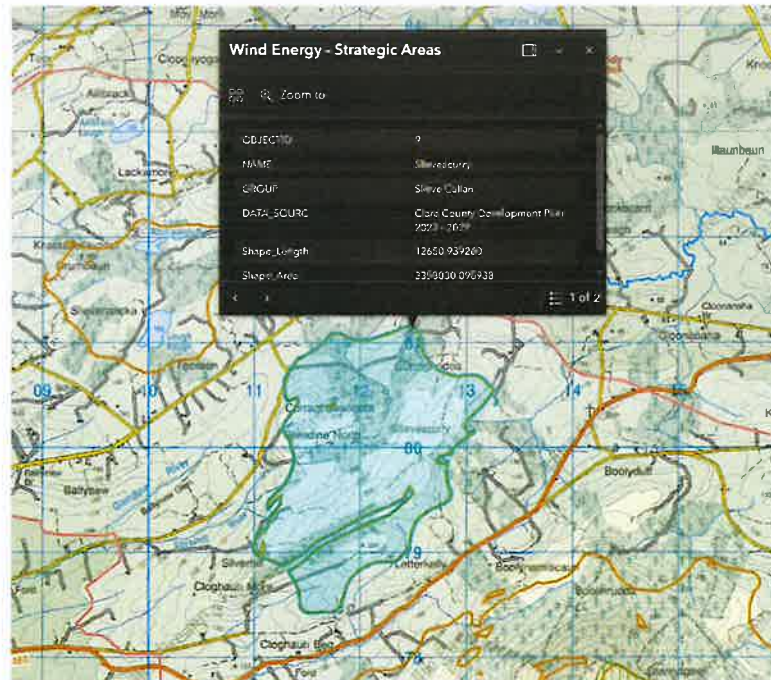


Figure 2: Site location relative to Strategic (blue)

4.0 Relevant Planning History

On site:

21/1226 - Permission was refused by Clare County Council for the construction of a renewable energy development comprising up to 8 no. wind turbines, a meteorological mast, underground cabling connecting the proposed turbines to an existing 110kv substation. This was refused on grounds relating to injury to the visual amenities of the area, adverse impact on residential amenity by way of noise, disturbance and visual overbearance, adverse ecological impact on the habitat of a number of bird species, and adverse impact on ground stability or hydrology from management of peat. On appeal (312728-22) this decision was upheld with three reasons for refusal on grounds of peat management, impact on SAC and impact on Hen Harrier.

21/370 - Permission was refused by Clare County Council for four reasons for the construction of a renewable energy development comprising up to 8 no. wind turbines, a meteorological mast, underground cabling connecting the proposed turbines to an existing 110kv substation. This application was subject to a first party appeal (ABP-Ref-310707-21) which was subsequently withdrawn.

20/806 - An application for permission for a development similar to the proposed development the subject of this appeal was made to Clare County Council. This application was withdrawn.

To the west:

25/60520 – Application refused by Clare County Council - Illaunbaun Wind Farm Limited – windfarm development of 5 no. wind turbines and all associated site works and facilitatory development. This was refused by the Planning Authority on grounds of visual impact, residential amenity, impact on hen harrier, impact on Marsh Fritillary, impact on watercourses/SAC, environmental impact, peat stability and traffic safety. This decision has been appealed to An Coimisiun Pleanala – PL-500605-CE-26 relates.

25-60578 – Application refused by Clare County Council - Illaunbaun Wind Farm Slievenalicka Locally Owned Turbine - for the development of 1 wind turbine with associated site works. This was refused by the Planning Authority on grounds of visual impact, residential amenity, impact on hen harrier, impact on Marsh Fritillary, impact on watercourses/SAC, environmental impact, peat stability and traffic safety.

26-60207 - Illaunbaun Wind Farm Slievenalicka Locally Owned Turbine - for the development of 1 wind turbine with associated site works. This application is currently under assessment by the Planning Authority. Decision due on the 06th July 2026.

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 majority of the subject site is located within an area designated as 'Strategic' for wind energy developments. The Strategy recognises the potential for this area for large to medium sized windfarms based on its topography and available windspeeds. The development as proposed will have an estimated installed capacity of 54MW.

The Commission is advised that the existing WES was originally prepared in 2009 and incorporated into the then 2005 - 2011 Clare County Development Plan by means of a variation on the 14th 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)).

Specifically, with regard to the subject site location, it is noted that the proposal is located within an area primarily designated as 'Strategic' in the WES due to available wind resources, distance from properties and proximity from European site. Thus, solely from a planning policy perspective, the Planning Authority recognises that the development as proposed would, in principle, 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.

The Planning Authority notes the significant level of existing and proposed windfarm developments in the West Clare area and is concerned that the manner in which further proposals are being advanced lacks a coordinated or strategic approach. This has clear implications for the proper assessment of cumulative impacts, particularly in relation to visual and residential amenity, landscape character, construction activity and associated road impacts, as well as potential effects on wildlife and biodiversity.

The Commission will note that there is an existing application on appeal nearby for 5 turbines (PL-500605-CE-26) and for 1 turbine (Pl. Ref 26/60207 refers). While the Planning Authority recognises the objectives of CDP Policy 11.47, which seek to support renewable energy development in line with national, regional and county targets and the transition to a low-carbon economy, there is a particular concern that this development, coupled with those as proposed in the locality would result in a overconcentration and proliferation of turbines at this location.

It should be noted therefore that the existing wind energy strategy has been in place for over 16 years and remains the planning policy framework that guides wind energy developments. Over this period of time 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 175m, which are 50m higher than the nearby Slieve Callan windfarm. There is a concern that the existing Section 28 guidelines do not account for such heights and scale of turbines, and in the absence of updated guidance it is considered that the cumulative impacts arising in the wider area are material considerations. In this context, it is considered that the proposal would result in an undue proliferation of turbines at this location, notwithstanding its designation within the Wind Energy Strategy.

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' 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 advise that a random layout with irregular spacing and high turbines may be appropriate for these landscape areas also. The turbines as proposed in this instance are to have a total tip height of up to 175m. Under the landscape character assessment of the wind energy strategy, this area is considered to have capacity to accommodate small to large windfarms.

The Guidelines acknowledge that a wind energy development may be located within one Landscape Character Type while remaining visible from adjoining landscape character areas. In such circumstances, the Guidelines advise that the assessment should consider the visual effects on the wider landscape unit rather than the host landscape alone. In this regard, given the proximity of the proposed development to the existing Slieve Callan Wind Farm, it is considered that the developments would be perceived collectively as a single, expansive wind energy landscape. Furthermore, the proposed Illaunbaun Wind Farm, if permitted, would contribute to and reinforce this cumulative visual effect, further intensifying the perception of a continuous wind farm presence across the wider landscape.

It is considered that the proposed development, by reason of its increased turbine height, scale and elevated siting, would be materially different in character from existing wind energy developments in the surrounding area. The proposed turbines, which would be approximately 50 metres higher than those at Slieve Callan Wind Farm, would introduce significantly more prominent structures into the landscape. As a consequence, the development would be visible across a substantially wider geographical area and would result in a considerably greater visual influence on the receiving landscape than existing wind farm developments in the vicinity.

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 photomontages as submitted with the application are noted and the impact of the development on the landscape from local and long range viewpoints is evident.

With regard to the photomontages as submitted, it is clear from the viewpoints taken at coastal locations – in particular at Spanish Point, Quilty, Doughmore – that the proposed turbines will occupy elevated positions on the landscape at Slieveacurry. From these viewpoints the proposal by reason of their increased height and scale will break the ridgeline and form prominent features on the landscape. In contrast the turbines on Slieve Callan are sited on the slopes with the mountain forming a backdrop which reduces their visual perception from these viewpoints. In addition it is clear from these particular photomontages that the subject development in conjunction with other proposed and existing turbines will read as a continuous pattern of turbines across the landscape. The cumulative effect and proliferation of turbines from these locations is evident and the negative visual impacts are considered to be significant and contrary to Scenic Route policy.

