

From: [Orlaith Nihill](#)
To: [SIDS](#)
Subject: Ref: 320705 - Further Information Response
Date: Wednesday 5 August 2026 17:17:02
Attachments: [320705_FurtherInformationResponse_OrlaithNihill.pdf](#)

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To Whom It May Concern,

Please find attached our observation in relation to the further information documentation submitted by FuturEnergy Knockshanvo DAC with regards to Planning Reference 320705.

Kind Regards,

Orlaith

Ryehill
Ardnatagle
O' Brien's Bridge
Co. Clare
V94 R9D7

An Coimisiún Pleanála
64 Malborough Street,
Dublin 1,
D01V902

Date: 05/08/2026

Re: ABP – PA03.320705

Planning Permission to develop a Windfarm and Ancillary Infrastructure located in the townlands of Snatty, Hurdlestown, Oatfield, Drumsillagh, Sallybank, Gortacullin, Aharinaghbeg, Knockshanvo, Cloontra, Cloghoolia, Ballycullen and others, County Clare. And located in the townland of Court, County Limerick.

To whom it concerns,

The bat survey report states the following with regards to the Lesser Horseshoe Bat:

'The Proposed Development Site is located in proximity of two European Sites designated for the protection of Lesser horseshoe bats. This species has been recorded foraging and commuting across the site, with activity peaks considered high during transitional periods in Autumn and Spring. The populations associated with the designated roosts are likely to utilise the Site as it is within or in close proximity of their core foraging ranges (2.5km); therefore, the Lesser horseshoe population recorded on the Site has been assigned International Importance.'

[Emphasis Added]

It is imperative that An Coimisiún Pleanála is cognizant of these facts when deliberating on this application.

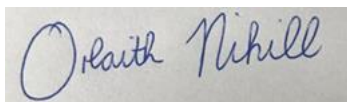
The further information response from the applicant does not appear to consider the contents of our original observation in formulating a response and as a result the issues and questions raised remain outstanding. The original observation has been attached to this letter for ease of reference, to be read again in tandem to this response.

The further information document states with regards to Lesser Horseshoe bats (LHB) on page 28 '*no roosts were identified within the Wind Farm Site during the surveys*' and on page 82 that '*no evidence of roosting LHB was recorded within the Proposed Development site boundary*'. One cannot confidently state this as no species ID was given to two bats emerging from a stable within the Proposed Development Site. Also, an ESB building was unexplored. These are referred to in our original observation.

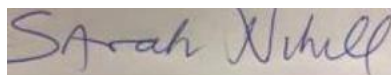
With regards to Marsh Fritillary, diagrams of survey findings with regards to the species are again not furnished. This is unfortunate as the butterfly lives in metapopulations and is a protected species under Annex II of the European Union Habitat's Directive 1992.

Thank you for taking the time to read our observation.

Yours Sincerely,



Orlaith Nihill (Main Point of Contact for any future correspondence)



Sarah Nihill



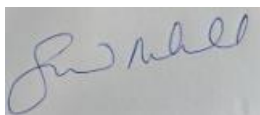
Eoghan Nihill



Deirdre Nihill



Tadhg Nihill



Sinead Nihill

Ryehill
Ardnatagle
O' Brien's Bridge
Co. Clare
V94 R9D7

An Bord Pleanala
64 Malborough Street,
Dublin 1,
D01V902

Date: 31/10/2024

Re: ABP – PA03.320705

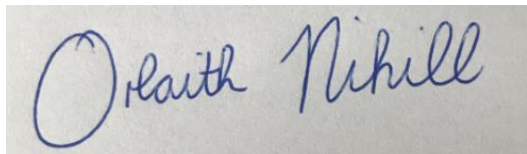
Planning Permission to develop a Windfarm and Ancillary Infrastructure located in the townlands of Snatty, Hurdlestown, Oatfield, Drumsillagh, Sallybank, Gortacullin, Aharinaghbeg, Knockshanvo, Cloontra, Cloghoolia, Ballycullen and others, County Clare. And located in the townland of Court, County Limerick.

