

S.37

File With

SECTION 131 FORM

Appeal No

ABP— 321285

Defer Re O/H

☐

Having considered the contents of the submission dated/received 07-12-24
from h. Rumbergen, I recommend that section 131 of the Planning
and Development Act, 2000 be not be invoked at this stage for the following reason(s):
no new material planning issues.

Section 131 not to be invoked at this stage.

☒

Section 131 to be invoked — allow 2/4 weeks for reply.

☐

Signed

Life (L)

EO

Date

15-01-25.

Signed

SEO/SAO

Date

M

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

BP

Signed

EO

Date

Signed

AA

Date



Planning Appeal Online Observation

Online Reference
NPA-OBS-004041

Lisa
BPLUO
to
ISSUE ✓
DMG 1.12.24
LDG-076674-24

Online Observation Details

Contact Name
Konrad Rumberger

Lodgement Date
07/12/2024 17:26:58

Case Number/ Description
321285

↑
CORRECT
LODGE MENT
NO.

Payment Details

Payment Method
Online Payment

Cardholder Name
Konrad Rumberger

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

☒ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

EO

Date

19/12/24

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG- ~~076991~~ - 24

DELETE LODGE MENT

Reason for Refund

Documents Returned to Observer

☐ Yes

☐ No

Request Emailed to Senior Executive Officer for Approval

☐ Yes

☐ No

Signed

EO

Date

Finance Section

Payment Reference

ch_3QTRmQB1CW0EN5FC1hHfgU3V

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

UTE AND KONRAD RUMBERGER

Submission against the proposed granting of full planning permission to the Lackareagh Wind Farm by An Bord Pleanála. Case Nr. 321285.

Carrownakilly

07.12.2024

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This is a list of objections against granting of full planning permission to EDF Renewables Ireland Limited by An Bord Pleanála with some background and explanatory statements.

Table of Content

| | |
|--|----|
| Management Summary..... | 4 |
| Introduction..... | 5 |
| Arguments against Windfarms..... | 12 |
| What do the locals think?..... | 12 |
| Why are the planned developments unsuitable in East Clare?..... | 13 |
| The Myth of “Green Energy” | 15 |
| Is reliant and cheap “green” energy provided for the people of Ireland?..... | 15 |
| Devaluation of property..... | 18 |
| Building Windfarms – the consequences on the environment..... | 19 |
| What about the traffic? What about consequences for tourism?..... | 20 |
| What about Job creation?..... | 22 |
| The Problem of Recycling..... | 22 |
| The noise from the windfarms..... | 24 |
| The Wind Energy Development Guidelines..... | 28 |
| The Shadow Flicker..... | 30 |
| Biodiversity, Flora and Fauna..... | 30 |
| How about the mandatory consultation with the Locals?..... | 32 |
| Developer’s story: why are new turbines needed?..... | 34 |
| The developers do not speak the truth..... | 35 |
| The “developer’s trust” versus East Clare..... | 36 |
| The so-called Community Benefit Fund as an example for Cheat&Lie..... | 37 |
| Developers do not fulfil their legal obligations towards Locals..... | 38 |
| Will developers be “rewarded” for their own misbehaviour?..... | 40 |
| Arguments specifically against the planned Lackareagh Windfarm..... | 42 |
| Visual obstruction..... | 43 |
| SAC and SPA..... | 44 |
| Biodiversity..... | 44 |
| Cultural Heritage..... | 47 |
| Traffic..... | 48 |
| Drop in House Prices..... | 52 |
| Lackareagh is not suitable for a Windfarm..... | 53 |
| Lack of proper Community Consultation..... | 53 |

| | |
|--|----|
| Miscellaneous topics..... | 57 |
| Conclusion..... | 59 |
| Signatures Konrad and Ute Rumberger (authors)..... | 61 |
| Support of submission by Nicola Henley..... | 62 |
| Support of submission by Markwin Kobus..... | 63 |
| Support of submission by Karima Prinsloo..... | 64 |
| Support of submission by Aisha Nolan..... | 65 |
| Support of submission by Yasmin Nolan..... | 66 |
| Support of submission by Diane Rodgers..... | 67 |
| Support of submission by Maeve Durand..... | 68 |
| Support of submission by Cassandra Antigone Czech..... | 69 |
| Support of submission by James Lattimore..... | 71 |
| Support of submission by Gerard Cahill..... | 72 |
| Support of submission by Maria Svensson..... | 73 |

Management Summary

After an introduction to the topic and explaining the layout of the document, we give our reasons why we are objecting to the possible granting of full planning permission to EDF Renewables Ireland Limited, registered under case id **ABP-321285-24**, as an appeal to An Bord Pleanála against the rejection of Clare County Council, who refused planning permission for the same, under case Nr **2460411**. We expect An Bord Pleanála to fully reject this appeal. We are looking at numerous aspects why Industrial Windfarms in general in East Clare, and specifically at Kilbane ("Lackareagh"), are uncalled for. We believe we give more than enough reasons to fully reject this planned development, with this document, which is an updated version of the same document that we sent to Clare County Council in August, to object against the same topic!

- There are a number of good "generic" or "general" reasons against industrial windfarms in East Clare, and specifically against the current multiple plans for windfarms in a very confined space; these developments (and especially their multiplying effects!) would inevitably destroy the area. The planned Lackareagh Windfarm is one such development; we will in a later chapter list more reasons that are (more) specific to the Lackareagh Windfarm plans.
 - Unsuitability of the location East Clare; multiplying effects of several planning applications
 - The myth of "green" and "cheap" energy from wind turbines unmasked
 - Devaluation of Property
 - Destruction of the environment; lack of recycling
 - The devastating effects on traffic
 - Deleterious consequences on tourism and jobs in East Clare
 - Noise and Infrasound from the turbines; Shadow Flicker: severe health implications for living creatures
 - HSE expects likely significant effects within a population and Human Health context
 - Severe risks for Biodiversity, Flora and Fauna
 - Lack of proper and law-mandated consultation with the locals
- In a second chapter, we will look at some aspects specific to Lackareagh planned Windfarm, adding more details on some of the above issues in relation to this planned development
 - The area is zoned as "open to considerations" regarding Windfarms by Clare County Council, but there were no "considerations" at all
 - The turbines would negatively alter the character of this rural landscape and depreciate designated Tourist Routes and Scenic Routes
 - The effects on the village of Kilbane in the midst of the planned development are not considered sufficiently
 - The significant excavations necessary for the turbines will endanger the Water Management; this is in breach of European Communities Environmental Objectives Regulations
 - Biodiversity is unduly put at risk
 - The roads around Kilbane and the access roads are completely unsuitable to take the construction and delivery traffic
 - Consultation with the locals on the developer's part was unacceptable. The community is being torn apart and destroyed by the developer.

We conclude that the planning application has to be completely and fully rejected.

Introduction

EDF Renewables Ireland Limited, in this document referred to as EDF, proposed 7 turbines windfarm, located in East Clare, mainly in the Townlands of Kilbane, Killeagy (Ryan), Shannaknock, Killeagy (Stritch), Killeagy (Goonan), Ballymoloney,, Magherareagh and Lackareagh Beg, Co. Clare. In this document, we will refer to the planning as **Lackareagh Windfarm**. The erection of a Meteorological Mast of **100m** in height in Killeagy (Goonan), Co. Clare is subject of a separate application for planning with An Bord Pleanála (also referred to as ABP in this document); No **318846**, against which we also protested. Decision is currently pending.

We are informed of 7 planned turbines up to **180m** in height, construction of associated foundations, hardstand and assembly areas, all associated wind farm underground electrical and communications cabling connecting the turbines and mast to the proposed electrical substation; construction of 1 permanent 38kV electrical substation including a single-story control building with welfare facilities, all associated electrical plant and equipment, security fencing, entrance on to new access road, all associated internal underground cabling, drainage infrastructure, wastewater holding tank, retention separator tank, and all ancillary works, in the townland of Killeagy (Goonan), Co. Clare, a Battery Energy Storage System within the 38kV electrical substation compound, 1 permanent meteorological mast of c. 36.5m in height, associated foundation and hard-standing area in the townland of Shannaknock; upgrade of site entrance off the L7080 ('The Gap Road'), Provision of 3 new permanent site entrances off the L7080, Upgrade of existing tracks/ roads, including the L7080, and the provision of new site access roads, 4 watercourse crossings, junctions and hardstand areas; 1 temporary construction compound with temporary offices and staff facilities in the townland of Killeagy (Goonan); 1 temporary storage area in the townland of Killeagy (Goonan); 1 borrow pit in the townland of Killeagy (Goonan); Peat and Spoil Management; Tree Felling to accommodate the construction and operation of the proposed development; Operational stage site and amenity signage; and All ancillary apparatus and site development works above and below ground, including soft and hard landscaping and drainage infrastructure. A **10-year planning permission** and **35-year operational life** of the wind farm from the date of commissioning of the entire wind farm is sought.

Lackareagh Windfarm is one of several planned windfarm developments in a relatively confined space in East Clare; all other windfarms are also requesting planning permission with An Bord Pleanála at this time; they are in various stages of the planning process or juridical reviews in the High Court and in the Supreme Court. There is fierce local opposition against this planning, both from local groups (against single windfarm developments) and alliances of groups (who ensure networking between the local groups and especially voice their opinion against the **multiplying effects of the various developments**).

EDF registered their request for planning with Clare County Council under **2460411** on 28.August 2024: as mentioned there is a separate application for planning for the 100m Meteorological Mast with ABP, under An Bord Pleanála **318846**, after a formal objection against a previous decision of Clare County Council to grant planning permission for this mast, in February 2024. Clare County Council refused planning permission for the windfarm on a number of grounds that we all endorse fully; regrettably they failed to list the dangers to the health of people / livestock / wildlife in the area and the severe risks to aviation security (Shannon Airport) as additional reasons for the denial of permission. EDF appealed to An Bord Pleanála on 19th November, 2024, registered under **ABP-321285-24**. (321285 for short...). This document contains our observations (submissions) against the possible granting of planning permission to EDF. We are basically re-submitting the document that was sent to Clare County Council (because none of our concerns was or is being adequately addressed by the developer!), with a few updates and additions that seem appropriate, now that EDF windfarm is also with An Bord Pleanála. We are grateful to Clare County Council for having fully rejected the planning application so far, and we fully support the arguments that Clare County Council brought up against

the planned Lackareagh Windfarm; as mentioned we like to add some more, specifically focussing on health problems caused by the planned development.

This document was composed by Ute and Konrad Rumberger. The authors of the document are German natives who are both in early retirement. Ute formerly worked as a teacher in Secondary Schools in Germany; Chemistry and English being her core subjects, but she also has teaching knowledge for German, Physics, Biology, Mathematics, Politics, and other subjects. Konrad worked internationally as an IT consultant, specifically as an IT and Data Centre Architect, and as a Project Manager; until his retirement. His last employer was BP; with his base in London, but working globally on international projects. Both Ute and Konrad came to Ireland over 25 years ago as tourists, fell in love with the beauty of East Clare, and purchased a near-derelict farm house more than 20 years ago, that they painstakingly repaired and turned into a holiday cottage, with the help of good friends from the locality, over a period of many years. Now in early retirement, we both love to spend as much time as possible in this place; but our roots (and some duties!) are still in Germany, for the time being. We, the authors, find it appropriate to emphasize at the beginning that we are not adverse to renewable energy; on the contrary we made a significant investment for a suitable Solar PV installation on our premises, which has been in use for over 2 years now, reducing our electricity bills, and making some money from feeding back not self-needed electricity to the GRID.

Ute and Konrad were approached by a number of neighbors and friends who are as opposed to the planned Windfarms in East Clare as we are. Those people want to raise their voices against these plans, too. We consider it unfair on all those individuals if they had to submit their own observation/submission again (and pay the fees), but at the same time we want to make it clear that this opposition does not come from a blow-in couple with a holiday home alone, but is widely shared in the area. Most of these people are native Irish, and for some their families have worked these lands for generations. It is their home, and they are deeply worried about what they consider unsustainable and un-ecological plans to be stacked against people / livestock / wildlife in this area. We will therefore amend this document with a number of Emails (facsimiles), sent by different people from the wider area, each giving their name, address, and Email address, stating that they are against the granting of full planning permission for the Lackareagh Windfarm and wish to support our submission. These Emails are addressed to Clare County Council, as they are out of the original (not edited) document on the same topic – objection against Lackareagh Windfarm – to Clare County Council. The topic has not changed – those people still support the submission against the development, and we considered it an unnecessary effort to ask everybody to send their Email again, with “An Bord Pleanála” replacing “Clare County Council”. Whilst this might be the procedural correct way, there is no added value for this extra effort; the local opposition remains as strong as ever, and people support the submission to An Bord Pleanála as much as they supported the submission to Clare County Council. So we ask An Bord Pleanála to kindly acknowledge that this submission is not in the name of Ute and Konrad alone, but also in the name of a number of residents from East Clare. If this is not acceptable, we ask to be notified accordingly, and ask to please get the opportunity to gather new Emails with “support” messages addressed formally correct to An Bord Pleanála as appropriate.

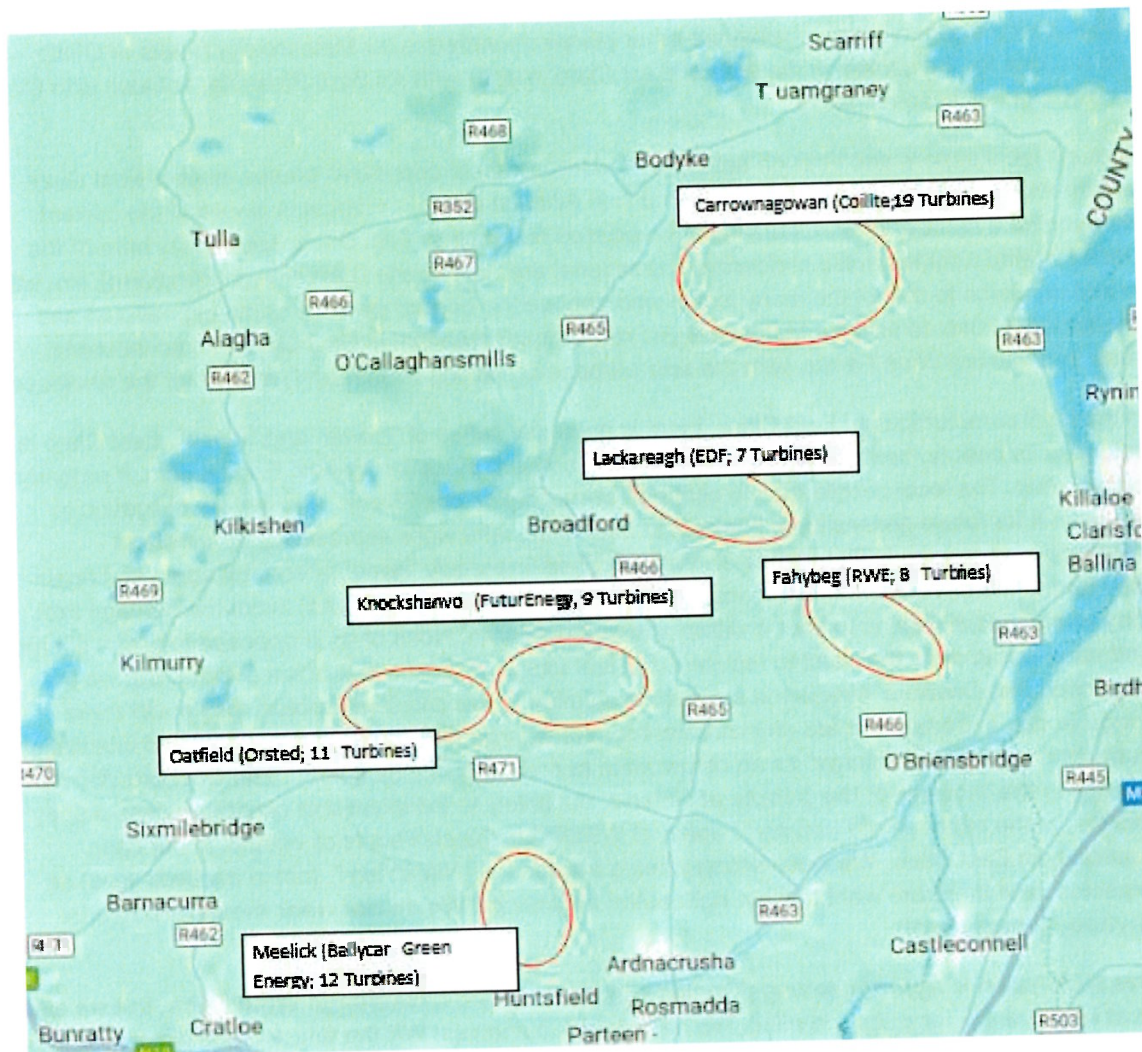
We, the authors, were approached in early 2018 by Coillte about plans to erect a Mega Wind Farm in the hills behind our house, on the slope of Moylussa, the highest mountain in County Clare. Details on how all this developed are to be found in our previous submissions to ABP on the Carrownagowan Windfarm subject, including the submission against the GRID connection. Ute and Konrad both became members of a local group of concerned residents from Killaloe and Ogonnelloe, and later of the (formal) Carrownagowan Concern Group, led by Michael McNamara (Member of the European Parliament). We spent much time researching the subject of windfarms, and their suitability especially for East Clare. Meanwhile, we also co-initiated and joined the East Clare Windfarm Opposition Alliance, a group that tries to form a network of local opposition groups against a number of wind farm projects in the immediate area in East Clare. That group with East Clare focus is connected to CEPA (Communities & Environmental Protection Alliance, a voluntary group representing communities all over Ireland that are directly impacted by wind energy developments); www.cepa.ie. We, the authors,

also submitted observations against the other planned windfarms (or Meteorology Masts or GRID connections for the same) in the area of East Clare, mostly with An Bord Pleanála, but also with Clare County Council in some cases..

Through local papers and through activities of individual local opposition groups all over East Clare and through our East Clare Windfarm Opposition Alliance group, we became aware of the current planning for a number of Windfarms and associated buildings in East Clare; specifically here of the plans for wind turbines in the residential/recreational area of Kilbane (Lackareagh Windfarm). We want to add our voice to that of the many locals who oppose the current plans by some big national and international trusts to turn the residential and recreational area that is East Clare into an industrial zone for Onshore Wind Farms, with the sole purpose of making (significant!) money for the developer.

In the local communities of East Clare, there is a special sense of "Home" and "Place". East Clare is unique in its beauty, heritage and culture, and it is an ideal place for "gentle" Eco-tourism, if properly looked after. The local people have a sense of ownership of this "Place", and feel an obligation to preserve it for future generations. Farmers in East Clare who were approached by windfarm developers wanting to build turbines on their land had financially "good" offers, but again and again they turned the developers down, because "this" (the turbines on their land) is not the heritage that they want to leave behind to their children and grandchildren. None of us is opposed to green energy, and none would deny the need to reduce fossil fuel usage in the interest of the climate. But we are convinced that Onshore Windfarms are not the solution to this problem (instead they could make things worse, in parts!), but are an instrument for some large and scrupulous national and international trusts who use "Green Energy" as an obfuscation to make big money quickly. The Onshore Windfarms are **not in the interest of the people of Ireland**, but solely in the interest of conscienceless money makers, at the expense of Flora and Fauna, of Wildlife/Livestock/People of Ireland; in our case especially of East Clare. We were wrongly being accused of "NIMBYism", (not in my back yard) as expected, and therefore want to state right at the beginning: **"We do not want those turbines in anybody's backyard!"**

This submission is against granting planning permission to the **Lackareagh Wind Farm**. But we also must keep the bigger picture in mind. We have to ask ourselves: Will the future of the picturesque East Clare be an area full of industrial wind turbines? Will the main "attraction" along the scenic routes from Tulla to Scarriff (R352), from Broadford to O'Briensbridge (R466), from Broadford to Limerick (R465), from Sixmilebridge to Clonlara (R471) and others, in the future be wind turbines up to 200 meters in height, with blinking red lights on top, in the dark? There are a number of projects, all looking for planning permission currently, to erect wind turbines in an area roughly placed in a circle around Broadford (County Clare), with a radius of less than 10km, as the crow flies. These will be visible from near and far; from Limerick City, along the Shannon to Parteen, O'Briensbridge and Killaloe, along Lough Derg with Holy Island and the Tipperary side towards Portroe with all its viewpoints for tourism, from Scarriff, Tuamgraney, Feakle and Tulla, from Kilkishen, Sixmilebridge to Bunratty and Cratloe.



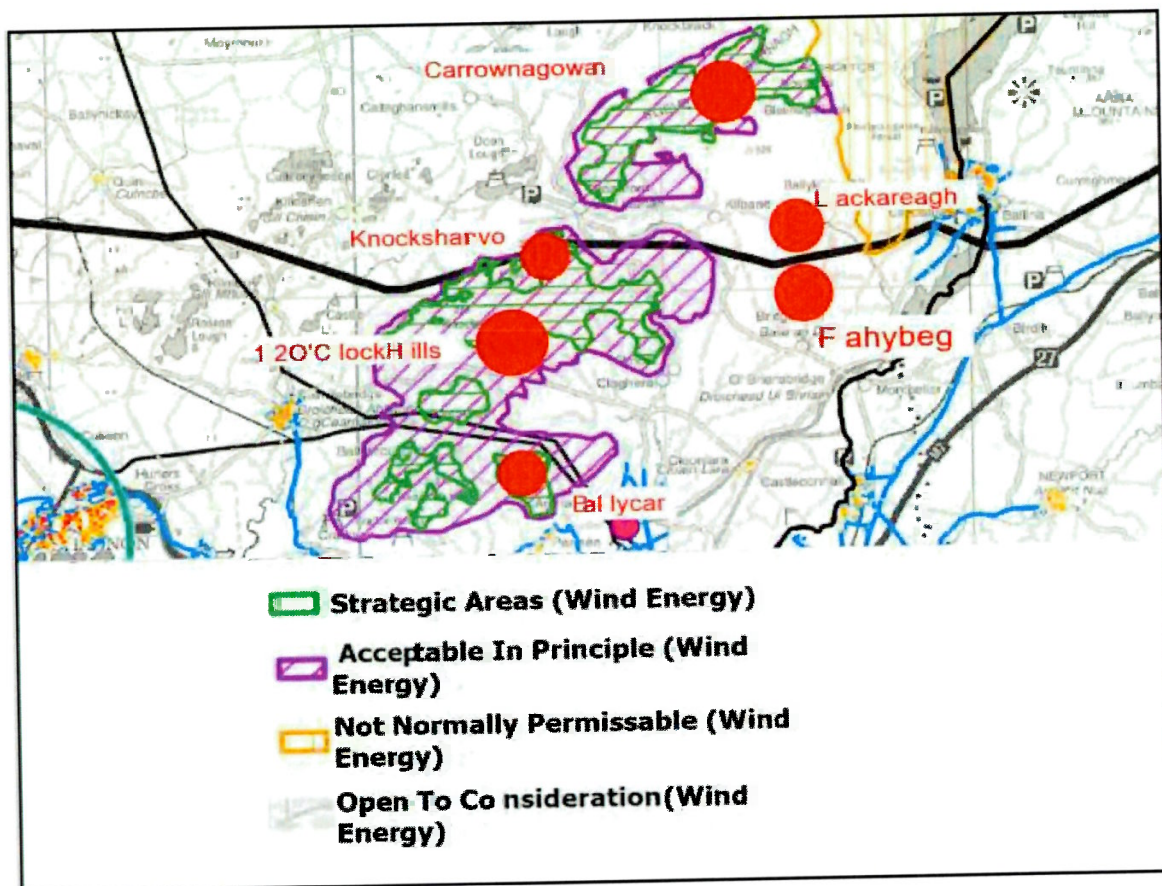
Large national (FuturaEnergy Ireland, consisting of Coillte and ESB; Ballycar Green Energy / Greensource) and international (RWE, Germany; EDF, France; Orsted, Denmark) trusts are trying to make Big Money with Onshore Wind Energy, at the expense of East Clare, its people, livestock, wildlife, heritage. Currently 6 major windfarm developments are being planned in the area to our knowledge; those are

- **Carrownagowan Windfarm** near Bodyke; 19 planned turbines, An Bord Pleanála Case reference: PA03.308799, currently seeking Judicial Review. Proceedings are now with the Supreme Court. A separate application for the GRID connection in Ardnacrusha is with ABP; An Bord Pleanála Case reference: ABP-318505. Developer Coillte (now FuturaEnergy); supporting Engineers Malachy Walsh and Partners, Blennerville, Co. Kerry.
- **Fahybeg Windfarm** near Bridgetown; 8 planned turbines; An Bord Pleanála Case reference: PL03.317227. Rejected by Clare County Council, appealed with An Bord Pleanála, and unbelievably granted planning permission in early March 2024, despite overwhelming local protest. Legal proceedings (judicial review) in the High Court on-going. Developer RWE; co-working with FuturaEnergy. Supporting Engineers Fehily Timoney, Cork.
- **Lackareagh Windfarm** near Kilbane; 7 planned turbines; Application for planning launched with Clare County Council under **2460411** in August 2024; this was rejected by Clare County Council, but the decision was appealed to An Bord Pleanála on 19th November 2024; case Nr **ABP-321285-24**. This submission is specifically on the topic of Lackareagh. A planned mast to

gather (wind) data was given planning permission by Clare County Council; this is being appealed with An Bord Pleanála Case reference: **ABP-318846**. Developer EDF; co-working with FuturEnergy. Supporting Engineers MKO Ireland Planning & Environmental Consultancy, Galway.