Viewpoints from the north of the site have also been considered at Lahinch, Liscannor and the Cliffs of Moher. Again of concern is the cumulative impact of the proposal in conjunction with existing and proposed turbines. The photomontages show the proposed turbines as being highly prominent, with the increased scale and height of same being notable. This prominence is exacerbated by most of the turbines presenting as being located on top of the ridge, emphasising their visibility and incongruity with the natural landscape. It is also clear that the proposed development forms a significant linear extension of turbines along the ridgeline. Landscape views from the north are considered to be significant, negatively impacting on designated Scenic Routes, coastal locations and tourist facilities.

Other photomontages have also been considered including from Inagh, Ennistymon and Mullagh. In all these cases the structures are noted to break the skyline and form prominent features on the landscape.

In conclusion it is considered that the proposed development would have a significant landscape and visual impact on the natural environment, both locally and over greater distances from houses, roads, scenic routes, and tourism and amenity locations. The height, scale and siting of the proposed turbines mean that the proposal would be highly visible in the landscape and skyline. This is exacerbated by reason of the increased height of the turbines relative to Slieve Callan and also by the cumulative impact of other windfarm proposals, namely the proposed Illaunbaun Wind Farm. Whilst the Planning Authority notes that the site is located within a designated 'Strategic' area for windfarm development, this has to be balanced with other landscape policies of the development plan, including CDP 14.2, Settled Landscape, and CDP 14.7, Scenic Routes. In this instance it is considered that the proposal would contravene these objectives.

Whilst it is acknowledged that the Commission did not refuse permission under Planning Reference 21/1226 (ABP Ref. 312728-22) on the grounds of visual impact, the context within which the proposed development is now assessed has materially changed. In particular, the emergence of additional wind energy proposals within the wider area has significantly altered the cumulative landscape and visual effects associated with the development. Having regard to these evolving circumstances and the increased cumulative impact arising from the interaction of the proposed development with existing and proposed wind farms, it is considered that the proposal would give rise to unacceptable landscape and visual effects and that a refusal of permission is now warranted on these grounds.

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. With regard to shadow flicker, subject to appropriate monitoring and adherence to necessary mitigation, it is not considered that the proposal would negatively impact on the amenities of residents in the vicinity of the site. The cumulative impacts of other developments would however need to be considered as part of any mitigation strategy.

The noise impacts of the development are set out in Chapter 12 of the EIAR. Turbine noise emission levels have been predicted at noise sensitive locations for a range of operational wind speeds. Whilst it is stated that the predicted noise levels associated with the development will be within the best practice noise limits, the cumulative impact of the development in conjunction with other existing and proposed windfarms is of concern, in particular for low frequency noise and amplitude modulation. The noise monitoring plan as set out under 12.7.5 of the EIAR is also noted. However, the Planning Authority has serious concerns about relying on a noise curtailment strategy and the enforceability of such measures at the post planning stage. As such there is significant concerns in respect of the noise impacts of this development and cumulatively with other windfarm developments, and the resulting impacts on the residential amenities of properties in the vicinity.

It is an objective of the Clare County Development Plan 2023–2029 (as varied), under Objective CDP11.47(e), to strike an appropriate balance between facilitating renewable and wind energy development and protecting the residential amenities of neighbouring properties. In addition to the noise-related concerns outlined above, it is considered that the proposed development, by reason of the extent and duration of the construction works, associated traffic movements, and the operational characteristics of the wind farm, would adversely affect the amenities enjoyed by nearby residents. Furthermore, having regard to the height, scale and proximity of the proposed turbines, it is considered that the development would result in a visually dominant and overbearing presence in the surrounding landscape when viewed from a number of existing dwellings.

Overall, it is considered that the proposed development would have a significant adverse impact on the residential amenities of nearby properties and would therefore be contrary to Objective CDP11.47(e) of the Clare County Development Plan 2023–2029 (as varied).

5.4 Traffic

The proposed haul route for the turbine blades would be from Foynes Port, N69, N/M18 to Junction 12 at Ennis. The haul route for the turbine tower sections would be also from Foynes but would enter County Clare at the Coonagh roundabout, before travelling along the R445, and the N/M18 to Junction 12 at Ennis. The route for both the turbines and towers then bypasses Ennis along the N85, before turning at the Claureen roundabout towards Inagh. In the village of Inagh the route turns left along the R460, before entering the local road network (L1074, L1076 & L6230). The turbine delivery route from Junction 12 to the site is indicated below (i.e. Figure 15-1 of Appendix 15-2 *"Traffic Management Plan"*). The documentation received states that the selection of this route was informed by swept path analysis. It is stated that no road would be closed to facilitate delivery and also that some remedial works may be required at pinch points. Temporary accommodation works along sections of the turbine/tower haul route would be required to accommodate the associated traffic.



Figure 3: Turbine Delivery Route

In addition to the above haul routes for the turbine blades and towers the Traffic Management Plan also includes a route for the direction of travel for heavy goods vehicles "accessing and exiting the site on busy days" and this is included below (i.e. Figure 15-2-1 of Appendix 15-2 *"Traffic Management Plan"*).

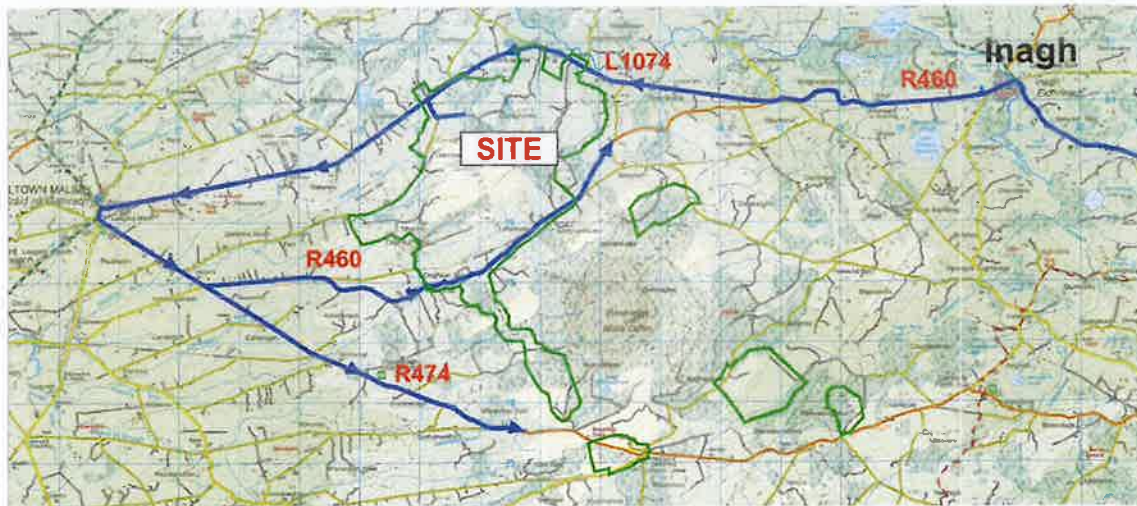


Figure 4: Construction access for HGV's

Grid Connection

With regard to the proposed grid connection, this would be achieved at the existing Slievecallan substation to the south east. This would be located within the public road corridor of the R460 over a distance of 1.55km. These works would be carried out over a period of approximately 8 days and would require a rolling stop-go traffic management system along this road for the duration of the works.

Traffic Implications

The main traffic implications that may arise in respect of this development are during the construction period and set out in the EIAR as follows:

- All concrete required for each turbine foundation will be delivered from local quarries to the site in one day per foundation for a total of 9 no. days. It is stated that the majority of the crushed stone required for said works would be sourced from the onsite borrow pit. In total 110 concrete loads would be required per turbine and this would equate to 9 HGV trips to/from the site per hour for 12 hours. On the days where concrete is being poured there would be a 146.3% increase in traffic volume on the L1074 local road approaching the site.
- Excluding concrete deliveries, a total of 3,282 truck loads would be required for the site preparation and groundworks.
- For the general construction days (71 days) associated with the grid connection a 49.9% increase in traffic volume is expected on the L1074 local road.
- For the general construction days (270 days) associated with the main onsite works a 22.3% increase in traffic volume is expected on the L1074 local road.

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 which will be the most affected by this development. 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 are concerns that any road diversions which may be required would have a knock-on impact on the wider road network in terms of damage, capacity, and local disturbance by reason increased use.

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 Licences

- 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.
- Any cabling shall also comply with the Department Guidance "Interim Guidance to Road Authorities regarding the proposed placement of Medium or High Voltage electricity assets, including ducts, cables, and associated infrastructure under public roads", 2026.

