

# Further Submission on Behalf of Sunyata Retreat Centre Ltd

**Proposed Knockshanvo Wind Farm**

**An Coimisiún Pleanála Reference: ABP-320705-24**

**Response to the Applicant's Response to Observations**

## Executive Summary

This submission is made on behalf of the Board of Trustees of Sunyata Retreat Centre Ltd in response to the Applicant's Response to Observations concerning the proposed Knockshanvo Wind Farm.

Sunyata recognises Ireland's climate obligations and supports the transition to renewable energy. This submission is not an objection to wind energy in principle. It concerns whether this particular development, at this particular location, is compatible with the continued operation of an established Buddhist retreat centre situated approximately 90 metres from the wind farm site boundary and approximately 891 metres from the nearest proposed turbine, and whether the Applicant has adequately demonstrated that its likely effects have been fully identified, assessed and can be satisfactorily mitigated.

The Applicant now acknowledges that Sunyata provides residential retreats, meditation, mindfulness practice, religious observance and spiritual community life. It does not, however, remedy the principal deficiency identified in Sunyata's original observation.

The central issue is not whether Sunyata was mentioned in the Environmental Impact Assessment Report. It is whether the Centre was assessed in a manner that reflects its actual function and sensitivity.

Sunyata is not an ordinary dwelling, generic community facility or tourism attraction. It is a place of worship and silent residential retreat whose established use depends fundamentally on tranquillity, natural soundscapes, visual seclusion, dark night skies and freedom from sustained industrial disturbance. These environmental qualities are not incidental amenities. They form part of the Centre's religious, contemplative and charitable purpose.

Despite recognising this purpose, the Applicant continues to assess Sunyata principally through methodologies intended to protect conventional residential amenity. The Applicant relies heavily on compliance with general numerical criteria and concludes from that compliance that significant effects will not arise. This does not answer the relevant question: whether the proposed development would materially alter the environmental conditions upon which Sunyata's established activities depend.

The Applicant states that the worst-case cumulative operational noise level at Sunyata would be 38.5 dB LA90 and that this complies with the applicable residential criterion. However, compliance with a general residential criterion does not establish that audible, repetitive industrial noise would be compatible with silent meditation, religious retreat, outdoor contemplation or the exceptionally quiet conditions intentionally maintained at the Centre.

The noise assessment also appears to represent the entire ten-acre Centre through a single receptor point. It does not separately assess the Dhamma Hall, residential accommodation, woodland cabins, gardens, outdoor meditation spaces or walking-meditation routes. Nor does the Applicant demonstrate that the selected receptor and monitoring positions represent the quietest and most sensitive parts of the property.

The Applicant also acknowledges that predicted shadow flicker at Sunyata exceeds the recognised 30-minute daily guideline before mitigation. That admission reinforces the need for a detailed and enforceable mitigation scheme. Instead, the response relies on broadly described local measures and possible turbine controls, without clearly identifying the affected buildings and spaces, the expected frequency and duration of the effect, the shutdown triggers or the means of monitoring and enforcement.

The landscape and visual response similarly fails to assess Sunyata from representative locations within the Centre. There is no adequate assessment of views from the Dhamma Hall, accommodation buildings, cabins, gardens and outdoor contemplation areas. The effects of blade movement, intermittent visibility through trees, aviation lighting, changing forestry conditions and cumulative wind energy development have not been sufficiently addressed from the perspective of the Centre's religious and contemplative use.

Construction effects also remain inadequately examined. Standard construction controls are not sufficient for a facility that conducts silent retreats and meditation throughout the day and throughout the year. The Applicant has not provided a Centre-specific construction programme, retreat-protection protocol or enforceable arrangement for controlling disruptive works during residential retreats.

The assessment remains fragmented across noise, shadow flicker, landscape, construction, human health and cultural matters. It does not assess the combined experience of a retreatant who may simultaneously encounter turbine noise, moving blades, altered landscape character, aviation lighting and shadow flicker. It therefore fails to evaluate the overall effect on the tranquillity, seclusion and sense of retreat upon which Sunyata depends.

