

From: [maeve durand](#)
To: [SIDS](#)
Subject: Fw: ABP - 320705-24
Date: Wednesday 5 August 2026 13:47:38
Attachments: [Knockshanvo Wind Farm Observation 04 08 26 ABP-320705-24.pdf](#)

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To: communications@pleanala.ie <communications@pleanala.ie>
Sent: Tuesday, August 4, 2026 at 07:56:02 PM GMT+1
Subject: ABP - 320705-24

To whom it concerns, I would like to respond to the proposed Knockshanvo turbines.

Please let me know if I can submit this letter here as an attached file or should I submit it online directly on your website.

Kind regards

Meabh Durand

To: An Coimisiún Pleanála

Planning Case Reference: ABP-320705-24 (Strategic Infrastructure Development)

Project Name: Proposed Knockshanvo Wind Farm (9 no. Wind Turbines and Associated Infrastructure)

Location: Townlands of Knockshanvo and adjacent townlands, Co. Clare and Co. Limerick

Applicant: FuturEnergy Knockshanvo Designated Activity Company

Subject: Structured Formal Objection and Counter-Observation to the Applicant's Multi-Part Response Submissions

Date: 04 August 2026

Dear Sir/Madam,

I am writing to formally object to the proposed Strategic Infrastructure Development (SID) application for the 9-turbine Knockshanvo Wind Farm. Having reviewed the applicant's entire submission across Parts 1, 2, and 3, along with reports from their project team and engineering experts, I wish to submit this structured counter-argument for the Commission's consideration.

RESPONSE TO PART 1 (EXECUTIVE SUMMARY & LEGISLATIVE CLAIMS)

1. Misuse of the Climate Action Act as a "Blanket Justification"

The applicant relies heavily on Section 15 of the Climate Action and Low Carbon Development Act 2015 to argue that the Commission must attribute overriding weight to national climate policy. While national 2030 and 2050 climate targets are vital, they do not grant an automatic mandate to override local environmental, ecological, and community protections. True sustainability requires balancing carbon reduction with the protection of local biodiversity and human environments. A project cannot be deemed "consistent with sustainable development" purely because it generates renewable energy.

2. Project Inefficiency, Grid Storage Constraints, and Energy Curtailment

The core logic of introducing 9 industrial-scale turbines at this location is fundamentally flawed given the clear technological limitations of our national grid infrastructure:

- **Lack of Utility-Scale Storage:** The national grid is not structurally designed to store the intermittent electricity generated by wind infrastructure.

- **The Reality of Curtailment:** Without viable, long-term energy storage systems co-located on-site, this project will inevitably contribute to regional grid saturation. This leads directly to "curtailment"—a systemic inefficiency where developers are financially compensated to shut down turbines when generation exceeds grid capacity, driving up baseline consumer costs.
- **Unsustainable Infrastructure Allocation:** Forcing massive physical interventions onto the landscape for infrastructure that cannot store its yield fails the core test of proper planning. Speculative, intermittent generation capacity should not override local community protections.

3. Unjustified Financial Burden on Local Consumers

The applicant positions this development as an essential public good, yet fails to demonstrate any localized economic benefit or protection against escalating regional energy costs. Relying blindly on blanket climate targets to push through highly subsidized infrastructure projects forces rural communities to bear the environmental and visual burdens of industrialization while facing increasingly volatile and costly energy costs.

4. Project Splitting and Fragmented Environmental Assessments

The applicant acknowledges that this project consists of two separate applications: the wind farm itself (Section 37E) and the grid connection works (Section 182A). Splitting the project into two distinct planning files creates a fragmented review process. The cumulative disruption of heavy construction traffic, excavation, and grid laying across Co. Clare and Co. Limerick will place an unacceptable, simultaneous burden on local infrastructure and sensitive ecosystems.

5. Failure to Adequately Address 120 Third-Party Concerns

The applicant notes that 120 separate submissions were received from third-party observers. Rather than addressing these unique local impacts individually, the applicant has consolidated them into generalized "common themes." This dilutes the deeply localized and severe concerns of residents regarding visual impact, shadow flicker, noise pollution, and depreciation of residential amenity. A generic project team matrix cannot fully mitigate the daily reality of living adjacent to industrial-scale turbines.