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 West Clare 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 West Clare 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

- It is recommended that a planning condition is attached to include for a bond to cover damage to national, regional and local roads within the county that will be affected by this development.

5.5 Natural Heritage

The hen harrier (*Circus cyaneus*) is 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. It is a noted Ecologically Sensitive Species. While the application footprint for the proposed wind farm is not located within a Special Protection Area (SPA) it is within a nationally important site for breeding Hen harriers (The North & West Clare region). The National Parks and Wildlife Service have identified this Northwest Clare region as one of the most important areas for breeding Hen harrier outside of the six Special Protection areas which have Hen Harrier as a Special Conservation Interest. The survey effort in Chapter 7 of the EIAR is noted both in terms of seasonality and multiplicity of years stemming from 2020 to 2025 which is in addition to previous years surveys to inform earlier assessments.

A population of sixteen pairs were recorded from the North and West Clare area in 2010. Eight pairs were identified in 2015 which correlates to a 50% decrease in occupancy between 2010 and 2015. As per Section 7.3.8 of the EIAR Hen Harriers are resident at the proposed wind farm site and are regularly observed commuting and hunting, primarily during the breeding season. There was a confirmed breeding territory identified 2km south of the site in 2021, 2022, 2024 and 2025. Additionally, there was a probable breeding territory within the site in 2021, however a nest was not located likely due to these birds not nesting or failing early in the season. There was no winter roost sites identified but Hen Harrier was observed during the winter season.

The results of the Vantage Point surveys clearly indicate that the site of the proposed wind farm and within 500m of the proposed turbines are being used by Hen Harriers not just for commuting or foraging but also displaying breeding behaviour and as per the more recent 2024 breeding walkover survey results an adult with two chicks were observed within a nest, at territory HH-b located 2km south of the site. Furthermore, in 2024, a bird was observed carrying prey within the site, however it is assumed that this bird was carrying prey to the identified nest site (territory HH-b). In 2025, there was an observation of a bird mobbing a buzzard, indicating probable breeding again at territory HH-b.

As per Section 7.4.1.3 of the EIAR based on the latest Breeding Hen Harrier Survey (Ruddock et al., 2024), the Republic of Ireland national breeding population is in the range of 85 – 106 pairs. That represents a decline in their numbers of one-third in just seven years since the last national survey. Therefore, a single breeding pair in Ireland conforms to national importance as per NRA criteria. The estimated national wintering population of hen harrier in Ireland is 311-435 therefore 1% of the Republic of Ireland national wintering population is 3-4 birds. A regularly occurring wintering population of 3-4 hen harrier is required for classification as nationally/internationally importance. This species was recorded regularly during the breeding season, with a confirmed nest located in 2021, 2022, 2024 and 2025 approximately 2km from the site. Hen harrier were also observed occasionally throughout the winter seasons surveyed. There were no hen harrier roosts identified during surveys.

The EIAR acknowledges that the windfarm site is of National Importance to this species throughout the year, given that the species were regularly observed at the site. Given the results of the national surveys Birdwatch Ireland have indicated that *“under the current rate of decline, Hen Harrier may be extinct within 25 years and that urgent interventions are now needed if we are to stand any chance of saving Ireland’s sky dancer”*.

Given the close proximity of the development to known breeding pairs of Hen harrier and taking into account the importance of the North and West Clare population as outlined above to the conservation of the species together with the potential loss of habitat in the wider landscape, it is difficult to conclude a finding of no significant effects in relation to this application with specific reference to the Hen harrier. Given the findings of the national survey in 2022 the assessment of the impacts from this application needs to be considered in the context of the national conservation status and not just the local impact.

The upland habitats which will be affected as part of this development are the receptors with the greatest sensitivity and while the assessment looks at the impact locally it may be more appropriate to assess the impacts at a regional and national level in light of the 2022 national survey. It is also not clear whether the cumulative effects have been assessed against the current national population estimate of 85–106 pairs, whether collision-risk, displacement and disturbance assessments adequately consider how the species is undergoing severe national decline and lastly whether the proposed habitat enhancement is sufficient given the national conservation status of the species. The chapter relies heavily on local survey findings and population-scale assessment methods. However, given the 2022 national survey results, Hen Harrier is now one of Ireland's most vulnerable breeding raptors and therefore should be assessed against the backdrop of this decline and its identified national importance at a local level.

The Biodiversity Management and Enhancement Plan (BMEP) as submitted proposes biodiversity enhancements across approximately 172 ha, including peatland restoration, conversion of commercial forestry to blanket bog, wet grassland enhancement, creation of species-rich habitats for Hen Harrier and Marsh Fritillary, and strengthening of linear habitat networks. While these measures are welcomed and support the objectives of the Clare County Development Plan 2023–2029 (as varied) and the Clare County Biodiversity Action Plan 2025–2031, concerns remain regarding the timeframe required to achieve the predicted biodiversity net gain. In particular, the ecological benefits of peatland restoration are unlikely to be fully realised for several decades, while gains for Hen Harrier habitat may not be apparent for a number of years following forestry removal. During this period, construction and operational disturbance may adversely affect foraging, commuting, breeding and roosting behaviour. Accordingly, it is considered that the proposed enhancement measures do not adequately address the short- to medium-term ecological impacts of the development, and that impact avoidance should have been prioritised.

Overall, it is considered that the proposed development would have significant adverse impacts on biodiversity and on the ornithological importance of the area by way of collision, mortality, disturbance and displacement of protected bird species, would be incompatible with the objectives to protect and conserve this area of biodiversity value and to protect the sustainable management and biodiversity importance of the area, and would, therefore, be contrary to the proper planning and sustainable development of the area.

5.6 Peat Management

From examination of the EIAR it is noted that there is a total of 58,450³ of peat and 66,050m³ of spoil to be managed on this site, some of which is proposed to be moved and deposited in the borrow pits. It is considered that the amount of peat and spoil material to be managed on this site is significant. In addition having regard to the upland nature of the site, the predominance of blanket bog soils, the extensive network of drainage channels, the proposed clear-felling of forestry, and road upgrades, the proposed development raises serious environmental concerns in particular in respect of peat management.

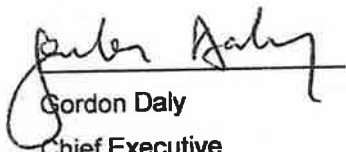
6.0 Conclusion

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.

The Planning Authority notes that the proposed development is broadly aligned with the County's established wind energy policy framework. While the Wind Energy Strategy was originally prepared in 2009, it has remained the operative strategy through successive Development Plans, including the current 2023–2029 Plan, in accordance with Circular Letter PL 20-13. The Planning Authority has not progressed a review of the strategy pending publication of the finalised Section 28 Wind Energy Development Guidelines (Objective CDP 11.47(d) relates in this regard). Consequently, the existing Wind Energy Strategy continues to represent the adopted policy position of the Planning Authority. Notwithstanding same there is a serious concern in respect of the visual impact of this development having regard to the height and number of turbines, and the cumulative impact of same with other existing and proposed developments.

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 the Hen Harrier and peat management on site 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), peat management, protection of water quality, bond conditions, and relevant community gain conditions.


Gordon Daly
Chief Executive
06th July 2026

Extract from minutes of the June Monthly Meeting of Clare County Council held in the Council Chamber, Áras Contae an Chláir, New Road, Ennis, Co. Clare on Tuesday, 14th May 2026 at 3 p.m.

Item 8: Chief Executive Report in accordance with Section 37E (4) and (5) of the Planning & Development Act 2000, as amended, in relation to the Slieveacurry SID Windfarm application.

The Chief Executive report dated 6th July, 2026 was circulated with the agenda. The report was prepared in accordance with the requirements of Section 37E (4) and 37E (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 (ACP), in relation to the Slieveacurry Windfarm application.

