



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Brid & Jeffrey Foley

(b) Observer's postal address

Illaunbaun
Lahinch
Co. Clare
V95YX65

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

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The agent at the postal address in Part 2

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Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Coimisiún Pleanála case number for the current application (if available)**

(for example: 300000)

324270

- (b) **Name or description of proposed development**

Proposed development of 9 no. wind turbines, a permanent extension to the existing 110kV Slievecallan substation at Knockalassa, and associated infrastructure and works

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

within the townlands of Tooreen, Fahanlunaghta More, Glendine North, Curraghodea, Silverhill, Cloghaun More, Letterkelly, Doonsallagh East, Knockalassa, Slievealoughaun and other townlands, Co. Clare.

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

I object to the proposed development under Case No. 324270.

1. The area has already been the subject of multiple planning refusals by Clare County Council and An Bord Pleanála, including ABP Case Ref. 312728, where serious concerns were identified regarding:

Unacceptable visual impact;

Skyline intrusion;

Cumulative landscape impact;

Peatland disturbance;

Hydrological risk;

Biodiversity impacts; and

Impacts on protected species and European sites.

The current proposal has failed to adequately overcome these previously identified concerns. The planning issues that resulted in previous refusals remain relevant and should be given significant weight in the assessment of this application.

This development must not be assessed in isolation. It must be assessed cumulatively alongside:

The previously refused Slieveacurry proposal;

The refused Illaunbaun Wind Farm proposal;

5. Grounds

The Slievenalicka proposal;

Existing operational turbines;

Existing and proposed substations;

Grid connections;

Access roads; and

All associated infrastructure across the same upland landscape.

There is a serious concern that the cumulative environmental effects of these connected wind energy projects are being fragmented across separate planning applications rather than being assessed comprehensively as part of a single cumulative wind energy cluster.

The cumulative impact on landscape character, visual amenity, ecology, hydrology, peatland habitats, protected species, tourism and residential amenity is therefore significantly greater than the impact of any individual development considered in isolation.

Accordingly, I submit that the proposal is contrary to the proper planning and sustainable development of the area and should be refused permission.

2. Project Splitting and Inadequate Cumulative Assessment

Under the Environmental Impact Assessment Directive 2011/92/EU (as amended), projects should not be artificially segmented or "project split" in a manner that understates their true cumulative environmental effects.

Given the overlap between this proposal and other wind energy developments in the wider West Clare uplands, there is a legitimate concern that the cumulative effects of these projects are not being fully assessed in an integrated manner.

5. Grounds

The developments share common and interconnected characteristics including:

Townlands and geographical areas;

Landscape character areas;

Ecological corridors;

Hydrological systems and catchments;

Visual receptors and viewpoints;

Grid connections and substations; and

Associated access roads and supporting infrastructure.

Accordingly, the cumulative effects of these developments require comprehensive and integrated assessment rather than being considered as a series of separate and unrelated projects.

The continued proliferation of large-scale wind energy development across this sensitive upland landscape would result in the excessive industrialisation of rural West Clare and would materially damage the visual character, scenic quality and amenity of the area.

Previous planning refusals have already identified this landscape as visually sensitive and unsuitable for turbine development of this scale. The current proposal has not demonstrated that these concerns have been adequately addressed.

Impact on Residential Amenity

The proposal would adversely affect residential amenity through:

Overbearing visual impact;

Dominance of the surrounding landscape;

Noise impacts and shadow flicker effects;

5. Grounds

Loss of rural character and tranquillity; and

The gradual degradation of the rural living environment.

The cumulative industrialisation of the area also gives rise to legitimate concerns regarding the long-term attractiveness and desirability of the surrounding communities.

Biodiversity and Protected Species

Particular concern arises regarding the potential impacts on protected species and habitats, including:

Hen Harrier;

Golden Plover;

Curlew;

Marsh Fritillary habitat; and

Other protected birds, mammal and invertebrate species associated with upland peatland and heath habitats.

The Hen Harrier is a species protected under Annex I of the Birds Directive 2009/147/EC. The Marsh Fritillary is protected under Annex II of the Habitats Directive 92/43/EEC. Any risk of habitat loss, disturbance, displacement, collision risk or deterioration of supporting habitats should be assessed with the utmost caution.

Given the ecological sensitivity of the area, I am not satisfied that the proposal has demonstrated the absence of significant adverse impacts on protected species, biodiversity, ecological connectivity or European sites.

5. Grounds

Conclusion

For the reasons outlined above, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development under Case No. 324270. The proposal would result in unacceptable impacts on landscape character, residential amenity, biodiversity, environmental quality, road safety and the overall rural character of the area and is therefore contrary to the proper planning and sustainable development of the area.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to request the Coimisiún to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

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No, I do not wish to request an oral hearing

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Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes