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Strategic Infrastructure Development Section
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**Re: Proposed development of 9 no. wind turbines, 110kV substation and ancilliary development
(Case Number: ABP-320705-24): Further Submission Following the Applicant's Response to
Observations**

Dear Sir/Madam,

I am writing further to my original observation on 15th September 2024 regarding the proposed wind farm development at Knockshanvo, having now read the Applicant's Response to Observations prepared by MKO on behalf of FuturEnergy Knockshanvo DAC (dated 17 April 2026, documents titled 241016 Knockshanvo Wind Farm Response F (Part 1).pdf^[1], 241016 Knockshanvo Wind Farm Response F (Part 2).pdf^[2], 241016 Knockshanvo Wind Farm Response F (Part 3).pdf^[3]). Having gone through the response in detail, my concerns are, if anything, greater than when I first wrote to the Commission. I would like to set out below where I believe the Applicant's response falls short, and to raise what I believe to be a further and very serious matter concerning aviation safety.

Biodiversity and the Wildlife I Have Observed

In my original letter I described the biodiversity of this area, including the birds of prey, red squirrels and other protected species that live in and around the proposed site, and I included a dated photograph of a red squirrel I had taken locally. The Applicant's response states that the development footprint is predominantly within existing Coillte forestry plantation with "limited potential" to support fox, badger, grouse, hares, red squirrel and rabbits, though it does accept that the habitat "does have some potential to support species such as red squirrel." It concludes that "no significant populations of the above species have been recorded" based on dedicated faunal surveys, and on this basis considers the development compliant with CCDP Objective 15.12 on the conservation of biodiversity and wildlife corridors.

I do not think this fully answers my concern. Objective 15.12 is about the protection of wildlife corridors, not simply population counts, and a corridor can be disrupted by construction and turbine infrastructure whether or not a formal survey records large numbers of animals using it at a given time. Nor do I think the fact that the development footprint is small relative to the wider forestry, (which is the main reason given for there being no significant effect) actually addresses whether this particular part of the forest, including the area where I photographed a red squirrel, functions as part of a wildlife corridor. I would ask the Commission to weigh my direct, dated evidence of red squirrel presence in this specific location on its own merits.

I was also struck by the Applicant's response regarding wet heath. It confirms that the national NPWS Article 17 habitat dataset, the kind of dataset the public might reasonably rely on for a general understanding of what habitats are present on a site, had mapped parts of the site as Dry Heath, and that it was only through the Applicant's own detailed botanical surveys that these areas were correctly identified as Wet Heath and Upland Blanket Bog mosaic: precisely the kind of sensitive habitat capable of supporting birds of prey and other species I am concerned about. While the Applicant's own survey work appears to have correctly identified and reported this habitat, I think this illustrates how much a proper understanding of this site's sensitivity depends on detailed, on-the-ground survey work rather than national datasets, and it reinforces why my own direct, dated observations of wildlife on site deserve real weight alongside the Applicant's own survey conclusions, rather than being set aside.

Birds of Prey

I recorded a video of birds of prey flying over the site, and this was submitted alongside my original letter (it is not clear to me if the video has been viewed by the Applicant). The Applicant's response addresses several bird populations in the area, and having read it I would particularly highlight the response on hen harriers, given this area's recognised national importance for the species. The response states plainly that "in the absence of offsetting measures, there is the potential for a significant (indirect) habitat loss effect to result from the Proposed Development for hen harrier." In other words, the Applicant's own assessment is that this development would cause a significant effect on hen harrier, were it not for a proposed Compensation and Enhancement Plan intended to offset that loss elsewhere. I do not think an offsetting scheme, however well-intentioned, is the same thing as avoiding harm to this habitat in the first place, and I would ask the Commission to treat this for what it is: an acknowledged significant impact being managed after the fact, not a development with no significant effect on this species.

For snipe and woodcock, the response explains that survey design accounted for their crepuscular activity, with snipe recorded on 30 occasions during vantage point surveys between 2018 and 2023, and a dedicated survey identifying a resident breeding population of woodcock. I accept this is a more thorough response than for some other species, though the impact assessment still relies on an assumption of ongoing night-time activity to compensate for likely under-recording, rather than on direct observation throughout. Given that this whole site has already been shown, by the Applicant's own admission, to be more ecologically sensitive than originally mapped, I do not think assumptions of this kind should be relied upon to dismiss risk to birds of prey which were directly observed on this site.