The development consists of

- 9 No. wind turbines with an overall ground-to-blade tip height of 175 metres; rotor diameter of 150 metres; and hub height of 100 metres, and a meteorological mast with a height of 30 metres, and subsequent decommissioning of the wind turbines and meteorological mast, following a thirty five-year operational period from the date of full commissioning of the wind turbines.
- Associated wind turbine and meteorological mast foundations and hardstanding areas
- An extension to the existing 110kV substation compound in the townland of Knockalassa (Including the provision of a new control building (floor area of 112.5 sq.m) with welfare facilities, all associated electrical plant and apparatus for an additional 110kV bay, security fencing, underground cabling, underground wastewater holding tank, site drainage and all ancillary works);
- Underground electrical (33kV) and communications cabling connecting the proposed wind turbines and meteorological mast to the 110kV substation extension via proposed and existing private access road/tracks and the R460 regional road;
- Temporary accommodation works to facilitate the delivery of turbine components and other abnormal sized loads on the L6230, L1076, L2118 and L1074 local roads
- Upgrade and widening works to the L6230 local road and access junction off the L6230 local road
- Upgrade of existing tracks/roads and new site access roads and hardstanding areas
- A borrow pit
- 2 no. temporary construction compounds (including site offices and welfare facilities, with a combined floor area of 202.5 sq.m);
- Peat and Spoil Management;
- Site Drainage;
- Tree felling and vegetation removal

- Biodiversity Management and Enhancement Plan measures (including hedgerow planting, peatland, marsh fritillary and hen harrier habitat enhancement areas);
- Operational stage site signage; and
- All associated site development works and apparatus

The report notes that the proposed development is generally consistent with the County's adopted Wind Energy Strategy and policy framework. However, significant concerns remain regarding the visual impact of the development, particularly due to the scale, height and number of turbines, as well as cumulative impacts with existing and proposed wind energy projects. Concerns were also raised regarding the capacity of the local road network, potential impacts on residential amenity, effects on the Hen Harrier, and peat management. Should permission be granted, it is recommended that comprehensive conditions be attached addressing residential amenity, construction management, road infrastructure, peat management, water quality protection, bonding arrangements, and community gain measures.

Cllr. M. Shannon welcomed the Chief Executive report and outlined the concerns he and the other elected members had in relation to the Slieveacurry Wind Farm application. Cllr. Shannon advised the meeting that the elected members were submitting a report and requested that it be appended with Clare County Councils submission to An Coimisiún Pleanála:

- Significant concerns were raised regarding the potential impact of the proposed development on aviation safety, including Shannon Airport operations, AirNav Ireland surveillance systems, the Woodcock Hill radar facility, and the Shanwick North Atlantic air traffic management system.
- Shannon Airport and the associated AirNav Ireland infrastructure play a critical role in managing Irish-controlled and transatlantic airspace. The safe operation of these services depends on the reliability of radar, surveillance and navigation systems.
- Members noted that An Coimisiún Pleanála previously refused planning permission for a wind farm development at Ballycar, County Clare, following objections from AirNav Ireland and Shannon Airport, citing concerns regarding aircraft safety and interference with air navigation systems.
- Concerns were expressed that wind turbines can adversely affect radar performance by creating radar clutter, generating false targets, masking genuine aircraft returns and complicating aircraft tracking, with potential impacts on the Woodcock Hill radar facility.
- Particular importance was attached to the strategic role of the Shanwick North Atlantic route structure and the potential implications for transatlantic air traffic management should surveillance systems be negatively affected.
- Members highlighted the need to assess not only the individual impact of the Slieveacurry Wind Farm but also its cumulative impact when considered alongside existing and proposed wind energy developments in the area, including Islandbane Wind Farm, Mount Callan Wind Farm and other turbine projects.

- It was noted that the combined effect of multiple wind farms could result in increased radar interference, reduced surveillance accuracy, greater complexity for air traffic management operations and a gradual degradation of aviation safety margins.
- Concerns were also raised regarding the potential precedent that approval of the development could set for further wind farm proposals within the same aviation environment, leading to additional cumulative impacts over time.
- Members considered that, given the strategic importance of Shannon Airport and associated aviation infrastructure, the precautionary principle should apply where uncertainty exists regarding aviation safety impacts.
- It was noted that the developer must satisfy the requirement to demonstrate that the proposal will not adversely affect aviation safety.

Ar moladh Cllr. M. Shannon

Cuidithe ag Cllr. J. Garrihy agus glacadh leis

“To attach report, agreed by the Elected Members which contains a number of observations and recommendations in respect of the proposed Slieveacurry Windfarm, to the Chief Executives report, already prepared under Section 37 E (4) and (5) of the Planning Act, and which is to be submitted to An Coimisiún Pleanála.”

Planning Objection to the Proposed Silvecurr Wind Farm Development

Aviation Safety, Shannon Airport, Shanwick Air Routes and Cumulative Impact Concerns

To Whom It May Concern,

I wish to lodge a formal objection to the proposed Silvecurr Wind Farm Development on aviation safety grounds. The proposed development raises serious concerns regarding its potential impact on Shannon Airport operations, AirNav Ireland surveillance systems, the Woodcock Hill radar facility, the Shanwick North Atlantic air route system, and the cumulative effect of existing and proposed wind farm developments in the region.

Shannon Airport occupies a uniquely important position within European and transatlantic aviation. Located on the western edge of Ireland, it serves as a gateway between Europe and North America and supports extensive air traffic management operations within Irish-controlled airspace. AirNav Ireland is responsible for managing approximately 451,000 square kilometres of controlled airspace, including airspace used by significant volumes of transatlantic aircraft travelling between Europe and North America. The safe operation of this network depends upon reliable radar, surveillance and navigation systems. ite +1

ACP-324270-26

Clr Michael J. J. J.

14/7/26

These concerns are not theoretical. In May 2026, An Coimisiún Pleanála refused planning permission for a proposed 12-turbine wind farm at Ballycar, County Clare, following objections from AirNav Ireland and Shannon Airport. The Commission concluded that it was not satisfied that the proposed development would avoid endangering aircraft safety or interfering with air navigation systems and found that adequate mitigation measures had not been demonstrated.

The same aviation safety principles must apply in the assessment of the Silvecurr proposal. In matters concerning aviation safety, uncertainty should always be resolved in favour of precaution. Any development that creates doubt regarding radar performance, aircraft surveillance capability or air traffic management effectiveness must be subjected to the highest level of scrutiny.

A further and highly significant concern is the cumulative impact of the proposed Silvecurr Wind Farm when considered alongside existing and proposed wind energy developments in the wider region, including **Islandbane Wind Farm**, **Mount Callan Wind Farm**, and other operational or proposed turbine developments.

Of particular importance is the Shannon Oceanic Control Area, commonly known as ~~Shanwick~~, which forms a critical element of North Atlantic air traffic management. Thousands of transatlantic flights each year operate through this airspace under carefully managed procedures designed to achieve the highest levels of safety. Aircraft entering and leaving Shanwick airspace subsequently rely upon Irish-controlled airspace and surveillance systems associated with Shannon operations. Any degradation of these systems has implications far beyond the immediate locality of the proposed development. rte +1

Modern utility-scale wind turbines are recognised internationally as having the potential to interfere with aviation surveillance systems. Rotating turbine blades can create radar clutter, produce false targets, mask genuine aircraft returns and complicate aircraft tracking. AirNav Ireland has previously raised concerns that wind farm developments in County Clare could result in radar beam deflections and false aircraft targets at considerable distances and altitudes, affecting the performance of the Woodcock Hill radar facility near Shannon Airport. This radar installation is a critical component of the surveillance infrastructure supporting both Shannon and Dublin Air Traffic Control Centres. clarechampion +1

These concerns are not theoretical. In May 2026, An Coimisiún Pleanála refused planning permission for a proposed 12-turbine wind farm at Ballycar, County Clare, following objections from AirNav Ireland and Shannon Airport. The Commission concluded that it was not satisfied that the proposed development would avoid endangering aircraft safety or interfering with air navigation systems and found that adequate mitigation measures had not been demonstrated. ¹⁷

The same aviation safety principles must apply in the assessment of the Silvecurr proposal. In matters concerning aviation safety, uncertainty should always be resolved in favour of precaution. Any development that creates doubt regarding radar performance, aircraft surveillance capability or air traffic management effectiveness must be subjected to the highest level of scrutiny.

A further and highly significant concern is the cumulative impact of the proposed Silvecurr Wind Farm when considered alongside existing and proposed wind energy developments in the wider region, including **Islandbane Wind Farm**, **Mount Callan Wind Farm**, and other operational or proposed turbine developments.