- **Knockshanvo Windfarm** south-west of Broadford, parallel to R471 between Clonlara and Sixmilebridge; 9 planned turbines; An Bord Pleanála Case reference: PC03.315797, later amended to ABP317763 and supplemented with ABP319215 (Application for Full Planning with ABP as a Strategic Infrastructure Development); finally now **ABP320705** asking for full planning as a SID; with ABP since 30th August, 2024. Developer FuturEnergy. Supporting Engineers MKO Ireland Planning & Environmental Consultancy, Galway.
- **Oatfield Windfarm** (locally known as 12 O'Clock Hills Windfarm), neighbouring the Knockshanvo Windfarm; 11 planned turbines; Currently with An Bord Pleanála, Case reference: PC03.315239 (SID) and 318782 (planning application). Developer Orsted; consultations with FuturEnergy. Supporting Engineers Nicolas O'Dwyer Ltd, for RSK group, United Kingdom
- **Ballycar Windfarm** currently with An Bord Pleanála, case number PA03.318943, in the residential area of Meelick; 1 km north of Ballycannon village which is deemed a large village in CCDP. Surrounded by houses on all sides – there are almost 400 houses within 1.3 km of the site, with a population of around 1250 people; and the area is highly populated in the 2km zone. 12 turbines are planned on a hill, dominating the skyline for all residents, and they will be very visible from Limerick city. Some turbines are planned to be erected within 500m of homes. The proposed grid connection is adjacent to Oatfield Windfarm's proposed grid connection in Ballycar North. Developer Ballycar Green Energy (Greensource); consulting and working closely with FuturEnergy and Orsted. Supporting Engineers Malachy Walsh and Partners, Blennerville, Co. Kerry. Unbelievably, major concerns for example for aviation security – see <https://www.clare.fm/news/shannon-airport-airnav-ireland-object-ballycar-windfarm-development/> on Shannon Airport And AirNav Ireland objecting to Ballycar Windfarm Development; and also <https://www.irishtimes.com/business/2024/04/22/clare-windfarm-proposal-faces-widespread-opposition/> - did not lead to a rejection, but the developer was only invited to provide more information and elaborate on this topic, with a very generous time frame given.
- There are already plans for **expansion** – the Oatfield Windfarm will look for 14 additional turbines, once the initial 11 are approved, and the Lackareagh Windfarm plans 10 more turbines around Kilbane and the mountain road towards Killaloe, according to the developers. Please note, this is no hearsay or rumours or the like – the developers freely admitted to those expansion plans in talks with the authors of this document and with other people! The planned further expansion of the Lackareagh Windfarm is underlined by their application; anybody reading the description of their planned undertaking will have wondered about the size! 7 turbines (only), but 4 permanent site entries – that does not really fit! It is clear that “future growth” is already envisaged...
- Furthermore, farmers in the wider area are already approached for their land, with a yet unknown number of additional turbines along the Slieve Bernagh mountain side and in the 12 o'clock hills, around Truagh, and also north of Broadford; up to 70 additional turbines are being planned.

Even leaving the planned extensions (and increase in number) out for now; 66 turbines are in the stage that planning is being applied for. In total, **we might be facing up to 160 turbines of around 200m in height** (and possibly even higher!) in this very confined area of East Clare!! The potential multiplying of effects on all levels can only be appreciated if a suitable map is consulted – this is all planned in a very confined area; here is another appropriate view::



This map shows the proximity of the planned Windfarm Developments in a very good summary. Clare County Council members in their monthly meetings in February and March 2024 expressed their regret about designating some of these areas as “strategic” or “acceptable in principle” in the past; stating that this was based on fewer and much smaller turbines. They agreed on the unsuitability of the area for the industrial wind turbines of nearly 200m (or even more, in the future?) tip height that are being looked at by the developers now. At its meeting in March 2024 Clare County Council noted ‘The high volume of windfarm applications being received, need for uniformity in any planning decisions.’ See https://www.clarecoco.ie/your-council/meetings/minutes/ccc-minutes/2024/mar/minutes-of-march-2024-monthly-meeting-of-clare-county-council.html#_Toc165388040

In most cases of these planned developments, the developer use the “SID” route (“Strategic Infrastructure Development”) to bypass Clare County Council by directly applying to An Bord Pleanála, and make life harder for the local opposition. (Remember – the developers do not play “fair”!). EDF did not choose that road, like most of the other developers in the area, but we like to mention all the same that in our view, those developers are preying on a “loop hole” in the law. It was agreed in 2006 that “SID” means more than 25 turbines or more than 50MWh nominal output. We already urged An Bord Pleanála to re-evaluate their criteria when a “SID” designation is appropriate. The nominal output does not feel to be the right criteria; the total nominal output will only go up further in the future, as technology evolves; the number and size of the planned turbines should instead be considered. The mentioned choosing the “SID” route by most of the developers may be following the letter of the law, but it is making a mockery of the spirit of the law, and should be rejected. This has to be emphasized the more in view of very recent developments, where as mentioned in Clare (as in other counties, Limerick for example) the County Council starts to question their own design of “suitable” sites for Windfarms, and becomes more and more careful and hesitant to approve industrial windfarms, especially in view of the strong local opposition everywhere.

Clare County Council went as far as to call for a halt of the approval of any new windfarm (in their February 2024 meeting) until such a time that the long-awaited new guidelines for Onshore Windfarms

in Ireland have been published, debated, and passed into law, and they had ample time to reevaluate their previous zoning of land as suitable for a Windfarm. See for example the following articles in Irish Independent Newspaper <https://m.independent.ie/regionals/clare/news/concern-in-clare-over-development-of-major-windfarm/a1374981324.html?fbclid=IwAR0tXeGcS627iy9CRSFAF--lb2rby78lrFMrJDPe3IVKxA7qctKNfUg56y8> and <https://m.independent.ie/regionals/clare/news/clare-residents-call-for-major-windfarm-projects-to-be-halted/a1723037766.html>; the same on local radio as in <https://www.clare.fm/news/protest-calls-immediate-halt-monstrous-east-clare-windfarms/> and <https://www.clare.fm/news/council-calls-suspension-clare-windfarm-developments-new-guidelines-published/>. We are very grateful towards Clare County Council that they kept their word and stood by these principles when EDF applied for planning in Lackareagh in August, and were denied planning, based on very good reasons. We expect ABP to reject the appeal, and furthermore consider the attitude of the locals and also deny planning for the other outstanding windfarm planning applications in East Clare, and revisit their decisions on Carrownagowan and Fahybeg, that are both subject to judicial reviews now.

Local opposition groups are fighting everywhere – all over Ireland, and actually all over the World; Canada and Australia are prominent examples for having very strong opposition groups against Onshore Windfarm Developments, and the same is true for Europe, even in countries like Denmark and Germany, the former poster children of Onshore Wind Turbines, where a process of re-thinking and re-evaluation of the effects of those developments started a number of years ago. Local groups are fighting against the madness that we consider those amassments of Industrial Windfarms in a Heritage Landscape or in Residential and Recreational Areas, to be; the planning being often in **disregard of National and European law for protection of people, flora and fauna**, and in **disregard of the Climate Action Plan of the County and other local initiatives**. The mentioned opposition groups are increasingly standing together and supporting each other in their fights against the Wind Farms. Only this will make sure that the "multiplying" effects of all this planning will be recognized. People may think a turbine here and a few turbines there in itself is not so bad, but they forget the mentioned multiplying of negative effects that this amassment of wind turbines in a relatively confined space will have! This submission is specifically against the planned Windfarm in Lackareagh in the area of Kilbane, County Clare, but the "bigger picture" of all the planned Windfarm developments in East Clare must not be lost from sight! Many if not all of the arguments listed here are true in the same way for the mentioned other planned developments in East Clare. **None of them is in the interest of the local people!**

Arguments against Windfarms

East Clare is not suitable for Industrial Windfarms. There is a multitude of reasons, and we will try and look into them in the following, using individual planned developments as an example, but not limiting our arguments to a specific planned development. Reasons that are more specifically speaking against Lackareagh will be looked at in a separate chapter further down.

What do the locals think?

Local groups are fighting everywhere against this madness, not only in East Clare but all over Ireland and all over the world, as we stated! As soon as plans for Onshore Windfarms appear, resistance groups start, in East Clare as much as in the whole country. These groups are increasingly standing together and supporting each other in their fights against the Windfarms. We assume we should reiterate the facts that wherever those industrial turbines are planned, opposition pops up; people engage, research, and present convincing cases against the turbines! This is a strong message in itself – **people do not want those industrial turbines in the middle of where they live and seek recreation!** Most people realize the climate challenge and the need for change, but the Onshore Windfarms are not an acceptable solution; on the contrary, the more people look into the background, the more opposed they get. The unhappiness leads to strong opposition groups, and lobbying of local Councils and Politicians everywhere. People are not happy with these turbines in their neighbourhood, and that message is hitting home now everywhere – see

<https://www.independent.ie/regionals/clare/news/concern-in-clare-over-development-of-major-windfarm/a1374981324.html> as an example; also consider <https://www.rte.ie/news/business/2024/0507/1447841-buddhist-retreat-centre-objects-to-clare-wind-farm/> describing the potential detrimental consequences of the planned Windfarm Developments on a Buddhist retreat centre in East Clare, which can be considered part of the National Heritage.

It is prudent to add a remark about neighbouring **Limerick** here – the situation, in one word, is the same! There are plans from developers for Onshore Windfarms, and the locals are just as concerned, as they are in East Clare. We are sure we could find this for every County of the Country, because the same is true everywhere – people do not want those giant Onshore Windfarms where they live and recreate! For Limerick, we like to mention two things – again out of the National Press, we learn that Limerick County Council is as unhappy about the situation around planned Windfarms as Clare County Council is; see Limerick Council seeks clarity from Health Minister on effects wind-farms have on public health – via <https://www.independent.ie/regionals/limerick/news/limerick-council-seeks-clarity-from-health-minister-on-effects-wind-farms-have-on-public-health/a136314802.html> The groups from Limerick try to work together for example with the East Clare Windfarm Opposition Alliance; we read in the press that Limerick protesters (and Clare protesters!) were among groups marching to the Dáil opposing windfarm projects; see <https://www.independent.ie/regionals/limerick/news/limerick-protestors-among-groups-marching-to-the-dail-opposing-windfarm-projects/a492303300.html>. All those groups deserve to be taken seriously!

Why are the planned developments unsuitable in East Clare?

Wind Energy Designations



The Clare County Council Country Development Plan **erred gravely** when an area roughly in a circle around Broadford, with a radius of about 10km, give or take, was in parts designed as "strategic" or "open for considerations" for development of Onshore Windfarms. The worst and most obvious mistake is where the so-called "strategic" area **directly borders** the "not permissible" area around **Slieve Bernagh SAC (Special Area of Conservation)**; for details see [https://www.npws.ie/sites/default/files/publications/pdf/Slieve%20Bernagh%20Bog%20SAC%20\(002312\)%20Conservation%20objectives%20supporting%20document%20-%20Upland%20habitats%20\[Version%201\].pdf](https://www.npws.ie/sites/default/files/publications/pdf/Slieve%20Bernagh%20Bog%20SAC%20(002312)%20Conservation%20objectives%20supporting%20document%20-%20Upland%20habitats%20[Version%201].pdf)) and the **Lough Derg SPA (Special Protection Area)** for birds; see <http://www.irishstatutebook.ie/eli/2019/si/331/made/en/print>); this is mainly the area of the planned Carrownagowan Windfarm; see Red Arrow above; which is bordering the Lackareagh Windfarm.

Note that the townland of **Carrownakilly**, Killaloe Civil Parish, Barony of Tulla Lower, Co. Clare (4330b in **S.I. No. 331/2019**; see the link to the Irish Statute Book above) is **explicitly part of the Lough Derg SPA**, and this townland **directly borders** the planned Carrownagowan Windfarm; see <https://www.townlands.ie/clare/tulla-lower/> By the way, the developer FuturEnergy for the Carrownagowan Windfarm falsely claims that Lough Derg SPA is 4km away from the planned Windfarm; this is simply not correct, following the above definitions! But these facts get ignored!

The planned windfarm at Lackareagh (Kilbane) is almost in the same place, for all practical purposes bordering this area (and Fahybeg borders Lackareagh to the south, and the others are "just across the road" in a south-west direction...)! The upper blanket bog of Moylussa and Slieve Bernagh is considered to be a largely intact example of such an upper blanket habitat, and the heath is now a scarce habitat type in County Clare in Flora and Fauna. Oatfield Windfarm and Knockshanvo Windfarm are both also planned into similar upper blanket bog and heath areas. It is completely incomprehensible how industrial windfarms could even be considered in or near an area like this. The protection "**in or near**" a SAC or SPA is regulated under **European Law**, and confirmed in the Dáil in 2019 (we put a special emphasis on the "**or near**" part here, as the planned area for the windfarms **directly** borders the SAC and the SPA!). The law rules out a Windfarm so close to these Heritage Areas, as other County Councils and also ABP themselves acknowledged, for example when turning down the planned Windfarm near Glentis in Donegal in November 2023, see

<http://www.donegaldaily.com/2023/12/07/planning-permission-refused-for-glenties-wind-farm-1/>

Among the reasons for ABP's refusal was that the proposed development was located on a site which lies within an area designated for 'Especially High Scenic Amenity'. The whole area of East Clare currently in our view (as said, roughly a 10km radius around Broadford) is also considered a **Heritage Landscape** (think of Moylussa and Slieve Bernagh; think of the 12 o'clock Hills recreational area, and National Heritage Sites or Proposed Natural Heritage Sites like Doon Lough, Loughanilloon Bog, Lough O'Grady, Gortacullin Bog, and Woodcock Hill Bog etc.) and is considered to be of High Scenic Amenity. This is an area where natural and cultural heritage are given priority and where development is not precluded but happens more slowly and carefully. The principal role of these heritage landscapes, according to the County Development Plan, is to **sustain natural and cultural heritage**. Plans, policies and development decisions in these areas will always need to simultaneously take account of scenic, ecological and historical considerations. Landowners and residents, on the other hand, are likely to experience significantly more scrutiny about where and how they carry out developments in these areas (see below for the discussion on a rejection of planning permission in the Lackareagh area). So how can industrial Windfarms even be considered? The proposed Windfarm developments are in **direct conflict** with these statements from the **County Development Plan**, and furthermore **in conflict with European Law!** See the ruling of the European Court of Justice; **ECJ ruling C24/19** at <https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://fra.europa.eu/en/caselaw-reference/cjeu-case-c-2419-judgment&ved=2ahUKewj7qvys-e2IAxUMUEEAHXimKTEQFnoECB0QAQ&usg=AOvVaw2MN2XU33PRr9K9KYkAuw66>. They quote from the European Union Charter; saying

Those foregoing considerations are consistent with the purpose and objectives of Directive 2001/42, which itself comes within the framework established by Article 37 of the Charter of Fundamental Rights of the European Union, according to which a high level of environmental protection and the improvement of the quality of the environment must be integrated into the policies of the European Union and ensured in accordance with the principle of sustainable development.

Protection of SAC and SPA designated under European Law is of very high importance, and the ruling verbatim says **"in or near"** those premises! Taking this seriously, there **cannot be a subordination of "protection of Nature" interests under commercial interests** from developers! The critical threshold the Application for planning permission must pass in this context is that there must be no reasonable scientific doubt as to the question of whether there will be an adverse impact on any protected habitat or protected species which come under the strict protection scheme laid down under the Directive 2001/42EC, the so called Strategic Environmental Assessment **"SEA"** Directive, which ECJ ruling C24/19 confirmed.

Clare County Council lately (February and March 2024) had a "re-think" on their own previous Windfarm plans. We quoted <https://www.independent.ie/regionals/clare/news/concern-in-clare-over-development-of-major-windfarm/a1374981324.html> already above. In the mentioned meetings from early in 2024, it was clearly stated that those plans were made with turbines of less than 90m in tip height in mind (not nearly 200m, as they are now!), much fewer turbines than planned currently, and they were under the impression that new and more appropriate Development Guidelines for Onshore Windfarms, replacing the 2006 guidelines that are universally recognized as completely outdated and even dangerous in parts, were only around the corner. Clare County Council called for a **moratorium of Windfarm Development in Clare** https://www.clarecoco.ie/your-council/meetings/minutes/cc-council/minutes/2024/feb/minutes-of-february-2024-monthly-meeting-of-clare-county-council.html#_Toc163223145, until such time that new guidelines were released, discussed and universally accepted, and they wrote to ABP informing them of their decision. We expect ABP to honour this decision from the local authorities!!!

On top of that, Clare County Council was critical on their own Wind Energy Development Strategy; considering those outdated, too. A process started there that may lead to a radical re-thinking; ultimately re-zoning East Clare as unsuitable for Industrial Windfarms, for a number of reasons

discussed here, but one special reason being **aviation safety** (for Shannon Airport). This topic is widely discussed in other submissions, especially on the topic of Ballycar Windfarm **ABP318943**, we will not repeat all the arguments here, but fully endorse them in our submissions against the planned Windfarms in East Clare. In their February 2024 meeting Clare County Council stated that the existing Wind Energy Strategy has been carried over since 2009, but is considered out of date and that the members have not had a chance to review same. See https://www.clarecoco.ie/your-council/meetings/minutes/coc-minutes/2024/mar/minutes-of-march-2024-monthly-meeting-of-clare-county-council.html#_Toc165388040 . Furthermore, see <https://www.independent.ie/regional/clare/news/clare-councillors-lodge-objection-to-12-turbine-windfarm-plan-citing-enormous-cumulative-impact/a1238228788.html> for more background, in the national press.

As stated above, quoting from the **ECJ C24/19**, if the idea of a SAC or a SPA, designed under European Law, is taken seriously, this whole undertaking with Windfarms or their Infrastructure **in or near** such designated areas simply has to be rejected. The alternative is to subordinate protection of nature under monetary interests of a greedy developer who is using a "Green Agenda" as obfuscation, and we sharply protest against such an undertaking!

The Myth of "Green Energy"

Onshore Windfarms are not "Green Energy", and we will provide many arguments in this document to prove that claim. The wrong "mantra" successfully spread by developers that their turbines are "green" and the quick & easy solution to our climate crisis is a myth! The developers use that legend, claiming to provide the saving grace in the current crisis; they present themselves as the ones that will solve all the problems with their "green Energy", and make everybody happy along the way, through significant contributions to the local community. All this couldn't be further from the truth. These **Onshore Windfarms are about the money for the developers, and nothing else**. The Onshore Windfarms are not the solution, but part of the problem, when it comes to the climate crisis; nothing could be further from "Green Energy". Nobody in his right mind would favour a solution that increases the given problem and adds more aspects to it, but the turbines appear to be seen differently...

There is an interesting article in the Irish Times as of December 2023; <https://www.irishtimes.com/environment/2023/12/18/trouble-with-wind-turbines-the-green-agenda-is-being-used-to-benefit-those-already-benefiting/>, stating that the Green Energy is all obfuscation, and the whole wind turbines are about huge profit for the developers.

People in Ireland in their vast majority do not want Onshore Wind Energy, as soon as they get really informed on the topic, outside and away from the dully and primitive propaganda by the windfarm lobby, because they realize the many downsides, the true motive (quick and high profits for the developers), and the risks associated with this technology. More and more people become convinced of that, and express their opinion accordingly. One useful example is here: https://gaelicreexistence.substack.com/p/renewable-energy-is-irelands-next?utm_campaign=post&utm_medium=web&utm_redirection=true ; stating that Environmental destruction and colonial violence now come cloaked in false 'green' promises from the developers,

Is reliant and cheap "green" energy provided for the people of Ireland?

Some of the big myths around energy from wind turbines are being discussed here:

- Wind turbines do not produce “**cheap**” electricity. The price of 1kWh of energy from windfarms is always pegged to the highest price of 1kWh from a fossil fuel source (gas), so wind energy is in fact the dearest, not the cheapest. See <https://www.irishtimes.com/opinion/editorials/2023/11/02/the-irish-times-view-on-energy-prices-a-market-that-makes-little-sense/>. The talk about “clean”, “green”, “cutting carbon emissions” etc. is cheap propaganda, knowingly ignoring all the downsides that come especially with Onshore Windfarms.
- Wind power is weather dependant; if the wind does not blow (or blows too much. Or blows from the wrong direction. Etc.) you have no electricity. For every Megawatt of wind electricity you have to have a Megawatt of electricity (likely fossil fuel or with Nuclear Power generated) **to back it up**. If our electricity is reliant on wind, we will see **Blackouts** in the future!
- Note, in early February 2024, Germany for example decided to build new gas-fired power stations (possibly to be changed to hydrogen-powered stations, once this technology becomes economical!), as backup for the non-reliant wind energy. The same is at least in discussion for Ireland. It is universally recognized that the so-called “renewables” (wind, especially) will never suffice; backup is always needed! At the same time, Nuclear Power is being “resurrected” (it was seen as “dead and gone” in Germany after the Fukushima nuclear accident in 2011) and declared “green” and “clean” energy by the European Union now. Interesting development...
- Any fossil based backup solution would be a “standby” and only fired up if there is not enough wind. Combustion Engines are least effective before they reach their optimal working conditions (temperature etc), and produce much more CO2 etc compared to optimal working conditions. A fossil based standby solution would be a catastrophe from a climate point of view, actually **making the CO2 situation worse!**
- Another possible backup solution might well be **Nuclear Power**, reversing Ireland’s attitude towards Nuclear Power Stations completely; either through the - admittedly rather unrealistic - scenario of Ireland building Nuclear Power Stations themselves, or Ireland getting French-produced Nuclear Power over a yet-to-be-established GRID connection. Even leaving the cost aspect for Nuclear Power aside, the potential political implications of embracing this form of energy generation in Ireland now couldn’t be estimated.
- Wind turbines are not „green“. The electrical parts of wind turbines (“Switchgear”) use an **insulation gas** to prevent short circuits. Banned world-wide since 2014 except for use in wind turbines, this gas **SF6** (Sulphur Hexafluoride) is the **most potent “Greenhouse Gas”**. This refers to a heat-trapping gas that covers the Ozone Layer (and trapping the heat is leading to global warming), with a **global warming potential of 23,900 times that of CO2** when compared over a 100-year period. Other sources www.focus.de as of 11/12/2019, say 1kg of SF6 equates to 26,087kg of CO2, compared over a 100-year period. Sulphur hexafluoride is inert in the troposphere and stratosphere [Ozone-layer] and is extremely long-lived (takes thousands of years to dissolve), with an estimated atmospheric lifetime of 800–3,200 years; where CO2 has an estimated atmospheric lifetime of 1000 years at most. SF6 does not destroy the Ozone layer, but “traps” the heat (greenhouse-effect).). The SF6 used in the wind turbines inevitably “leaks” into the atmosphere through mechanical faults; equipment degradation; material fatigue; vibrations in normal operations; or during maintenance or decommissioning. For example, the amount of SF6 that is “accidentally” lost per year around Windfarms in Germany alone is more damaging than the CO2 produced by the complete domestic flight travel within Germany in that same year! A renowned German periodical FOCUS says that the effects of the “accidentally leaked” SF6 in Germany alone equals that of the CO2 emissions of an additional 1.3 million cars on German roads; see https://www.focus.de/wissen/klima/ausstoss-entspricht-1-3-millionen-zusaetzlich-len-auto-kritik-an-solarenergie-und-windkraft-die-klima-gefahr-durch-das-toxische-gas-sf6_id_11443694.html SF6 also triggers chemical reactions producing extremely toxic Fluoride combinations. The use of SF6 as insulation material makes a wind turbine **highly toxic**, and a mockery of Green Energy! SF6 is continued to be used by the wind turbine developers because it is **cheaper** than the available alternatives! **The continued usage of SF6 is irresponsible!** SF6 was

supposed to be disallowed in Europe by end of 2020, but unfortunately through the Corona pandemic it got a further expansion of the exception for wind turbines. One cynical remark from developer FuturEnergy to people concerned about SF6 was that we would have to live with SF6, if we wanted electrical energy; again the facts prove them wrong, and show their real attitude again: build it cheap, in order to maximize profit!.

