

From:

To:
Planning Section,
Clare County Council,
New Road,
Ennis

Date: / / 2024

Re: Objection to Application Reference Number: 2460411

A Chara,

I wish to strongly object to the planning application Ref No: 2460411 which seeks permission to erect 7 x 180m high Wind Turbines on Lackareagh Mountain for the following reasons:

1. Having regard to the location of the site on lands identified as 'Open to Consideration' for windfarm developments as set out in the Clare Wind Energy Strategy and the County Development Plan 2023- 2029, the proposed turbine structures, by reason of their height (tip height up to 180m}, scale and sitting on this open and exposed upland landscape would constitute a prominent feature on the landscape from both local and long range viewpoints. Furthermore, it is considered that the development would be highly visible from, and negative impact upon, the R466 Regional Road which is a designated Scenic Route and would negatively alter the character of this rural landscape. The proposed development would therefore seriously injure the visual amenities of the area, would contravene Objectives CDP14.2 and CDP14. 7 of the Clare County Development Plan 2023-2029 and would be contrary to the proper planning and development of the area.
2. It is an objective of the Clare County Development Plan, 2023-2029, as set out under Objective CDP11.47(e) to strike an appropriate balance between facilitating renewable and wind energy related development and protecting the residential amenities of neighbouring properties. Having regard to the scale and height of the turbines as proposed, the location of the site in this open landscape, the noise impacts that would be generated from this development and the significant volume of traffic movements required to facilitate the construction process, it is considered that the proposed development would seriously injure the amenities of the residential property in the vicinity by reason of noise and disturbance. Furthermore, it is considered that the proposed turbines would be visually overbearing on existing properties and thus depreciate the value of properties in the vicinity. The proposed development would therefore be contrary Objective CDP11.47 of the Development Plan and be contrary to the proper planning and development of the area.
3. The plans, assessment and reports submitted with the planning application do not demonstrate adequate proposals for the removal, storage and general management for the substantial volume of excavated soils, peat and materials during the construction phase of the development. This results in a significant consequent concern in relation to surface water management and the potential contamination of waterbodies both within and downstream of the proposed development site. Under Article 5 of the European

Communities Environmental Objectives (Surface waters) Regulations, 2009, as amended, a public authority, in the performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water. On the basis of the information submitted with the application to date it is considered that the proposed development would present a significant risk of adverse environmental impact on the sensitive natural habitats of the site and of the wider area, constituting an unacceptable risk of pollution of watercourses in the area and seriously injuring the amenities of the area. The proposed development would, therefore, be contrary to the proper and sustainable development of the area.

4. There is hydrological connectivity between the proposed development site and both the Lower River Shannon cSAC, and the River Shannon and River Fergus Estuaries SPA. The majority of the habitats and species for which both European sites are designated are water-dependent habitats and species with requirements for high to pristine water quality. Having regard to the inadequate proposal for management of the excavated soils and materials on the proposed site, the absence of co-ordinated approach to sizing of stilling ponds and definition of their location relative to sensitive water bodies; absence of consideration of other developments likely to give rise to cumulative impacts on the receiving environment; absence of adequate definition of tree felling/hedgerow removal and replacement planting; and, absence of consideration of invasive species in the footprint of the work areas in the wind farm there is an inherent risk to the Qualifying Interests and Special Conservation Interests of these European Sites which have not been adequately addressed in the Natura Impact Statement. As a result of the foregoing issues it cannot be concluded that no adverse effects on the integrity of the associated European sites, the proposed development would be contrary to the Objective CDP15.3 of the County Development Plan and contrary to the proper planning and sustainable development of the area.

5. 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 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.

Signed: _____