To whom it concerns,

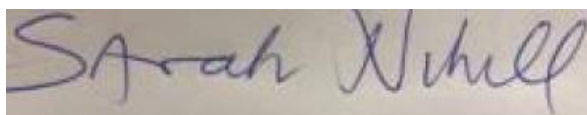
Please find enclosed our observation regarding the above planning application. We are against this development and ask that An Board Pleanala refuse this application for planning permission. We have grave concerns as to the potential impact of this proposed windfarm development on biodiversity in this area both individually and cumulatively.

Thank you for taking the time to read our observation.

Yours Sincerely,



Orlaith Nihill **(Main Point of Contact for any future correspondence)**



Sarah Nihill



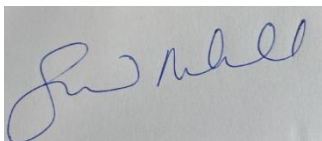
Eoghan Nihill



Deirdre Nihill



Tadhg Nihill



Sinead Nihill

Negative Effects on Bats

Bats are protected under the Wildlife Act 1976 (amended) in Ireland and also under the EU Habitats Directive. The lesser horseshoe bat is also listed under Annex II of the Habitats Directive.

“The Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation” by Scotland’s Nature Agency (2021) surmises as follows:

Wind farms can affect bats in the following ways:

1. Collision mortality, barotrauma and other injuries (although it is important to consider these in the context of other forms of anthropogenic mortality)
2. Loss or damage to commuting and foraging habitat, (wind farms may form barriers to commuting or seasonal movements, and can result in severance of foraging habitat);
3. Loss of, or damage to, roosts;
4. Displacement of individuals or populations (due to wind farm construction or because bats avoid the wind farm area).

It is worth noting the following information supplied in the bat survey report:

*‘While **the last bat surveys for the Proposed Wind Farm were carried out in 2022 and are therefore considered out of date according to existing guidance**, the Site has been visited by MKO ecologists in 2023 and 2024, and no significant changes in the baseline environment were identified to justify repeated surveys.’*

[Emphasis Added]

Four structures (an iron shed, an ESB building, a stable and a cow shed) within the Proposed Development Site were identified as potential roosts that warranted further exploration. The bat report states that access was gained to all structures except the ESB building. As the applicant, FuturEnergy Ireland is a joint venture company of the ESB with Coillte it is confusing as to why access was an issue here.

In addition to this, with regards to the identified stable the following information is supplied in the bat survey report:

*‘An emergence survey was conducted on 31st May 2022 on the stable. Two bats were observed emerging from it approximately half an hour after sunset: both bats were not picked up by the detector, so it was not possible to confirm a species ID, however it is likely to have been soprano pipistrelle as this was the only species recorded before and after the emergence was observed. **The survey was stopped one hour after sunset due to poor visibility and continued as a transect.**’*

[Emphasis Added]

It is curious that despite having ample time, no further effort was made to concretely confirm the species at this roost. No maps or diagrams plotting these structures were found while perusing this planning application.

High bat activity levels recorded at Windfarm Site

Significant wind turbine curtailment is proposed to counteract the high levels of bat activity recorded at the Windfarm Site, in particular for common and soprano pipistrelles. Both pipistrelles are high risk species as studies have shown that pipistrelles have a high risk of direct impact from wind turbines. In the UK, studies have found that pipistrelles are one of the most frequently found casualties at wind turbine sites.

Table 6-27 Analysis Results: Detectors with High Median Bat Activity

Species	Survey Period	Detector ID	Corresponding Turbine	Median Bat Activity (bp/h)	Median Bat Activity Level	Max Bat Activity	Max Bat Activity Level
Soprano Pipistrelle	Summer	D05	T5	23.11	High	67.52	High
		D06	T6	20.62	High	48.32	High
Common Pipistrelle	Spring	D07	T7	48.27	High	159.00	High
		D09	T9	31.33	High	134.99	High
	Summer	D03	T3	17.91	High	114.83	High
		D05	T5	21.65	High	49.74	High
		D06	T6	63.32	High	106.12	High
		D07	T7	36.72	High	89.08	High
		D10	n/a	30.29	High	98.05	High
	Autumn	D05	T5	21.97	High	117.8	High
		D06	T6	39.90	High	128.67	High

Table 6-28 Turbine Specific Curtailment Strategy for High-risk Species

Turbine No.	Proposed Curtailment Period		
	Spring (April to May)	Summer (June to mid-August)	Autumn (mid-August to October)
Turbine 3	No	Yes	No
Turbine 5	Yes	Yes	Yes
Turbine 6	Yes	Yes	Yes
Turbine 7	No	Yes	No

Turbine No.	Proposed Curtailment Period		
	Spring (April to May)	Summer (June to mid-August)	Autumn (mid-August to October)
Turbine 9	No	Yes	Yes

The significant curtailment required suggests the location of this windfarm is unsuitable.

In addition to this, these curtailment measures do not have due regard to the cumulative impacts of nearby wind farm developments, namely Oatfield Windfarm, which when considered collectively will have a larger landscape scale effect on the bat species that use this site and weaken the effectiveness of mitigation measures being implemented.

Other high risk bat species recorded was the Leisler bat which is a high-flying bat that flies in open spaces between 10-70m and has been known to reach heights of 500m. As a result, it is considered a high-risk species in relation to wind turbines as flying at such heights means it has a high risk of direct collision with wind turbines (See: Cloonlara House [000028]).

Lack of Proper Cumulative Impact Analysis

“The Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation” by Scotland’s Nature Agency (2021) advocates taking account of

“The location of other wind energy developments, including the number of turbines and their size, within the surrounding 10km in order to inform an assessment of cumulative pressure.”

There is a significant amount of windfarm development proposed within 10km of this proposed development from Carrownagowan, Fahybeg to Lackareagh, and in particular Oatfield, which is merely 500m from the proposed development. The proposed Knockshanvo Windfarm and the Oatfield Windfarm are so close together that the Eastern Development Area and Western Development Area of the proposed Oatfield windfarm give the appearance when placed on a map together of being bookends on either side of the proposed Knockshanvo Windfarm.

Table 6-31 Wind farm projects within 10km of the Proposed Development

Pl. Ref.	Distance from Proposed Development	Separation distance between nearest turbines	Wind Farm	Status	Turbine No.
ABP-315239	Adjacent to the Proposed Development boundary	500m	Oatfield	Proposed	11
ABP-317227	Approx. 3.4km east of proposed Wind Farm Site boundary	4.3km	RWE Fahybeg WF	Permitted	8
Pre-planning	Approx 4km northeast of proposed Wind Farm Site boundary	5km	Lackareagh WF	Proposed	7
ABP-312193-21	4.4km south of proposed Wind Farm Site boundary	4.8km	Ballycar Wind Farm	Proposed Lodged 26/01/2024	12
ABP.308799	Approx. 4.7km northeast of	5.7km	Carrownagown Wind Farm	Permitted	19

Pl. Ref.	Distance from Proposed Development	Separation distance between nearest turbines	Wind Farm	Status	Turbine No.
	proposed Wind Farm Site boundary				
10/453 (EOD 15/812), 22254, ABP-314887-22	Approx. 7.8km south of proposed Wind Farm Site boundary	8.9km	Parteen Turbine	Existing	1

Negative Effects on Lesser Horseshoe Bat

The bat survey report states the following with regards to the Lesser Horseshoe Bat:

‘The Proposed Development Site is located in proximity of two European Sites designated for the protection of Lesser horseshoe bats. This species has been recorded foraging and commuting across the site, with activity peaks considered high during transitional periods in Autumn and Spring. The populations associated with the designated roosts are likely to utilise the Site as it is within or in close proximity of their core foraging ranges (2.5km); therefore, the Lesser horseshoe population recorded on the Site has been assigned International Importance.’ [Emphasis Added]

The Natura Impact Statement states that Danes Hole, Poulnalecka SAC [000030] is merely **383m** from the proposed development. It also states Ratty River Cave SAC [002316] is 2.5km from the proposed development and that Kilkishen House SAC [002319] is 3.7km from the proposed development.

Under Article 17 of the Habitats Directive (Council Directive 92/43/EEC), every six years Member States must report to the Commission on the conservation status of protected species and habitats under the Habitats Directive. In the most recent Article 17 report submitted to the EU Commission the lesser horseshoes conservation status was deemed ‘unfavorable inadequate’ due to concerns over habitat loss and landscape connectivity. The Lesser Horseshoe Bat Species Action Plan 2022 – 2026 was launched in response to this report, in a bid to rectify the matter and return the lesser horseshoe species in Ireland to favorable conservation status.

‘The Lesser Horseshoe Bat Species Action Plan 2022 – 2026’ (NPWS & VWT, 2022) prepared by the Department of Housing, Local Government and Heritage states on page 28 the following:

“Maintaining the genetic diversity of the lesser horseshoe bat in Ireland is crucial for its long-term survival. The retention of existing linear landscape features within at least 2.5km but preferably 5km of lesser horseshoe bat roosts with 20 bats or more is essential to counteract the documented genetic differentiation that has already occurred within the species throughout its Irish distribution.” [Emphasis Added]

As referred to above, Danes Hole, Poulanecka SAC is located merely 383m from the proposed development. As the proposed development encroaches upon the minimum 2.5km retention of existing linear landscape features advocated by the Lesser Horseshoe Bat Species Action Plan 2022 – 2026, the proposed development should not be granted permission. The same rationale applies to River Cave SAC which 2.5km from the proposed development.

In addition to this, as the Kilkishen House SAC is well within the preferable 5km retention of existing linear landscape features advocated by the Lesser Horseshoe Bat Species Action Plan 2022 – 2026, being merely 3.7km away, the proposed development should not be granted permission.

In addition to these SAC's the bat report states the following:

*'The Proposed Development Site is located within 2.5km of two lesser horseshoe designated SACs, Ratty River Cave SAC [002316] and Danes Hole, Poulanecka SAC [000030]. In addition, **seven roosts, including two large summer roosts of which at least one maternity roost, were recorded within 2.5km of the Site and provided as confidential records by NPWS. Other roosting sites located within 2.5km of Knockshanvo Wind Farm include day roosts and transitional roosts.**'* [Emphasis Added]

Fig. 3-2 'Roost Records' shows all the lesser horseshoe roosts (*Rhinolophus hipposideros*) and has been attached for ease of reference at the end of this submission.



Rhinolophus hipposideros

The Natura Impact Statement (NIS) with regards to the SAC's surmises that 'there will be no direct effects as the project footprint is located entirely outside the designated site.'

Chapter 6 of the EIAR surmises the NIS as follows:

'The NIS concludes that in view of best scientific knowledge and on the basis of objective information, the Proposed Development either individually or in combination with other plans or projects, is not likely to have adverse effects on the European Sites that were assessed as part of the Appropriate Assessment process. Similarly, with the prescribed mitigations in place, there is no potential for impact on any nationally designated site.' [Emphasis Added]

Taking into account all of the lesser horseshoe bat roosts that fall within this distance, including two designated SAC's and the sentiment expressed in 'The Lesser Horseshoe Bat Species Action Plan 2022 – 2026' referred to above, there is substantial doubt raised as to the validity of this conclusion reached in the Natura Impact Statement.