- The turbines need **precious minerals**, so-called rare earths chemical elements, especially Neodymium ND (or **Neodym**, for short. See for example https://efahrer.chip.de/news/energie-wende-verstrahlt-ganze-region-ueber-dieses-metall-redet-niemand_1015501 for details and background) Each modern turbine needs about 550kg of this element, for their precision magnets etc. 90% of it is mined in China, under indescribably bad circumstances, **destroying** whole **landscapes**, and especially the **health** of the people involved. China just cares for the money, and being the sole producer of this, they are successful to this end. Neodym in itself is not radioactive, but together with it a number of Uranium-derivates are dug out, and those are! The amount of **toxic (or radioactive) waste** is immense! Also see <https://www.faz.net/aktuell/wissen/physik-mehr/radioaktive-belastung-der-strahlende-makel-chinesischer-windraeder-19211290.html> for background on the radioactive problem that comes with mining of the Rare Earth elements for the turbines. The problem is also nicely summarized in <https://blackout-news.de/aktuelles/die-dunkle-seite-der-energie-wende-radioaktive-belastung-in-chinas-seltene-erden-minen/>
- It is prudent to mention here, when talking of alleged "Green Energy", that large amount of **fossil fuel** (mostly) are expended to turn wind turbines, at least for a significant time (several months or sometimes even years), especially in the ramp-up phase. The reason is that the turbines, before they start working "as usual" and generating electricity, need Diesel-driven engines to turn them for mechanical reasons, otherwise (especially for Offshore solutions, but not exclusively) they could be destroyed (rust, clumping together of lubricants etc.). Riffgat Offshore Windfarm in Germany (near the island of Borkum – developer Orsted is involved here!) uses **more than 22.000 litre of Diesel each month** for quite some time now (and will continue to do so!) due to the fact that the GRID connection is not there, and the ready-built turbines cannot produce electricity! But they have to be turned, as described, using Diesel. See <https://www.bild.de/geld/wirtschaft/oeko-strom/dieser-windpark-wird-mit-diesel-betrieben-31754746.bild.html>
- Similar things are documented for Scotland, 71 turbines are documented to turn by using Diesel generators. See https://efahrer.chip.de/news/energieskandal-71-windraeder-mit-diesel-betrieben_1011471. Locally here in Clare, there is a story from neighbouring rural Tipperary where locals are having a good laugh about their new wind turbines – every 3 days a **tank truck with Diesel** arrives, to keep them turning.
- Also, at least older turbines are turned into the wind by Diesel-driven engine, so those continuously burn fossil fuel! Besides, each turbine uses about **1.5 tons of oil** during its lifetime for mechanical reasons, and loss of oil through leaking is widely documented; see <https://www.sonnenseite.com/de/energie/windraeder-bekommen-gegen-oel-austritt-einen-kragen/>. The mentioned case of the 71 turbines in Scotland above is known for **spilling large amounts of oil into the environment**. These are not rare or exceptional cases (as the windfarm lobby would tell you), but rather the norm, and documented everywhere; just another one of the "dirty" secrets of the alleged "clean" renewable energy from windfarms...
- The mentioned problems with Onshore and Offshore Windfarms being built but not being able to deliver energy (but instead consuming fossil energy, in order to keep turning at all, for mechanical reasons) for example due to the lack of proper GRID connection is omnipresent; see https://www.focus.de/earth/analyse/in-nord-und-ostsee-deutschland-baut-windraeder-aber-kann-sie-dann-nicht-nutzen_id_259625569.html There is no huge and quick profit to be made or any subsidiaries to cash in, from providing proper GRID connections as such, so this is not in the focus of the developers...

Devaluation of property

In the vicinity of windfarms, **loss of value of property and of land** is a well-established fact, although developers – without proof – sometimes try to deny this.

- Homes adjacent to windfarms become less valuable (**25% loss in value**, on a world-wide average), if anyone even wants to buy them. Very often people would refrain from buying in the vicinity of a planned or operating windfarm!
- On the potential loss of real estate value on houses, see for example <https://www.forbes.com/sites/judeclemente/2015/09/23/do-wind-turbines-lower-property-values/#6ceae2848cb>. Within a radius of 3.5km of a windfarm, expect losses of 20% to 50% in value, at minimum! <http://www.farms.com/ag-industry-news/ontario-court-says-wind-turbines-reduce-property-values-882.aspx> has a Canadian Court accept a loss of 55% in real estate value through wind turbines. The London School of Economics in 2014 more conservatively estimated up to 20% loss in a 3.2km radius. Newer research on that basis (2018; <https://www.wind-watch.org/news/2018/04/04/wind-turbines-affect-property-values/>) came to the following conclusion: “Residential property values are **adversely and measurably impacted** by close-proximity of industrial-scale wind energy turbine projects to the residential properties, if they are up to 3.2 km away. They **decrease a property’s value by 35 to 40 per cent**.”
- A 2019 Study by the **Leibniz Institute for Economic Research, Germany** “Local Cost for Global Benefit: The Case of Wind Turbines” states the following; extract is taken from page 2: “houses in rural areas suffer price reductions of up to 23%, probably due to stronger preferences for a pristine landscape” Source: <https://www.econstor.eu/bitstream/10419/203583/1/VfS-2019-pid-27741.pdf>
- This change to valuation also **affects existing mortgages** because if the value of a property drops the “loan to value ratio” increases leading to higher interest rates, so your mortgage cost increases.
- The land around the windfarm becomes **sterile for future house-building** so your children and grandchildren may not be able to build on the land they inherit (even assuming they would want to live near Wind turbines, which in itself is unlikely!). Industrial windfarms do not belong into residential or recreational areas!
- All windfarm developers use the same “trick”, a sort of sinister methodology – they name the location of their plans after “obscure” little townlands that nobody (only those living there...) has ever heard of, to give the impression that the turbines will be in nobody’s way. They give distances to some larger local settlements (villages, but only if they are far away, at least 5km or more) to pretend everything that might be harmful is far away from human dwellings, and conveniently “forget” settlements in the middle of it all! **We call that deception with intent!** Carrownagowan (not “Bodyke” or “Tuamgraney” or “Broadford”) is a great example of it, but also Fahybeg (or Fahy Beg, as it is sometimes spelt – nobody has ever heard of that. The villages of Bridgetown and O’Briensbridge in East Clare are the ones mostly hit by the planned Fahybeg windfarm, but they do not get mentioned...) or Lackareagh (the village of Kilbane next to the planned development is well known to locals in East Clare, but also to tourists and hikers! But this does not appear prominently in the plans...), the worst in this effect probably being Ballycar, that is right in the middle of the residential area of Meelick, which gets wisely not mentioned. “The townland of Ballycar” sounds so much more suitable for industrial development than the truth: “hey, we are building turbines of almost 200m height directly into the middle of the residential area of Meelick, under 5km from Limerick City. Meelick is (or was, until now) a popular area for young families with kids!” What conveniently gets forgotten there is the fact that these areas **are not sparsely populated** (as implied and often explicitly stated!), but that in all those “obscure” places and townlands, a significant amount of people are living and working there; they have **constitutional rights to life and physical integrity**

both under local and European Law, which the industrial turbines put at jeopardy! Some places are popular with tourists and hikers; have listed structures and places of local or national heritage. Allowing turbines to be built in these places – example Kilbane, Meelick, and others - is against the objectives of the Clare County Development plan to **protect residential amenities**. The scale and height of the proposed turbines, the location of the site in this open landscape, the noise impacts generated from the development and the significant traffic during construction would seriously injure the amenities of these residential properties. A depreciation in property value is to be expected, and cannot be accepted.

Building Windfarms – the consequences on the environment

We look at dangers for the environment due to construction and operation of windfarms – the huge amount of concrete and other material that will be needed, the risks of pollution and contamination etc.:

- The current Onshore Wind turbines need a foundation of **1500 cubic-meter of concrete**, reinforced with **180 tons of steel**, to support the total weight of over 3500 tons of the turbine, the engine house, and the rotor combined. For those numbers, see Kopp Publishing in Germany, www.kopp-exklusiv.de Number 34/19 (20th of August, 2019) These numbers are 5 years old now; remember they only get bigger with the years, because the turbines get bigger! For the ground to take this weight, compacting with **crushed rock** is necessary. More than 125 lorry loads for the **concrete** alone (assuming a “normal” Cement Mixer HGV that can carry up to 13 cubic meters of ready-mixed concrete) are required for each base, plus the steel and compacting material on top. In addition, similar amounts are needed again for all necessary roads, associated buildings etc. For Carrownagowan alone, 20km of roads (11.4km new build; 8.4km upgrade of existing roads) need to be “concreted” into the mountains on the planned site! Major excavations are required for these bases and for the access roads and all ancillary work. All the mentioned necessary HGVs need to traverse over unsuitable roads, and especially through residential areas in East Clare, with Crèches, Primary Schools, and Sports Grounds etc. It’s a bad accident waiting to happen; no “Traffic Management Plan” or anything in that direction will prevent that!
- The massive amount of concrete necessary for foundations, roads, and associated buildings, and the management of the substantial volume of excavated soils and materials during construction poses substantial risks to the **water management** and a big risk of **contamination of the water** flows in the area, both surface and subterranean, with potentially huge consequences on the water management around Lough Derg and the Lower Shannon. This is a **breach of European Communities Environmental Objectives Regulations**. Waterways, streams and rivers, but especially subterranean streams, are put at risk, and the access for people and wildlife to water is gravely being endangered. The **ecological balance** is unduly put at risk (landslides/mudslides, especially in bogs like in East Clare. See <https://clarechampion.ie/windfarm-concern-group-raises-questions-over-risk-of-landslides/>). Just think of the **Cement Mixer HGVs** again – more than 125 are necessary for the foundation of one turbine alone according to the “theory”; if we consider a 10 turbine windfarm plus the ancillary buildings and roads etc, we will see between 1500 and 2000 drives of loaded Cement Mixers alone (plus the return or the empties, after washing them out...), probably more in a peat bog. We became aware of numbers for turbines in West Clare, for turbines built around 2019, on much “rockier” soil than the peat bogs in East Clare; there the number of cement trucks needed per turbine base on average was given as 175. So we can expect much larger numbers of necessary cement trucks than the “theoretical” 125 cement mixer HGVs per turbine base, for East Clare. On top come the vehicles to provide the crushed rocks for the packing of the ground, and the vehicles with the steel reinforcement for the concrete. All those

vehicles need to be cleaned after discharging their load; especially the cement trucks – the vehicle itself and the chute at minimum needs washing. The amount of water needed for that are immense, and the potential to contaminate the water is huge, and again this poses a significant risk without proper mitigation for the water around the construction side, and in consequence for the whole region.

- **Peat Bogs**, considered a valuable “sink” for CO₂, **are being destroyed** through building of the turbines and building of the access roads. There will be significant excavations necessary for everything around Windfarms and for their GRID connection, given the character of the East Clare area as an upland Peat Bog (which in itself is woefully unsuitable for a windfarm!). The amount of concrete necessary to support the turbine bases, the groundwork for the associated buildings, the foundation of the access roads etc. will inevitably destroy the Peat Bog. This again **is in breach of** County Council rules, national (Irish) rulings, and European rules on protecting and enhancing Biodiversity. Remember that in Ireland, what was almost the main source of heating in houses for decades (and centuries), the peat briquettes, commercially pressed by Bord Na Mona or others, or the self-cut, self-stapled, self-dried variant, are now taken off the market; the main reason being the protection of the peat bogs, not so much the avoidance of fossil fuel (since alternative briquettes were introduced). What sense does it make to conserve peat bogs through these measures, and on the other hand destroy them on a large scale through the construction of windfarms?
- Wind turbines do not belong into a Peat Bog! Remember the **landslides** at Derrybrien – a mere 30km away from Carrownagowan, by the way – and at Meenbog in County Donegal in November 2020; see <https://www.donegallive.ie/video/finn-valley/589063/watch-amazing-video-captures-peat-slippage-incident-in-donegal.html>)!) Peat Bogs are especially unsuitable for windfarms! Also remember the construction of turbines on **blanket bogs** like in East Clare, an internationally rare habitat and a huge source of carbon sequestration, may result in excessive release of CO₂; see <https://theconversation.com/wind-farms-built-on-carbon-rich-peat-bogs-lose-their-ability-to-fight-climate-change-143551>

What about the traffic? What about consequences for tourism?

We look at potential results from the strain that is put on the area and what that might mean for tourism in East Clare.

- Our **local roads** in East Clare **are not suitable** for the transportation of all the materials required and for the transportation of these giant wind turbine parts, so extensive roadwork and tree-felling will be required, destroying even more valuable carbon sinks. The transport of one complete turbine alone requires 10 individual special super-large HGVs; some of which are up to 75m in length (NOTE – this number is from the early days of Carrownagowan planning, back in 2018/2019; the latest plans in 2024 – Lackareagh Windfarm – admit to 81m, now, and Knockshanvo even says **88m** in length); this is significantly more than 5 ordinary city buses coupled tightly together! For Carrownagowan alone, we are talking 190 such “extraordinary transports”. This traffic poses a **very high risk to human health and population**, not only in East Clare but also “en route” through City and County of Galway or City and County of Limerick, depending where the turbines are unloaded. Regarding the HGVs necessary for transportation of the construction material, again take the example of Carrownagowan. Considering the amount of Cement Mixers needed, the steel reinforcement, the crushed rock, for the foundations only, and everything on top for buildings, masts, roads etc, (and counting in the “empties” for the return journey) it is fair to assume that easily way **more than 10.000 Heavy Goods Vehicle** transporting the necessary supplies will have to pass through East Clare (Bodyke, in that case, and back), if this construction should go ahead. Using the numbers that the developers gave out themselves (which are usually on the

low side...) and counting in the "empties" on return, we would have **48** HGV movements through Bodyke every hour during peak working hours; that is almost one HGV per minute! As far as planned transportation routes for the construction traffic for the planned developments are known, all those development will pass Primary Schools (for example Bridgetown, Broadford, Bodyke) directly with their lorries, and numbers will very much be the same for all locations. As already mentioned; this is a terrible accident waiting to happen, and no Traffic Management Plan or the like can prevent that! The planned locations for the windfarms can all only be reached via very small and minor roads, and even the main roads in the area are not made for HGV, and in almost all cases one look at a map will show that alternatives are not available.

- Also, all this "construction traffic" over months and years will have a **deleterious impact on tourism** in East Clare. Planning permission is usually sought for 10 years, meaning possibly 10 years of construction and disruption. If anybody is in doubt about the potential impact of the planned constructions on traffic, and believes in the effectiveness of Traffic Management Plans, just look at the chaos place that was formerly the much loved tourist hotspot of Killaloe. (The situation has been very bad for almost 2 years now, and will last at least for another year into the future. Three years heavy impact on tourism will have a huge effect for the area. Tourists do not come here to be caught in permanent traffic and in dirt and noise, in the middle of a construction side.) This will make you re-think! All main entries and exits to and from the town are blocked with construction, unsuitable deviations in some places, temporary traffic lights, unbelievable dirt, slippery roads, dangerous potholes, sheer chaos on the road at certain times (school runs, delivery times for shops, traversing of construction vehicles), and speeding HGVs too wide for their lanes (and thus "over the line" and cutting corners at liberty, obviously following a weird principle of the "right of the bigger one" on the roads) on the main access roads. Each trip in and around Killaloe culminates in a number of near-misses, and it is only miraculous that we did not see a higher number of major accidents (yet). There are no doubts countless "Traffic Management Plans" and the like in place, but none took the legitimate rights and interests of the locals and of the tourists in and around Killaloe into consideration; those are obviously considered collateral damage...
- The mentioned eco-friendly and gentle tourism that East Clare stands for is massively being put at risk. Just consider the many roads in East Clare designed as **Tourist Route** or **Scenic Road**. The turbines would negatively alter the character of this rural landscape. The proposed turbine structures, by reason of their height, scale and siting on this open and exposed upland landscape would constitute a prominent feature on the landscape from both local and long range viewpoints. The **turbines would seriously injure the visual amenities** of the area, contrary to the Clare County Development Plan. But what we observe is almost grotesque; take Kilbane as an example: The planning application to erect a dwelling house and garage in the same area where the windfarm developer now plans a mast of over 100m in height was rejected, as a visually obstructive feature in the landscape, resulting in the dwelling to be clearly visible from a wider area; this was decided as being contrary to the Clare County development plan, as it would seriously injure the visual amenities of the area. As stated, this was a decision about a planned dwelling house, probably 7m in height. But a Mast (in preparation of a future windfarm) of over 100m in height at almost the same spot got full planning permission! How can that be?
- The height of modern turbines is **very visually intrusive**; an average house is 7 meters, Dublin Spire is 121 meters. The turbines now planned in East Clare very nearly **reach the 200 meters mark!** According to one developer (FuturEnergy), turbines below 185m would not be "on the market" anymore, and thus this height is to be considered the minimum, going forward!
- Consider the **CO2 emission** that the production of turbines (including the mining of rare earth elements etc.) and the transport (do not forget the empties for the return!) for all the construction work will cause, coupled with possible pollution of water from the necessary washing out of the trucks (remember, water will be needed and used for washing out the concrete truck chutes, for wheel wash, for dust suppression and for the sanitary facilities on

the construction site! And probably many more cases of potential pollution of water). A somewhat "older" report from Fox News 2016 on the CO2 emission of Wind Turbines can be found at <https://www.youtube.com/watch?v=ltJmRikUBV4> and shows again how wind farms destroy the environment. Some numbers – a 2MW Windmill (which is less than a quarter what the modern, much bigger and heigher wind turbines deliver), consists of 260t of steel; this requires 170t of coking coal and 300t of Iron ore; all mined, transported and produced by hydrocarbons. Today's numbers are significantly higher! All the calculation that this CO2 emission will be offset after a year or two of operation of a windfarm are pure embellishment; a simple whitewash that only works when leaving facts (the greenhouse gas SF6, for example) aside!

- Underground cable connections (as said, here in East Clare, 6 different windfarms plan to connect to Ardnacrusha) mean **even more disruption to the local roads system**, and this will happen repeatedly, if all these plans go ahead. On the other hand, the alternative of using overhead cabling (as Ballycar and Oatfield plan, in parts) means unsightly pylons and the possible health risk through electro-smog.

What about Job creation?

There is always a lot of talk about positive effects on the employment situation. Allegedly local jobs are created. But:

- The maintenance for a windfarm is carried out remotely so opportunities for local employment are limited to temporary and low-level jobs during construction only, contrary about the developer's **meanderings about local job creation and economical benefit**.
- The local economy in East Clare depends on tourism to a great percentage Tourism is put severely at risk, as mentioned. It will be badly affected by the traffic situation during construction; going forward you will have a clear and uninterrupted view of these menacing "giants" (turbines), starting from Limerick City, and all along the main tourist routes in East Clare, into North Tipperary and possibly East Galway. Tourists who come to Ireland come here for the unspoilt beauty of the land, the beautiful views, and the tranquil landscapes, to experience nature as it was, and should be. Nobody comes here to "enjoy" windfarms! On the contrary, tourists will avoid the area, with detrimental consequences for the economy of East Clare, for Hotels, B & Bs, Restaurants, Cafes, amenities like boat hires, shops for tourism etc. The potential **loss of jobs** in this area through the windfarm development significantly outweighs any temporary job creation.

The Problem of Recycling

- A number of components of the turbines are not currently suitable for **recycling**- where will they end up? See for example the following article in the Financial Times newspaper: <https://www.ft.com/content/31f96d56-8f12-4fde-9e2e-6a013df7f7f2>. The material used (GFK and CFK) cannot be recycled, it's non-biodegradable and made up of a composite of very fine strands of plastic and glass, which is extremely difficult to process at the point of recycling. Dumping of these plastics is illegal. Crumbling or burning leads to **highly toxic** particles that are known to cause lung cancer, amongst other diseases, very much like asbestos. What good is it, if the developers claim 80% - 90% of the material would be recyclable, if the rest is so toxic and its destination after its useful life so unclear? Also – who will pay for recycling? Let's not fool ourselves: In many cases, the developers of one windfarm cash in on the

subsidies for wind energy erection (for that topic, see for example <https://www.agriland.ie/farming-news/wind-farms-in-ireland-what-exactly-is-going-on/>, an article from 2019; here it is documented that the Irish Taxpayer contributes 1.2 billion Euros per year, to keep the rotors turning..), and sell the place off with immense profit after a while, to a Pension Fund ("Vulture Fund") or the like. So in later years, the "owner" of the windfarm will be somebody who does not consider himself bound to promises to locals, or to commitments about recycling etc.; they are just the operators, for as long as the turbine produces energy (=money!). It is very likely that the whole construction will be **left in situ, to rot away**, should the usable lifespan be over, which will happen probably more likely after about 20 years. Technology evolves so fast that the likelihood of these turbines still being useful in 20 years time is negligible, although the developers talk about a lifespan of 30 or 35 years... For details, see

<http://www.gegenwind-saarland.de/Materialien/Entsorgung/CFK/191102-FAZ---Das-grosse-Entsorgungsproblem-der-Windraeder-comm.pdf>.

- Also think of the many "**accidents**" with wind turbines reported world-wide lately – parts of the rotors crumbling off, turbines catching fire etc., when they age, and this happens way before even 20 years of operational life! See for example <https://www.ndr.de/nachrichten/mecklenburg-vorpommern/Zwei-Feuer-in-luftiger-Hoehe-Windraeder-in-MV-abgebrannt,windrad984.html> or <https://www.handelsblatt.com/29451124.html?share=mail>; also <https://www.n-tv.de/24758003> or <https://blackout-news.de/aktuelles/windkraftanlage-verliert-22-tonnen-schweres-rotorblatt/> for examples. This is a serious, world-wide problem of wind turbines, and the likelihood increases with the ever-growing size of the same! <https://www.nordkurier.de/regional/mecklenburgische-schweiz/schaeden-bei-windraedern-einwohner-fragen-nach-notfallplan-2525053> is another quote; this one focusing on the concern of the locals near Windfarms regarding those frequently occurring "accidents". They rightly ask whether there is any kind of risk assessment and emergency planning around these issues!
- There are already enough examples worldwide for rotting former windfarm sites that are past their usable lifespan, and nothing was done about recycling; they are just left to rot away!
- The blades of the **turbines shed micro plastics** into the environment as they age, posing huge danger for wildlife / livestock / people. Some of this "stuff" is highly toxic! Additionally, rain and hail or maintenance work can lead to release of micro particles wearing off or split from wind turbine blades. It is stated that for example Scotland is littered by tonnes of Toxic Plastics Shed by thousands of Wind Turbine blades; see <https://stopthesethings.com/2023/01/31/scotland-littered-by-tonnes-of-toxic-plastics-shed-by-thousands-of-wind-turbine-blades/>. How long will we all stand by and ignore the facts, putting our trust in the statements of the Windfarm lobby who – without proof – state that the claim "wind turbine blades are emitting large amounts of bisphenol A (BPA) and microplastics into their surrounding environments" was wrong, and allege that wind turbine blades contain only microscopic traces of residual BPA and therefore do not account for large emissions of BPA or microplastics to the environment. Even if that was true – that statement (very similar to the statements around Infrasound) are always about 1 single turbine, and the multiplying effects of an amassment of turbines (as planned in East Clare) get conveniently forgotten. Internationally, projects were recently (2024) started in Scandinavia to scientifically research the effects of degrading polymer structures (main material component of the blades) – and it is scientifically absolutely no question that these do degrade over time!!! - on marine life, today or in twenty years (blades are supposed to "run" for 35 years.); see <https://wind.dtu.dk/newsarchive/2024/06/project-premise>. This is just another ticking "time bomb" from the turbines being ignored by the windfarm lobby.
- Whilst the possibility for this next problem occurring in Ireland may be low (but far from zero!) due to the moderate climate (and it is not strictly on the point of recycling, but more on the "shedding" aspect), it should be mentioned that in many parts of the world (Bavaria in

Germany, for example, where this problem occurs frequently!) **wind turbines pose a huge risk in winter time**: The turbine blades tend to gather a lot of ice on them, during “suitable” weather conditions. When the ice breaks, the pieces – through the rotation – are thrown off, and distances of well over 1.5km are “achieved”. Imagine livestock or indeed farmers working their land near a windfarm being “bomarded” by those ice “shrapnel” – those are lethal! How can somebody get planning permission to build turbines (of almost 200m in height) with a distance of 500 metres to a dwelling house, in view of this danger? You do not find any risk assessment (or mitigation) of this danger in any of the current applications for planning for windfarms in East Clare; it is simply being ignored!

The noise from the windfarms

The noise from an industrial windfarm is one of the key factors that need to be considered. The noise – audible and non-audible – plays a huge part in the fact that a windfarm is a **big risk for the health and wellbeing of living creatures**; we will look at some points here.