RESPONSE TO PART 2 (HYDROLOGY & TRAFFIC DATA APPENDICES)

1. Serious Hydrological Failures and Public Water Supply Risks

The Hydro-Environmental Services (HES) report in Appendix 2 attempts to minimize community water concerns, but inadvertently exposes glaring flaws and omissions in their baseline fieldwork:

- **Admission of Critical Data Omission:** The applicant openly admits that the **Broadford Public Water Supply (PWS) Boreholes were completely omitted** from the original impact assessment in Chapter 9 of the EIAR. This failure to evaluate a primary community drinking water source cannot be brushed aside as a minor issue.
- **Surface Water Vulnerabilities:** The layout physically threatens the **Castle Lake Public Water Supply** and the **Shannon (Lower)_060 Drinking Water Protected Area (DWPA)**, which supplies drinking water to Limerick City.
- **Zero On-Site Household Well Surveys:** The applicant confirms they **did not perform a physical door-to-door well search** for private residences, opting for desk-study assumptions because the turbines sit on a hill. This puts local private wells at immediate risk of chemical or sediment contamination.
- **Industrial Scale Aggregates and Runoff:** The plan details **5 on-site borrow pits extracting 151,000m³ of rock**. Blasting and heavy excavation risk permanently rupturing regional underground aquifers and sending heavy sediment directly into nearby streams.

2. Baseline Traffic Strain and Degradation of Local Infrastructure

The manual turning count data compiled in Appendix 1 highlights that our narrow rural arteries—specifically the R465/R466 in Broadford and Carmody's Cross—already handle substantial localized transit volumes. Forcing multi-ton industrial turbine components and heavy quarry haulage trucks onto these corridors will damage roads, trigger long bottlenecks, and cause severe safety hazards for daily school and commuter traffic.

3. Long-Term Decommissioning Failures and Environmental Liabilities

The applicant's technical appendices gloss over the environmental realities of decommissioning these massive industrial structures once their operational lifespan concludes.

- **The Recycling Crisis:** Modern wind turbine blades are constructed using complex, bonded fibre-reinforced composite materials that are fundamentally difficult, energy-intensive, and often impossible to recycle cleanly.
- **Landfill and Environmental Legacy:** Pushing forward with an application that results in massive quantities of un-recyclable industrial waste—destined either

for specialized landfilling or carbon-heavy processing elsewhere—fails the core definition of a truly circular, sustainable project.

- **Lack of Restorational Safeguards:** The applicant has provided no definitive, legally binding plan or localized recycling strategy for these specific turbine parts. The Commission should refuse permission for developments that leave behind an unaddressed structural liability for future generations.

RESPONSE TO PART 3 (STATUTORY CONSULTATIONS & SURVEILLANCE RADAR)

1. Severe Aviation Safety Risks and Radar Interference

The applicant's Part 3 documentation confirms critical, unmitigated objections from AirNav Ireland and Shannon Airport regarding radar degradation.

- **Woodcock Hill Radar Blind Spots:** Technical reports highlight that the Knockshanvo turbines will directly block the Woodcock Hill Mono-pulse Secondary Surveillance Radar (MSSR). Combined with the proposed **Oatfield Wind Farm**, these massive structures create severe radar "shadow zones." Red-line tracking drops spanning up to 2km in length directly endanger commercial and low-flying aircraft.
- **Lack of Real-World Precedent:** The applicant admits that AirNav Ireland explicitly requested case studies demonstrating where wind farms successfully co-exist with these specific radar sensors without compromising safety. The developer has failed to present a single operating example, confirming that this project poses an unacceptable gamble to regional aviation safety.

2. Local Authority Objections and Lack of Social License

Part 3 details the final observations from Clare County Council and Limerick City & County Council. As the elected representatives and planning authorities for the affected areas, their detailed local knowledge regarding development plans, county zoning, and community impact must be given primacy over the applicant's generalized arguments. The sheer volume of objections (120 submissions) paired with municipal planning concerns proves that this project completely lacks a social license to operate.

CONCLUSION

An Coimisiún Pleanála has previously refused regional turbine projects when state bodies like AirNav Ireland and Shannon Airport warned of unmitigated aviation navigation threats. Because the applicant cannot fix the radar blind spots at Woodcock Hill, has failed to physically inspect local private wells, omitted vital public water data in

its initial filings, failed to prove the structural grid readiness of the infrastructure, and provided no circular solution for blade decommissioning, I respectfully request that the Commission protects our community and **refuses planning permission** for the Knockshanvo Wind Farm.

Yours faithfully,

Meabh Durand

Kealderra, Bodyke, Co Clare, V94W2HX