The Applicant's additional material explains its previous conclusions. It does not provide the receptor-specific evidence necessary to substantiate them.

Sunyata respectfully submits that the information currently before An Coimisiún Pleanála is insufficient to support a reasoned conclusion that the likely effects on the Centre have been fully identified, assessed and satisfactorily mitigated. Permission should be refused on the information presently available.

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## 1. Introduction

This submission should be read together with Sunyata's original observation. It addresses the extent to which the Applicant's Response to Observations resolves the concerns previously raised.

Sunyata has operated since 1998 as a Buddhist retreat centre, place of worship and charitable facility. It provides residential retreats, meditation instruction, religious observance, mindfulness practice, spiritual community life and opportunities for quiet contemplation in a secluded natural environment.

The Centre's location was selected and developed specifically for these purposes. Its tranquillity and seclusion are not incidental benefits comparable to the ordinary amenity of a rural dwelling. They are integral to the activities carried out at the Centre.

The Applicant now acknowledges Sunyata's general function. However, the assessment methodology remains materially unchanged. Sunyata continues to be treated primarily as:

- a conventional residential noise receptor;
- a single dwelling for shadow-flicker purposes;
- a community or tourism destination for landscape purposes; and
- a generic sensitive receptor for human-health purposes.

None of those categories adequately reflects the Centre's combined religious, residential, contemplative and charitable use.

Recognition of Sunyata's existence is not equivalent to assessment of its sensitivity.

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## **2. Sunyata Has Not Been Assessed According to Its Actual Use and Sensitivity**

A reliable assessment must begin by correctly identifying the receptor and the activities that may be affected.

Sunyata is a ten-acre, multi-building retreat centre containing indoor and outdoor spaces used for different but related purposes. These include:

- the Dhamma Hall;
- residential accommodation;
- woodland cabins;
- teaching and communal spaces;
- gardens;
- outdoor meditation areas;
- walking-meditation routes;
- areas used for individual contemplation; and
- areas intended to support longer-term monastic residence.

The Applicant's response does not map these uses or assess their differing sensitivities.

Instead, the Centre is repeatedly reduced to a single numbered receptor. This may be administratively convenient, but it does not demonstrate that the environmental conditions experienced throughout the Centre have been properly assessed.

The Applicant have not considered:

1. where the Centre's principal activities occur;
2. when those activities occur;
3. the environmental conditions required for those activities;
4. the sensitivity of each relevant indoor and outdoor location;
5. the duration and frequency of exposure;
6. the combined effect of different environmental impacts; and
7. the implications for the Centre's continued operation.

The statement that Sunyata has been "fully acknowledged and considered" is therefore unsupported by a transparent receptor-specific assessment.

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### **3. Compliance With Residential Criteria Does Not Establish Acceptability at Sunyata**

The Applicant's response relies heavily on compliance with general assessment criteria.

Recognised criteria are important, but they are not a substitute for judgement about the actual receptor. A threshold designed to protect ordinary residential amenity does not automatically establish that the same level of impact is acceptable at a silent Buddhist retreat centre.

The relevant distinction is between:

- avoiding an unacceptable impact on an ordinary dwelling; and
- preserving the environmental conditions necessary for silent retreat, meditation and religious observance.

The Applicant does not explain why these two standards should be treated as equivalent.

The Centre's activities involve sustained attention to sound, periods of silence, early-morning and evening practice, outdoor contemplation and residential occupation by persons specifically attending to withdraw from ordinary environmental disturbance.

A sound that would be tolerated as part of ordinary residential life may have a materially different effect where silence and attentiveness to the surrounding soundscape form part of the activity being undertaken.

The assessment was required to examine that difference rather than assume it away.

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## 4. Operational Noise

### 4.1 The 38.5 dB LA90 prediction does not prove absence of significant effects

The Applicant states that the worst-case cumulative operational turbine noise at Sunyata would be 38.5 dB LA90 and that this complies with the applicable criterion.

This figure does not, by itself, establish that the effect would be insignificant.