- There are different types of noise from wind turbines – the “whoosh” of the blades through the air, the pulse of each blade passing the tower and others. The still-not-published new guidelines for Onshore Windfarms in Ireland give a maximum allowable level of audible noise (43dB) that the World Health Organization still considers detrimental to human health! They consider 40dB during the day time and 35dB during night-time as a maximum allowable level, and still demand further research in order to have more suitable guidelines. (See http://www.euro.who.int/_data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf?ua=1) Please note that 40dB is an internationally recognized threshold for annoyance and sleep disturbance (by the World Health Organization, for example); see WHO. The Burden of Disease from Environmental Noise. Copenhagen: WHO Europe; 2011
- A relatively recent study from Germany (<http://www.rettet-den-taunuskamm.de/windkraft/mythos-8.html>) is a scientific piece of work on the myth that people are safe from harm through the existing laws and rules & regulations, and that a windfarm does not pose any dangers for human health. The scientists who undertook this study conclude that the facts and common sense demand that, due to the state’s liability to **protect human health and human life**, the discussed noise limits (43dB maximum) have to be lowered by at least 5dB, and nightly to 30dB at maximum; and that the absolute minimal distance between a turbine and a human dwelling has to be more than 3km.
- A very interesting development in early March 2024 saw the High Court in Dublin rule that **windfarm noise constitutes nuisance to nearby residents**; see <https://www.irishtimes.com/business/2024/03/08/neighbours-entitled-to-damages-for-unreasonable-interference-from-wind-farm-noise-high-court-rules/>. One would expect the message to be gradually understood. Surely this must have consequences on the operation of windfarms near to residential dwellings!
- This landmark wind turbine noise ruling was also recently submitted to the Attorney General. The ruling found that turbine noise – even if within planning regulation limits – could be categorized as a nuisance, and implications for the operation of existing and future wind farms are to be expected; see <https://www.independent.ie/irish-news/landmark-wind-turbine-noise-ruling-from-high-court-referred-to-attorney-general/a596207135.html>
- Planning permission was recently refused by An Bord Pleanála (late February 2024; **ABP-315656-23**) to the planned Cappaboy Beg Windfarm in County Cork on appeal, after it was previously refused by County Cork Council. Amongst the core reasons for refusal is the topic of noise. An important point is the question of amplitude modulation of wind turbine

noise. **Amplitude Modulation (AM)** in relation to wind turbines refers to a distinct characteristic of noise – that the level, or “volume” is not constant in amplitude. The wind turbine noise is varying in amplitude at a frequency which is the same as the blade passing frequency which, for a three-bladed wind turbine, is three times the rotational frequency of the wind turbine. As the noise varies over time, it can be perceived as more annoying than noise of a similar level which is constant. Amplitude Modulation is not addressed by standard methods of measuring noise of windfarms, and is **not** discussed in the current Wind Energy Development Guidelines from 2006, one of the many major failings of these guidelines. In contrast to Infrasound (see below), even the developers acknowledge the potential for adverse environmental effects from amplitude modulation but are whitewashing the issue with excuses over difficulties of measuring these effects and lack of binding guidelines to measure against. So they tend to ignore the whole problem and plough on regardlessly.

- In general, the developer’s attitude towards any form of noise **shows a severe disregard of the human right to bodily integrity**, by actively ignoring the WHO recommendations, and in some cases even insisting on using the completely outdated recommendations from the 2004/2006 guidelines. We consider it a huge mistake (and call for a moratorium at minimum for all Onshore Windfarm Planning!) to grant any planning permission for anything related to Onshore Windfarms, before the new guidelines are agreed, published, and turned into law! Even ABP themselves appear to share this view; we quote from ABP-315656-23: *“there is extensive conflicting research on noise related to wind farm development. I again note the WHO guidance. At this time of no updated Section 28 Guidelines, my principal observation is that the **precautionary principle should reasonably apply**. The lack of finalised Wind Energy Development Guidelines, which would be expected to provide an updated, informed and relevant guide for planning authorities, leaves the Board at this time without adequate Section 28 Guidelines. It could reasonably be determined that failure to be able to adequately assess noise impact (and other environmental issues) measured against informed Guidelines **must lead to the application of the precautionary principle** because the environmental and/or human health hazard that arises is uncertain.”*
- There is also the **infrasound**, i.e. sound below 20Hz which is **inaudible** to the human ear but can affect the human body detrimentally. (Infrasound is also often referred to as “pressure waves” or “vibration”; the consequences known as Vibro-Acoustic Disease or Wind Turbine Syndrome. Remember – **humans cannot hear that**; it’s more “sensed” or “felt”). It is prudent to mention that Infrasound was first researched as a possible **lethal weapon**, during World Wars I and II. Turbines produce Infrasound, and the Infrasound from the turbines again is a **high risk for human health and population** (the World Health Organisation states that much more research into the health impacts from wind turbine noise is needed so that better-quality evidence can inform any future public health recommendations properly, and that more suitable metrics can be defined to measure against). But Infrasound is **equally dangerous for wildlife and livestock**.
- The noise (audible and non-audible to humans) is permanent, 24/7, and effects wildlife/livestock/people – the turbines do not shut off when you go to bed! People suffer from **insomnia, headaches, attentiveness, heart conditions, and fullness, revulsion of fear, tinnitus, and tendency to cramp** in the outer extremities, and a **multitude of internal ailments** (stomach and bowel). In many cases, the symptoms go away, once people are far away from the turbines! Some form of **cancer** in humans are said to be negatively influenced by Infrasound from turbines, and there are studies that link **human fertility problems** to Infrasound and especially to Infrasound produced from industry wind turbines. It was observed that especially people with autistic tendencies are worst hit, but generally speaking **about 25% of the human population around wind turbines are badly affected by Infrasound**
- Infrasound also **badly affects animals** - “sea-sickness”, “drying up” of cows, infertility, high-rise in still-born and disfigured offspring, and some species with complete non-predictive behaviour (Well documented here is the behaviour of horses! See <https://www.saarbruecker-zeitung.de/saarland/saarland/peterhof-kohlpharma-chef-straft-perl-wegen-windraedern->

[ab-aid-23659485](https://www.ab-aid-23659485) or <http://www.spiegel.de/video/video-99009280.html> October 2018 as an example) are being observed, when exposed to industrial wind turbines and the infrasound those are emitting. All this also poses high economical risks to farmers!

- A fairly recent international study “Acoustics and Biological Studies” on Infrasound and Low Frequency Noise (ILFN) was published in 2019; see <https://www.intechopen.com/books/acoustics-of-materials/acoustics-and-biological-structures> It sums up well the effects from Infrasound that is being produced by industrial wind turbines on living creatures.
- The attitude of the developers towards Infrasound is **cynical and inhuman**. Against better knowledge they either ignore infrasound altogether or claim that there is admittedly infrasound from a turbine, but this would allegedly be so low that it does not have any effects. Conveniently, when they argue this, they always argue about one single turbine, and forget the “multiplying” effects of many turbines in an industrial windfarm! And the developers allege that there is also – intermittent - “other” infrasound, from natural sources, and for example from motorways! But they ignore the fact that the infrasound from industrial turbines is permanent, and comes in especially “clean” waves, and therefore is **much more harmful**, and the developers **ignore all the science and research** on that topic, belittling the many scientists that argue differently. Even if the developers provide statistics for one single turbine regarding the production of Infrasound (usually they deny the existence of Infrasound altogether, before facts prove them wrong. Then they try to appease...This happened lately again during a public webinar on the planned Knockshanvo windfarm in Autumn 2023 from developer FuturEnergy in East Clare), they refuse to even comment on the possibility of infrasound effects multiplying through the many turbines on close ground, as mentioned. They also refuse to consider the massive amount of empirical data world-wide, regarding the damage that Infrasound does. The mentioned ABP report **ABP-315656-23** (see above) acknowledges “*There is extensive conflicting research on these issues...that this – noise and infrasound from turbines – is a particularly complex issue, with extensive conflicting research and a wide range of international guidance and standards*” and also quotes the World Health Organisation whose recommendation necessitate an overhaul of the existing guidelines, in stark contrast to the developers and their lobbies!
- The developers and their experts (from Malachy Walsh & Partners or MKO, in our experience) talk about “every study coming to the conclusion that Infrasound from turbines do not do harm”, or – as they like to put it alternatively, if cornered in a discussion – “studies could not scientifically prove” that Infrasound from turbines “directly” causes harm” – they usually refer to studies based on (or the study itself) by a company called LUBW from Baden-Wuerttemberg, Karlsruhe in Germany (www.lubw.baden-wuerttemberg.de/startseite, s their home page) allegedly from 2016, but the study is based on older data from 2012. The (wrong!) conclusion that the developers and their experts draw from this – and keep repeating, like a mantra – is the following “*any reputable scientific study that exists clearly proves that there is infrasound from turbines but to levels insignificant to being harmful to human health*”.
- What they forget, of course, is that the same Government (in this case of the County of Baden-Wuerttemberg in Germany) who ordered and paid for these studies first “bulldozed” the wind turbines into the land, with total disregard to potential danger to wildlife / livestock / people. The fear of possible recovery claims from people who could argue these governments knowingly endangered them must be huge. So is it a surprise if a government study, executed by a government-owned company, comes to the conclusion that there is “no scientific proof”? (mind you, they do not even try to deny the damage! They just say there is no proof that it comes directly from the turbines!!!) Could one assume such a study is perhaps a little biased?
- And furthermore, a brief review of that same study, carried out by the International Acoustics Research Organization (IARO; 37 Ferguson St, Palmerston North, 4412, New Zealand) from October 2020, points out that significant scientific advances have been made in the field of acoustic data acquisition and, hence, these data from LUBW may be rather antiquated. Professional courtesy among colleagues in scientific research prevented the group of

scientists reviewing the LUBW report from calling it worthless, but they point out clearly that the study is based on the erroneous, yet prevalent, assumption: “*what you can't hear won't hurt you*”, proved by their use of comparative analyses with the human hearing threshold levels. **This is scientifically indefensible.** The methods used for measuring were erroneous, the data very limited, the drawn conclusions dangerously wrong. The study, and everything that is ultimately based on that study, is indeed worthless!

- We quoted enough studies from reputable scientists above that Infrasound from turbines is indeed harmful; we said that we consider the **attitude of the developers and their experts** towards countless scientists and research institutions whose studies prove the danger of Infrasound from Wind turbines, their calling them “niche” or “biased” **absolutely disgraceful and offensive**. We met this attitude again in the Webinar and the Clinic held by FuturEnergy lately, and we find it contemptible. They cannot argue with the truth, so they ignore it with intent. And because this is about potential health issues for people / livestock / wildlife, we have to call this a **felony, under Irish Law and under European Law!**
- In the so-called “Community Consultation” that all developer are duty-bound to hold, the attitude of the developers and their experts was again and again brought to the surface; we consider it worth mentioning and considering: Go back to the 1950s in America, when people were first questioning whether Tobacco may be harmful to human health and caused an addiction (and the producers knew about it, but ignored it, and even worked on extra compositions to keep people addicted). Huge outcry from the tobacco lobby followed. They found doctors to tell the whole world that tobacco was indeed healthy, helping to remove throat infections, providing valuable additions to the overall health of people, and of course absolutely no connection between smoking and health problems could be observed. And as to the addiction – ridiculous! So why stop – since smoking is so good for you? The manufacturers were of course totally innocent, and more of good-doers for humanity than everything else. All this was published and allegedly believed, despite the facts being in plain view to everybody. The windfarm lobby follows the same path – the facts that turbines are harmful to people, livestock, and wildlife are there, but they find some “doctors” and other so-called experts who state they couldn't detect any direct connection between turbines and ill health. They ignore the inefficiency of the turbines on top, they ignore their inability to deliver on bringing down CO2-emission (see the SF6 debate) and the side effects of the mining of the rare earth elements, they present themselves as the saving grace to the country and the solution to all its challenges, through their alleged “green” and “cheap” energy – and it is for the same reason that the tobacco lobby did what they did, back then in the nineteen-fifties: **A huge amount of Quick Cash!**
- We studied some of the developer's (and their supporting engineering companies) documents on the Infrasound topic; those documents were published in their EIAR (Environmental Impact Assessment Report) and NIS (Natura Impact Study) for various applications for planning of Windfarms. We find a quote from “Guidance Note for Noise Assessment of Wind Turbine Operations at EPA Licensed Sites (NG3) (EPA, 2011)”. This we have seen multiple times before now (and it still is wrong!):
„There is similarly no significant infrasound from wind turbines...”
- Next comes a quote that is a special lowlight:
*With respect to infrasonic noise levels below the hearing threshold, the World Health Organisation (WHO) document Community Noise (WHO, 1995) has stated that:
 “There is no reliable evidence that infrasounds below the hearing threshold produce physiological or psychological effects.”*
- There it is again – the old “**what you cannot hear cannot harm you**” misconception which you find at the heart of most if not all studies that allegedly “prove” infrasound from wind turbines to be non-harmful. To quote a 30 years old statement from the WHO which has numerous times been proven to be utterly wrong, when there is huge newer scientific research available, and even the WHO has published assessment to the contrary much more recently;

see above, is low even for the standards that the windfarm lobby, the developers and their supporting engineers set...

- In addition, take the comments from **WHO ENVIRONMENTAL NOISE GUIDELINES** for the European Region, **2018**, where **WHO states that Wind Turbines generate Infrasound**, and quote:

"The noise emitted from wind turbines has other characteristics, including the repetitive nature of the sound of the rotating blades and atmospheric influence leading to a variability of amplitude modulation, which can be a source of above average annoyance (Schäffer et al., 2016). This differentiates it from noise from other sources and has not always been properly characterized. Standard methods of measuring sound, most commonly including A-weighting, may not capture the low-frequency sound and amplitude modulation characteristic of wind turbine noise (Council of Canadian Academies, 2015)"

- The developers in their EIAR usually go on to quote more research from 2009 and 2013, and culminate with the famous **LUBW** study that we mentioned above, a study that is universally seen as biased and absolutely **outdated**, scientifically **refuted**, and even considered **worthless**, meanwhile! We quoted ABP-315656-23 above, a refusal of planning permission by An Bord Pleanála based on newer research on **Amplitude Modulation** from Wind Turbines, but the developers remain in complete denial of the up-to-date research on this topic, and blabber on about infrasound being an intermittent occurrence, with an undertone that since there are not internationally recognized metrics for measuring those, AM may as well be ignored. We repeat our assessment throughout this document – the attitude of the developers and their experts especially on Noise and Infrastructure is grossly negligent, it's putting the health and wellbeing of windfarm abutters massively at risk..
- We consider it a **felony on the developer's part**, by **causing bodily harm with intent** and a **breach of the constitutional rights to life and physical integrity** for the locals, if they go ahead with building turbines as planned and not taking Infrasound (and Noise, including AM) adequately into consideration! The only known protection from Infrasound is DISTANCE from the turbines! Turbines do not belong into a residential or recreational area! And in absence of scientifically proven and agreed binding guidelines, there should be a complete stop for Onshore Windfarms; rather err in the interest of safety! (precaution principle).
- We quote again from **ABP-315656-23** summing up this chapter on noise and infrastructure: The inspector queries "...how the Board can reasonably balance one set of research studies which determines that there is no (or no proven) adverse effect arising from noise from wind turbines against a competing set of studies which determines that there is." Yes, as many reputable scientists – and the WHO – would argue, especially on the topics of Noise including Amplitude Modulation and Infrasound from the wind turbines, there is an appalling lack of research and a miss of clear and binding guidelines which have the health and wellbeing of people/livestock/wildlife and the whole environment at heart! In view of that, **err on the side of caution, and stop those developments in East Clare!**

The Wind Energy Development Guidelines

We mentioned the guidelines repeatedly – **Wind Energy Development Guidelines (2006) from Department of Housing, Local Government and Heritage** – and we mentioned that those guidelines are universally considered as outdated, and even dangerous in places. In 2013, work started on new Guidelines; Drafts were published in 2019 and publicly discussed. We noticed a huge outcry from the Windfarm Lobby (Windenergy Ireland etc.) at the time - for example repeatedly on the "Drivetime Show" on RTE1 during 2019, when the Draft Guidelines were publicly discussed. The speakers of the Windfarm Lobby called the Draft Guidelines "**ridiculous**". Ministers Murphy and Bruton (at that time) called the proposed noise limits in the guidelines "aligned with the WHO suggested limits" (the WHO themselves are still a bit vague in stating that these limits are good

enough to protect living creatures, and are especially careful in their document from 2019 to make binding statements in the field of Infrasound, as mentioned!), whilst the Windfarm lobby, in their first public responses, called those suggested limits for Ireland “the harshest in the world” and moaned about the ultimate end of civilization as a consequence, if the wind industry was forced to adhere to these limits... This was followed by not-so-subliminal threats that each person in Ireland would be burdened with an additional € 550 per head yearly for energy, in order to reach the 2030 climate goals, if this noise limit came into being. Unfortunately, the Draft Guidelines have not been published, discussed, and put into law as yet, despite many activities like the mentioned march to the Dáil in May 2024, the Clare County Council call for a moratorium, the Limerick County Council appeal for a better protection of health, and others. The developer, in line with their “ridiculous” attitude quoted above, of course still base their EIAR and noise assessment on the 2006 Guidelines, and try to push their windfarm plans through. We mentioned in other submissions that especially for the SID developments, the **HSE** is a mandatory body, to be included in the planning to provide an assessment (which apparently has not been done in most of the cases in East Clare!).

For the Lackareagh Windfarm (Clare County Council **2460411**, application for planning refused), the HSE National Environmental Health Service has provided an assessment for a planning application, dated October 14th, 2024. Link to the document is

<https://clarecoco.eplanning.ie/iDocsWebDPSS/ViewFiles.aspx?docid=764209&format=djvu> It considers **likely significant effects within a population and Human Health context**. Regarding the 2006 guidelines, they state that “...it is recognised that the nature of wind energy development has significantly changed since the publication of these Guidelines, particularly the size of the turbines and the proximity to centres of populations and the cumulative effects with other wind energy development. There have also been substantial increases in the body of knowledge around the likely significant effects of the operation of wind farm development on Population Health, in particular around the characteristic of noise emissions and health effects of shadow flicker...” In more detail, they analyse the criteria for turbine noise, and come to the conclusion that any change in noise environment to a magnitude possible under those guidelines is **highly likely to cause complaints and/or nuisance**. They basically call for new and more appropriate guidelines before assessing any further windfarm applications, and explicitly refer to the 2018 WHO Guidance (Environmental Noise Guidance), and considers it appropriate to carry out assessment against the WHO 2018 guidelines, and include cumulative noise impacts from existing and planned wind farm developments.

Do we dare to hope for a “**Health before Turbines!**” attitude in the future?

In parallel, there were Parliamentary Questions by a Limerick TD lately in September 2024 to the [Minister for Housing, Local Government and Heritage](#) in the Dáil, see https://www.oireachtas.ie/en/debates/question/2024-09-09/810/#pq_810, regarding the 2006 Guidelines and the revised Guidelines. The TD asked if the SEA of the revised Wind Energy Development Guidelines has adequately assessed the potential impact on wind turbine noise on human health, if the Environmental Protection Agency EPA is the body responsible for assessing the impact on human health, and whether the revised guidelines are at a minimum consistent with WHO standards for the protection of human health. It was confirmed that a SEA in line with the mentioned EU directive **2001/42/EC** is being undertaken, and noise experts (consultants) have assessed the impact of human health from turbine noise, having regard to international best practice and standards, including the European Noise Guidelines 2018 issued by the World Health Organisation (WHO). The EPA is the designated national authority for the general supervision of the functions and actions of noise-mapping bodies and, where necessary, provides guidance and advice to such bodies and authorities. The minister emphasises the fact that as a part of the SEA process, it is intended to undertake a public consultation on updated draft Guidelines, whereby all interested parties will have an opportunity to submit observations on the draft Guidelines. It is universally recognized that these revised guidelines, taking in up-to-date scientific research, are a necessity now, because the 2006 guidelines are no longer fit for purpose.

But the windfarm developers instead revert explicitly to the 2006 guidelines in their EIAR and Natura Impact Statements, therefore those Reports and Statements are unsuitable!

The Shadow Flicker

Another topic from a wind turbine that has huge effects on different aspects, for example tourism, but more so health and well-being, is the potential Shadow Flicker from the turbines. For the HSE, Shadow Flicker is as much of a health issue, as noise and infrasound are!

- Depending on the location of your home – if there is a turbine between you and the sun, there could be **very aggravating flicker** which is a bit like strobe lighting. Blinds and curtains do **not** block this out. See <https://www.youtube.com/watch?v=XDOLW3A3nKg&feature=youtu.be> or <https://www.youtube.com/watch?v=pjdUHpdpFP-E> for examples of the devastating effects of this “**Shadow Flicker**”.
- Developers promise to apply software to avoid the shadow flicker by stopping the turbine for the time that your house is affected, but this never happens. There is no working software, as trials show, and the rotor blades are much too inert to stop in time (field tests showed it lasts up to 25 minutes before they actually stop! See <https://www.facebook.com/radiokerry/videos/noise-and-flickering-from-wind-farms/572261413247373/> on effects in County Kerry, where field tests showed the inefficiency of that software).
- Shadow flicker **makes people ill**, and also affects tourism badly – think of the designated hikes like the East Clare Way, through unspoilt beautiful nature, that are an asset to tourism in County Clare. Again, think of East Clare as an example, take the area around the 12 o'clock hills, Moylussa and Slieve Bernagh – these places offer eco-friendly tourism with many water activities on the lakes (Lough Derg and others), beautiful hikes in unspoiled countryside, with breathtaking views of the lake and the surrounding country. The landscape of East Clare is considered to be of high quality due to its unspoiled nature; this needs to be preserved! The Shadow Flicker from turbines is adverse to these goals. And remember, even if there was a working software to stop the turbines and prevent houses from coming under the influence of the Shadow Flicker (we say “even if” – knowing the stop will never happen, out of commercial reasons!), there will never be such a thing for hikers, for people working outside (in their garden, for example), or for any animals who suffer from Shadow Flicker in the same way.

Biodiversity, Flora and Fauna

Protected rare birds from the area and the possible changes on the whole ecosystem caused by industrial wind turbines comes to mind first.

- **Biodiversity is put at risk** (we mentioned SF6, we mentioned the shed micro plastic, as examples), and the biodiversity value of the area is degraded, **contrary to the Clare County Development Plan**. For example, the proximity to SAC and SPA around Slieve Bernagh and Moylussa rules out the East Clare area as suitable for industrial wind turbines, with regards to flora and fauna of the area.
- **Wildlife / Flora and Fauna** are put at risk by the planned Wind turbines. **Wind turbines kill birds**, including rare and protected species, on average 1-3 dead birds per turbine per day. The windfarm developer and their lobby call this a “myth”, but unfortunately it is a fact. See www.stern.de/digital/technik/so-haben-windkraftanlagen-in-indien-die-raubvoegel-dezimiert-8438454.html as an example how birds of prey got eliminated by wind turbines; on the same topic here is an article out of Scientific American journal: <https://www.scientificamerican.com/article/wind-turbines-can-act-like-apex-predators1/#:~:text=Scientists%20have%20documented%2C%20for%20example,can%20function%20as%20apex%20predators.>, or a quick (and depressing) video on how wind turbines destroy the

environment at <https://www.youtube.com/watch?v=ItJmRikUBV4>. The promised “solutions” by the developer to stop the rotors in time to protect the birds are non-existent! The Climate Action plan stands for the **protection of rare and listed birds**, but the habitats of a number of listed species (for example Hen Harrier, Red Grouse, Meadow Pipit, all **protected under EU directive on bird habitats 92/43/EEC**) are gravely endangered, for example looking at the planned developments in East Clare. The same is true for Badgers, Bats, and others. Around Moylussa in East Clare, you find Soprano pipistrelle, Common pipistrelle, and Leisler’s and Myotis species amongst the Bats population, as further examples.

