

Submission No. 166

Planning Section,
Clare County Council,
New Road,
Ennis,
Co. Clare



November 16th 2020

Re: Submissions to Draft County Development Plan 2022-2028

To whom it may concern,

The following is a submission to request that provisions should be made within the Clare County Development Plan 2017–2023 to ensure that local communities are not further negatively impacted by wind energy developments in the county.

Zoning:

We are requesting that there be a review of areas zoned as 'Strategic' areas for wind development. We request that the area zoned as strategic (marked in the orange circle below), have this strategic zoning removed. In 2018 An Bord Pleanála ruled against a proposed development in this area due to overpopulation of wind developments in the area. Therefore,

The Wind Energy strategy should be updated to reflect recent ABP rulings.

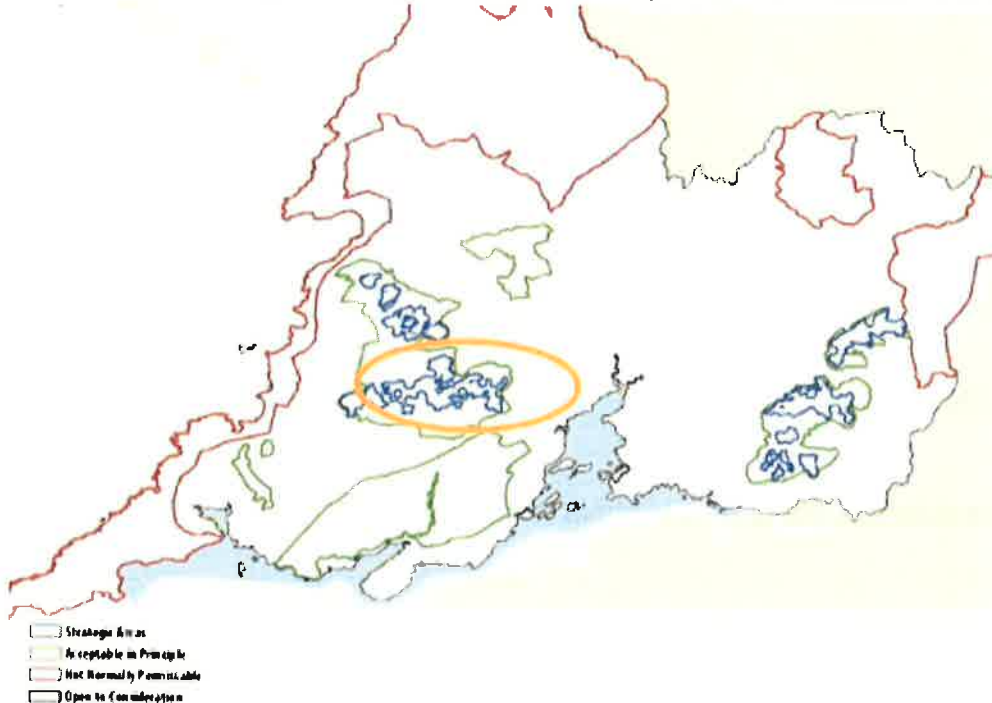


Figure 1: Showing Booltiagh to Doolough area designated as Strategic area for wind farm

Please refer to **Board Order PL 03.248008** in relation to **Planning Register Reference Number: P15/860**.

REFUSE permission for the above proposed development in accordance with the reasons and considerations set out below.

(...con'd)

Having regard to:

- the Wind Energy Development Guidelines for Planning Authorities issued by the Department of the Environment, Heritage and Local Government in June, 2006;*
- the pattern of development in the area, including the proximity of existing dispersed residential dwellings predominantly to the east, north and northwest of the application site;*
- the noise impact assessment carried out by the applicant and the failure to apply appropriate noise criterion for what may be defined as a low noise environment contrary to the recommendations of the Wind Energy Development Guidelines;*
- the spatial extent and height of existing constructed and/or permitted wind energy developments that are as yet not constructed/commissioned within the vicinity of the site;*

the Board was not satisfied that the proposed wind farm (including as reduced from 11 number to 10 number wind turbines by condition in the decision of the planning authority), taken cumulatively with other wind energy development in the vicinity, would not seriously

injure the amenities of residential property in the vicinity by way of noise effects.

Setback distances:

We are requesting that set back distances be imposed to prevent developers from constructing turbines too close to residential homes. Please refer to Westmeath coco policy objective, CPO 10.132, as a working example of a plan that protects residents from the obtrusive impacts of wind developments. We propose that Clare County Council adopt the same setback distances as follows:

Westmeathcoco , CPO 10.132

- *500 metres, where height of the wind turbine generator is greater than 25 metres but does not exceed 50 metres.*
- *1000 metres, where the height of the wind turbine generator is greater than 50 metres but does not exceed 100 metres.*
- *1500 metres, where the height of the wind turbine generator is greater than 100 metres but does not exceed 150 metres.*
- *More than 2000 metres, where the height of the wind turbine generator is greater than 150 metres.*

Characterisation of LCAs

The designations of the LCAs (Landscape Character Area) in the proposed Clare Wind Energy Strategy are not accurate. We observe several areas are inaccurately designated in the plan as 'bogland' and the plan omits that they are bustling residential areas.

We disagree with the classifications of med - low sensitivity in the Mount Callan to Booltiagh area. This area is highly impacted by overpopulation of wind developments. We request that this be revised and reflected in the plan.

Alternative renewables:

We encourage CCC and developers to consider alternative sources of energy such as offshore wind or solar. It is common practice in many countries to build solar fields in the off ramps of motorways to utilize the wasted land between onramps and off ramps.

Kind Regards,



Denise McGuane
Conserve Kilmaley Group

Conserve Kilmaley Group is a group of more than 250 local residents in the Kilmaley & Connolly area, including townlands Kinturk, Furror, Lisroe, Renagisha, Glenletternafinny, Mount Callan, Booltiagh & Lough Naminna and more.