The response does not adequately explain:

- the existing sound level during the quietest retreat periods;
- the extent to which turbine noise would be audible above natural sound;
- the frequency with which the predicted level would occur;
- whether the figure includes a clear allowance for prediction uncertainty;
- whether every turbine model permitted by the application would remain within the assessed level;
- the contribution of each relevant wind energy development;
- the effect during downwind and stable atmospheric conditions;
- the effect during early morning, evening and night-time periods;
- the effect on outdoor meditation and walking meditation; or
- the difference between a numerical noise level and the perceptual intrusion of repetitive turbine sound.

It does not demonstrate compatibility with Sunyata's established use.

### 4.2 A single receptor point is inadequate

Sunyata appears to have been assessed as Noise Sensitive Location H310.

The Applicant has not demonstrated that this location adequately represents:

- the Dhamma Hall;
- sleeping accommodation;
- woodland cabins;
- gardens;
- outdoor meditation spaces;
- walking routes; or
- the quietest parts of the site.

The Applicant has not identified the exact position, height or acoustic surroundings of H310 or the baseline monitoring position described as Location A.

The response also does not explain:

- why those positions were selected;
- whether they are representative of all sensitive areas within the Centre;
- whether they are affected by road noise, vegetation noise or building screening;
- whether measurements were taken during residential retreats;
- whether the Centre's quietest periods were separately analysed; or
- whether seasonal conditions were adequately represented.

Without this information, the Commission cannot determine whether the selected point fairly represents the Centre as a whole.

### **4.3 The character of turbine noise has not been adequately addressed**

The response concentrates on an overall LA90 value.

For a receptor dependent on silence, the character of sound is as important as its numerical level. Repetitive, rhythmic or modulating sound may be intrusive even where the overall level remains below a general limit.

The response does not contain a sufficiently specific assessment of:

- amplitude modulation;
- tonality;
- low-frequency components;
- mechanical or impulsive characteristics;
- changing audibility as blades rotate;
- increased audibility during low-background conditions;
- wind shear and stable atmospheric conditions; or
- the effect of prolonged exposure during silent retreats.

A single averaged value cannot fully represent these effects.

### **4.4 The operational implications have not been assessed**

The response does not examine whether operational noise could affect:

- the ability to conduct silent retreats;
- the use of outdoor meditation areas;

- sleep and early-morning practice;
- teaching and religious ceremonies;
- the experience of monastics and long-term residents;
- retreat attendance;
- repeat visits;
- the Centre's reputation as a place of seclusion; or
- the financial sustainability of a donation-supported charity.

These are foreseeable consequences of the impact alleged by Sunyata. They should have been assessed rather than excluded by applying an ordinary residential criterion.

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## 5. Turbine Design Flexibility and Assessment Uncertainty

Sunyata's original submission raised concerns regarding the absence of a fixed turbine model.

The Applicant's response does not adequately demonstrate that the assessment represents the worst case across the full design envelope.

Different turbine models may have materially different:

- sound-power levels;
- spectral characteristics;
- tonal features;
- amplitude-modulation characteristics;
- hub heights;
- blade dimensions;
- rotational speeds;
- operating modes;
- shadow-flicker effects;
- visual scale; and
- lighting requirements.

The Applicant didn't demonstrate that every turbine capable of being installed under the permission would result in effects no greater than those assessed.

A representative turbine is not sufficient unless it is shown to be the worst case for each relevant environmental effect.

Essential design parameters should not be deferred until after permission without binding controls that prevent the selection of a turbine producing greater effects than those described in the environmental assessment.

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## 6. Shadow Flicker

The Applicant acknowledges that predicted shadow flicker at Sunyata exceeds the recognised 30-minute daily guideline before mitigation.

This is a significant admission. It confirms that an adverse effect is predicted unless active mitigation is implemented.

The response does not provide sufficient detail regarding:

- the affected buildings;
- the affected rooms and windows;
- outdoor meditation areas;
- woodland cabins;
- the number of affected days;
- the maximum daily duration;
- the time of day;
- the turbines responsible;
- the effect of maximum turbine dimensions;
- the assumptions made regarding vegetation;
- the proposed shutdown triggers;
- the monitoring system;
- the response to complaints; or
- the means by which mitigation would be enforced.

