

**Letterkelly,  
Miltown Malbay  
Co Clare  
23/06/2026**

**Submitted by:** Sinead Lafferty, Roisin Lafferty & Pdraig Lafferty

**ACP File Reference:** PAX 03.324270

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

Dear Sir/Madam

We wish to make an observation on the proposed Slieveacurry Wind Farm development.

At the outset, we wish to state that we each recognise the importance of the natural environment and the urgency of addressing climate change. We acknowledge and support the transition to renewable energy and recognise the importance of reducing reliance on fossil fuels. However, this must be balanced against ensuring that the transition to renewable energy does not place a disproportionate burden on any one rural community- particularly where impacts are locally concentrated while the benefits are widely distributed. We believe that renewable energy developments must be planned and located in a manner that protects existing communities, biodiversity, water resources and the wider environment.

Having reviewed the Environmental Impact Assessment Report (the “**EIAR**”), we are not satisfied that the applicant has demonstrated that the proposed development can proceed without significant adverse impacts. In particular, we have concerns regarding residential amenity, noise, shadow flicker, cumulative impacts, biodiversity, Hen Harrier protection, groundwater, peat stability, communications infrastructure and the overall adequacy of the assessments presented.

### **1. Planning History and Previous Refusals**

The planning history of this proposal is highly relevant. Previous refusals and withdrawn applications demonstrate that significant concerns have repeatedly arisen in relation to this development.

These concerns have included landscape impacts, peat stability, environmental risks, residential amenity and ecological impacts. The existence of multiple previous refusals suggests that the fundamental suitability of this location for a wind farm of this scale remains unresolved.

The current application should therefore be assessed with particular care and should not be viewed in isolation from its planning history.

## **2. Residential Amenity**

The EIAR concludes that the proposed development will not result in unacceptable impacts on residential amenity.

We do not accept that this conclusion has been adequately demonstrated. We are also concerned by the apparent inconsistency in the treatment of residential properties within the EIAR. Certain vacant or derelict dwellings appear to have been included within the assessment, while others that are capable of restoration, occupation or redevelopment appear to have been excluded or given limited consideration. In the context of Ireland's ongoing housing shortage in 2026, every existing property and every dwelling with realistic potential to become a residence should be considered a sensitive receptor for the purposes of a residential amenity assessment. As individuals in our mid-twenties to early thirties facing the housing crisis, it is neither reasonable nor appropriate to discount the future residential use of potentially habitable or restorable properties when assessing the long-term impacts of a development that may remain operational for decades. We have actively considered renovating and occupying existing dwellings on our family land, but the cumulative impacts associated with the existing turbines and the proposed development would make such investment and occupation significantly less attractive, if not impractical. Any omission of such properties risks understating the true impact of the proposed development on present and future residents.

Residential amenity is not limited to compliance with technical standards. It includes the ability of residents to enjoy their homes, gardens, outdoor spaces, views and general quality of life. The long-term sustainability of rural communities must also be considered. Many parts of rural Ireland are already experiencing challenges in retaining younger generations with employment increasingly concentrated in urban centers. The growth of remote and hybrid working has created an important opportunity for people and families to live in rural areas while maintaining professional careers. Developments that diminish residential amenity, environmental quality and the attractiveness of an area as a place to live risk undermining this. The claims made in the EIAR that population demographics will not be impacted do not withstand scrutiny. In assessing the impact of this proposal we implore the Coimisiún to give consideration not only to current but to potential future residents. Decisions that impact upon the quality of life for rural communities risk accelerating population decline and increasing pressure towards urban

migration, contrary to broader national objectives of supporting balanced regional developments and sustainable rural communities.

The proposed development would introduce additional industrial-scale infrastructure into an area already influenced by existing wind energy developments. The cumulative effect of turbine presence, movement, aviation lighting, operational noise, shadow flicker and visual dominance has not been adequately assessed from the perspective of those living in the area. The proposal risks imposing a disproportionate burden on local residents while delivering benefits that extend far beyond the affected community.

### **3. Noise and Sleep Disturbance**

The conclusions of the EIAR regarding noise impacts require particularly careful scrutiny. A recurring concern raised by local residents in relation to existing wind energy developments is the difference between predicted noise levels and actual lived experience once turbines become operational.

The existence of noise complaints associated with existing developments demonstrates that modelling and prediction do not always reflect reality on the ground.

Furthermore, our family have recently constructed a new home in the area and have deliberately included dedicated office space to facilitate remote working for family members. As all of us are employed in roles that allow either full-time or partial remote working, this arrangement was intended to enable us to spend extended periods living and working locally. However, the cumulative noise impacts arising from both the existing turbines and the proposed development would significantly undermine the suitability of the property as a remote-working environment, making such use impractical. This would diminish the attractiveness of the area as a place to live and work and could influence decisions regarding long-term occupancy and residency, contrary to the EIAR's conclusion that population demographics would not be affected.

The applicant places significant reliance on predictive modelling. However, where existing wind farms have generated concerns regarding operational noise, cumulative impacts and sleep disturbance, there is a compelling case for adopting a precautionary approach.

Of particular concern is the possibility of sleep disturbance. Sleep is fundamental to health and wellbeing. Even intermittent disturbance can significantly affect quality of life.

We would prevail on the Coimisiún to ensure it is satisfied that cumulative operational noise from existing and proposed turbines has been robustly assessed before any permission is considered.

### **4. Shadow Flicker**

The EIAR concludes that shadow flicker impacts can be adequately controlled through mitigation measures.