The planning process must assess not only the impact of Silvecurr in isolation but also the combined effect of multiple turbine arrays within the same aviation environment. While individual developments may claim that their impacts are minimal, the interaction of several wind farms can create a much greater overall effect on radar and surveillance systems. Multiple concentrations of turbines within radar coverage areas can increase clutter, generate additional false targets, reduce target identification accuracy and increase the complexity of air traffic surveillance operations.

clarechampion +1

This cumulative effect is particularly relevant in the Shannon region because of the strategic importance of Shannon Airport and the Shanwick North Atlantic route structure. The concentration of existing and proposed turbines within the wider operational area could lead to incremental degradation of surveillance performance, even where individual projects appear acceptable when assessed separately. Such "creeping" impacts are a recognised planning concern because no single development may appear significant, yet the combined result can produce unacceptable consequences for aviation safety.

The cumulative risk extends beyond radar performance alone. Reduced surveillance reliability can increase controller workload, complicate aircraft tracking, and diminish system resilience during periods of high traffic density, adverse weather or emergency operations. Given the volume of long-haul passenger flights crossing the North Atlantic daily, any reduction in operational safety margins must be treated with the utmost seriousness. rte +1

It is also necessary to consider future development pressures. Approval of the Silvecurr project may create a precedent for additional wind farm development within the same aviation environment. The gradual proliferation of wind farms in proximity to Shannon Airport and associated surveillance infrastructure could progressively constrain the ability of aviation authorities to maintain the highest standards of air traffic management and radar performance.

In light of the concerns previously expressed by AirNav Ireland, Shannon Airport and the Irish Aviation Authority regarding comparable wind farm developments, the burden of proof must rest with the developer to demonstrate conclusively that the proposed development, both individually and cumulatively with Islandbane, Mount Callan and other wind farm projects, will have no adverse impact on radar systems, air navigation services, aircraft surveillance, Shannon Airport operations, Shanwick air route management or transatlantic air traffic safety. rte +2

Conclusion

The proposed Silvecurr Wind Farm is located within a region of major strategic importance to national and international aviation. The development gives rise to serious concerns regarding aviation safety, radar interference, surveillance capability and the management of Shannon Airport and Shanwick transatlantic air traffic operations. These concerns are heightened by the cumulative impact of neighbouring and nearby wind farm developments, including Islandbane and Mount Callan.

Given the importance of maintaining the highest aviation safety standards and the absence of conclusive evidence demonstrating that no adverse aviation effects will occur, I respectfully submit that the precautionary principle should apply and that planning permission for the proposed Silvecurr Wind Farm Development should be refused.

Accordingly, I request that the Planning Authority refuse permission for the proposed development on aviation safety and cumulative impact grounds.

Air Navigation Safety and Cumulative Impact

The proposed Slieveacurry development must be assessed in combination with the existing and permitted wind energy developments at Ilandban and Mount Callan. Collectively, these projects would create a significant concentration of tall rotating structures within the wider Shannon-controlled airspace environment. The cumulative obstacle field has the potential to affect aviation safeguarding, radar surveillance performance, emergency aircraft routing, obstacle-clearance assessments and the management of aircraft operating on arrival, departure and en-route procedures associated with Shannon Airport. While individual wind farms may be considered acceptable in isolation, insufficient evidence has been provided to demonstrate that the combined effect of the three developments would not adversely impact AirNav Ireland systems, protected instrument flight procedures, emergency contingency operations or the overall safety and efficiency of air navigation in the region. Air navigation impacts should therefore be assessed cumulatively rather than on a project-by-project basis.

Slieveacurry Wind Farm — Aviation Opposition Summary

Co. Clare, Ireland — Shannon Airport / AirNav Ireland aviation concerns

The Project

Slieveacurry Ltd (Enerco Energy) has repeatedly applied to build a wind farm (up to 9 turbines, ~180m tip height) near Miltown Malbay, Co. Clare. First application refused 2021/2022 on ecological grounds (Marsh Fritillary butterfly, Golden Plover, Hen Harrier). A new REDIII application (case 324270) was lodged 5 May 2026, decision due May 2027.

Aviation Opposition — Core Concern

IAA / AirNav Ireland / Shannon Airport object because the site sits near flight paths feeding Shannon's Woodcock Hill radar (Cratloe) and Shannon Airport's own radar/approach systems. Turbines can:

- Create false radar returns (rotating blades mimic aircraft-like signals).
- Cause Doppler/clutter effects masking real aircraft returns.
- Physically shadow radar line-of-sight to low-flying aircraft.
- Degrade track quality — reduced sensitivity, corrupted tracking data.

Comparable case (Ballycar, Co. Clare): AirNav's Surveillance Manager stated the wind farm would degrade Woodcock Hill radar and reduce safety in the Shannon–Dublin ATC centres. An Coimisiún Pleanála refused permission (May 2026) as it could not be satisfied aircraft safety would not be endangered.

UNBEG3A & Shanwick Context

- UNBEG: waypoint near Kilkee, Co. Clare — close to the project site.
- UNBEG3A: STAR (arrival route) used by transatlantic flights descending into Shannon-controlled airspace.
- Shanwick Oceanic Control: joint UK (Prestwick/NATS)–Irish (Shannon/IAA) control of North Atlantic airspace; non-radar, procedural separation over open ocean.
- Aircraft leave Shanwick's non-radar airspace at the Shannon Oceanic Transition Area (SOTA) and are then picked up by Shannon's Woodcock Hill radar — the same radar the turbines threaten to degrade.

Engine-Out / Reduced-Power Approach Factor

Obstacle clearance for missed approaches is designed around degraded performance, not normal power:

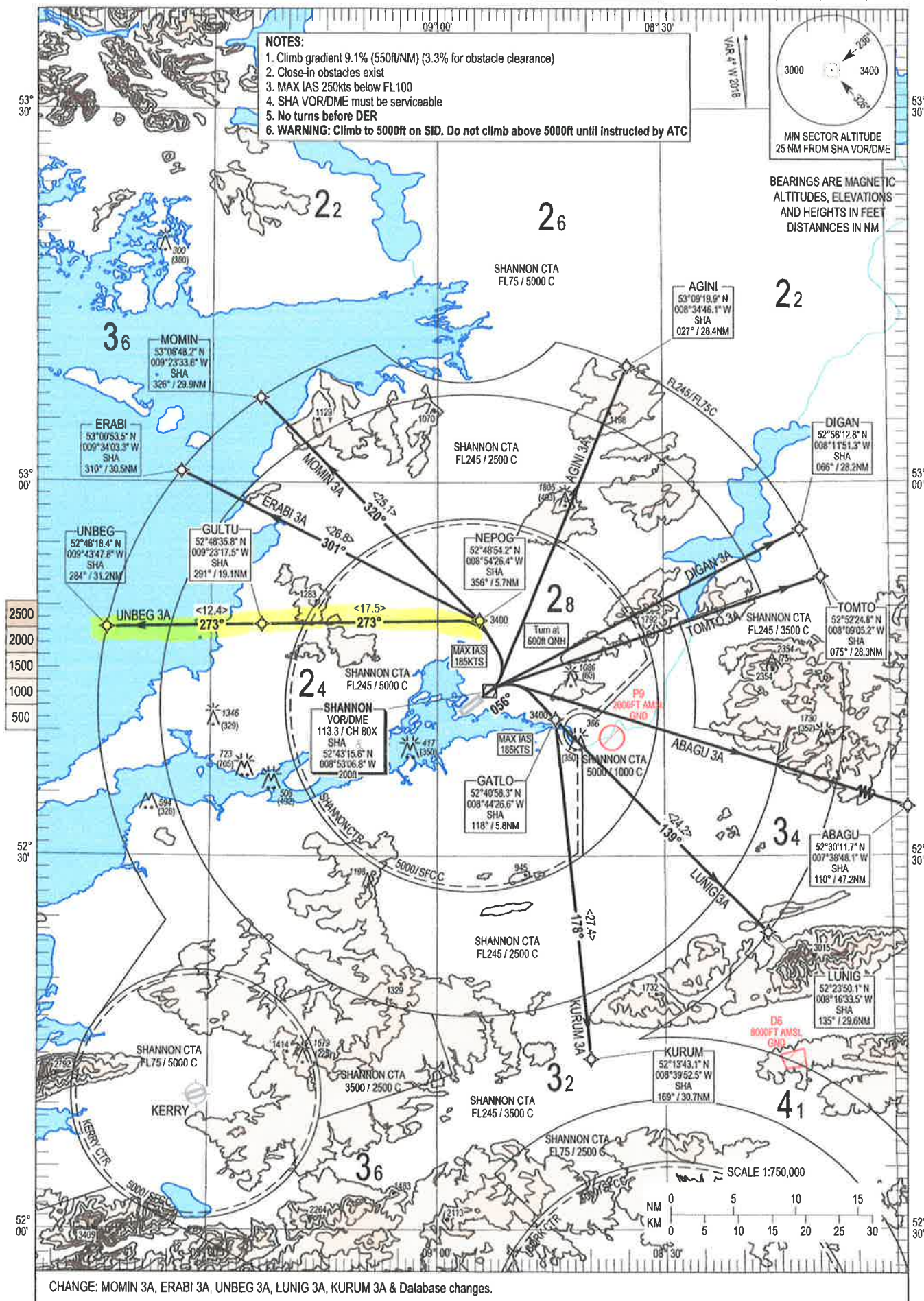
- Twin-engine aircraft, one engine out (~50% power): required climb gradient only 2.1% (vs. 2.5% nominal all-engines gradient).
- Clearance margins: 30m (intermediate phase) tightening to 50m (final phase).
- A turbine that clears normal-performance climb-outs may still penetrate the obstacle clearance surface calculated for the engine-out case — the scenario regulators must protect against.