- Of almost international fame are the White Tailed Sea Eagles of Lough Derg; see <https://www.facebook.com/share/v/3XN1QuY4rWbJM3uJ/> for details. Incidentally, when hiking in the Carrownagowan area in October 2024, one of our activists observed not one or two but THREE White Tailed Sea eagles hunting and soaring over the proposed area of the Carrownagowan Windfarm south of Bodyke village. There cannot be any doubt as to the risks to these birds (amongst others) which are endangered. It is shocking to see that a costly state reintroduction programme for this magnificent species is being potentially wasted, to allow profit from so called ‘green’ technologies for some big trusts. There does not seem to be a ‘joined up thinking’ in regard to the Government strategy.
- *“Bats, badger, pine marten, red squirrel and otter were evaluated as being important at a local scale due to their occurrence and/or conservation status”* is a quote from the Carrownagowan planned windfarm so-called Environment Impact Assessment Report EIAR. In that same report, the Developers admit that (existing) breeding ground and hunting ground for Hen Harriers (amongst other species) will be lost through erection of the windfarms, and that the birds will be significantly impacted especially during construction, but conclude nonchalantly, that the birds will adjust, and find new suitable breeding and hunting ground. Another quote from their EIAR for the planned Carrownagowan windfarm in East Clare: “Birds may also avoid the windfarm when it is operational”. In other words, nature will adjust. This attitude is not only totally wrong, but stupid and cynical! For example **breeding Hen Harrier pairs** are known to occur in the wider region around Moylussa (those pairs form between 2.5% and 5% of the national population) and are considered to be of international importance, but have not been surveyed following best practises. This alone puts all the planned windfarms in East Clare (first and foremost Carrownagowan, Lackareagh and Fahybeg, in this case, but also especially Knockshanvo and Oatfield, because of the close proximity) in question! The Hen Harriers appeared prominently in the headlines of newspapers in February 2024 again, with extinction of the species a real possibility within relatively short time; see <https://www.radiokerry.ie/news/report-finds-hen-harrier-could-be-extinct-from-kerry-within-25-years-368874>. Farmers are urged to take more care around Hen Harriers; see <https://www.rte.ie/news/regional/2024/0209/1431351-hen-harrier/>, and renowned organisations who look after conservation of wildlife like Birdwatch Ireland and An Taisce make it very clear that the main reason for the decline in Hen Harrier population are the Onshore Wind Turbines and the heavy forestry work; see <https://birdwatchireland.ie/birdwatch-ireland-an-taisce-and-environmental-pillar-urge-public-to-get-behind-their-save-the-skydancer-campaign-in-light-of-stark-hen-harrier-decline/> Also consider the above quoted Local Council / ABP decision on a planned Windfarm near Glentis in Donegal; we mentioned the refusal for the planned turbines; another reason to turn this down was that due to the presence of a pair of Merlin, confirmed to be breeding in the area, there was a risk for significant adverse impact on the birds that could not be mitigated. This argument is even more applicable for the Hen Harriers nesting around Moylussa and in the area of Carrownagowan. Lackareagh, Oatfield and Knockshanvo, and actually all over the area in question!
- Generally speaking, the ecological balance is unduly put at risk (think of the statistical likelihood of landslides/mudslides, as mentioned). Expected **hydrological effects** could have a huge influence on the water supply; again in East Clare for example it could affect Lough Derg and the whole Lower Shannon region, and specifically the drinking water for Shannon

Town and its environment. **Pollution of water** is to be expected, especially during construction. Where does that align for example with the Climate Action Plan or the County Development Plan for Clare?

- Large windfarms – the amassment of planned turbines across East Clare fits this description! - are known **to raise the average temperature and slow down humid airstreams** coming over the North Atlantic. This could have a huge impact on the weather locally; likely much more rain, increasing the risk of mudslides and the like significantly!

The article

https://www.achgut.com/artikel/windkraft_und_ihre_verheerenden_folgen_fuer_mensch_und_natur nicely sums up the detrimental disastrous consequences of the Wind Industry on people and nature (wildlife / livestock), and is just another useful summary of the last few chapters.

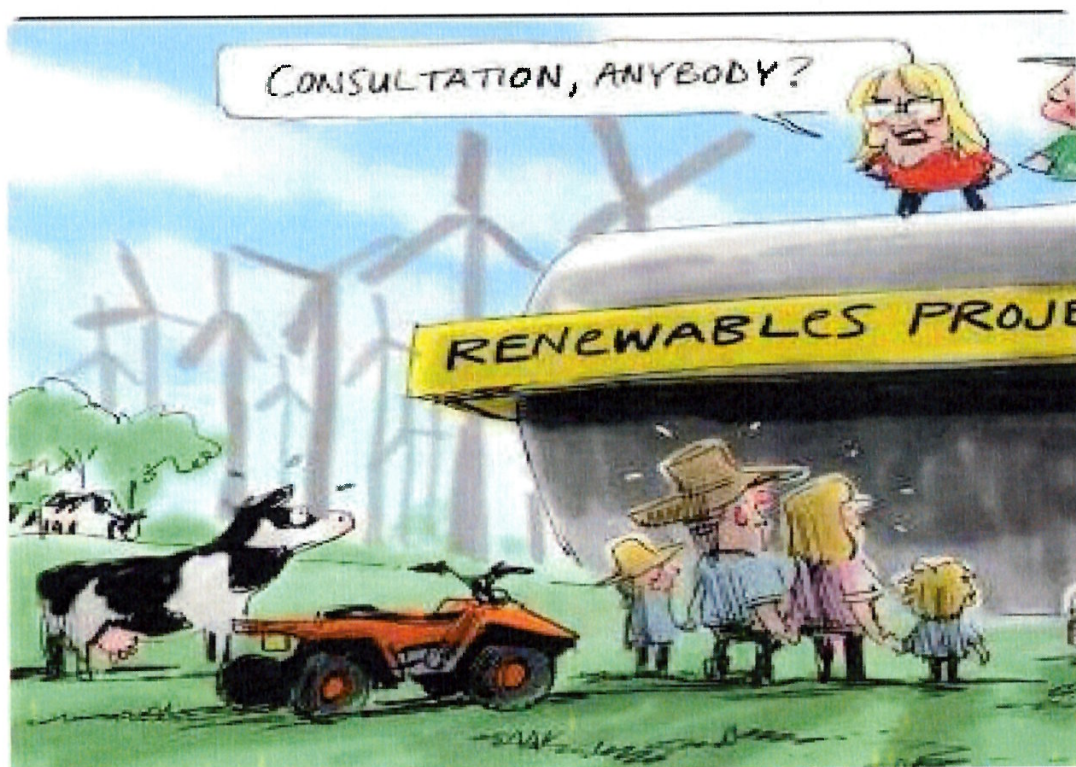
Ho wabout the mandatory consultation with the Locals?

We now look at the field of the relationship between the developers and the people living around the planned development. It is always alleged by the Windfarm Lobby that everybody wants cheap reliable green energy, and therefore (?) the vast majority of people would be in favour of Onshore Windfarms. Of course everybody would be happy about cheap / cheaper energy, but electricity from Onshore Windfarms is not cheap (see above!), and people realize that and are not happy about Onshore Windfarms. Regarding the alleged favouring of Onshore Windfarms by people, we find the contrary to be true; wherever plans for an Onshore Windfarm surface, local **opposition groups** are formed and begin the fight against those plans, that have only quick and big money for the developer at heart, under the pretext of doing something good. The vast majority of people, once they are educated on Onshore Windfarms and their negative impact, are fiercely against them, and we have yet to find anybody who was happy about the dealings with the developers (possibly bare for a very small number of land owners without much care or conscience whose land was urgently needed for planned turbines, from a developer's point of view, and so they offered big money for the land. A few people accepted the offers; some now complain about being eliminated from the community. Friendships are broken up, Communities are being torn apart; that's the real situation on the ground!

- **Consultation with the local community?** This is mandated by law, and the developers publicly pride themselves about those. Only recently (August 2024), a lady from RWE appeared on the local radio Clare FM and painted a rose-tinted picture of community engagement by the developers; unfortunately this was propaganda speech only as usual; see <https://www.clare.fm/podcasts/morningfocus/energising-clare-episode-12-wind-energy-communities/> . Most of the time, the whole “community engagement process” is fiction and fabrication. There is no such thing that deserves the name “consultation”, and all the developers are the same to this effect. They might organize a “clinic” or a fancy “webinar” where they show colourful posters and slides. But this is never about “consultation” or “discussion” – this is always telling the locals (and other interested parties) that this is the way it will be (this area, that many turbines, this height); everybody should be happy that you get a few crumbs off the richly laid table of the developers under the RESS scheme etc. Certainly, the conditions for the RESS scheme are never mentioned...), this will happen, like it or not, end of story.. There is **never a real discussion**. Very interestingly, the lady in the interview quoted above stated that community engagement is about the developer informing the public, so that everybody can make up their own mind! No mentioning of real discussion, no mentioning of taking in the views of the locals, no mentioning of the fact that this “information”

usually leads to formation of local opposition groups. Controversial topics are avoided; evasive answers or outright lies are given. The attitude shown is cynical and arrogant. Developer tend to be claiming things against common sense, and what ought to be their better knowledge! As an example for this, take the noise and infrasound topic discussed above!

- The whole "consultation" talk is highly unfair. There is a lot of talk from the developers about "level playing field" and "open and honest communication and feedback", "win...win", "mutual trust" – but this is all blather, or outright lies! The real situation is more like two giant cats (the State and the developer, always favouring one another where they can) playing with a tiny mouse (some individuals or groups opposed to the windfarms, but very often representing the huge majority of the locals, who unfortunately often are a silent majority. They are trying to live their lives, often struggling, and trying to make ends meet; only realizing what is happening with Wind Turbines when the diggers arrive. This happens regardless of the alleged efforts of the developers to "inform"...) – very frustrating! The big national and international developers, the Coillte, RWE, FuturEnergy, Orsted, EDF etc., they get away with everything in this county! In the interest of people/livestock/wildlife in Clare and elsewhere in Ireland, this has to stop!
- We cannot help ourselves – on the topic of "consultations" with Onshore Windfarm Developers, we just have to include the below picture – no words could sum it up more appropriately, how the locals really feel about those so-called consultation:



- Coillte / FuturEnergy could be singled out, because they are, in our own personal experience, especially bad, it has to be said. The missing community consultation on the Carrownagowan Windfarm or its GRID connection was already subject of the Judicial Review against this Windfarm. But the Knockshanvo Windfarm again is a "brilliant" example of their attitude – promise people what they want to hear, regardless of truth or not, and use a steam-roller to bulldoze your plans through. As an example, we could refer to a Webinar in November 2023 and a so-called "clinic" in Castleconnell, County Limerick, also in November 2023. And along

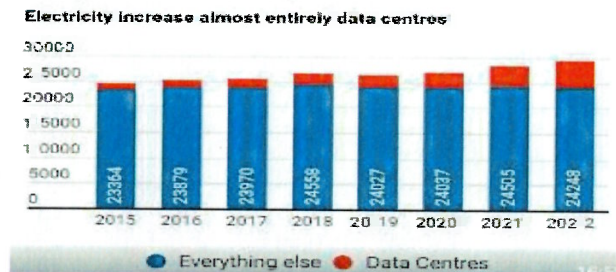
with our repeated personal experience with the liaison officers in some of those planned windfarm cases, this is testament for the disgusting attitude of Coillte / FuturEnergy, when it comes to Community Consultation! However – the others (EDF, Orsted, RWE,...) were not much better.

Developer's story: why are new turbines needed?

During those "consultations", we hear a lot why the new development would be urgently required. Nothing convincing, but a lot of blabber...

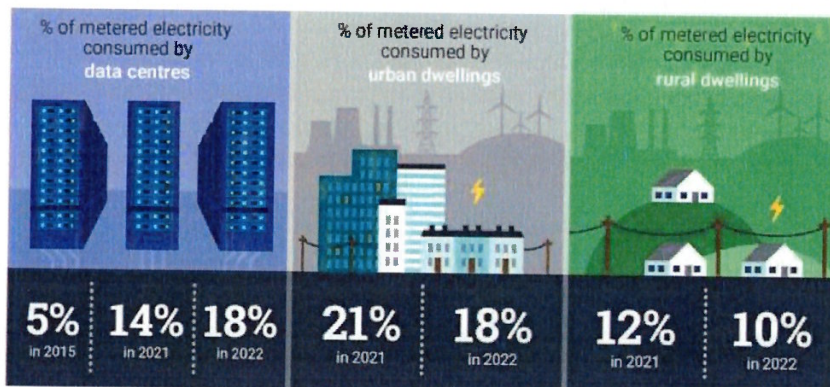
- Every developer for a planned new windfarm takes big pride of the huge amount of houses that this windfarm will power. "40.000 new houses" or "64.000 new houses" etc. is what they tell you! Really impressive! Then you ask them, where these 64 000 houses etc. are going to be built, who will build them, when, and if they are necessary at all. And you get the Silence in the Woods... This is all part of **propaganda** by the developers – for example the 6 windfarms envisaged in East Clare are likely all to provide electricity for the **planned giant data centre** outside of Ennis (money-printing machine for the developer!); something that the people of Clare will not gain anything from, but they will pay the price through the destruction of their homesteads through these turbines! The situation appears to be getting worse with a possible future giant data centre in Limerick City (Dooradoyle), just across the Shannon from Meelick, in County Limerick. Remember that over the last decade, the energy consumption from houses stayed relatively constant (new energy demand for example from electric vehicles balanced out by savings through more efficient appliances, better insulation etc.); **the rise in energy globally came solely from giant data centres!**

From the reporting by data published this week, data centres accounted for 4,000 GWh of the 4,500 GWh increase in total metered electricity consumption in Ireland since 2015.



- In 2022 18% of Ireland's electricity grid is consumed by Data Centres, 9 times the international average of 2%. Data Centres consume more electricity than all urban houses combined. It is predicted by 2030, **30-70% of Ireland's national grid** will be consumed by Data Centres; see <https://www.irishtimes.com/news/politics/data-centres-could-use-70-of-ireland-s-electricity-by-2030-committee-to-hear-1.4685589>.

Data Centres Metered Electricity Consumption 2022



- The necessity of Giant Data Centres in Ireland is a very controversial topic, as we all know; see <https://www.zdf.de/nachrichten/politik/ausland/klima-datenspeicher-stromversorgung-kuenstliche-intelligenz-100.html> for example on background information, why this is especially a topic in Ireland. Giant data centres are necessary, to a degree, but when it comes to deciding between healthy living in a tranquil unspoilt area, conserving the heritage, versus cheap and unlimited access round the clock to Facebook and Co, the choice is obvious!

The developers do not speak the truth

We have quite some experience in dealing with the developers, having had discussions on planned Windfarms in East Clare for almost 7 years now, with different developers and their supporters / lobbies. We are not impressed!

- Public statements from developers and their lobbies like Windenergy Ireland are a constant source of annoyance. It seems that their mantra is "**Cheat & Lie!**", and they live this to the fullest! Again and again they talk in public about the clean, "green", cheap energy that comes only from (Onshore) Windfarms, denouncing opposition groups or individual people who have reservations against turbines, to condemn people of Ireland to higher prices and to prevent Ireland from reaching its climate targets. Without providing any evidence, they claim for every planned windfarm that is being discussed that it is absolutely vital for Ireland and in the interest of the local people and Ireland as a whole. When confronted with specific questions in relation to one individual farm and (at first sight perhaps appearing localized) concerns, they revert to general remarks on planning laws (often quoting the 2006 Onshore Windfarm guidelines that are universally known to be completely out of date and even dangerous in some aspects), or admit to lack of detailed knowledge of that "local" situation (which is very rarely really "local", but most of the time a universal problem), ensuring the developers have everything under control and would do what is best. The developers and their lobbies like Windenergy Ireland use their vast resources to spread their propaganda and statements that can only be characterized as outright lies, in any way possible. On top of regular advertisement (which is surely paid for, and definitely recognizable as such), the lobby obviously 'buys' air time on the (local) radio to spread their chimera over fixed slots, for example over 3 months every Friday at a certain time, in a very popular daily Current Affairs show. The show usually thrives from listeners phoning in or texting their views on the topics being discussed, but here it was striking that any "negative" comments (that we and others

from the opposition sent in) were completely ignored – obviously a case of ‘he who pays for the music gets to choose the tune...’. At the same time, Windenergy Ireland and people from FuturEnergy visited Primary and Secondary Schools in the area, with nice and shiny brochures, and little models of wind turbines as presents etc, got a platform for spreading their fabrications there, of course without any chance for the opposition groups to comment or correct anything at all. This behaviour borders on being dangerous and undemocratic – this is a reminder of darker times with a dedicated “ministry for people enlightenment and propaganda”, when the order of the day was the total control over people’s views and minds...

The “developer’s trust” versus East Clare

The planned windfarm developments in East Clare are all undertaken by separate legal entities, see above – Coillte/FuturEnergy (Carrownagowan and Knockshanvo), RWE (Fahybeg), EDF (Lackareagh), Oatfield (Orsted) and Ballycar (Ballycar Green Energy / Greensource). But in fact they operate as one big trust, aligning their plans, splitting East Clare between them, and all pulling on the same strings to avoid opposition. The truth is, we are dealing with one big “developer” monster (that includes the likes of the lobby organisation Windenergy Ireland), and this monster uses all means and tricks in the book to smother opposition and have things their way.

- According to their own allegations during their clinics, 1:1 talks, webinars and even on some of their posters and in their brochures, they would admit to “consulting with...” or “working with...” statements on individual windfarms; so both RWE and EDF talked about a close alignment regarding their respective planning at Fahybeg and at Lackareagh, and both talked of involvement of FuturEnergy in the plans. Orsted admitted to engagement with FuturEnergy, and so did Greensource. Etc.
- The whole thing goes much further – FuturEnergy in their role as Coillte owning some of the land that Orsted wants to use for Oatfield, and some of the land that Greensource wants to use for Ballycar, are directly involved in planning of windfarms, officially under somebody else’s name! There are plans of sharing part of the GRID connection to Ardnacrusha between Orsted and Greensource, and lots more example of the trusts working extremely close together.
- However, the most obvious proof for this informal “trust” is that for the vast majority of applications to ABP around windfarms in East Clare (over 10 now, in total, if you count in the separate GRID connections, the application for Masts, applications going to County Council and then to ABP after their rejection), there are basically only two engineering bureaus involved; namely Malachy Walsh & Partner, Blennerville Co Kerry, and MKO Ireland Planning & Environmental Consultancy, Galway. It is to be assumed that there is a close exchange with the other engineering bureaus that provided the documents for Fahybeg and Oatfield, as some documents appear verbally identical in parts. Those engineering companies produce the whole documentation and all the necessary paperwork for the developer. So it is no wonder that we, as individuals, often get confused when “ploughing” through literally thousands of pages (Environmental Impact Assessment Report, Natura Impact Statements etc.) produced by these engineers, and have the vague feeling that we already read all that somewhere. And yes we did – the engineers work with Copy&Paste, and re-use existing material (which in itself is not bad; we do that, too. As long as some necessary due diligence is applied...). So heaps of the EIAR that we read for Knockshanvo, we already had the same for Carrownagowan. And no wonder the Natura Impact Statement for Lackareagh and Ballycar are so similar – either the same engineer wrote them, or the second one only slightly modified the text from a colleague... This is all not wrong in itself, however at times due diligence was lacking; whole chapters copied without even changing the name of the places, and sometimes things that may have been relevant for place 1 are simply copied to place 2 where they are not relevant!

This devalues the provided documentation; the whole undertaking gets the character of “tick the box” exercises!

- But then it gets ugly, and we are back to the “cheat and lie!” mantra: The engineers very cleverly leave out facts or basically lie about them when it might go against them. We have repeatedly stated that the **multiplying effects** of so many turbines in such a restrained area are not adequately considered, and it appears that the engineers see that, too. So as an example from the Ballycar application, first, it states “*The proposed development would positively cumulate with other wind farm developments in the region to advance in delivering local, regional, and national Green Energy targets*”, an empty propaganda phrase, without any rhyme or reason. And then those “other” developments are listed: A single turbine in Parteen, another single turbine Vistacon existing (but they will not say where – is it the single turbine in Castletroy, Limerick? An educated guess from the associated map...), a permitted but not constructed development at Castlewaller (We have to guess again – is this a planned development in Tipperary of 16 turbines, somewhere east of Newport, by ABO Wind?), the planned Carrownagowan Windfarm (currently under judicial review) together with the planned GRID connection for that (also opposed by us, and a number of others), and the planned development at Fahybeg (also under judicial review). They “forget” **Lackareagh** (neighboring Fahybeg), but most appallingly they “forget” to mention **Oatfield Windfarm** and **Knockshanvo Windfarm** virtually across the road from them, and in view of their own plans to share some of their GRID connection to the existing overhead line into Ardnacrusha with the Oatfield Windfarm. Why not mentioning those when discussing cumulative effects? It’s obvious – if they did, even the last observer would recognize the amassment of turbines in a very confined space! And question multiplying effects of the same... We find the same approach in the Knockshanvo application: During the Clinic, a map of the wider area of East Clare was showing the other planned windfarms, but interestingly the directly neighbouring planned Oatfield Windfarm was completely missing, which changes the picture around the 12 o’clock Hills and Gortacullin Bog significantly. The lame excuse that we got was that they did not know that there was a final layout from Orsted. But Orsted filed their application for planning with ABP less than 4 weeks after that clinic, as ABP 318782! Again, this was no genuine mistake, nothing was overlooked; this was **deceit with intent**, in order to make the amassment of turbines in a small space not too obvious, and avoid discussion about possible multiplying effects, during construction and during operation.

The so-called Community Benefit Fund as an example for Cheat&Lie

- The **RESS** approach (2€ per MWh generated by the turbines should go to a – unfortunately only vaguely defined. Who exactly is that; who belongs and who doesn’t? – “**local community**”, but only for years 2 to 14 of the lifetime of these turbines! And of course no adjustment due to Inflation or any other changes...) is always quoted when outlining so-called “community benefits” (Community Benefit Fund etc.; where “compensation funds” would be a more honest phrase...) Developers very often ignored the facts and conditions around RESS, and painted a completely unrealistic picture for the locals, telling everybody what they want to hear. (Significant amounts of money, free dry-lining of house, free triple-glassing, free electricity for life and other promises were made to locals around the planned Carrownagowan Windfarm. Later on, again huge amounts of money – a total pie in the sky! - were promised, and schemes to best avoid tax on those were publicly discussed, with tax advisors provided by the developer!). There was a rough awakening for those who listened to those promises! The windfarm lobby (Windenergy Ireland) calls RESS a fantastic scheme; everything in the responsibility of the community, and the community takes it into their own hand to “better the life of everybody”. They deny that in terms of possible recipients, non-profit community enterprises within a radius of 20km around the turbine are the potential beneficiaries; not

necessarily what most people would consider “local”. The lobby also does not mention the restrictions that RESS provides by law, the money in large parts going to not-for-profit community enterprises whose primary focus or aim is the promotion of initiatives towards the delivery of the UN Sustainable Development Goals – these do not include sports (or a new roof for the local church etc.)

- There is one important aspect of the RESS scheme remaining that developer and lobby will always overlook. The **onus for this work (locally) is completely on that “local community”**, in other words on a few individuals who – on a voluntary basis!! – agree to accept the responsibility to manage the incoming money / fund, inform the other locals about the possibility to apply for grants from that fund, assess and evaluate the incoming application, make a decision based on criteria they still have to develop, and then distribute the money accordingly. Who would volunteer for this role? There will never be satisfaction across the community about the way the money is distributed, because there will always be winners and losers in the community. Remember the money is not in endless supply. The community will be torn apart, and the individuals volunteering will likely become pariahs in the community, because whatever they do, it will alienate some. The onus on individuals (especially on a voluntary basis!) and on little communities to take up the distribution of the RESS money for themselves is much too much; therefore it is not a “fantastic scheme”, but a dazzler, in favour of the developers!
- One thing about RESS should also not be forgotten: The so called “Community Fund” is basically tax payers getting their own money back because windfarms are so heavily subsidised! See, for example, https://en.m.wikipedia.org/wiki/Wind_power_in_Ireland# on this topic. Ireland uses an EU industry subsidy known as the Public Service Obligation PSO to support development of wind and other domestic power generation. That was for example levied at €72 per year per household for a time. In the 2016/17 period, €308 million raised through this levy was planned to be granted to supporting domestic renewable energy schemes.
- Both developers and lobby ignore or laugh at the fact that local people state “**Our health is not for sale!**” and are not interested in compensation like RESS schemes, because they value their health higher than any compensation... Especially the mental health of people involved is put under serious strain.

Developers do not fulfil their legal obligations towards Locals

- The windfarm developers and their lobby are aggressively campaigning for their Windfarms, and in doing so are not backing off from twisting the truth and outright lies, on a massive scale. This happens contrary to common sense, ignoring of facts, and against what ought to be their better knowledge. And every method is acceptable to this end. So the use of fossil fuel (diesel, see above) to keep wind turbines turning is categorically denied, contrary to the evidence worldwide that is apparent! Lobby’s statements that no reputable scientist would see any danger from Infrasound, for example, are completely wrong, and offensive towards internationally renowned researchers from the University of Lisbon, Portugal, or the University of Mainz, Germany, or institutions like the International Acoustics Research Organization or the International Congress on Sound and Vibration, who all prove the contrary. Or take the following relatively recent article from Deutsches Ärzteblatt, which is the leading regular publication amongst German speaking medical personnel (doctors) - <https://www.aerzteblatt.de/archiv/205246/Windenergieanlagen-und-Infraschall-Der-Schall-den-man-nicht-hoe-rt>, Infrasound exists, turbines produce Infrasound, and Infrasound is making living creatures sick! So the lobby’s statements are indefensible in view of the massive amount of (scientifically researched and empirical) data on negative effects of infrasound from wind turbines. The developers claim to be on top of the research, and they claim to be experts in

the field of their wind turbines, so their statements around Infrasound are contrary to what has to be their better knowledge.

- On top of all the denying, ignoring and twisting the truth by the developers and their lobbies, when brought to court by people suffering from infrasound, for example, they usually relatively quickly settle (out of court). They deny liability, but spend hundred thousands of Euros to appease the claimant. Weird, isn't it? See <https://www.thejournal.ie/high-court-siblings-settle-wind-farm-action-5021713-Feb2020/> as a relatively recent example from Ireland! But the same behaviour is omnipresent all over the world; countless cases from Europe, Canada, Australia for example are documented!
- One example of twisting facts and fabricating their "alternate reality": Windenergy Ireland spokesperson on the local radio Clare FM (24th Nov 2023, the Morning Focus program) - see <https://soundcloud.com/clarefm/claim-clare-wind-farm-projects-are-vital-to-reduce-energy-bills> – during an interview, quotes a survey carried out by an (alleged) independent body, SEAI, which looked at the experience of people living next to existing windfarms, who have gone through the whole process of planning, constructing, and operating of windfarms. He claims 72% of them are allegedly positive about wind energy, and are calling for more windfarms, not fewer. These statements are the height of nonsense! First of all, calling SEAI an independent body is a stretch; for example the head of Renewable Energies there was Community Engagement person with Coillte, on the Carrownagowan windfarm project in East Clare, before he took up his current role. "Conflict of Interests" might be a more fitting description than "independent"... The study itself is questionable. The study doesn't have any names of the people who supposedly conducted it, doesn't show any peer review, there is no information on the size of the group being interviewed. The reader does not know what questions were asked, and by whom and to whom exactly, and there is no insight into the actual answers. So an assessment "positive" remains very questionable. The "results" of this study can only be judged as being totally unreliable. When trying to gain more insight and contacting SEAI, the Windfarm Opposition Alliance was informed that the people conducting the study selected 50 unnamed sites for planned windfarm and solar projects all over Ireland, and knocked randomly at some doors there. (It remains a mystery how many actual people participated; however a map of Ireland provided by them shows significantly over 3 times more planned solar project sites were surveyed than planned windfarm sites). The important overall key word is "sites for planned..." And the results (copied from the study, Chapter 4.3 Results say the following:

4.3 Results: Attitude to local wind and solar project

- 72% of those <1km from a RESS1 site felt positive or very positive towards known local solar projects
- 85% of respondents between 2km and 5km from a RESS1 site felt positive or very positive towards known local solar projects
- 66% of those <1km from a RESS1 site (who did not know of a project under development) felt positive or very positive towards a *hypothetical* local solar project, a similar majority held regardless of distance to the RESS1 project
- Please note this carefully! Although the heading says "...local wind and solar project", the two "results" shown are talking "**solar projects**" only, distinguishing between "known" and "hypothetical" **planned solar projects**. And the spokesperson from Windenergy Ireland quotes this survey to "prove" his claims about positive feedback from abutters of operating windfarms. This is an **unbelievable perversion of facts, heavy propaganda**, and to be sharply rebated. The real attitude of people towards operating windfarms can be found all over the place, for example the Cloghan residents (Offaly) in November 2023, who stated that the local windfarm is affecting their mental and physical health!

<https://www.offalyexpress.ie/news/midland-tribune/1354182/offaly-residents-are-worried-about-wind-farm-s-effect-on-their-health.html>

- Similar resentments can be found here: <https://droghedalife.com/news/residents-express-shock-and-horror-as-windfarm-plans-go-on-display> A quote from this article, very much in line with what the Cloghan residents said, is this: **"We are now living in an industrial area. Peaceful country life is becoming a thing of the past."**
- The same can be found also from our own country; see <https://clarechampion.ie/garda-presence-at-windfarm-consultation-leaves-sour-taste> on Kilbane, and find the below article in the Clare Champion of November 2020. It gives testimony to what people are going through, living in close proximity to windfarms. See <https://clarechampion.ie/huge-number-of-objections-to-west-clare-windfarm/> A remarkable quote from that article is "...**So-called windfarms destroy habitats, not only for birds** ..." And the Internet is full of similar reports; positive remarks are hardly to be found! The spokesperson from Windenergy Ireland, after those false claims, called the Windfarm Opposition Alliance a very small minority, standing against the clear interest of the vast majority of the Irish People; this can only be considered an **absolute impertinence** on his part! The East Clare Windfarm Opposition Alliance voices the concern of many people in this county, and we are not alone! In May 2024, for example, we met with countless other opposition groups in Dublin, to take the protest against Onshore Windfarms and the lack of proper and suitable Guidelines to the Dáil in Dublin; see <https://clarechampion.ie/clare-windfarm-group-ta-kesprotest-to-dublin/>

Will developers be "rewarded" for their own misbehaviour?

Finally, our experience of the last almost seven years with dealing with the developers, research, observations and submissions to Clare County Council and An Bord Pleanála, surveys, studies, reports etc., we are left with the feeling that developers are being favoured. This is no "level playing field"; we are far from "Equality of Arms", a principle within Irish Law, and we do not feel that we are treated fairly! Very good examples for this are the Carrownagowan submission, where huge gaps didn't lead to a rejection of the planning application, but a granting of another full year (!!!) to the developer to fill in gaps, come up with new reports, muddy the waters and the works. The same is happening again regarding the mentioned extra time granted to the developer of the planned Ballycar windfarm (Meelick), to work on the significant safety risks for aviation security around Shannon Airport through the planned turbines. No rejection, but extra time for the developers, to provide more and more pages of apparently scientific reports and statements, when the local objectors only get one shot, within a very limited time frame, and no second chance, and no concessions whatever. This is grossly unfair!

- We have a real issue with some of the developers of windfarms, in relation to the **County Development Plan and the Climate Action Plan of Clare County Council**. Take the example of developer Coillte, semi-state owned (now working as FuturEnergy, together with ESB). They were mainly working as a forestry company until very recently. This company, over decades, has practised business in an **unsustainable and un-ecological way in Clare**; planting fast-growing softwood (Sitka spruce) **alien** to the area, with quick gain in mind, and **destroying local peat bogs** and upper blanket bogs through use of heavy machinery and through **poisoning** the area with spraying for that softwood. **Biodiversity** was badly put at risk by Coillte over decades. Often Coillte would **ignore Planning Law** and the need for Environmental Impact Assessment Reports **EIAR** when building roads and fire aisles for their convenience on the land that was practically given to them by the state, as for example around Moylussa, back in 1959! If the same developer now argues that a given peat bog is

“not so good” (anymore, after the heavy forestry work on the land), and might as well be used for a windfarm, going forward, giving them the green light would only be “the icing on the cake”, in anybody’s view. The idea of rewarding the same company that previously destroyed an area in a malicious way (with only making money in mind!), with now giving them planning permission to further destroy the area with windfarms (and make much more money) – it leaves one speechless! Coillte was singled out because they appear to be involved with most of the planned windfarms in East Clare. However, the other trusts (big foreign trusts like the German RWE in Bridgetown – known to be the **biggest polluter in Europe** with their continued use of brown coal, destroying massive territory in Germany – or the big French trust EDF in Kilbane, or the big Danish trust Orsted in Oatfield – who publicly declared they would turn away from Offshore Windfarms, because there was not enough “quick money” for them in that approach, in contrast to Onshore Windfarms. They went as far as to cut jobs and return on investment on their shares (dividends) in their American Offshore plans, since they were not showered with money; see

<https://www.handelsblatt.com/unternehmen/energie/windparkentwickler-orsted-streicht-stellen-dividenden-und-investitionen/100013339.html>) – none of those trusts are any better. These foreign giants have difficulties building new Onshore Windfarms in their own countries (the significant protest against RWE in Germany in the last few years was very effective in parts!), because in some cases common sense prevailed, and those trusts and their plans were (at least temporarily) stopped! So their greedy eyes now turned on Irish Soil. We have to stop that; **this is not in the interest of the people of Ireland, and it is not in the interest of the climate!**

Arguments specifically against the planned Lackareagh Windfarm

The planned Lackareagh Windfarm is woefully displaced where it is planned, in close proximity to the Slieve Bernagh Special Area of Conservation **SAC** and the Lough Derg Special protection area **SPA**, right on the western slope of Moylussa (the highest mountain in Clare, and a very popular hiking area) and the slopes of the Slieve Bernagh mountain range. This is a very picturesque area and at the heart of the unspoilt beauty that East Clare has to offer.

This area is not even considered as an area for an Industrial Windfarm; even the Clare County Council plan (see above) only zoned the area as “**open to considerations**” regarding Wind Farms. The developer EDF dwells on this phrase in their document, and it quickly becomes evident how they interpret the “open for considerations” – for them it’s solely a question how “suitable” an area is for a windfarm, from a commercial point of view (how much does the wind blow there). If they believe an area has enough wind to fuel their turbines and in consequence fill their pockets with cash, their “considerations” are finished, and that becomes very evident here again. There are no real consideration about Heritage, about Visual Amenities, about unspoilt nature, about gentle Tourism, about suitable Infrastructure that can take construction traffic, about a true balance between Industrial Areas and Residential / Recreational Areas (which by nature do not mix), and real considerations about Biodiversity, Wild Life, protected species etc – it’s all about the profit!

Even the “open for considerations” assessment of the Lackareagh area in itself is very debatable, as we mentioned above repeatedly. Clare County Council in their meetings in February and March 2024 came to the conclusion that the size/height of the turbine and the planned number in this area were far from what they had in mind when designing suitable areas for onshore windfarms; keeping in mind that the area of the planned Lackareagh Windfarm is explicitly not included in those!!! The zoning (from 2009) was repeatedly called “outdated” and needing a revision; a possible rezoning of the whole area of East Clare as unsuitable for Windfarms is in the cards.

There is a quote from the Application Cover Letter (from EDF and their supporting engineers bureau MKO) to Clare County Council that sets the tone for everything that is to come from the developer:

“The proposed development is strongly supported in principle by EU and national policy and legislation relating to increasing the delivery of renewable energy, improving energy security and reducing carbon emissions.”

Nicely put – “strongly supported in principle by EU and national policy and legislation”, when the truth is the following:

- This proposed development is in **direct conflict** with European Law and National Law designing the Special Area of Conservation **SAC** of Slieve Bernagh
- This proposed development is in **direct conflict** with European Law and National Law designing the Special Protection Area **SPA** Lough Derg.
- This proposed development is in **direct conflict** with the Clare County Council **Development Plan**
- This proposed development does not demonstrate due consideration to both the **Water Framework Directive** and the **Habitats Directive**, both under European and National Law.
- The proposed development is a **direct attack on the health and well-being** of the creatures (people / livestock / wildlife) in the area, and those seeking recreation around the area.
- Many more points could follow here, but we will refrain from repeating ourselves...

This gives the whole undertaking of having to struggle through the documents provided by the developer a difficult start – a strong statement like the above that is uttermost wrong! It continues along those lines; a further quote being “*It is submitted that the proposed development is in compliance with the provisions of the Clare County Development Plan 2022-2028.*” which is just as wrong, in view of the mentioned change in the attitude of Clare County Council in early 2024, when they clearly asked for a **moratorium on all Onshore Windfarms in Clare**, and expressed their anger at the size and number of turbines now planned for the East Clare area by the developers, which is clearly not what they had in mind when designing suitable areas for Onshore Wind. And keep in mind, Lackareagh is outside of the area that Clare County Council called ‘strategic’ or ‘acceptable in principle’ already at the time (2009), let alone these days when a rezoning of the whole area of East Clare as “not permissible” for windfarms is on the horizon!

As an Observer / Submitter to a planned development, an individual faces an uphill battle that can only be called unfair. We will refrain from criticising the Irish Planning System in its entirety, but we have to mention (and repeat what we said above) that the process is highly unbalanced – on the one hand a big developer, with unlimited resources, highly skilled and motivated employees (engineers etc.), working on their planned development project for as long as they deem appropriate, have every resource at their fingertip, produce literally thousands of pages of (partly) scientific descriptions (lots of which are copied and pasted from one development to another, with or without some minor adjustment. But an observer has to take that all in), with all the time in the world to add/amend/adjust later on, versus a bunch of individuals, without any additional funds to spend on experts, lawyers, and others, who are in real fear for their health / their lives / their properties / their livestock / the surroundings with water, peat, wildlife, their Heritage and so on, but have their life to live, and are now burdened with having to show their opposition to the development, and they are given 4 weeks (or a little more, if the case is with ABP) for that one shot that they have to raise their voices against a development that they see as detrimental! We, the authors, raised our voice against all of the planned Windfarm in East Clare (for good reasons, as we believe!), and we faced the difficulties mentioned above – plough through thousands of pages (and find something you would like to comment on, because it is inherently wrong, on many of those pages...), and come up with something meaningful. In this chapter, we will pick out a few of the “Lackareagh specific” topics and items, after analysing some of the documents as published under www.eplanning.ie/ClareCC under 2460411 (and on An Bord Pleanála website www.pleanala.ie, under 321285); specifically – in no specific order – the Application Letter and Introduction, Non-Technical Summary, Grid Construction Method, Community Report, Traffic Management Plan, Noise and Vibration, Photomontages, and a number of others. Some of our comments may be a repetition from what we said above, some are unique to the Lackareagh development.

Visual obstruction

Application to erect a dwelling house and garage in the same area as now envisaged for the Windfarm was recently rejected, as a visually obstructive feature in the landscape, resulting in the dwelling to be clearly visible from a wider area; this was decided as being contrary to the Clare County development plan, as it would seriously injure the visual amenities of the area. This was a decision about a planned dwelling house, probably 7m in height. But turbines of nearly 200m in height are to be considered in order? This is completely unacceptable! See the many “Photo-montage” documents provided with the application...

The R466 alongside the planned Wind Farm site is explicitly designed a **Tourist Route or Scenic Road**, and the turbines would negatively alter the character of this rural landscape. The proposed turbine structures, by reason of their height, scale and siting on this open and exposed upland landscape would constitute a prominent feature on the landscape from both local and long range

viewpoints. The turbines would seriously injure the visual amenities of the area, contrary to the Clare County Development Plan.

SAC and SPA

We commented on the importance of **SAC** and **SPA**, designed under **European Law**, and especially the “**in or near**” condition above. There is one topic that needs to be mentioned in connection with the SAC; that is the usage of lead (the chemical element!). We could not find any specification what materials are being used in the cables, pipes, cable joints etc that are planned to be put into the ground for the planned GRID connection and for the connections within the planned farm; however it would not be uncommon if lead was being used, if only as ballast to keep cables down. Local hunters tell me that it is an offense to have lead shot within 150meters of a SPA or SAC in Ireland, and rightly so, because lead has some naughty (poisonous) characteristics. If this risk was even identified by the developer, the mitigation surely would be “adhering to best practices during construction” etc as usual (and this is as evasive and offensive, as usual, in our opinion!). However, as mentioned, the usage of lead in construction is far from unusual, on the contrary. This is one of the reasons why normally there would not be permission to build anything in a SAC or a SPA; like those designed under European Law in this area, as previously mentioned! So yet again the subordination of the protection of nature (the SAC and SPA, in this case) under monetary interest of a developer would be a hot topic here. We want this stopped, and protection of nature (under European Law, as in the definition of the different SAC and SPA in the area; specifically for the Slieve Bernagh SAC and the Glenomra SAC, and the Lough Derg SPA that borders the area of Carrownagowan and Lackareagh Windfarms, as described above) that are all being impacted by the Lackareagh plans, being taken seriously!

Biodiversity

Generally speaking, as appears to be usual with those Windfarm Developers, due consideration to both the water frameworks directive and the habitats directive has not been demonstrated in the EIAR or the Natura Impact Statement documents, nor was there anything convincing during the so-called “public consultations” or “clinics”.

Biodiversity is put unduly at risk in the area. There will be significant excavation necessary, first for the planned temporary mast, and later for the planned turbines and all associated buildings (permanent mast etc.) and the GRID connection, especially given the character of the area as an upland Peat Bog, which in itself is woefully unsuitable for a wind farm! The huge amount of concrete necessary for foundation (see above, in the “general” part), and the management of the substantial volume of excavated soils and materials during construction poses substantial risks to the water management and a big risk of contamination of the water flows in the area, both surface and subterranean, with potentially huge consequences on the water management around Lough Derg and the Lower Shannon. This is a breach of **European Communities Environmental Objectives Regulations**.

Beginning with the planned temporary mast, and increasingly more so with the turbines to follow, **Biodiversity is put at risk**, and the **biodiversity value of the area is degraded**, contrary to the Clare County Development Plan. The proximity to multiple SAC and SPA (designed under European Law, as stated above) around Slieve Bernagh and Moylussa rules out this area as suitable for industrial wind turbines, with regards to flora and fauna of the area.

The EIAR states „Where loss of habitat occurs in the site, this has been mitigated with the proposal of habitat enhancement and improved habitat connectivity with hedgerow replanting within the Proposed

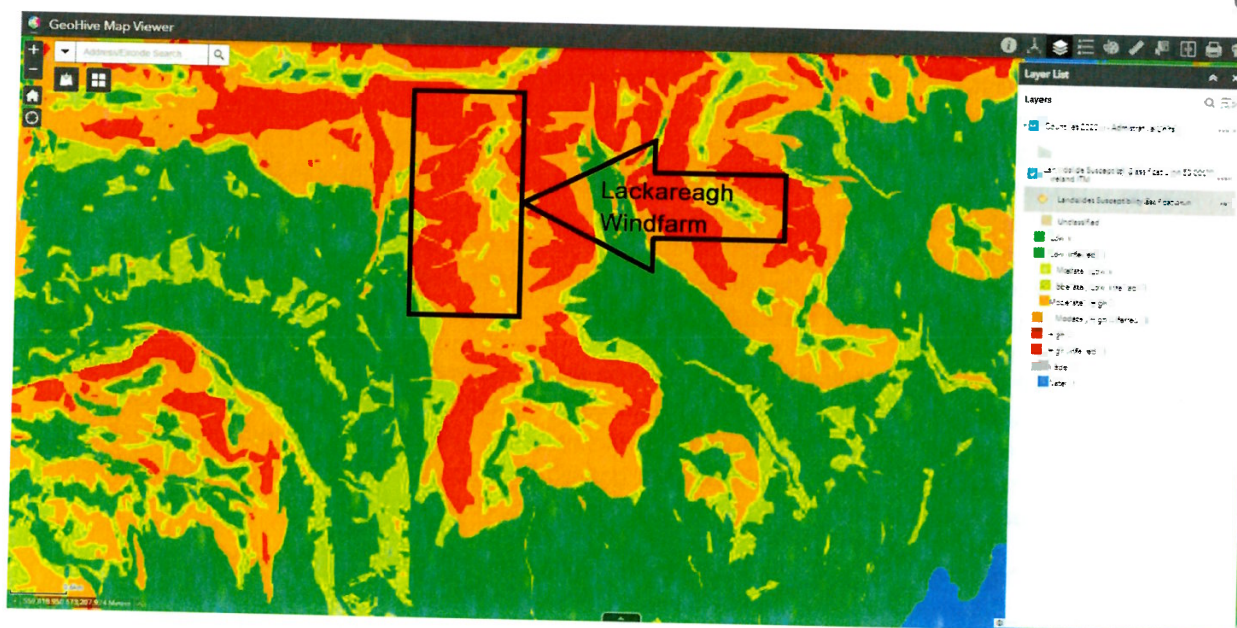
Wind Farm site", listed under „Alternative Mitigation Measures". We consider this to be pure cynicism, and simply ridiculous in itself. They will cut countless trees, remove hedges, destroy habitats, bulldoze concrete roads into the landscape, sink huge amount of concrete into the peat, and then want to make good by planting a few hedges next to turning blades. The wild birds will love that... But the following chapter on Population and Human Health in the Non Technical Summary tops all that. The dangers through Infrasound / low frequency noise, the evidence of sleep deprivation and making people sick are not even mentioned, the dangers from noise (explicitly considered under the 2006 guidelines, again) and shadow flicker belittled, the visual amenities basically laughed at. Proposed mitigation measures are insufficient and unsuccessful, as usual.

The whole issue of Biodiversity is treated in the same superficial way – bats, badgers, and others are mentioned, but „nature will adjust" is the obviously underlying belief. The vicinity to SPA and protected wild birds is not even mentioned. Influences on water are being ignored and belittled. The habitats directives and the water framework directives are ignored. Due consideration to any of those directives has not been demonstrated in the EIAR or the Natura Impact Statement.

We read about "sections of peat land and recently felled woodland, degraded blanket bog and agricultural lands", where the GRID connection will run through. (Interestingly, this whole description appears to be Copy and Paste from the aforementioned application for the Carrownagowan Windfarm GRID connection. The whole thing looks very familiar in parts...) Peat - isn't that the big CO2 sink, that should be left intact? This does not get mentioned, of course. As to the "Recently felled woodland, degraded blanket bog" – the question comes up who "destroyed" that land, through unsustainable and un-ecological forestry work, with planting (and spraying/poisoning the surroundings) fast-growing softwood that is alien to the area, in the interest of quick revenue? The answer is simple - it was Coillte, who now under the new disguise as "FuturEnergy" are working closely with EDF on their planned neighboring windfarms and their GRID connections. Both now want to dig up the ground, for their GRID connections... They state "drains being deepened and roadside hedgerows being cut back, this practice reducing ecological value." One has to wonder - what will their excavation do? Remember the big machinery and trucks needed; but their contribution to these un-ecological "activities" is not even mentioned. Badgers, pine marten, stoat, hare, red squirrel and others are being mentioned, and evaluated as of local importance in the development area. But they nonchalantly conclude - no importance to our construction plans! Birds are also described as being of local importance, and the same for the frogs. It is then adhered to that habitats are put in danger, noise will impact the wildlife, water quality change may affect the animals, but all in all effects are only considered "slightly negative" on wildlife, mainly during construction but some during maintenance also. But they don't consider this relevant, and some blabber on best practices that will be followed. Same as everywhere – the protection of flora and fauna is not taken seriously by the developer, and definitely only second to the main purpose, which is maximizing profit! We believe that Biodiversity is put at risk, and the biodiversity value of the area is degraded, contrary to the Clare County Development Plan.

The Glenomra River has been identified as "At Risk" by The Local Authority Waters Program (LAWPRO) and as a single water-body Priority Area for Action (Broadford_010) in East Clare; see

<https://irishriverproject.com/wp-content/uploads/2022/03/Broadford-PAA-Desk-Study-F02.pdf>



Due to the hydrological characteristics of the peat land located within the site, areas within the proposed "Lackareagh Windfarm" (as much as the Carrownagowan and the Fahybeg sites!) site have been assigned the highest level of risk for Landslide Susceptibility; see <https://webapps.geohive.ie/mapviewer/index.html> To give any consideration to a project of this nature at this site would be nonsensical and end up with a repeat of the Meenbog and Derrybrien environmental catastrophes that were mentioned above.

Clare County Council, in their rejection of the planned Fahybeg Windfarm (which was inexplicably not upheld by ABP), rightly highlighted the many possible adverse effects on the biodiversity of the wider area due to the proposed Fahybeg Windfarm (and remember Lackareagh borders Fahybeg, so the assessment is true in the same way for the Lackareagh Windfarm!!!) in the following reason for refusal:

"It is an objective of Clare County Council, under Objective CDP15.12 of the Clare County Development Plan 2023-2029 to inter alia to promote the conservation of biodiversity through the protection of sites of biodiversity importance and wildlife corridors, both within and between the designated site and the wider plan area."

Having regard to the species and habitats data submitted with the application, the high level of usage of the site by multiple animals (including bats) and bird species, the particular biodiversity value of Ballymoloney Wood, and the likely impacts of the proposed development on same, the Planning Authority considers that the proposed development would significantly diminish the biodiversity value of the area, would be contrary to Objective CDP15.12 of the Clare County Development Plan 2023-2029 and would be contrary to the proper planning and sustainable development of the area.

Also take note of the existing submissions against the Fahybeg Windfarm in Bridgetown; ours is to be found with **ABP 317227**. On top of the accumulating negative effects of Carrownagowan Windfarm and Lackareagh Windfarm due to their being close together, keep in mind that due to the extremely close proximity of the Lackareagh Windfarm site to the planned Fahybeg site as can be seen in the 500m/2km buffer area shown below, it is obvious that the many highlighted possible adverse effects on the biodiversity of the area due to the Fahybeg Windfarm would be mirrored by the proposed Lackareagh Windfarm.

