

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

Peter & Concellia Fee

(b) Observer's
postal address

Lackamore, Miltown Malbay, Co Clare V95 P9C4

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

Not applicable

(b) Agent's postal
address

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 Bord Pleanála case number for the current application (if available)**
(for example: 300000)

PAX03.324270

- (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.
(www.slieveacurryplanning.com)

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 wish to object to SID Application Ref. 324270 by Slieveacurry Ltd.

This proposal forms part of an ongoing concentration and proliferation of wind energy development across the Slieveacurry, Slievenalicka, Illaunbaun, Tooreen, Lackamore and adjoining West Clare uplands.

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.

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,
- the Slievenalicka proposal,
- existing operational turbines,
- and all associated substations, access roads, grid connections and related 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 assessed comprehensively as a single cumulative wind energy cluster.

5. Grounds

Under the EIA Directive 2011/92/EU (as amended), projects cannot be artificially segmented or “project split” in a manner which understates their true cumulative environmental effects.

Given the overlap in:

- townlands,
 - landscape character areas,
 - ecological corridors,
 - hydrological systems,
 - visual receptors,
 - and shared infrastructure,
- the cumulative effects of these developments require full integrated assessment.

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 and amenity of the area.

The previous refusals already identified the landscape as visually sensitive and unsuitable for turbine development of this scale.

The proposal would also adversely affect residential amenity through:

- overbearing visual impact,
- dominance of the surrounding landscape,
- noise and shadow flicker concerns,
- and the degradation of the rural living environment.

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

Particular concern also arises regarding impacts on protected species including Hen Harrier, Golden Plover, Curlew and Marsh Fritillary habitat.

The Hen Harrier is 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.

5. Grounds

Under Article 6(3) of the Habitats Directive, permission can only be granted where it has been established beyond reasonable scientific doubt that the proposed development will not adversely affect the integrity of any European site either individually or in combination with other plans or projects.

Given the scale and concentration of wind energy development now proposed within the same upland landscape and adjoining townlands, significant uncertainty remains regarding:

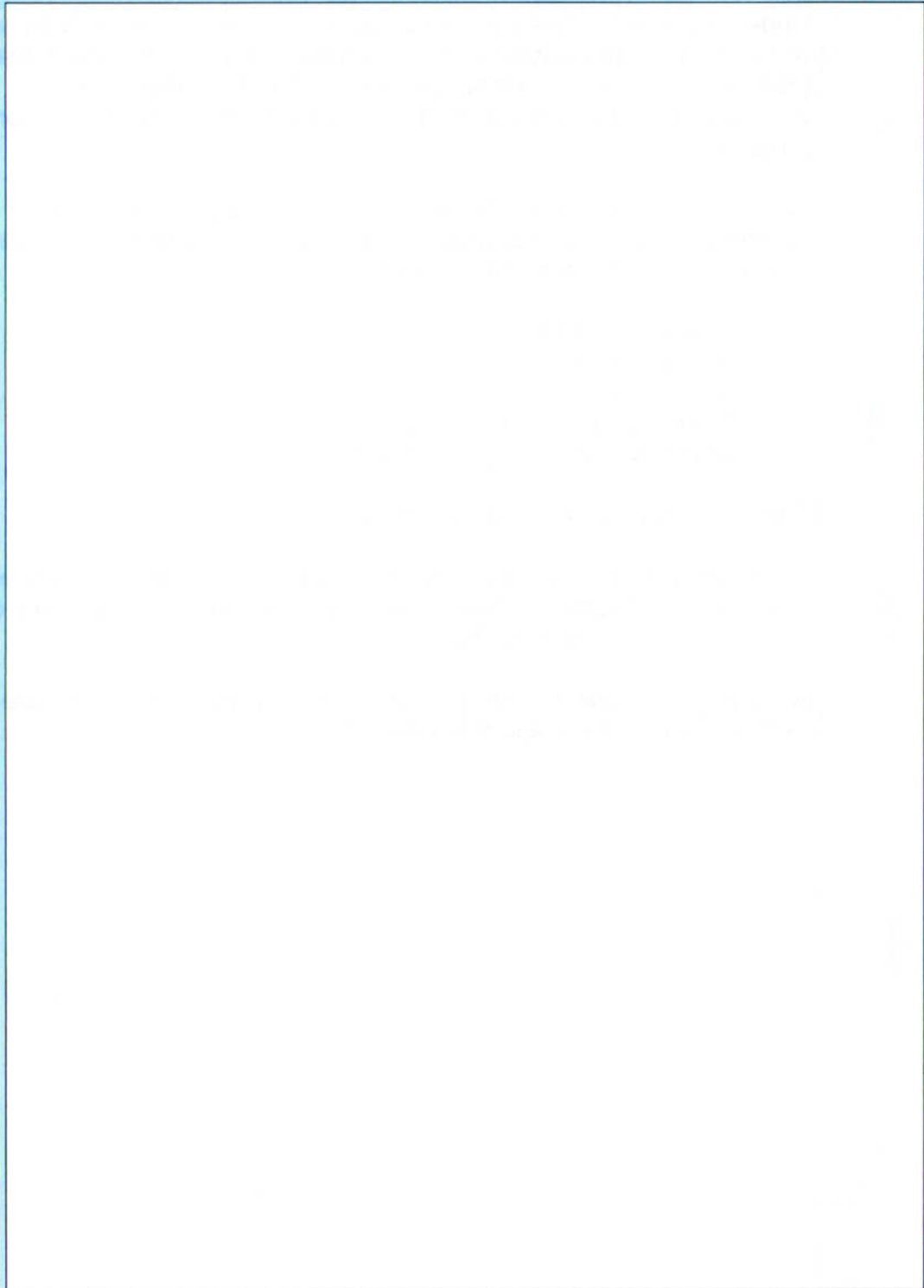
- cumulative ornithological impacts,
- habitat fragmentation,
- peat stability,
- hydrological impacts,
- and downstream impacts on European sites.

The precautionary principle must therefore apply.

The proposed development would materially conflict with the landscape protection, biodiversity protection and residential amenity objectives of the Clare County Development Plan.

Accordingly, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development.

5. Grounds



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 Board 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

☐

No, I do not wish to request an oral hearing

☐

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