We remain unconvinced that the assessment has fully considered real-world cumulative effects.

The proposal relies heavily on theoretical modelling and operational controls. However, the effectiveness of such controls must be demonstrated rather than assumed.

Shadow flicker is not merely an inconvenience. Repeated exposure can interfere with enjoyment of homes, gardens and outdoor spaces.

The cumulative impact of existing and proposed turbines should be fully assessed, particularly where residents may already experience shadow flicker from operational wind farms.

## **5. Visual Impact and Landscape Character**

The proposed turbines would represent a further substantial industrial intervention within a rural landscape. The EIAR appears to understate the significance of the visual impact by focusing primarily on individual viewpoints rather than the wider cumulative effect on landscape character.

The proposed turbines would be visible over extensive areas and would contribute to the continuing industrialisation of the local landscape.

Landscape impact is not solely a matter of visibility. It is also concerned with character, sense of place and the cumulative effect of repeated wind energy developments within the same geographical area.

We are concerned that the proposed wind farm may significantly restrict the future potential uses of our family's land. Given the exceptional natural landscape, scenic value and the area's growing tourism industry, we have a reasonable expectation that, at some point in the future, we or other members of our family may wish to establish an outdoor recreation or nature-based tourism business on the property. This could include activities such as guided walks, eco-tourism, camping, wellness retreats, outdoor education, pony trekking, or other enterprises that rely on the area's natural beauty, tranquillity and unspoilt character.

The presence of large-scale wind turbines in close proximity to the land has the potential to diminish the landscape's visual amenity, reduce its appeal to visitors, and adversely affect the commercial viability of such ventures. The proposed development would therefore not only impact the current enjoyment of the land but could also undermine its future economic potential and limit reasonable opportunities for sustainable rural enterprise.

## **6. Cumulative Impact of Multiple Wind Farms**

The cumulative impact assessment is one of the most important aspects of this application. The area is already subject to existing wind energy developments, while additional projects have been proposed or permitted within the wider locality.

The assessment of cumulative effects should extend beyond visual impact and include:

- Noise
- Shadow flicker
- Residential amenity
- Biodiversity
- Protected species
- Water resources
- Traffic
- Landscape character

The Coimisiún should carefully consider whether a tipping point has been reached whereby the concentration of wind energy developments within a relatively small area results in unacceptable cumulative impacts on the receiving environment.

## **7. Groundwater, Private Wells and Water Resources**

We are concerned that the assessment of groundwater and private water supplies is incomplete. The conclusion that there will be no impact on private wells appears to depend on assumptions regarding the identification and location of existing water supplies.

Where baseline information is incomplete, it is not possible to conclude with confidence that impacts can be ruled out.

Construction activities, turbine foundations, excavation works, borrow pits and associated infrastructure all have the potential to affect groundwater pathways, local wells and overall water quality.

The precautionary principle should apply where drinking water supplies are concerned.

## **8. Biodiversity and Protected Species**

I dispute the conclusion that biodiversity impacts will be insignificant. The proposed development is located within an environment that supports a range of habitats and protected species.

Habitat disturbance, displacement effects, construction impacts and operational impacts must all be considered comprehensively.

## **9. Hen Harrier**

The conclusions regarding Hen Harrier require particularly careful examination. The Hen Harrier is a protected species of significant conservation importance. The EIAR appears to rely on assumptions that birds can relocate, adapt or utilise alternative habitat without adverse consequences.

Such assumptions should not be accepted without robust scientific evidence stretching over extended periods of time.

Protected species cannot simply be treated as though they can be moved from one area to another without ecological consequences.

The burden of proof rests with the applicant to demonstrate that the development will not adversely affect breeding, nesting, foraging or population viability. It is our submission that this standard has not been met.

## **10. Peat Stability**

Peat stability remains a major concern. Previous planning decisions have identified peat-related risks as a significant issue and indeed a core reason for refusing permission.

The environmental consequences of peat instability can be severe and long-lasting, including sediment release, water pollution, habitat damage and downstream impacts.

## **11. Communications and Broadcast Signals**

The EIAR concludes that there will be no significant impacts on communications infrastructure. However, local experience associated with existing wind energy developments suggests that this conclusion is totally misplaced and just does not stand up to scrutiny. Local experiences certainly do not support any such conclusion.

The conclusion of “no impact” appears overly definitive given the recognised potential for interference and the actuality of local experiences.

## **12. Community Benefit Claims**

While community benefit schemes are frequently cited as advantages of wind energy developments, such benefits cannot compensate for unacceptable environmental impacts.

Planning decisions should be based on the suitability of the development and its environmental consequences rather than projected financial benefits. Community benefit funds should not be treated as justification for adverse impacts on residential amenity, biodiversity or environmental quality.

Community benefit funds cannot be considered a meaningful offset where the result is that a valued rural area becomes fundamentally degraded and no longer a fit place to live. No financial contribution can compensate for the loss of an environment that we call home.

For the reasons outlined above, we do not believe the applicant has demonstrated that the likely impacts of the proposed development have been fully identified, assessed and mitigated.

In particular, we remain concerned regarding residential amenity, cumulative impacts, operational noise, shadow flicker, biodiversity, Hen Harrier protection, groundwater, private wells, peat stability and landscape character.

We respectfully request that An Coimisiún Pleanála carefully scrutinise the application and refuse permission unless it can be clearly demonstrated, through robust and independent evidence, that unacceptable impacts will not arise.

Sincerely,

Sinead, Roisin and Padraig Lafferty