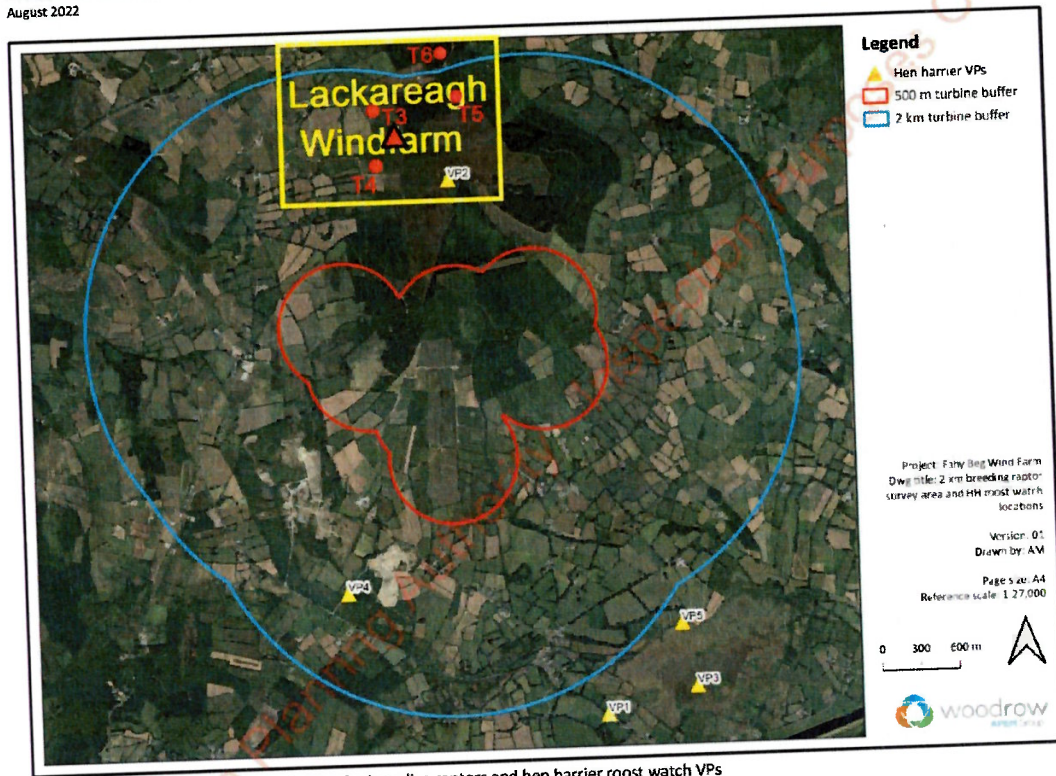


Figure 2: Survey area (2 km turbine buffer) for breeding raptors and hen harrier roost watch VPs

11

In some instances, the impact could even be greater than anticipated for Fahybeg; that is especially true for the nesting Hen Harriers in the neighboring area of Carrownagowan. The results of the breeding season surveys completed, suggest that the area around Slieve Bernagh and wider surroundings (which fully covers Lackareagh, Fahybeg and Carrownagowan planned Windfarms) are important for breeding hen harrier. Hen harriers have been recorded breeding within the area, with an estimated three breeding pair within 5km of the both Carrownagowan and Lackareagh planned sites. Remember the surveyed Hen Harrier around Slieve Bernagh are considered of international importance, and are about 5% of the national population!

Cultural Heritage

This has to be briefly mentioned, without deep-diving into the topic; submissions from others on the same topic will be much more elaborate. Kilbane Bridge is in the middle of the planned delivery route for the whole construction traffic and for the turbine delivery, and furthermore part of the planned Grid Route. "Mitigation" for all the risks associated with this building for the GRID connection (this is from the EIAR of the Carrownagowan GRID connection application, but it is copied by EDF), according to developer, is the following: "directionally drilled to a depth of 1.5m, therefore there are no predicted direct impacts to the Protected Structure" This remains extremely questionable! And the question of construction and delivery traffic over this bridge for the Windfarm remains completely unanswered.

Remember there are no alternative routes! The area is full of national heritage; the developers are passing through zones of notification for recorded monuments. They admit that for example during excavation for the GRID connection, impact may range from moderate negative to profound negative; the same is stated for excavation on undeveloped land. However, a suitable mitigation is not offered, other than "monitoring by a suitable archaeologist". The challenges around Ballyquin House and the bridge in Kilbane (those are listed buildings!) are simply swept aside and not given due consideration, and again without any proper mitigation offered. And remember, local sanctuaries (Holy Wells, Megalithic Tombs, and similar places) that are all part of the local heritage, and are especially part of the culture of the area; those are not even considered or mentioned, but significantly put at risk through the planned work.

Traffic

Traffic in this region is a big problem, and the accumulating effects from the various plans around wind farms in this very confined space prove that. Here is an excerpt from the EIAR Section for the planned Wind farm in Fahybeg (Bridgetown, developer RWE from Germany, but Coillte/FuturEnergy, according to their own allegations, are also involved, and EDF work closely with RWE!!), just a stone's throw down the R466 from the planned GRID work for Carrownagowan; this development of Fahybeg was rightly rejected by Clare County Council, but on appeal with An Bord Pleanála, it was unbelievably granted permission, and is to our knowledge subject of a Judicial Review currently.

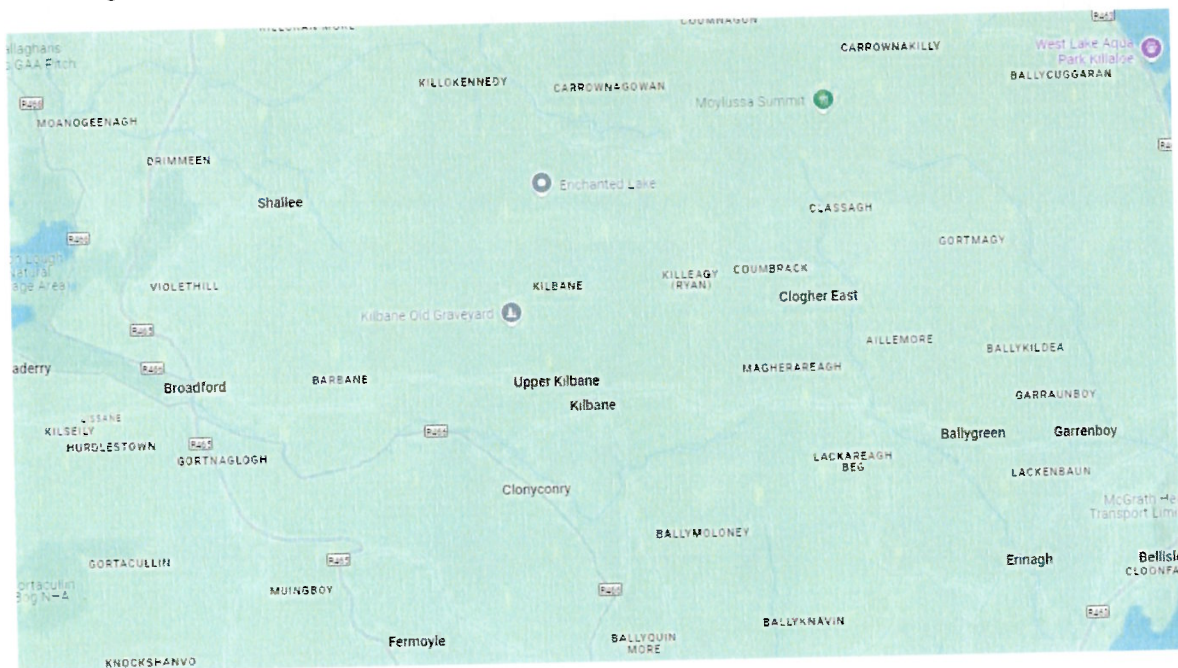
1. They cite the concurrent construction of the Carrownagowan Windfarm as a positive factor and as a result the impact on traffic on the R466 will be "minimized".
2. They "assume" that traffic associated with the grid connection works will follow "different roads".

The first claim is complete nonsense; how can a concurrent construction nearby minimize the impact on traffic? Will there be even one HGV less? On the contrary, we likely will have cumulative effects, through HGVs traveling to and from two destinations at the same time, instead of one. This is "bollox"; it really needs no further comment. The second claim (from EIAR Section 13.6.1 – They "assume" the traffic generated by the grid connection will follow "different roads") is really telling on the developers and their minions! No information or suggested routes have been supplied for the use of "different roads". It can be seen from the haul route mapping supplied by the developer in their application that there is no other route. Despite the fact that the grid connection route itself is a more direct route to the Wind Farm construction site, it has been avoided by the developer as a potential haul route because the local roads are obviously unsuitable for HGV traffic. It would be nonsensical to think, that at minimum, the first half of the grid connection route from the R466 to Harold's Cross will indeed be accessed, or at least have the potential to be accessed as a possible grid connection haul route along the R466 and appropriately, the associated potential HGV traffic should be included in any "worst case scenario" predictions. In short, there are significant cumulative effects from the different planning, in stark contrast to what the developers say.

The potential damage to the road network through the planned turbine transport (developer EDF really wants to use the completely unsuitable R466 and a few even less appropriate L-roads for that!!) and especially through the planned GRID connection in Ardnacrusha is being belittled in the EIAR. We explicitly refer to our submission against the GRID connection for the Carrownagowan Wind Farm (**ABP 318505**) where we deep-dive into the problems of the planned GRID connection: one being the **Glenomra Wood SAC**. We cannot and will not repeat everything here, but the same arguments remain valid! There are no alternative routes, the existing roads are unsuitable for the construction work and for the turbine delivery; the GRID connection plans will completely bring traffic to a standstill in East Clare, especially if seen in conjunction with the plans from all of the other developers. Please refer to our mentioned document for details. The GRID connection alone is estimated to take

approximately 6 months (which is likely unrealistic; for Carrownagowan 18 months were envisaged, for the same undertaking!), with frequent road closures, and at least 14 return trips of HGV (for Lackareagh Windfarm alone!) vehicles in the core hours 9 to 16 daily over completely unsuitable roads for this kind of traffic. This is a **total disregard for the health and safety of the abutters of those roads**; be it people or livestock. There are creches and Primary Schools directly on those roads; in the interest of those this traffic is to be rejected. No traffic management plan can mitigate the risks that these construction vehicles pose! Remember – there is the R466 and nothing else, and the neighboring developments of Fahybeg and Carrownagowan also have their greedy eyes on that road, arguing that other traffic „may find alternative roads“ (that are non-existent). This whole plan is in stark contrast to reality, and sweet-talking about traffic management plans etc does not change that!

Traffic indeed is a very special issue in this region. The roads around Kilbane are woefully unsuitable for the construction traffic.. Plainly speaking, there is one “main” road which is the R466, which in itself is a “country lane”; two ordinary cars are able to pass each other – with reduced speed and special care, mind you! – but passing of a car and a van / tractor / HGV already requires one of the vehicles to stop and wait for the other to pass, in most places. Two HGVs, for example, could not pass each other; one has to stop or even revert on many stretches of this road. And we repeat – this is the only “bigger” road in the area, the roads directly leading to the planned site (like the “Gap Road” towards Killaloe, are single-lane roads only, with soft edges in most places, grass growing in the middle, very few sidings where vehicles could pass; for all practical purposes those are no more than farm tracks!



The multiplying effects with other plans for Windfarms in the area, as discussed above, are not even considered yet. Developers “babble” about alternative routes etc. in their EIAR, if they even remotely consider traffic problems. But **there are no alternative routes in the area**. The expected traffic is an accident waiting to happen. The parts in the delivered EIAR are a completely unsuitable analysis of the traffic situation; see <https://clarecoco.eplanning.ie/iDocsWebDPSS/ViewFiles.aspx?docid=754467&format=djvu> . They appear to have only a very limited scope (mountain road). Some risks are listed, but no suitable mitigation is supplied. “Temporary traffic management measures...to minimize risk of conflict” is embellishment at best! The rest is not better!

We find it appropriate to repeat in parts what we put into another submission, against the planned GRID connection for the planned Carrownagowan Windfarm, which borders the area of the planned Lackareagh Windfarm, with the planned GRID connection going through Kilbane along the planned

routes for the construction traffic and the turbine delivery for Lackareagh (talk of “multiplying effects”...).

We tested some of the intended roads for the various construction traffic and specifically GRID connection, from Kilbane via local roads onto the R466, then onto Ballyquin More Road to Harold's Cross, and then R471 to a place past Truagh Church, in a sort of “field trip” (the part after Harold's Cross is not relevant for Lackareagh GRID connection, as they are continuing straight down that road to Ardnacrusha, past a Nursing Home, for example; however the road remains of the same character, and this does not change the picture) This is a part of the planned GRID route from Carrownagowan (and in part Lackareagh) of just over 9km in length; we were driving on a Friday around 11:30am, in dry weather and clear visibility. For the purpose of easier reading, we include a part of the map the developer provided, to visualize our route.



This is what we noted during our “field trip”:

- We were encountering one situation where we had to stop in a siding and let another vehicle pass, whilst on the stretch from Kilbane towards the R466.
- On the R466 we met two HGVs. Both were too wide to stay on “their” side of the road, as marked, and would drive over the middle line, occupying some (even if not much) space on “our” side of the road. In both cases we had to slow down significantly and keep very close to the left, almost landing in the ditch ourselves, to avoid a collision.
- On the stretch of Ballyquin More Road to Harold's Cross we were lucky – we only met two other vehicles. The first oncoming car (again, an ordinary car, not an SUV!) was nice and stopped in a siding, to let us pass. The second time, a little further down, we had to stop in a siding, to let an approaching car from the opposite direction pass. The road is one lane only!!!
- We then followed the R471 to the right, which is not relevant to Lackareagh GRID connection plans which continue straight ahead. We again met a number of different vehicle and had to stop, reverse, wait as before, to let the other pass. It simply remains to be said the road after Harold's Cross (which by the way is an accident spot, as visibility from both side of the

crossing R471 is very poor!) continues to be unsuitable for the planned undertaking; it remains a basically one-lane road, and not wide enough for HGVs, with houses left and right almost all the way! Also, there is a Nursing Home further down the road as mentioned, a very sharp bend onto the R463, and a very unsuitable bridge directly following that bend; everything woefully inadequate for HGV traffic!.

This is the reality on these roads today, without construction traffic for Wind Farms or GRID connections etc. **These roads are not suitable to take extra traffic;** they are kind of "OK" for the traffic there is, if and only if all participants on the road show some foresightedness and some behavior based on thoughtfulness and partnership, instead of Formula 1 like ego-trips and a law of "the strongest wins!" on the road. We have to repeat ourselves here – those roads are not suitable to take the necessary construction traffic for the GRID and accept periods of partial and total blockage. There are no alternatives for drivers available, and the plans will inevitably result in chaos for traffic, and very likely in accidents, so the undertaking to lay down the GRID connection for the Lackareagh Wind Farm (plus the Carrownagowan Wind Farm and the Fahybeg Windfarm on top, along the same routes!!!) presents a very high risk to the health and well being of the locals and the people traversing the area during construction.

No "traffic management plans" can mitigate these risks! The best "proof" for that is the traffic around Killaloe, caused by the building of the new Shannon Crossing and the Bypass of the town itself. Now ongoing for almost 2 years (with probably another year ahead), this whole thing is a nightmare! We mentioned it in the "general" session above, but it is prudent to repeat a few highlights here:

- Look into the traffic situation at certain hours of the day (school run, for a number of adjacent schools, primary and secondary schools) that is the situation in Killaloe itself – chaos! And the bad temper resulting in unsuitable behavior on the road is visibly rising! We have seen strange behaviors, like aggressively pushing ahead into a bottleneck and forcing the oncoming traffic to stop, reverse, or even drive partly across the pedestrian's pathway. We will not even mention the frequent ignoring of red traffic lights, both at the "normal" traffic lights at the bridge, and at the construction sites themselves...
- Look at the situation on the R463 towards Limerick. This is the main road from this part of East Clare into Limerick, via Ardnacrusha and Parteen (and part of the planned delivery route of the turbines to Lackareagh). This road is not wide enough for HGVs, busses, and a lot of tractor trailers, as it is. Those vehicles inevitably cross the middle line when driving, simply because there is not enough space on their lane. The road is curvy, sometimes the curves are sharper than you may have anticipated, and the road is not very wide, as stated, so the "possible" 80km/h speed is very theoretical in some parts. Through the construction traffic, there are countless pot holes and other damages to the road like soft edges in places, meanwhile, also culverts and drainage blocked, so water is logged on the streets! All this is adding to the difficulties of driving there, plus the dirt which – in suitable Irish weather – pollutes the road, and makes it slippery and very treacherous, at least as far as Ardnacrusha.
- But the worst things are the HGVs for the construction traffic. We assume the drivers are under a lot of pressure, time-wise, to either deliver material, or bring away material and return empty to the construction. Without wanting to blame anybody personally (there may be exceptions, but our observation unfortunately is different!), the driving of those HGVs on R463 from Killaloe to Ardnacrusha in general is atrocious. As stated, the HGVs are too wide for the road (not fitting into one lane) for almost all of the way, but they cut corners at liberty, and go at speeds that are totally improper, obviously exceeding the maximum of 80km/h on some straight stretches. This exceeding of the maximum permitted speed also happens on the long stretch into Killaloe (roughly from the townland of Cloonfadda, down to the townland of Cloverfield, just before the temporary traffic lights for the construction); there is a speed limit of 60km/h. With many residential buildings and at least two crèches and one commercial used building on it, this is a potential black spot for accidents; regardless the speed limit is not observed, generally speaking, and especially not by the construction HGVs. It is nothing short

of a miracle that we have not seen many serious accidents with severely injured or even killed road users there yet; however only in February 2024 there was a serious collision of two vehicles there; 3 people had to be hospitalized! There is reckless driving to be blamed, no arguments here, but the construction works add big time to the problems (or cause them, for all practical purposes), with the permanent hold-ups through temporary traffic lights, the dirt on the roads, the long queues everywhere, and the rising temper associated with all that, leading to an extremely aggressive behaviour on the roads. No traffic management plan in the world will be able to mitigate the risks for individuals having to use these roads, with the construction traffic ongoing!

- Note that we never mentioned cyclists or pedestrians – for them using this road is almost a suicide mission!
- Every time we drive along this road, we would witness near-misses, accidents avoided not through skilled driving, but through sheer luck!

Our “field trip” as described and the experiences on the R463 (which is nearby to Lackareagh, and planned to be used for turbine transport and construction traffic) give us a stark warning about the reality on the ground – the roads of East Clare (here especially the R466), and the rural roads around the planned windfarms are absolutely **not suitable for the planned construction traffic and transportation traffic**. There is a **very high risk for human health and population** (but also for livestock and wildlife!) through the planned traffic, and a suggested mitigation like “traffic management plan will be in place” is not only completely unsuitable, but a mockery of the worries of residents in the wider area. And remember, **there are no alternative routes available!**

Drop in House Prices

A deterioration in house prices and general Real Estate is to be expected, as everywhere around Windfarms world-wide. The developers have a somewhat weird and cynical view on the whole matter. <https://clarecoco.eplanning.ie/iDocsWebDPSS/ViewFiles.aspx?docid=754483&format=djvu> is provided by the developer on the topic. This is more of a mockery than a study! How can they come to the conclusion: “No evidence of a consistent negative effect on house prices” – when there are countless worldwide studies to the contrary (from very reliable sources, and not limited to some obscure thinly populated place in Scotland); we quoted a few above in the general section! They admit to some very specific effects due to the study location in Scotland (it is nowhere shown or even discussed that the same applies to the East Clare area and Lackareagh specifically!), and admit “The results vary across different regions of Scotland”, but their data is too limited to provide information on the reasons for this. Again, this is whitewash and blabber at best, but not trust-building or worthy information. It remains a fact that on a world-wide average, the proximity of windfarms lead to a loss in real estate value of around 25%. By the way, how do you interpret the word “consistent” above – is there a huge loss for some time, say a decade or more, and then the prices slowly catch up, with the potential houses for new buyers without any windfarms in the vicinity become fewer and fewer, and people feel they have to “compromise” somehow? How about those who want/need to sell now, as a windfarm is planned or being erected, and there are not even any potential buyers interested, as soon as they become aware of the Windfarm plans? Also, what about the argument that land around a windfarm becomes “sterile”, even if people would want to build near windfarms? You have the family farm, and one or more of the “offspring” would want to build houses for themselves in a corner of the farm (planning permission assumed), but they can’t, because of the windfarm? Does this even get considered? In short, we find the argument provided by EDF (again) very underwhelming, and disappointing. Is there anything suitable for trust-building, for appeasing the locals who live in real fears about their health and homes? As on other topic, the answer is clearly NO.

Lackareagh is not suitable for a Windfarm

This topic is too central not to mention it again and on its own here. Without deep-diving, there are likely many more arguments against the Windfarm at Lackareagh; against the temporary mast, and against the turbines themselves that EDF plans to build in the area. We know that everything having to do with water, possible change of water courses, possible pollution of water through construction, the possible effects on many little streams, private wells, subterranean streams threatened, access of people, livestock and wildlife to water thus put at risk, raises grave concerns among the locals, who know the area much better than some engineers after a (superficial?) inspection and their somewhat questionable EIAR chapters, that appear "copied and pasted" from previous work elsewhere, as already repeatedly mentioned. Mudslides are always a topic in this upper blanket bog area, and Kilbane is located right at the slope of it! We know that other observations submitted to ABP provide more expertise on these topics than we claim to have, but we want to mention that we share those fears, ultimately for the whole water management of Lough Derg and the Lower Shannon, and the drinking water of urban settlements like Shannon Town.

Lack of proper Community Consultation

It is an objective of the Clare County Development Plan 2023-2029 under the Renewable Energy Strategy RES18.3 to require developers to carry out Community Consultation in accordance with "best practice". For the Lackareagh Windfarm near Kilbane; the first "engagement" happened in the village of Kilbane; the developer brought the Garda along, fearing protests; see <https://clarechampion.ie/garda-presence-at-windfarm-consultation-leaves-sour-taste/>

The Clare Champion



Home » Breaking News » Garda presence at windfarm consultation leaves sour taste



Answered the large crowd that attended the consultation in Kilbane on Tuesday evening, at which a Garda was present.

GARDA PRESENCE AT WINDFARM CONSULTATION LEAVES SOUR TASTE

© August 18, 2023 1,763 Views

This is how "communication" started. The developers pride themselves of "being open and transparent in all (their) communications • Communicating project updates and milestones as early as possible • Providing opportunities for feedback on the proposed project • Listening and answering any questions • Identifying and understanding local issues to be considered in the development of the project" – see <https://clarecoco.eplanning.ie/iDocsWebDPSS/ViewFiles.aspx?docid=754420&format=djvu> – which is all propaganda of the worst kind. Nothing could be further from the truth. There may be very few people in the Kilbane area who will profit from the development by getting huge money for their land, and the developers surely are bothering big time about them. But in doing so, they actively destroy the community. Very few people will get a lot of money, a great number of people will suffer from everything that has to do with the turbines. The few who sell out to the developers will become outsiders in the local community; this was already a topic during a meeting in the local church in Kilbane, of all places, on the turbines in late 2023. We learned new things – so, figuratively speaking, Judas only took the 30 silver pieces because he needed them. And that's OK, and everybody should understand that. We really have to re-read the appropriate chapters in the Bible; we understood that completely different... Anyway, it remains a fact that the community is being destroyed and torn apart.

A little while after the "consultation with Garda presence", on 21. November 2023, 3pm – 8pm, a clinic was held in The Lakeside Hotel, Ballina, County Tipperary, by road some 17km away from Kilbane; but this was obviously visited by opposition groups only! We, the authors, and others from the East Clare Windfarm Opposition Alliance, were there the whole time whilst this clinic ran, and we know who came and attended it – only people associated with the opposition against windfarms! The developers themselves admit to approximately **20 people** attending the show (see document above). Most of those people have a deep knowledge of the risks and challenges around a Wind Farm, and have deep fears regarding those planned developments in their area. The developers during those clinics would

perhaps initially engage in discussions, but they would never give an inch regarding their intentions with the development, even if they ran out of arguments (which they usually did, in our experience...). This cannot be called "community consultation" by any means; it's a tick-in-the-box exercise of the same value as high-gloss-brochures with sugar-coated statements, when in fact they come bulldozing into the place with their windfarm plans. The "community report" document from EDF lists the main questions that were allegedly discussed during the clinic:

- The visual impact of the project – residents queried the visual impact the turbines would have on the local landscape. Using the photomontages illustrating how the turbines will look from several local landmarks, the team described how and why the proposed turbine locations were selected.
- Noise – in relation to queries about the level of noise produced by operational wind turbines, the team explained the existing noise limits in Ireland, and how these are among the strictest in Europe.
- Shadow flicker – some residents queried whether the turbines would produce shadow flicker. The team explained that no shadow flicker would be created.
- Ecological sensitivities – residents questioned the impact on local biodiversity and the environmental impact of the project, and were provided with details of the mitigation strategies in place and surveys conducted as part of the EIAR.
- Cumulative impacts – some attendees raised the issue of cumulative impact from multiple wind farms in the local area.