Insufficient Marsh Fritillary Information supplied in EIAR

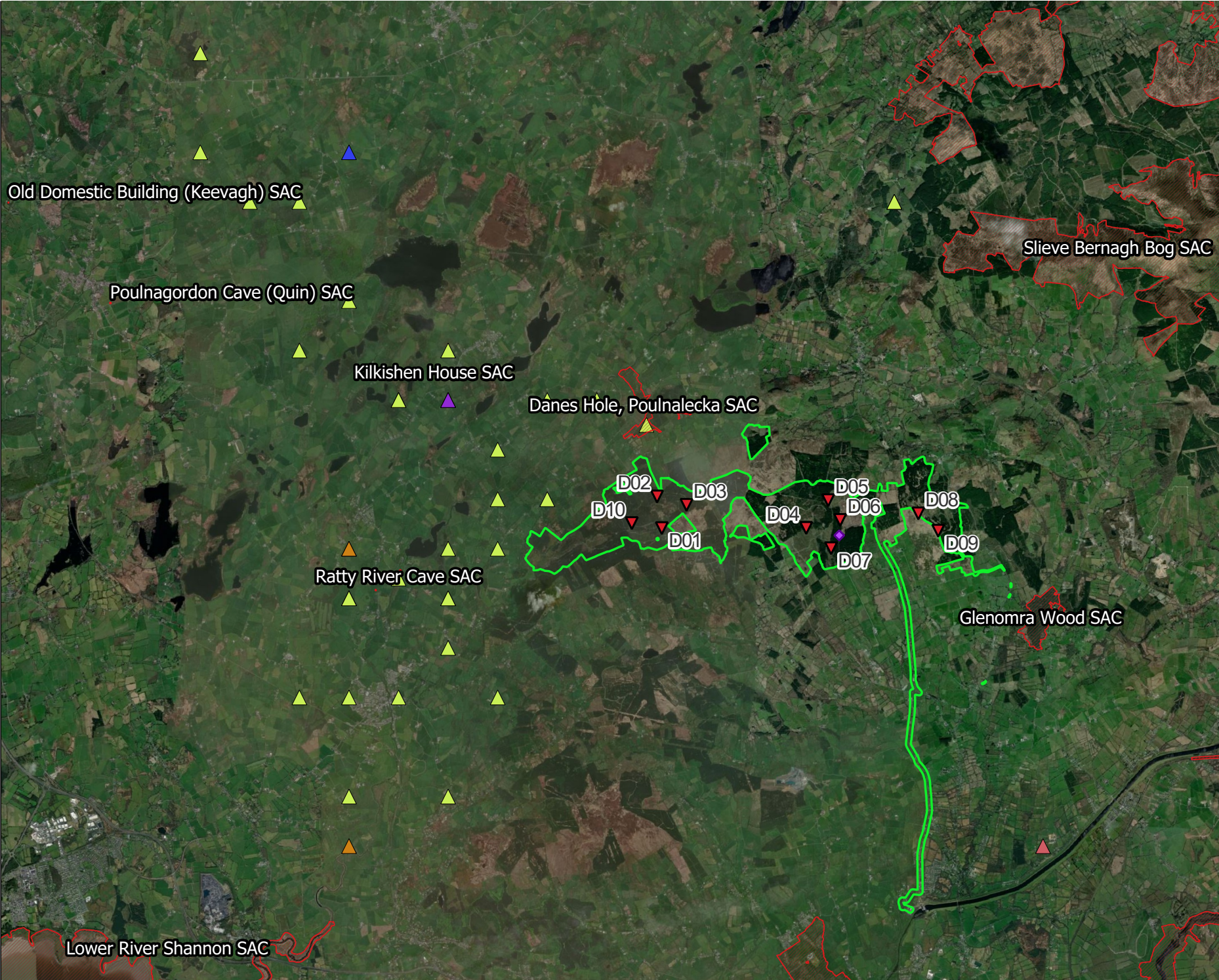
We are not furnished with the Marsh Fritillary Report in the EIAR or any diagrams of survey findings with regards to this species. The desk study referred to in chapter 6 of the EIAR stated:

‘An NPWS record for Marsh Fritillary butterfly exists less than 500m from the Proposed Development boundary. Given that there are mapped wetland areas within the Proposed Development Site, there is potential for this species to be found on suitable habitats within the site boundary.’
[Emphasis Added]

Chapter 6 of the EIAR also states:

‘NBDC records for marsh fritillary are located in the hectads R56 and R57 within which the Proposed Development is located. One NPWS point record is located approx. 500m east of the Proposed Development Site boundary.’

Marsh Fritillary under the EU Habitats and Species Directive (Annex II).



Map Legend

- EIAR Site Boundary
- Special Area of Conservation
- Spring Detectors 2022
- Soprano Pipistrelle Roost

BCI Roost Records

- Myotis nattereri
- Myotis spp.
- Nyctalus leisleri
- Pipistrellus pygmaeus
- Pipistrellus spp.
- Plecotus auritus
- Rhinolophus hipposideros
- Unidentified bat

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Drawing Title
Roost Records

Project Title
Knockshanvo Wind Farm

Drawn By DC	Checked By SF
Project No. 200513	Drawing No. Fig. 3-2
Scale 1:100,000	Date 16/08/2024

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