Engine Failure Far Out Over the Atlantic (e.g. ~1,000nm)

A different regime — ETOPS (Extended-range Twin-engine Operations), not a terminal obstacle issue:

- Aircraft are certified (ETOPS-180/207/240/330) for max diversion time to a suitable airport on one engine.
- Crew declares an emergency, diverts immediately, flies single-engine cruise at reduced altitude/speed.
- Shannon, Keflavik, Gander & Goose Bay exist as spaced diversion airports so no aircraft is ever beyond its ETOPS range.
- Concern here is fuel/range, not obstacles — turbine height is irrelevant until the aircraft is inbound to land.

Sources: Clare Champion, RTE, Irish Times, Irish Examiner, Clare FM Live, An Coimisiún Pleanála case files (312725/22, 324270), AirNav Ireland, Wikipedia (Shanwick Oceanic Control, UNBEG waypoint).



31 JAN 2019

ABAGU3A CAT A/B/C/D SID RWY06

ABAG3A

Navigation Performance	Path Terminator	WPT Name	Latitude (N) / Longitude (W)	Fly-By or Fly-Over	Distance (NM)	True Track / Magnetic Track	Upper Limit/ Lower Limit	Speed Limit (kts)	Remarks
RNAV 1	CA	RWY06	-	-	-	052.2 / 056	- / 600	-	-
RNAV 1	DF	ABAGU	523011.7 / 0073848.1	Fly-By	-	-	-	-	R

AGINI3A CAT A/B/C/D SID RWY06

AGIN3A

Navigation Performance	Path Terminator	WPT Name	Latitude (N) / Longitude (W)	Fly-By or Fly-Over	Distance (NM)	True Track / Magnetic Track	Upper Limit/ Lower Limit	Speed Limit (kts)	Remarks
RNAV 1	CA	RWY06	-	-	-	052.2 / 056	- / 600	-	-
RNAV 1	DF	AGINI	530919.9 / 0083446.1	Fly-By	-	-	-	-	L

DIGAN3A CAT A/B/C/D SID RWY06

DIGA3A

Navigation Performance	Path Terminator	WPT Name	Latitude (N) / Longitude (W)	Fly-By or Fly-Over	Distance (NM)	True Track / Magnetic Track	Upper Limit/ Lower Limit	Speed Limit (kts)	Remarks
RNAV 1	CA	RWY06	-	-	-	052.2 / 056	- / 600	-	-
RNAV 1	DF	DIGAN	525612.8 / 0081151.3	Fly-By	-	-	-	-	L

ERABI3A CAT A/B/C/D SID RWY06

ERAB3A

Navigation Performance	Path Terminator	WPT Name	Latitude (N) / Longitude (W)	Fly-By or Fly-Over	Distance (NM)	True Track / Magnetic Track	Upper Limit/ Lower Limit	Speed Limit (kts)	Remarks
RNAV 1	CA	RWY06	-	-	-	052.2 / 056	- / 600	185	-
RNAV 1	DF	NEPOG	524854.2 / 0085426.4	Fly-By	-	-	- / 3400	185	L
RNAV 1	TF	ERABI	530053.5 / 0093403.3	Fly-By	26.8	296.9 / 301	-	250	-

KURUM3A CAT A/B/C/D SID RWY06

KURU3A

Navigation Performance	Path Terminator	WPT Name	Latitude (N) / Longitude (W)	Fly-By or Fly-Over	Distance (NM)	True Track / Magnetic Track	Upper Limit/ Lower Limit	Speed Limit (kts)	Remarks
RNAV 1	CA	RWY06	-	-	-	052.2 / 056	- / 600	185	-
RNAV 1	DF	GATLO	524058.3 / 0084426.6	Fly-By	-	-	- / 3400	185	R
RNAV 1	TF	KURUM	521343.1 / 0083952.5	Fly-By	27.4	174.1 / 178	-	250	-

LUNIG3A CAT A/B/C/D SID RWY06

LUNI3A

Navigation Performance	Path Terminator	WPT Name	Latitude (N) / Longitude (W)	Fly-By or Fly-Over	Distance (NM)	True Track / Magnetic Track	Upper Limit/ Lower Limit	Speed Limit (kts)	Remarks
RNAV 1	CA	RWY06	-	-	-	052.2 / 056	- / 600	185	-
RNAV 1	DF	GATLO	524058.3 / 0084426.6	Fly-By	-	-	- / 3400	185	R
RNAV 1	TF	LUNIG	522350.1 / 0081633.5	Fly-By	24.2	135.0 / 139	-	250	-

MOMIN3A CAT A/B/C/D SID RWY06

MOMI3A

Navigation Performance	Path Terminator	WPT Name	Latitude (N) / Longitude (W)	Fly-By or Fly-Over	Distance (NM)	True Track / Magnetic Track	Upper Limit/ Lower Limit	Speed Limit (kts)	Remarks
RNAV 1	CA	RWY06	-	-	-	052.2 / 056	- / 600	185	-
RNAV 1	DF	NEPOG	524854.2 / 0085426.4	Fly-By	-	-	- / 3400	185	L
RNAV 1	TF	MOMIN	530648.2 / 0092333.6	Fly-By	25.1	315.7 / 320	-	250	-

TOMTO3A CAT A/B/C/D SID RWY06

TOMT3A

Navigation Performance	Path Terminator	WPT Name	Latitude (N) / Longitude (W)	Fly-By or Fly-Over	Distance (NM)	True Track / Magnetic Track	Upper Limit/ Lower Limit	Speed Limit (kts)	Remarks
RNAV 1	CA	RWY06	-	-	-	052.2 / 056	- / 600	-	-
RNAV 1	DF	TOMTO	525224.8 / 0080905.2	Fly-By	-	-	-	-	L

UNBEG3A CAT A/B/C/D SID RWY06

UNBE3A

Navigation Performance	Path Terminator	WPT Name	Latitude (N) / Longitude (W)	Fly-By or Fly-Over	Distance (NM)	True Track / Magnetic Track	Upper Limit/ Lower Limit	Speed Limit (kts)	Remarks
RNAV 1	CA	RWY06	-	-	-	052.2 / 056	- / 600	185	-
RNAV 1	DF	NEPOG	524854.2 / 0085426.4	Fly-By	-	-	- / 3400	185	L
RNAV 1	TF	GULTU	524835.8 / 0092317.5	Fly-By	17.5	269.2 / 273	-	250	-
RNAV 1	TF	UNBEG	524818.4 / 0094347.8	Fly-By	12.4	268.8 / 273	-	250	-