Reading their document, you might get the impression that upcoming questions were actually answered, or feedback accepted by the developer. The contrary is true – the team may have described why the locations were selected, but this does not lessen the destruction of the visual amenity; the phrase that the existing noise limits in Ireland -actually, which ones? The ones based on the 2006 guidelines are not! The new suggested ones in the 2019 Draft may be... - are allegedly around the strictest in Europe is saying nothing about the fears against noise for the Kilbane residents, and Infrasound was – as usual – simply ignored (first the existence was denied, then the fact that their turbines produce infrasound, then the cumulating effects of infrasound from more than one turbine, and reputable scientists who argue the contrary were pictured as "outsiders" or charlatans; the usual insolent behaviour of windfarm developers on the topic of infrasound); the "no shadow flicker" is simply wrong (we quoted the field tests in Kerry above, and the turbines being much too inept to stop quickly); the ecological sensitivities were, flatly said, ignored ("I did not see any peat bog up there" was one of the unbelievable "explanations" that we got, in a discussion with one of the engineers); the cumulative impacts were raised indeed, and the questions remained completely unanswered. Especially questions around traffic during construction and transport over completely unsuitable roads were raised, and ignored, as much as other topics (hunting ground for enlisted wild birds, like the Hen Harrier!). Bluntly put, the clinic was a "**dog and pony show**", as one of the attendees put it! The document from the developer can only be considered completely worthless, and a sham! The story on the RESS scheme adds a little "icing to the cake" – we commented on that allegedly "fantastic" scheme above. Just do the Math – approximately 240k€ per year for the Community Benefit Fund (for the years 2 – 14 of operation only, to be paid to the community) means they expect 120.000 MWh per year, for 35 years (according to their planning application), which is 4.2 million MWh. At a gross price of currently around 185€ for a MWh (this is not consumer price; we as consumers would pay around 400€ for a MWh) as it is now, and expecting only moderate growth (which is unlikely, given that electricity will be THE source of energy, and the windfarm lobby will have that in their hand, as a monopolist!) over the next decades, we can assume EDF will make between 850 million € to over 1 billion € with their Lackareagh Windfarm only (and we mentioned that there are expansion plans already being discussed! So it will be more and more! And we do not even mention the numerous subsidiaries that windfarm operators get from the State...). Those numbers do not include rise of costs

through inflation; so the total profit in absolute numbers from EDF's point of view will be much more pleasant... (the price for 1 MWh of electricity only knows one way – up!). Figure in interest payments to EDF from the accumulated money over the years – it will make you dizzy! On the flip side, “2€ per MWh produced, in the years 2 – 14 of operation”, is fix – the Community Benefit Fund will not see any adaption because of inflation, no subsidiaries, no interest rates...The “community benefit fund” are few crumbs from the richly laid table of the developer! This is all about **huge profit for the developer, and nothing more, at the expense of nature and people, destroying the habitats of wildlife, destroying the environment.** If you argue this view with the experts at those clinics (and the calculation comes only from their own numbers that they pride themselves of, after all!, on their beautiful posters), those who have still some human feelings left will suitably blush... EDF during their clinic was not able to answer that challenge.

EDF states in their Non Technical Summary and their Community Report pamphlets that they „carried out consultation in relation to the Proposed Project with local residents and interested parties in the wider community“; we commented strongly that this is not the case; there was never anything that would qualify as "Community Consultation" that has been carried out, by any of the developer; this is true for EDF as much as it is for Coillte/FuturEnergy, Orsted, RWE, and others. On top of some brochures (definitely not delivered to all houses in question!), the developers may have “Community Liaison officers” walking (some) doors to (some) doors (note: a lot of "doors" are left out – on purpose, one has to ask oneself? And it happened repeatedly that on maps associated with an EIAR, individual houses were "forgotten" - conveniently those were houses of people who raised their voices against the planned wind farm! This happened here with our own place in Carrownakilly, near the planned Carrownagowan wind farm, with our house that is here since about 1845, and where Coillte project members were guests a number of time for discussions in 2018 and the first 3 months of 2019, and it happened with the house of a lady who is very active against the planned Ballycar development; her house dates from 1997). In general, none of those clinics that were lately held, on the planned windfarm developments in East Clare, could be considered "consultation" or "open honest discussion". The local community is basically being told – this is it, that's what we are going to do, like it or not, but get used to it! There is always the subtle or less subtle undertone that they (the developer) have every base covered, are the saving grace, produce the much needed "green energy", and don't you dare criticizing, in view of all the benefits to the local community that will come from this development, under the RESS scheme. Even politicians from the locality (Michael McNamara MEP, and Cathal Crowe TD) who called for more meaningful “clinics” to be held nearer to the planned development were simply ignored by the developers. In short, all this cannot be called “community consultation” by any means; the developers clearly totally **failed on their obligations!** We had our own experience, and we refer to the experience of others. EDF and their supporting engineers bureau MKO, Galway, may not have been the worst of the developers that we dealt with regarding the planned windfarm developments in East Clare, but they failed on their obligations to consult with the community in the same way as the others did. As stated, if we were to assess the knowledge on the topics at hand, after those discussions during the clinic, we were left with mixed feelings. As we said, for Lackareagh (and Knockshanvo, a day later) we were dealing with MKO Ireland Planning & Environmental Consultancy, not Malachy Walsh and Partners Engineering Consultants, as on other of the planned developments. MKO on those clinics for Lackareagh and Knockshanvo appeared to be better prepared than Malachy Walsh on previous occasions, in general. For example, the expert on noise present during the clinic knew his field, just like his colleague who was an expert on environment; they were friendly enough and dedicated their time for the discussions with us. Did they answer our questions? Did they reassure us? Did they help to overcome our fears regarding those developments? NO to all of that! Low-lights were definitely when the environment expert told us about the Lackareagh area not being a peat bog (which the locals there find ridiculous...), and the noise expert denouncing the internationally acclaimed scientists (for example from the Universities of Lisbon, Portugal and Mainz, Germany, as we mention in our remarks on Infrasound) and their findings on the potential dangers of Infrasound as a “niche” opinion that was allegedly not shared by a majority of scientists. This is a perversion of the truth; there are no other words for that! We have to conclude that anything deserving the name “consultation” did not happen!

Miscellaneous topics

Without intending to deep-dive into those topics, we find some more things from the EIAR and the Natura Impact Statement worth mentioning and commenting on; we will list those here briefly.

When beginning to read the many documents provided by the developer, we stumble across the statement that the **turbine life** is intended to be **greater than 35 years**. We do not share this assessment at all; on the contrary we would argue that technical advance is such that today's turbines will be outdated in less than 20 years. Remember we are dealing with industry commodity here. Just look at the facts – 20 years ago we were looking at turbines of 70m in height, with an output of less than 1MWh. Now the “standard” turbine is 200m and (in parts significantly) more, with a nominal output (depending on what sources you believe) of way over 7MWh; and again some significantly more. In other words, the turbines of – say – 2004 are technically hopelessly obsolete and outdated, altogether uneconomical to keep (which is a strong topic in many countries that built turbines at the time or earlier; notably Denmark and Germany!). EDF has some strange different views, obviously. They continue stating: “The actual turbine procured as part of a competitive tender process may have a power output that is marginally lower or greater than the 6.6MW turbine described in the EIAR.” Right. That raises a few questions about the size of the actual turbines, and other parameters of the actual turbines. Is there a distinct possibility that the turbines may be “slightly” bigger than described in the EIAR? Say 10% - so in total 220m instead of the planned 200m? EDF coyly and almost in passing talks of “blade tip height range of between 179.5 and 180 metres” But the project team from the planned Knockshanvo Windfarm (their “buddies” from FuturEnergy) during a public consultation (webinar) in November 2023 argued when asked about turbine height that they might end up bigger; as „smaller turbines are not on the market anymore“. We talked about industry commodity above – will that be a valid excuse to build even larger turbines, as has happened elsewhere, in Wexford for example? With a shrugging of the shoulder and a quick ask for forgiveness, but without any consequences whatsoever for the developer? There is no basis to build trust between the locals and the developer, in our opinion, and anything could happen in the end!

Developer EDF states „The Proposed Project provides the opportunity to capture an additional part of County Clare’s valuable renewable energy resource.“ but deny that their project is mainly about themselves making money, at the expense of County Clare’s most valuable resources, the unspoilt nature! They „babble“ about **alleged economic benefits**, talking of 80-100 jobs during construction (those are low-paid navy jobs! And temporary!) and mention a vague possibility of 2 to 3 permanent jobs, knowing quite well that this will never happen – this is for monitoring and occasional maintenance, and experience tells us this will done remotely, possibly even offshore! They mention the so-called **Community Benefit Fund** as usual, ignoring all its negative sides as discussed, the limits time-wise, the limitation in possible benefactors, and the most telling fact of the relation between the „couple of millions“ (best case) for the “Local Community” and the profit in the billions that the developer EDF is looking at. This is the usual rose-tinted view of the world, blowing up some facts and ignoring all the others.

We read in EDF’s document: “It is considered that the Proposed Project is consistent with the policies and objectives of the Clare County Development Plan 2023-2029”. But we mentioned that Clare County Council clearly stated that their policies and objectives when laying down this plan were based on much fewer turbines of significantly less height in this area of East Clare; in other words the current plans of the developers FuturEnergy, RWE, EDF, Orsted, Ballycar Greensource are in fact against the Clare County Development Plan, as stated. The area around Kilbane specifically is still only classified as „open for considerations“ (we discussed that topic), and especially in view of all the other planned windfarms in the immediate vicinity the area around Kilbane should definitely be ruled out! Also, they dwell about the Slieve Bernagh LCA (Landscape Character Areas) but do not mention the **SAC**

(Special Area of Conservation) or the **SPA** (Special Protection Area for birds) that both border the area in Kilbane. And it may be prudent to repeat that under European Ruling, "in or near" those SAC and SPA areas very strict rules apply! Windfarms are woefully displaced there!

The Chapter "**Reasonable Alternatives**" in the Non Technical Summary document is worthless. No real alternatives are discussed or even considered (for example more modern and less intrusive turbines, as mentioned; hydro-power; Offshore Solution) – simply nothing, just a relatively meaningless list of components. The whole thing remains underwhelming!

The negligence towards Human Health and Population evident in many chapters of their documents continues into the **Lands, Soil, and Geology** chapter of the Non Technical Summary document. A very superficial and general statement on peat is given; no necessary considerations on avoiding peat slides are to be found; „acceptable margin of safety“ and „considered to be low risk for peat failure“ (without mitigation for those low risks) is simply not enough. Locals who know the area come to very different conclusions...

The **Air Quality** chapter of that same document interestingly ignores the highly toxic and dangerous SF6 insulation gas in the turbines – see above in our general chapter about this topic. And it is not sufficiently demonstrated how the turbines will offset all the CO2 created through their construction, transportation, erection, and maintenance. Nobody in his right mind can call this „Green Energy“!

Specifically regarding the GRID connection plans (but not exclusively), the topic of **Material assets – Waste** comes into focus. The Waste facilities in Tuamgraney, Inagh and Shannon are being mentioned as suitable goals for repositioning of waste; same as in the Carrownagowan plans for GRID connection. In other words, we need more heavy trucks / HGVs over completely unsuitable roads, across half of County Clare. Quantification is totally missing, the amount of additional CO2 emission is not looked at, and the potential danger to the public and wildlife along the roads is not mentioned; let alone any suitable roads being identified. (R466/R471 and probably R463 being the only ones available in the wider area. We talked about possible cumulative effects already!) This is simply inadequate!

Next, the developer in their Non Technical Summary document cite again the totally outdated and universally considered as dangerous **Guidelines for Onshore Windfarms from 2006**, and proudly state „*The design of the Proposed Wind Farm has been designed in accordance with the Guidelines*“. As said before – "cynicism" is the only possible explanation for this assessment... This in itself is a good enough reason to reject this planned Windfarm!

Conclusion

We looked at the appeal by EDF Renewable Ireland Limited to An Bord Pleanála **ABP 321285**, after their planned Lackareagh Windfarm near Kilbane in County Clare was denied planning permission by Clare County Council, under **Case Nr. 2460411**. We showed that this planned windfarm is woefully displaced in East Clare and especially in this area, as outlined above, and needs to be prevented under all circumstances.

We are grateful towards Clare County Council for "keeping their word" as expressed in February 2024 when they called for a moratorium on Onshore Windfarms in Clare until such a time that the long-awaited new Guidelines for Onshore Windfarms are published, discussed, entered into law, and universally accepted. We expect that Clare County Council will, as indicated, go ahead and rectify its obvious mistakes, when they designed the discussed area in East Clare as "strategic" or "allowed in principle" for Windfarm Developments, against what is definitely now their better knowledge, by their own admission, and against Clare's County Development Plan and the Climate Action Plan. In addition to all the valid points that led to the rejection of the planning application, **health & safety** of the people of East Clare, and **aviation security for Shannon Airport** are now at the forefront; a rezoning of the East Clare area as unsuitable for Windfarms is expected to be imminent! Clare County Council declared that they had expected much less and much smaller turbines when designating the area in the past, but that they now realize the danger that East Clare gets transformed into an industrial wind turbine area, a sacrifice zone for the interests of giant national and international trusts, and that they will not support that. We expect that An Bord Pleanála will come to the same conclusion as Clare County Council, and will reject the appeal; furthermore we trust that An Bord Pleanála will also decide against the pending applications for Ballycar, Knockshanvo, and Oatfield, and will revert their decisions on Carrownagowan and Fahybeg.

We want those mentioned development plans for industrial wind turbines in the residential and recreational area that is this heritage landscape of East Clare, to be forever rejected.

These turbines are **not in the interest of the Irish people**, contrary to what the developers and the lobbies say. And again contrary to their assertion, the vast majority of the people do not want those turbines, neither in their own backyard nor in anybody's backyard, because they see the risks and dangers associated with those industrial turbines. The **"Green Agenda"** of those windfarm developers and lobby groups is a **huge obfuscation**; it is all about making big money quickly, regardless if they destroy valuable heritage or endanger the life of people / livestock / wildlife!

We need to bundle our efforts to find suitable solutions to the challenges of the climate change – Onshore Windfarms with today's industrial commodity, turbines with large rotating blades, up to or even over 200m in tip height, with the associated weight, especially if built into residential or recreational areas, or unsuitable places like peat bogs, are **not** such solutions, and have the tendency to make things even worse for the climate, tearing communities apart, massively lowering the quality of living for the area, and posing huge risks to Flora and Fauna, and to all living creatures in the area.

It may not be our place to suggest alternatives, but we observe that newer developments in the field of generating electricity from wind are ignored by the developers here, because they are not industrial commodity yet and therefore more costly (less profit for the developers). But at the same time those devices are far less intrusive [USA, Spain have developed solutions here. See <https://uk.yahoo.com/news/wind-turbines-image-problem-silent-123040264.html> on Vortex Bladeless (Spain) and Aeromine (Texas, US), who have designed silent, bladeless turbines] because they are much smaller (only the height of a dwelling house!).

Also, Solar may not provide the same efficiency as wind power, but again it is far less intrusive, so it should be preferred. Then there is hydropower, worth to look into; the tidal power station in St. Malo/France has run successfully and economically since 1961, and nearer to home, Ardnacrusha Power Station has successfully delivered power from water for over 90 years now! Nobody could state

that the “technology is not yet developed to a commercially viable level” (regarding hydropower), as the Onshore Windfarm developers do; see the EIAR for Carrownagowan, for example.

Lastly, – though it is not ideal in itself, but for the time being probably without alternative – we should consider Offshore Windfarm solutions. All in all, there are enough alternatives to Onshore Windfarms available to provide energy from Renewables, but all that is being done by those windfarm developers is looking at maximizing their profit, at all costs. This is not acceptable, and has to be opposed! We trust in An Bord Pleanála to support our views and act accordingly.

Finally, we urge An Bord Pleanála to make use of the instrument of **setting an oral hearing** on the matter, which the Board can do at its discretion. The local opposition against the planned Windfarms in East Clare, including the planned Windfarm in Lackareagh, is immense and fierce. The people here live in fear for their homestead and their mental and physical health, and deserve to be taken seriously and listened to! We believe an oral hearing would be beneficial for both the locals and for the Bord. Dublin is “far away” from a point of view of a person living in rural East Clare, and we guess from a Dublin point of view, “Lackareagh” or the likes are somewhere out in the sticks, and the reality on the ground may not be so obvious from that distance, be it traffic, be it noise and vibration, be it visual amenity, and others. An oral hearing—in some way you could see that as a real “community consultation”, something the locals did not get before—could help matters immensely! You are dealing with real people, in fear of being bulldozed over by some giant profit-hungry national and international trusts, and those people deserve to be listened to!

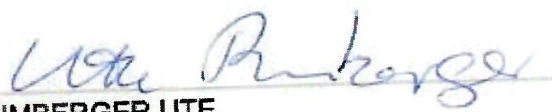
Signatures Konrad and Ute Rumberger (authors)

Here are the signatures by the authors of this document.

05/12/2024


RUMBERGER KONRAD

05/12/2024


RUMBERGER UTE

Carrownakilly, Killaloe, Co. Clare, Ireland. V94 NDP8

☎ 087 91 55 421

konradrumberger@gmail.com

Support of sub mission by Nicola Henley

Nicola Henley
nhenley@tiscali.com

Reply Forward Archive Unsubscribe Delete Mark

To: Konrad Henberger

11/1

Letters of sub mission- support

Hi Konrad,

Thanks you for your important contribution the other night, and for continuing to fight this madness despite so many obstacles. If you can help me by forwarding the following to the relevant depts, I would be so grateful if not I can send it as if you can give me the relevant email addresses.

2.

To whom it may concern: w/Re: Lord Fleenside (AHS)

I Nicola Henley of Tuamgrange, Co Clare, Ireland, to lend my full support to the submission against the planned GHD construction of the planned 2nd phase at



Knockshanry, B. Rosford, Co Clare.

Our environment, flora and fauna, landscape, tourism and quality of life, under threat. Our ancient Park, Clonsilla, being sacrificed to comply with GHD targets, irrespective of the harm they will do to the people and lives of those who will be affected. No energy crisis is worth this destruction. Alternatives which are not profit led should be supported, not those short term maximum profit businesses which fail to address the widespread of our natural heritage, countryside and livelihoods.

Yours Nicola Henley

My Contact number: 085 3475684

Support of submission by Markwin Kobus

 Markwin Kobus
mkobus101@gmail.com 

To Konrad Rumberger 

o whom it may concern at Clare Co. Council

I Markwin Kobus of Bodyke ,
Co.Clare

wish to support the submission against the planned GRID connection of the planned Windfarm at :
Lackareagh, Kilbane, Co Clare.

My Contact number: 0863679487

Thankyou

Support of submission by Karima Prinsloo

 Karima Prinsloo
kayaisha@gmail.com 

To Konrad Rumberger 


Submission 1 Karima

Hi, I Karima Prinsloo
Raheen road, Ballymalone, Tuamgraney, Co. Clare
wish to support the submission against the planned Windfarm at,
Lackareagh, Kilbane, Co Clare.

My no 0897084168

Thanks, Karima

Support of submission by Aisha Nolan

 Karima Prinsloo
kayaisha@gmail.com

To Konrad Rumberger

Fwd: Objection 2 (Aisha)



Hi, I **Aisha Nolan** of
Raheen road, Ballymalone, Tuamgraney,
wish to support the submission against the planned Windfarm at ,
Lackareagh, Kilbane, Co Clare.


My Contact no 0897084168

Thankyou

Aisha Nolan

Support of submission by Yasmin Nolan

 Karima Prinsloo
kayaisha@gmail.com 

To: Konrad Rumberger 

Fwd: Objection 1 from Yasmin



I, Yasmin Nolan of Ballymabne, Tuamgraney,
wish to support the submission against planned Windfarm at Lackareagh, Kilbane, Co Clare

My Contact no 0897084168

Thankyou

Yasmin

Support of submission by Diane Rodgers

 Diane Rodgers
dianerodgerseriu@gmail.com 

To Konrad Rumberger 

Objection to turbines

To whom it may concern at Clare Co. Council


I Diane Rodgers of Bodyke,
Co.Clare

wish to support the submission against the planned GRID connection of the planned Windfarm at :
Lackareagh, Kilbane, Co Clare.

My Contact number: 0899523281

Thankyou
Diane

Support of submission by Maeve Durand

 maeve durand
meabhdurand@yahoo.com

To Konrad Rumberger

Wind Turbine objection

To whom it may concern at Clare Co Council

I Meabh Durand of Scarriff, Co Clare


wish to support the submission against the planned GRID connection of the planned Windfarm at :
Lackareagh, Kilbane, Co Clare

My contact number is : 0860597926

Kind regards

Meabh Durand

Support of submission by **Kassandra Antigone Czech**

 KassandraAntigone
KassandraAntigone@protonmail.com

To Konrad Rumberger

To be attached to the submission objecting against those wind farms that are being planned near us.

Madam/ Sir,
Please, please listen to an elder who has been fighting for the environment all her life.

We have no right to exploit this still mostly beautiful planet for our insane wants, and leave nothing but destruction behind for our children and to the life forms that may still survive when the human race exits, soon.

3% growth in Ireland is totally insane at a time when we must urgently reset the economy to radical(!) de-growth. Infinite growth on a finite planet, what could possibly go wrong?

We have broken through most planetary boundaries already and we are well on the way to total collapse of this industrial civilization. Not a single civilization before us did ever not collapse, and ours is a highly complex, interdependent and therefore vulnerable system. In the West we are still cushioned from the shock waves that make the Global South suffer already.

Since wind was added to the energy mix, no greenhouse gas emissions have been reduced, on the contrary, these rebuildables, also known as renewables, have witnessed exponential growth of CO₂. No new form of energy has ever, and will never, replace an older form.

Don't fell those trees, whom we badly need, for those turbines. Steel is responsible for 8 % of emissions, concrete for 9% (!). That concrete will stay in place forever! There is absolute nothing renewable about these constructions, other than the wind itself. Maybe the huge profits sucked out of them by those greedy corporations are renewable.

We urgently have to stop the insane consuming, and procreating. We are 7 billion too many on this planet, which is cracking up under these gigantic numbers, which have doubled twice within one century (!), eating up their Petri dish. Watch professor William Rees if you are not convinced.

Supporting and even expanding this insane consuming only keeps this destructive system going for a little while longer. Only the industries need, or rather want, electric cars, or data centres etc., which are wanted especially for that new destructive toy called AI, which gobbles up incredible amounts of electricity, and water, and will be used for waging war and by the fascist rulers that we are establishing again, in inverted totalitarianism. As a result of our overshoot (read Catton, Overshoot, if you are not familiar), the consequence of our reckless exploitation of all so-called resources. We have no right to leave the planet any poorer than

we found her. Ripping open her bowels for our mad extractivist greed. We were quite happy without AI and data centres only a short while ago.

We are causing huge damage to all ecosystems with our extractivism. "Sustainable development" is an oxymoron, a contradiction in itself!

Please look up the attached link for all the figures that speak against wind turbines, here.


https://vaclavsmil.com/wp-content/uploads/15.WINDTURBINE.pdf?fbclid=IwZXh0bgNhZW0CMTAAAR1hw2toHpDfbUytrXfLkesMKK30qFT2Tr_sjkMgWFyoEyg-GW5Ujmx1Flc_aem_2HKEZK-C2JDulANoFii45Q

https://vaclavsmil.com/wp-content/uploads/15.WINDTURBINE.pdf?fbclid=IwY2xjawFTo2FleHRuA2FlbQIXMQABHXB8DhQ6YzM5oHt0U00-dGoYro9dBW6v0_bSjadfkGHKyst2u-JYVXZYFg_aem_Fz2NTgEJw_LD-P5yD1l9dA

And I agree with everything that konradrumberger@gmail.com says in his submission!

Yours faithfully,
Kassandra Czech
Tuamgraney
Co.Clare
kassandraantigone@protonmail.com

Support of submission by James Lattimore

 James Lattimore
jamespatricklattimore@gmail.com

To Konrad Rumberger

Both Wind Farm Protest Applications Please.



"1).Myself: a). To whom it may concern at Clare Co. Council:

I, James Lattimore, of Ballymacdonnell, Bodyke, Co.Clare, wish to support the submission against the planned GRID connection of the planned Windfarm at :
Lackareagh, Kilbane, Co Clare.

My Contact number: 087 4127335.

Thankyou.

Support of submission by Gerard Cahill

 James Lattimore
jamespatricklattimore@gmail.com 

To Konrad Rumberger 

Both Wind Farm Protest Applications Please.



a). To whom it may concern at Clare Co. Council:

I, Gerard Cahill, of Feakle-East, Feakle, Co.Clare, wish to support the submission against the planned GRID connection of the planned Windfarm at :
Lackareagh, Kilbane, Co Clare.

My Contact number: 087 2486360.

Thankyou

Support of submission by Maria Svensson

 Maria Svensson
maria.m.svensson@gmail.com 

To Konrad Rumberger 

Re: Carrownagowan Windfarm and further Windfarm Plans in East Clare

To whom it may concern in Clare County Council: I, Maria Svensson of Coolready, Bodyke, Co Clare, wish to support the submission against the planned Windfarm at Lackareagh (Kilbane) Co Clare. My email is maria.m.svensson@gmail.com; my contact number is 086-1957817.

