

Terence O'Brien  
Knockliscrane  
Miltown Malbay  
Co Clare  
23/06/2026

## **Observation to An Coimisiún Pleanála**

**Re: Submission in Opposition to Proposed Slieveacurry Wind Farm Development**  
**Case Reference: PAX03.324270**

Dear Sir/Madam,

I wish to make the following observation in relation to the proposed Slieveacurry Wind Farm Development.

I respectfully submit that the proposed development would result in unacceptable impacts on the landscape, rural character, residential amenity and environmental integrity of the area. I further submit that insufficient weight has been afforded to the extensive planning history of the site and the cumulative burden already placed upon rural communities in West Clare.

### **National Energy Policy, Rural Sustainability and the Cumulative Burden on Rural Communities**

I am concerned that rural communities such as West Clare are increasingly being expected to absorb the environmental, visual and residential impacts of large-scale industrial energy infrastructure without sufficient consideration being given to the wider drivers of national electricity demand.

There is growing public concern regarding the rapid expansion of energy-intensive infrastructure, including large-scale data centres, and the apparent absence of clear limits or balanced regional planning in relation to overall national energy consumption. While some renewable energy generation is important, it is difficult for rural communities to continuously accept increasing levels of industrial-scale wind energy development where there appears to be no corresponding strategy for managing future energy demand growth.

Communities such as ours are being asked to permanently alter landscapes, accept cumulative industrialisation and tolerate significant impacts on residential amenity, visual character and quality of life while the overall scale of national energy demand continues to expand. This raises legitimate questions regarding fairness, proportionality and the equitable distribution of the burdens associated with national energy policy.

I respectfully submit that there is a need for a balanced approach that recognises the importance of renewable energy while also safeguarding rural communities, agricultural land use, environmental assets, landscape character, biodiversity and residential amenity.

The cumulative effect of successive wind energy developments can fundamentally alter the character and function of rural landscapes over time. While individual projects may appear acceptable when assessed independently, the combined impact of multiple developments can result in a gradual but significant transformation of the landscape, reducing its rural character and diminishing the qualities that have historically defined the area.

### **Weight to be Attached to Previous Refusal Decisions and Planning History**

I respectfully submit that significant weight should be afforded to the extensive planning history associated with the Slieveacurry site and surrounding area.

The current application follows a series of previous proposals for wind energy development at this location, including:

- Planning Reference P20806 – withdrawn;
- Planning Reference P21370 – refused by Clare County Council;
- Planning Reference 211226 – refused by Clare County Council; and
- Appeal Reference PL03.312728 – refused by An Bord Pleanála.

This planning history demonstrates that the suitability of the Slieveacurry area for industrial-scale wind energy development has been repeatedly examined by both the planning authority and the national planning appeals body.

Of particular relevance is the decision of An Bord Pleanála under Appeal Reference PL03.312728, which upheld the refusal of permission for the previous wind farm proposal. The Board concluded that the proposed development would have resulted in unacceptable impacts on a prominent and visually sensitive upland landscape and would have significantly adversely affected the visual amenities of the area.

While each planning application must be assessed on its own merits, the fundamental characteristics of the receiving environment have not changed. The landscape remains the same sensitive upland landscape that formed the basis of previous concerns, while the cumulative presence of existing and permitted wind energy infrastructure within the wider area has increased rather than diminished.

In these circumstances, I submit that the Board must be satisfied not merely that the current proposal differs from previous applications, but that it demonstrably overcomes the substantive planning and environmental concerns previously identified by both Clare County Council and An Bord Pleanála.

The existence of refusals over a prolonged period suggests that the principal constraints affecting this location arise from the inherent sensitivity of the site and its landscape setting rather than from shortcomings in any individual application. This issue should remain central to the Board's assessment.

The Strategic Infrastructure Development process should not diminish the relevance of this planning history. On the contrary, where a site has been the subject of multiple refusals, it is reasonable to expect that the Board's assessment will carefully consider the conclusions reached in those earlier decisions and clearly demonstrate why a different outcome would be justified in the present case.

## **Impact on Rural Character, Farming and Traditional Land Use**

The area surrounding the proposed development is characterised by its long-established agricultural use, rural settlement pattern and cultural association with farming and land stewardship. These characteristics form an important component of the area's identity and contribute significantly to its landscape value.

This is fundamentally a farming community and the surrounding landscape has historically been used for agriculture, grazing, environmental stewardship and food production. The increasing industrialisation of upland areas through large-scale turbines, access roads, substations, excavation works, borrow pits, grid infrastructure and associated construction activity risks permanently altering the long-established character and function of the area.

In my view, insufficient weight is often afforded to the cumulative effect that repeated infrastructure development can have on traditional farming landscapes. Agricultural land use, food production, environmental stewardship and rural heritage represent important national assets and should be afforded appropriate consideration when assessing proposals of this scale.

The Board should carefully consider whether the cumulative extent of existing, permitted and proposed wind energy infrastructure is compatible with the long-term protection of the rural character, farming traditions and agricultural function of the area.

## **Landscape Capacity and Visual Impact**

A key consideration in the assessment of this application should be the capacity of the receiving landscape to accommodate additional wind energy development without significant adverse effects.

The scale, height and prominence of modern wind turbines mean that visual impacts can extend across a wide geographical area. Where multiple developments are present, cumulative visual effects can become particularly significant and may result in the perception of widespread industrialisation of previously rural landscapes.

I also ask that the Board should carefully examine whether the proposal would contribute to an excessive concentration of wind energy infrastructure within the area and whether the cumulative visual effects are compatible with the protection of landscape character objectives contained within the Clare County Development Plan and relevant national planning policy.

