

From: [Cathal Crowe](#)
To: [SIDS](#)
Subject: Further submission re proposed Knockshanvo Windfarm, County Clare ABP-320705-24
Date: Tuesday 4 August 2026 09:00:40
Attachments: [image002.png](#)
[ACP submission - Knockshanvo.pdf](#)

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To whom it may concern,

I wish to exercise my right to make an additional submission relating to the proposed Knockshanvo Windfarm, County Clare (ACP reference ABP-320705-24)

A copy of my submission is attached to this email in PDF format. I'm not sure if an additional fee is charged at this stage – if I owe money can you please advise?

Many thanks

Is mise le meas,



Cathal Crowe TD

Fianna Fáil Spokesperson on Aviation and Logistics



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Cathal Crowe TD

Your Fianna Fáil TD for Clare



Submission to An Coimisiún Pleanála

Planning Reference: ABP-320705-24

Proposed Development: Knockshanvo Wind Farm, County Clare

Subject: Submission in Response to Further Information – Aviation Safety and Technical Non-Compliance

From: Cathal Crowe (Clare Constituency)

1. Executive Summary

As a public representative for County Clare, I welcome the opportunity to submit this further information response regarding the proposed wind farm development at Knockshanvo (Planning Reference: ABP-320705-24). Following a rigorous review of the applicant's recent submissions, it is clear that the critical technical, environmental, and spatial planning conflicts raised by statutory aviation bodies remain entirely unresolved.

The developer has failed to demonstrate that this project can co-exist with the essential aviation infrastructure that protects Irish airspace and supports Shannon Airport. The technical flaws, unviable planning conditions, and lack of verified mitigation strategies detailed below mean this development poses an unacceptable risk to aviation safety. Consequently, this application must be refused planning permission.

2. Unmitigated Radar Impacts & Threat to Woodcock Hill

The applicant has failed to meet the explicit requirements set out by AirNav Ireland regarding the protection of the long-range en-route Mono-pulse Secondary Surveillance Radar (MSSR) at Woodcock Hill.

- **Lack of Precedent:** No empirical evidence has been provided of a comparable wind farm operating safely alongside an en-route MSSR of this nature.
- **Persistent Interference:** The scale and location of the Knockshanvo turbines will cause severe radar reflections, deflections, and shadowing, blinding air traffic controllers.
- **Primary Radar Clutter:** The Shannon Primary Surveillance Radar (PSR) will suffer significant radar clutter, directly degrading real-time aircraft tracking.

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- Absence of Mitigations: AirNav Ireland has formally stated that no credible or implementable technical mitigations exist for this site. Any theoretical fix would require massive capital investment, lengthy operational downtime, and carries no guarantee of success.

3. Degradation of Aviation Safety Standards

A foundational principle of spatial planning near aviation infrastructure is that systems must remain *at least as safe* after a development as they were before.

- The applicant's proposals represent a net reduction in the current level of aviation safety in the Mid-West region.
- Overriding the explicit safety warnings of AirNav Ireland and the Irish Aviation Authority (IAA) would set a dangerous planning precedent that prioritizes commercial energy interests over public safety.

4. Impact on Instrument Flight Procedures (IFPs) & Shannon Airport

The physical presence and electromagnetic interference of the turbines will directly disrupt at least five established Instrument Flight Procedures (IFPs) used by aircraft routing into and out of Shannon Airport.

- ATCSMAC Disruption: The Air Traffic Control Surveillance Minimum Altitude Chart (ATCSMAC) procedure is severely impacted. This directly restricts Air Traffic Control's (ATC) ability to safely vector and sequence aircraft.
- Threat to Shannon's Strategic Status: These operational constraints threaten to strip Shannon Airport of its Category II Instrument Landing System (ILS CAT2) status.
- Transatlantic Diversions: Shannon's vital national role as the primary diversionary airport for transatlantic traffic would be critically compromised if ATC capacity is diminished.