06 DEC 2018

RWY 06 ILS Approach

Fix	IF ELPOM	FAP/FAF ASGON	SHA	MATP NN005	IAF SHA
Fix Coordinates	523337.1N 0091326.8W	523554.4N 0090838.1W	524315.6N 0085306.8W	524904.1N 0084044.4W	524315.6N 0085306.8W
Fix Formation Bearing °T	232.20 SHA	232.26 ISE	-	052.18	-
Fix Formation Distances	15.71 SHA	9.27 ISE	-	9.50 SHA	-

RWY 06 LOC Approach

Descent Angle:	3.00°						
Fix	IF ELPOM	FAP/FAF ASGON	SDF NN003	MAPt NN004	SHA	MATP NN005	IAF SHA
Fix Coordinates	523337.1N 0091326.8W	523554.4N 0090838.1W	523838.7N 0090251.4W	524058.4N 0085755.3W	524315.6N 0085306.8W	524904.1N 0084044.4W	524315.6N 0085306.8W
Fix Formation Bearing °T	232.20 SHA	232.26 ISE	232.26 ISE	232.26 ISE	-	052.18	-
Fix Formation Distances	15.71 SHA	9.27 ISE	4.80 ISE	1.00 ISE	-	9.50 SHA	-

Holding Identification - EINN AD 2.24-10

Holding Fix	Latitude (N) / Longitude (W)	Inbound True Track (degrees)	Inbound Magnetic Track (degrees)	Maximum Indicated Airspeed (kts)	Minimum/ Maximum Holding Level / Altitude (FL/ft)	Limiting outbound distance (NM)	Direction of Turn
ELPOM	523337.1N / 0091326.8W	051.85	056	220	3000ft / FL140	D21 SHA	L

ATC SURVEILLANCE MINIMUM
ALTITUDE CHART - ICAO

AERODROME ELEV 46 ft
TRANS ALT 5000ft
TRANS LEVEL by ATC

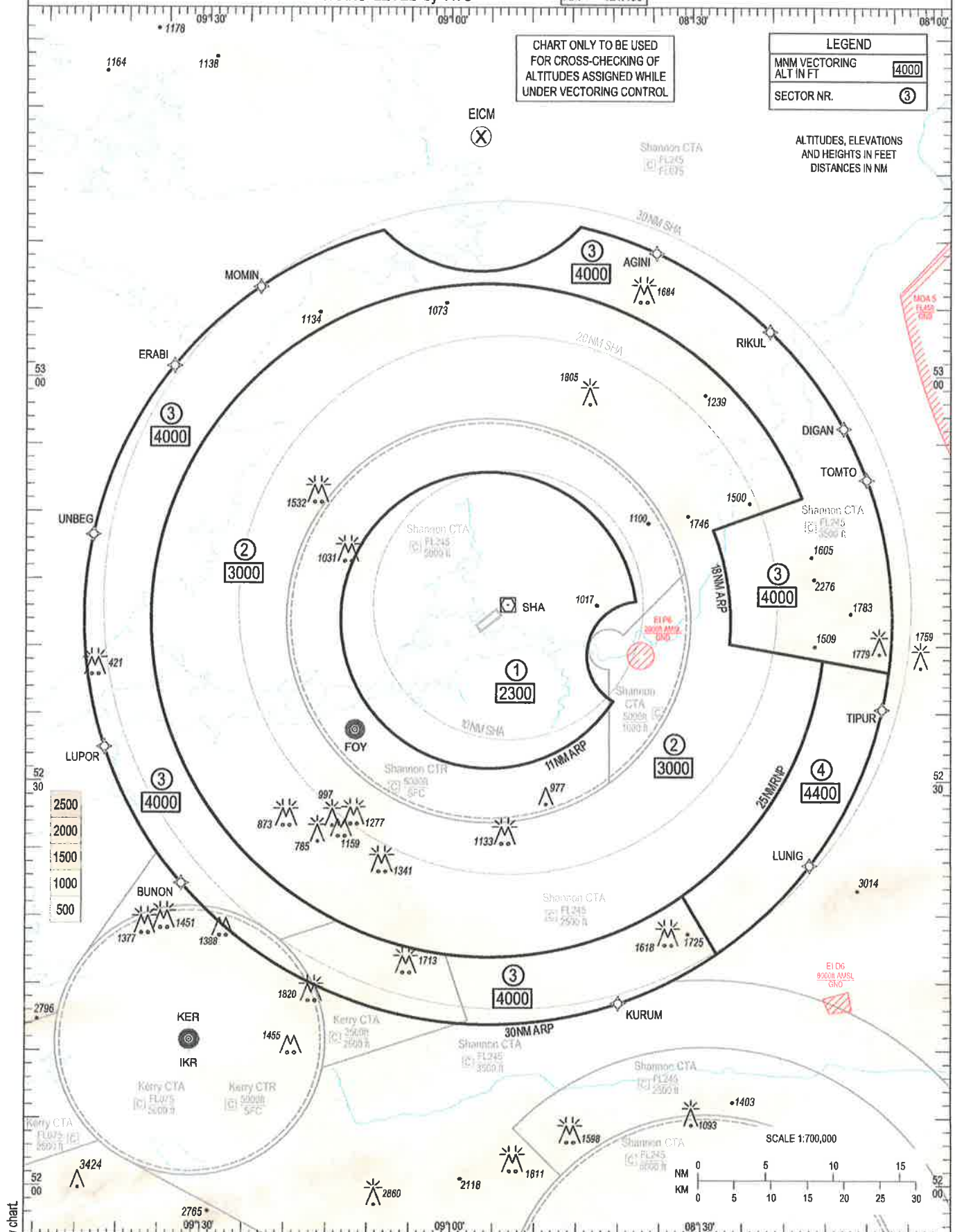
ATIS 130.955
TWR 118.700
GND 121.800
APP 121.400

SHANNON / SHANNON

CHART ONLY TO BE USED
FOR CROSS-CHECKING OF
ALTITUDES ASSIGNED WHILE
UNDER VECTORIZING CONTROL

LEGEND	
MNM VECTORIZING ALT IN FT	4000
SECTOR NR.	③

ALTITUDES, ELEVATIONS
AND HEIGHTS IN FEET
DISTANCES IN NM



CHANGE: New chart.

INFORMATION BOX: 1. ALTITUDE TEMPERATURE CORRECTION to 0°C taken into account in determining minimums. 2. MAX IAS 250kts below FL100.
3. COMMUNICATION FAILURE: In accordance with procedures described in AIP Ireland, EINN AD 2.22 FLIGHT PROCEDURES, paragraph 5.2.4 Communications failure procedures for arriving aircraft.
WARNING: Set hPa only.

AERONAUTICAL INFORMATION 17 JUN 2021

IRISH AVIATION AUTHORITY

ATC Surveillance Minimum Altitude Coordinates

Sector 1. MNM ALT **2300**

52°43'29"N 008°37'32"W,
arc anti-clockwise 4 NM radius centre 52°39'30"N 008°36'59"W,
52°36'05"N 008°40'23"W,
arc 11 NM radius centre 52°42'07"N 008°55'29"W,
52°43'29"N 008°37'32"W

Sector 2. MNM ALT **3000**

Inner boundary:

52°43'29"N 008°37'32"W,
arc anti-clockwise 4 NM radius centre 52°39'30"N 008°36'59"W,
52°36'05"N 008°40'23"W,
arc 11 NM radius centre 52°42'07"N 008°55'29"W,
52°43'29"N 008°37'32"W

Outer boundary:

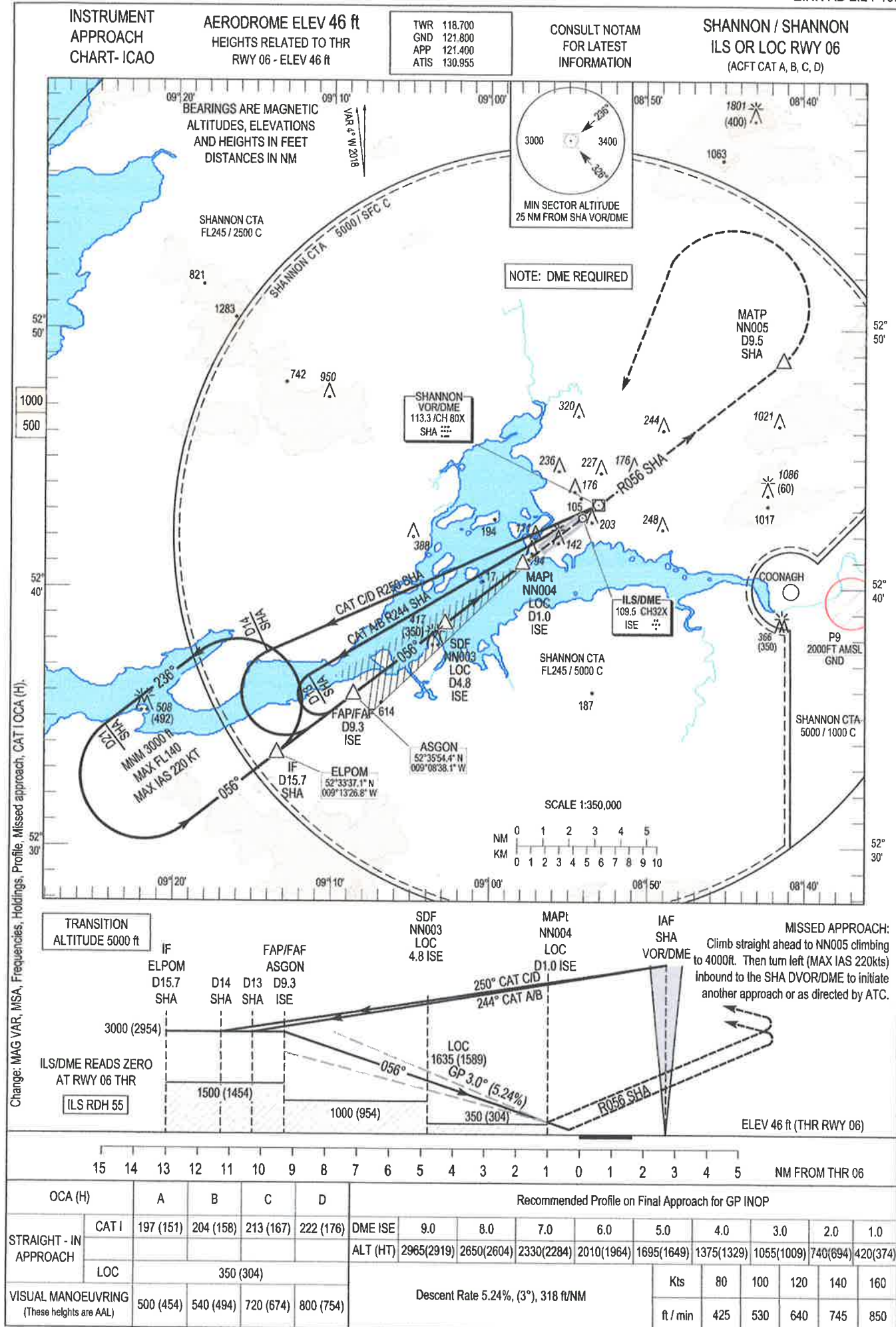
52°51'06"N 008°17'04"W, 52°48'46"N 008°27'57"W,
arc 18 NM radius centre 52°42'07"N 008°55'29"W,
52°40'19"N 008°26'03"W, 52°39'02"N 008°14'43"W,
arc 25 NM radius centre 52°42'07"N 008°55'29"W,
52°51'06"N 008°17'04"W

Sector 3. MNM ALT **4000**

52°38'06"N 008°06'38"W, 52°40'19"N 008°26'03"W,
arc anti-clockwise 18 NM radius centre 52°42'07"N 008°55'29"W,
52°48'46"N 008°27'57"W, 52°51'06"N 008°17'04"W,
arc anti-clockwise 25 NM radius centre 52°42'07"N 008°55'29"W,
52°21'40"N 008°32'00"W, 52°17'21"N 008°27'50"W,
arc 30 NM radius centre 52°42'07"N 008°55'29"W,
53°11'03"N 009°08'26"W,
arc anti-clockwise 10 NM radius centre 53°18'01"N 008°56'30"W,
53°11'18"N 008°44'11"W,
arc 30 NM radius centre 52°42'07"N 008°55'29"W,
52°38'06"N 008°06'38"W

Sector 4. MNM ALT **4400**

52°38'06"N 008°06'38"W, 52°39'02"N 008°14'43"W,
arc 25 NM radius centre 52°42'07"N 008°55'29"W,
52°21'40"N 008°32'00"W, 52°17'21"N 008°27'50"W,
arc anti-clockwise 30 NM radius centre 52°42'07"N 008°55'29"W,
52°38'06"N 008°06'38"W



Proposed Amendment to add to the Report

I wish to object to the proposed Silvecurr Wind Farm on serious aviation safety grounds.

Visual / Scenic / Biodiversity and Habitat Directives

Shannon Airport is not just a regional airport. It is a strategic national and international aviation asset, particularly because of its role in transatlantic traffic between Europe and North America. The airspace around Shannon is closely connected with the Shanwick North Atlantic air routes, which handle large volumes of long-haul passenger aircraft. Safety in this airspace depends on reliable radar, surveillance, navigation and air traffic control systems.

Modern wind turbines can interfere with aviation radar. Their rotating blades can create radar clutter, false targets, shadowing effects and difficulty in tracking aircraft. This is especially concerning where turbines are located within areas relevant to Shannon Airport operations and AirNav Ireland surveillance systems, including the Woodcock Hill radar facility.

UNBEG 3A

This concern is not theoretical. AirNav Ireland, Shannon Airport and aviation authorities have already raised objections to other wind farm developments in County Clare because of potential impacts on radar and air traffic safety. A similar wind farm proposal at Ballycar was refused because the planning authority was not satisfied that aviation risks had been properly removed or mitigated.

The proposed Silvecurr Wind Farm must also be considered cumulatively with other existing and proposed wind farms in the region, including Islandbane and Mount Callan. Each development may claim to have limited impact on its own, but together they may create a much greater combined effect on radar performance, aircraft tracking and controller workload. This creeping cumulative impact could reduce safety margins over time.

A chive

In aviation, even a small uncertainty must be treated seriously. The consequences of degraded radar or reduced surveillance reliability in airspace used by transatlantic aircraft are too significant to ignore.

Therefore, unless it can be conclusively proven that Silvecurr, both on its own and in combination with Islandbane, Mount Callan and other wind farms, will have no adverse effect on Shannon Airport, Shanwick air routes, radar systems or aircraft safety, the precautionary principle must apply.

For these reasons, I respectfully request that planning permission for the Silvecurr Wind Farm be refused on aviation safety and cumulative impact grounds.

Maximum Take-Off Weight — MTOW

Aircraft	Maximum Take-Off Weight	In tonnes
Boeing 777-200 Freighter / 777F	766,800 lb / 347,815 kg	347.8 ton 
Boeing 747-8 Freighter / 747-8F	990,000 lb / 449,056 kg	449.1 tonnes

The **Boeing 777F** has an MTOW of **347,815 kg / 766,800 lb**.

The **Boeing 747-8F** has an MTOW of **449,056 kg / 990,000 lb**. [flugzeuginfo](#) [cargolux](#)

Useful comparison for your speech/submission

The **747-8F** is about **101 tonnes heavier** at maximum take-off weight than the **777F**. That is a very substantial difference when discussing large transatlantic freight aircraft using Shannon-



COMHAIRLE | CLARE
CONTAE AN CHLÁIR | COUNTY COUNCIL

At the Adjourned July meeting of Clare County Council held on

Tuesday, 14th July, 2026 it was:

Proposed by: Cllr. M. Shannon

Seconded by: Cllr. J. Garrihy

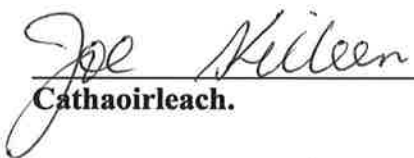
And agreed

“To attach report, agreed by the Elected Members which contains a number of observations and recommendations in respect of the proposed Slieveacurry Windfarm, to the Chief Executives report, already prepared under Section 37 E (4) and (5) of the Planning Act, and which is to be submitted to An Coimisiún Pleanála.”

Signed:


Riarthóir Cruinnithe.

Signed:


Cathaoirleach.

Dated:

14th July 2026