The East Clare Way

My original letter raised the impact of nine 185m turbines on the East Clare Way, a walking route I and many others in this community value for its scenic, undeveloped character. Having read the Applicant's response in full, the East Clare Way is not mentioned by name anywhere in it. I am concerned that this may be because the developers are not fully aware of its significance to this region and are treating it, if at all, as just another local trail. In response to the general recreational routes policy (CDP Objective 10.11), the Applicant instead describes a new trail it proposes to build near the 12 O'Clock Hills, a different route entirely, over 6km from the proposed development. I do not think a new trail over 6km away can reasonably be said to account for the effect nine turbines of up to 185m in height will have on the character and experience of the existing East Clare Way, and I would ask the Commission to require the Applicant to engage directly with the significance of this specific route, rather than substitute it with an unrelated one. Moreover, the 12 O'Clock Hills itself is mentioned as a viewpoint (VP12) that would, according to the Applicant's own Visual Impact Assessment, experience "Significant" Visual Impact as a result of the turbine construction. I would

also like to note that my home, located close to Sallybank (VP13) is also named as an area of “Significant” impact, in the Applicant's own words, indicating the real and serious visual harm this development would cause to people living nearby.

As an aside I would like to note that the Views Representing Majority of Local Residential Receptors section was difficult to fully understand due to the presence of several parts of the document (e.g. at the bottom of page 48) reading “Error! Reference source not found.”

Property Values

The Applicant's response on property devaluation states plainly that “there are no studies on the potential for impact on property values from wind farm developments in Ireland.” In place of Irish evidence, it relies on a small number of studies from the United States, the UK and Scotland.

I do not think this is a reasonable basis to reassure homeowners here. The principal US study relied upon dates from 2009; property market conditions in the United States at that time bear no meaningful resemblance to Ireland's property market in 2026, and I do not think a study now over fifteen years old, from a wholly different country, can tell us much about what is likely to happen to house prices in this community. The 2014 UK study cited found “no significant effect on the change in price of properties within 2km or 3km” of a wind farm, but many of us potentially affected by this development unfortunately live closer than that. My own home is less than 800 metres from one of the proposed turbine locations, well inside the distance at which even the Applicant's own cited research stops offering any reassurance. As someone who has only recently managed to get onto the property ladder, this is a source of real anxiety for me, and I do not think the Applicant's response comes close to addressing it.

Shadow Flicker

I was also distressed to read the Applicant's own shadow flicker assessment. It confirms that of 78 residential dwellings within the shadow flicker study area (1.63km, being ten times rotor diameter), 31 are predicted to experience daily shadow flicker in excess of the 30 minute guideline threshold under worst-case conditions, and that even once average regional sunshine hours are taken into account, 4 properties are still predicted to exceed the annual guideline limit of 30 hours. When the cumulative effect of the nearby proposed Oatfield Wind Farm is included, 14 properties are predicted to exceed the daily threshold.

I do not understand why this is not treated as a more serious concern by the Applicant. These are not marginal exceedances against an arbitrary preference, they are predicted breaches of the Wind Energy Guidelines' own recommended limits, identified by the Applicant's own modelling, before the development has even been built. If the guidelines intended to protect residents from this kind of disturbance are already predicted to be broken at several properties, I believe that clearly shows the site itself is not appropriate for a development of this scale, rather than something that can simply be managed away with turbine control measures after the fact.

Roads and Traffic

I would also note that the Applicant's response confirms that traffic count data for the Corbally Road/Athlunkard Street/Pa Healy's Road junction was missing from the original application, and has only now been supplied after observers raised this. I would also highlight that Limerick City and County Council's own Roads Department separately objected to the safety of the Applicant's proposed arrangements for delivering turbine blades via a temporary compound on the N69, specifically on the grounds of the speed of approaching traffic at that location. The Applicant's response to this relies on the temporary nature of the works, night-time delivery under Garda escort,

and precedent from other developments, rather than any change to the location or design proposed. I think it is telling that even a statutory Roads Authority has itself raised safety concerns of this kind, and I remain concerned about how our own narrow, pothole-affected local roads will cope with construction traffic over the course of this project.

A Serious New Concern — Aviation Safety and the Ballycar Decision

Finally, I want to bring one further matter to the Commission's attention directly, as I believe it is very significant. Living in the area of the proposed site I am very well aware of the corridor which aircraft travel through on approach to Shannon Airport, which passes directly overhead at a relatively low altitude, at what I would approximate to be a rate of roughly one flight per hour. As I am sure the Commission are aware, Shannon Airport is not only heavily used by commuters but also regularly used as a stopover point for US military aircraft.

Given the presence of this heavily trafficked key piece of infrastructure, I find it difficult to understand why a site raising this level of concern, from AirNav Ireland and Shannon Airport Group, the very bodies whose job it is to assess exactly this kind of risk, would be considered appropriate when there must surely be other locations available that would not carry the same risk to the safety of the travelling public and military personnel passing overhead.

On 7 May 2026, An Coimisiún Pleanála refused permission for a similar proposed 12 turbine windfarm, located on a 140-hectare site located within the townlands of Cappateemore East, Ballycannon West, Ballycannon East, Ballycar South, Ballycar North, and Glennagross (Case Reference PA03.318943^[4], Commission order ABP-318943-24^[5]), a 12 turbine project located approximately 5km from Knockshanvo, for one reason above all others: aviation safety. That refusal followed a “Specified Matter only” oral hearing held specifically to examine the aviation issue, which suggests to me that the Commission considered this kind of objection serious enough to warrant its own dedicated hearing. The Commission gave two distinct reasons for refusing permission. First, it found that it was “not satisfied... that measurable, evidence based, demonstratable and credible mitigation measures have been submitted by the applicant, that can remove all level of aviation related risk... or that such measures can then be agreed and implemented to the satisfaction of AirNav Ireland, the Shannon Airport Group and the Irish Aviation Authority.” Second, and separately, it found that it was “not satisfied that the applicant has sufficient legal interest, or can acquire such interest to implement such mitigation measures on lands that have not been identified within the application site boundary, the applicant's landholding or within the applicant's control.” It went on to find that it was “not practicable... to approve the development... by imposing a condition requiring such matters to be agreed between parties where the necessary consents have not been demonstrated as achievable,” and concluded that it was “not satisfied that the proposed development would not endanger or would not interfere with the safety of aircraft or the safe and efficient navigation thereof.”

I think that second reason matters a great deal for Knockshanvo too. Any physical mitigation at the Woodcock Hill radar facility would necessarily involve land and equipment belonging to AirNav Ireland, not to FuturEnergy, and I have seen nothing in the Applicant's response to suggest that AirNav's consent to carry out such works has actually been secured.

The Applicant's Response to Observations for Knockshanvo runs to several pages addressing AirNav Ireland and Shannon Airport's objections, drawing on reports from Ai Bridges, Cyrrus and the Dutch aviation research organisation TNO. Having read it closely, I do not think it changes the position that mattered at Ballycar. The response confirms that “AirNav objects in the strongest possible terms” (and that these “concerns are shared by SAA”) to concerns including the compromise of Instrument Flight Procedures and degradation of the Woodcock Hill radar through beam deflection, reflection and shadowing, which AirNav says would undermine the 5 nautical mile and 3 nautical mile aircraft

separation standards required under EU mandated rules, and that AirNav has been raising concerns of this kind about developments in this area since 2018. The parties' most recent meeting, held on 16 April 2026, the day before the response was finalised, did not result in AirNav withdrawing its objection or confirming that any proposed mitigation is acceptable.

I would also note that, on the Applicant's own account, three of the proposed turbines (T01, T02 and T03) currently penetrate the obstacle protection areas for Shannon Airport's departure and approach flight procedures, and that the Applicant's own position is that this can only be resolved once new navigation measures come into force on 6 June 2030. In other words, by the Applicant's own admission, part of this development is not currently safe to build under existing procedures, and depends on a regulatory change that has not yet happened. On the radar question, the Applicant's position rests entirely on assessments it has itself commissioned, which conclude that any effect on the Woodcock Hill radar would be "operationally tolerable", directly contradicting AirNav's own stated position that there are "no credible and implementable mitigations that could be applied to the Woodcock Hill radar to eliminate these effects." And while the Applicant believes its new modelling from TNO now provides sufficient assurance, the fact that AirNav requested a further meeting after reviewing that report, rather than confirming its acceptance, suggests to me that this has not actually been resolved.

I note that the Applicant also points to several other wind farm developments within the same 16km radar assessment zone that have previously been granted permission, including Fahy Beg, Carrownagowan, Lackareagh and Boolynagleragh. I do not think these examples assist the Applicant's case: what matters is not whether developments have been permitted in this general area in the past, but whether AirNav Ireland and Shannon Airport's specific, current, unresolved objections to this particular development have been addressed, and, on the Applicant's own account, they have not.

Finally, I note that the Applicant proposes a planning condition under which development "shall not commence unless and until written confirmation has been submitted to, and agreed in writing by, the Planning Authority that AirNav Ireland and Shannon Airport Authority have approved the detailed mitigation measures." I would ask the Commission to note that this is, in substance, the same approach it rejected outright at Ballycar only weeks ago: agreeing the details with the aviation authorities after permission is granted, rather than having a demonstrated, credible solution in hand at the point of decision. I do not see how this approach can be acceptable at Knockshanvo when it was found unacceptable at a comparable site only a short distance away, and I would ask the Commission to apply the same standard here and refuse permission given the continued serious concerns of AirNav Ireland and Shannon Airport Group.

Conclusion

I remain firmly opposed to this development. Having read the Applicant's response carefully, I do not think it resolves the concerns I raised about the wildlife, the East Clare Way, our property values, or our roads. If anything, the Applicant's own words of an acknowledged significant effect on hen harrier absent offsetting measures, and predicted breaches of the Wind Energy Guidelines' shadow flicker limits at several properties before construction has even begun, suggest to me that this site is simply not appropriate for a development of this scale. Moreover, the very recent refusal of a comparable, nearby wind farm on aviation safety grounds suggests to me that the same outcome is warranted here. Given the slew of very serious concerns, I would ask the Commission to refuse this application, or at the very least to require the Applicant to properly resolve the outstanding objections from AirNav Ireland and Shannon Airport, and to provide a proper, site-specific assessment of the impact on local property values, before making a decision.

Thank you for taking the time to consider my further concerns. I would appreciate being kept informed of any developments in this case.

Yours sincerely,

Hanna Greaves

References

[1] 241016 Knockshanvo Wind Farm Response F (Part 1): Available at [https://www.pleanala.ie/publicaccess/Responses/320705/241016%20Knockshanvo%20Wind%20Farm%20Response%20F%20\(Part%201\).pdf?r=692513](https://www.pleanala.ie/publicaccess/Responses/320705/241016%20Knockshanvo%20Wind%20Farm%20Response%20F%20(Part%201).pdf?r=692513)

[2] 241016 Knockshanvo Wind Farm Response F (Part 2): Available at [https://www.pleanala.ie/publicaccess/Responses/320705/241016%20Knockshanvo%20Wind%20Farm%20Response%20F%20\(Part%202\).pdf?r=670102](https://www.pleanala.ie/publicaccess/Responses/320705/241016%20Knockshanvo%20Wind%20Farm%20Response%20F%20(Part%202).pdf?r=670102)

[3] 241016 Knockshanvo Wind Farm Response F (Part 3): Available at [https://www.pleanala.ie/publicaccess/Responses/320705/241016%20Knockshanvo%20Wind%20Farm%20Response%20F%20\(Part%203\).pdf?r=375594](https://www.pleanala.ie/publicaccess/Responses/320705/241016%20Knockshanvo%20Wind%20Farm%20Response%20F%20(Part%203).pdf?r=375594)

[4] An Coimisiún Pleanála - Case reference: PA03.318943: Available at <https://www.pleanala.ie/en-ie/case/318943>

[5] An Coimisiún Pleanála Commission Order ABP-318943-24: Available at <https://www.pleanala.ie/anbordpleanala/media/abp/cases/orders/318/d318943.pdf?r=095222451745>