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5. Flaws in Performance-Based Navigation (PBN) & Geopolitical Realities

The applicant heavily relies on the future rollout of Performance-Based Navigation (PBN) to bypass current flight procedure constraints. This reliance is deeply flawed:

- **Implementation Paused:** The implementation of PBN in Irish airspace has been officially delayed and paused.
- **GPS Interference:** Due to the sharp rise in GPS jamming and spoofing across Europe—which has directly affected Irish-controlled airspace—satellite-dependent navigation cannot be solely relied upon.
- **Retention of Ground Aids:** Statements from both the Irish Air Corps and the IAA confirm that conventional, ground-based navigation aids must be aggressively retained as a core resilience measure. PBN is not a complete or imminent solution.

6. Discrepancies in Consultant Qualifications & Credibility

The technical credibility of the applicant's assessments by AI Bridges and Cyrrus is fundamentally undermined by a lack of statutory certification:

- **No IFP Design Approval:** The IAA has explicitly confirmed that neither Cyrrus nor AI Bridges is an approved Approved Procedure Design Organisation (APDO). They lack the required EU certifications to design or alter Instrument Flight Procedures.
- **Lack of Engineering Licences:** Neither consultancy holds the mandatory EU-ATSEP (Air Traffic Safety Electronics Personnel) engineering qualification and licence of competency required to assess radar impacts or propose technical mitigations.

7. Unauthorised Meteorological Mast (Enforcement History)

The applicant's past actions demonstrate a disregard for aviation safety protocols. In 2023, a meteorological mast was erected at the site without informing the relevant aviation authorities, in direct contravention of aviation regulations.

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- AirNav Ireland categorized this unauthorized structure as a serious aviation risk.
 - Clare County Council was forced to initiate formal enforcement action to address the breach. This history calls into question the developer's operational integrity and attitude toward safety compliance.
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8. Reliance on Factually Unagreed Meeting Minutes

To support their claims, AI Bridges has relied on meeting minutes that were never formally agreed or signed off by AirNav Ireland.

- No proof of agreement has been provided to the Board.
 - This mirrors a highly concerning pattern observed in the nearby Oatfield Wind Farm RFI submission, where AirNav Ireland explicitly stated that AI Bridges utilized unagreed meeting minutes to misrepresent the statutory body's position.
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9. Unenforceable and Speculative Planning Conditions

The applicant has proposed planning conditions to defer the construction of Turbines 1–3 until PBN is implemented (speculatively cited as 2030), or until AirNav, Shannon Airport Authority (SAA), and the IAA are satisfied.

- Vague and Uncertain: These conditions rely entirely on uncertain future events that are outside the developer's control. As noted, PBN delivery is stalled due to international GPS security issues.
 - Legally Flawed: Conditions requiring the future, post-planning approval of independent third parties (AirNav/SAA) fail the legal tests for planning conditions, as they are unenforceable and shift the burden of assessment away from the planning authority.
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10. Deficient Navigation Aid (Navaid) Assessments

The technical modeling submitted for Knockshanvo under reference ABP-320705-24 (and the linked Oatfield project) is fundamentally inaccurate because the consultants failed to assess the actual layouts currently before the Board.

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- For Knockshanvo, the consultants relied on an outdated assessment modeled for an older, entirely different project iteration known as "Violet Hill."
- For Oatfield, they relied on data from an entirely separate wind farm project. Consequently, the true cumulative calibration impacts on local navigation aids have never been accurately assessed.

11. Rejection of Irrelevant International Comparisons

The applicant's attempts to draw comparisons with wind farms operating near overseas airports must be entirely rejected. AirNav Ireland has already confirmed that those international examples feature entirely different topography, airspace structures, and technology, and are not comparable to the unique Woodcock Hill radar environment.

12. Conclusion & Request for Refusal

The applicant has comprehensively failed to discharge their burden of proof. They have not demonstrated that the Knockshanvo wind farm can be built without severely degrading Ireland's aviation safety, radar performance, air traffic control efficiency, and the strategic viability of Shannon Airport.

Given the unresolved safety concerns, the lack of approved mitigation strategies, the uncertified status of the consultants, and the legally flawed proposed conditions, I respectfully urge An Coimisiún Pleanála to uphold the integrity of our national aviation infrastructure and refuse planning permission for development ABP-320705-24.

Signed:

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