The Board should also consider whether the proposal would contribute to a gradual erosion of the scenic qualities and landscape character that distinguish this part of West Clare and which are valued by residents and visitors alike.

## **Residential Amenity, Property Impacts and Telecommunications**

The protection of residential amenity remains a fundamental planning consideration.

As residents living in close proximity to the proposed development, we are deeply concerned about the potential impacts that this project may have on our homes, properties and quality of life. While property values may not be the primary consideration in the planning process, the

Board should recognise the legitimate concerns of local residents regarding the potential economic consequences arising from the industrialisation of a previously rural landscape and the effect this may have on the desirability of the area as a place to live.

Particular regard should also be given to the cumulative impact of existing and proposed wind energy developments on nearby residents in terms of visual dominance, noise, shadow flicker, aviation lighting, construction disturbance and the overall enjoyment of their homes and properties.

### **Ecological, Peatland and Hydrological Considerations**

The Board should carefully evaluate the potential ecological and hydrological consequences of the proposed development, particularly where peatland habitats, watercourses, drainage systems or environmentally sensitive areas may be affected.

Large-scale upland developments can result in significant land disturbance through excavation, road construction and drainage works. Such activities have the potential to affect habitats, biodiversity, water quality and hydrological systems if not adequately mitigated.

Given the sensitivity of upland environments and peatland systems, a precautionary approach should be adopted where uncertainty remains regarding potential environmental effects.

### **Landowners Bond**

In the unlikely event that planning is granted, and because of the location on the wild Atlantic way of this unspoiled scenic landscape, we formally request that all landowners, access road owners and entrances owners, who enter into agreements to host wind turbines on their lands be required to provide and maintain a legally binding reinstatement bond to guarantee the full restoration of the land at the end of the project's operational life.

The landowners have willingly invited the wind energy developer onto their lands for private financial gain through lease payments, annual rents, and long-term commercial benefit. As they are directly profiting from the placement of industrial wind infrastructure on agricultural land, they must also accept full responsibility for ensuring that the land is fully restored and properly reinstated once the turbines reach the end of their operational life. It is not reasonable that neighbouring communities, future generations, local authorities, or taxpayers should carry the risk and cost of decommissioning industrial infrastructure placed on private land for private financial benefit.

The principle must be simple: those who profit from the development must also carry responsibility for its full lifecycle, including final removal and land reinstatement.

Our concern is that developers may change ownership several times over the lifetime of the project, may operate through limited companies, or may cease trading entirely before decommissioning becomes due. In such cases, responsibility can become unclear, and the financial burden may fall on the wider community, or the State.

For this reason, the bond must not rely solely on the developer's financial position. Most formal planning conditions usually seek security from the developer alone, but this is not

enough, as developers can disappear, and projects are often sold multiple times, making liability increasingly difficult to enforce decades later. As these projects extend across decades and often beyond one generation, the obligation must remain permanently attached to the land.

The landowner, as the permanent beneficiary of the lease arrangement and the long-term holder of the land, must also be bound by enforceable financial security that remains attached to the land itself. A landowner who accepts private financial benefit from hosting industrial wind infrastructure must also accept legally secured responsibility for full land reinstatement. Profit cannot be separated from restoration liability.

Landowners should therefore be required to have their own legally binding reinstatement bond in place ensuring the full removal of turbines, towers, substations, cables, concrete foundations, crane hardstands, access roads, and all associated infrastructure. This should also include the restoration of drainage systems, hedgerows, field boundaries, any polluted Lakes, and the full return of the land to its original agricultural condition suitable for farming or recreational use.

We further request that the landowner's assets cannot be reduced, transferred, or otherwise placed below the required bond threshold for the full duration of the project. The financial security must remain sufficient at all times to guarantee full restoration, regardless of ownership changes, inheritance, sale, refinancing, or transfer of either the land or the wind energy project.

A promise of future restoration is not enough. A fully costed, independently secured, inflation-adjusted bond should be lodged before construction begins and remain enforceable throughout the entire lifetime of the project and beyond.

We respectfully request that this be made a mandatory condition of any planning approval for wind Turbines and that clear responsibility for long-term reinstatement be established from the outset.

## **Conclusion**

Having regard to the planning history of the site, the cumulative concentration of wind energy development within the wider area, the importance of protecting rural character and agricultural land use, the potential impacts on residential amenity, and the need to safeguard landscape and environmental resources, I request that the Board apply a particularly rigorous and precautionary assessment to the proposed development.

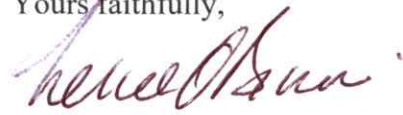
The residents of the area who would be directly affected by the proposed development, we believe that the cumulative impacts on residential amenity, landscape character, property enjoyment, telecommunications reliability, farming activity and the wider rural environment have not been adequately justified when weighed against the significant and permanent changes that would result from this proposal.

The Board should be particularly cautious before reaching a different conclusion to that reached under Appeal Reference PL03.312728. Where a previous proposal has been refused due to the sensitivity of the receiving landscape, it is incumbent upon the applicant to clearly

demonstrate that the underlying constraints identified by the Board no longer apply. In my opinion this has not been met.

For all of the reasons outlined above, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed Slieveacurry Wind Farm Development.

Yours faithfully,

A handwritten signature in red ink, appearing to read 'Terence O'Brien', is written over the closing 'Yours faithfully,'.

Terence O'Brien