The Centre also appears to have been assessed as a single dwelling rather than as a multi-building retreat facility.

Any mitigation that requires Sunyata to close blinds, alter the use of rooms or relocate activities would transfer the burden of the development onto the Centre. Such measures would not preserve existing amenity.

For a receptor of this sensitivity, the response has not clearly demonstrated how shadow flicker would be prevented or effectively mitigated at all occupied buildings and established meditation spaces.

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## 7. Landscape and Visual Effects

### 7.1 Generic conclusions do not constitute a Sunyata-specific assessment

The Applicant describes Sunyata as a community destination of local importance and concludes that visual effects in the surrounding area would generally range from not significant to moderate.

A general conclusion applying to a group of receptors does not establish the effect on Sunyata.

The response does not provide a clear assessment from:

- the Dhamma Hall;
- residential accommodation;
- woodland cabins;
- gardens;
- outdoor meditation spaces;
- walking-meditation routes;
- the approach to the Centre; or
- other locations central to the experience of retreat.

The visual experience of a person attending a silent retreat is materially different from that of a person briefly passing through a recreational viewpoint.

The Applicant has not adequately assessed that distinction.

### 7.2 The effect is not limited to visibility

The significance of the effect on Sunyata cannot be determined solely by counting the number of visible turbines or the extent of theoretical visibility.

The relevant considerations include:

- turbine scale;
- blade movement;
- repeated or intermittent visibility through trees;
- visual dominance;
- alteration of the sense of seclusion;
- introduction of industrial structures into a contemplative setting;
- cumulative visibility with other wind developments; and
- the duration of exposure experienced by residents and retreatants.

The response does not adequately address these experiential effects.

### **7.3 Forestry cannot be treated as permanent mitigation**

The Applicant relies in part on surrounding forestry and topography to reduce visibility.

Forestry is not necessarily permanent screening. Its effectiveness may change through:

- commercial felling;
- thinning;
- storm damage;
- disease;
- fire;
- replanting;
- seasonal conditions; or
- changes over the operational life of the wind farm.

It cannot be relied upon as permanent mitigation.

### **7.4 The Visual Assessment Is Not Supported by Centre-Specific Visualisations**

The Applicant has not provided verified photomontages or wirelines from representative locations within Sunyata, including the principal meditation, residential and outdoor contemplation areas. Without such material, it is not possible to evaluate adequately the likely visual effects of the proposed development from the locations where the Centre's principal activities take place.

The visual material should address, as appropriate:

- the maximum permitted turbine dimensions;
- leaf-on and leaf-off conditions;
- all relevant turbines;
- cumulative wind-energy developments;
- representative blade positions;
- intermittent views through forestry; and
- night-time aviation lighting.

Without this material, the Applicant's conclusions regarding visual effects at Sunyata cannot be meaningfully evaluated.

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## 8. Aviation Lighting and Night-Time Effects

The response does not sufficiently assess the effect of aviation lighting on the Centre's night-time environment.

Night-time tranquillity and darkness are important to:

- evening meditation;
- overnight retreats;
- sleep;
- views from residential accommodation and cabins;
- the perception of remoteness; and
- the wider experience of withdrawal from urban and industrial activity.

The Applicant has not identified:

- which turbines would be lit;
- the lighting type and intensity;
- whether lights would be steady or flashing;
- whether any directional or visibility-controlled system would be used;
- the predicted visibility from the Centre; and
- the cumulative effect with other lit structures.

Daytime visual conclusions cannot be assumed to represent night-time effects.

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## 9. Construction Effects

The construction phase has not been assessed in a manner specific to Sunyata's operation.

Generic construction mitigation does not address a centre where silence is required during ordinary daytime working hours.

The response does not adequately assess:

- drilling;
- rock breaking;
- blasting, if applicable;
- heavy construction traffic;

- reversing alarms;
- early-morning movements;
- weekend works;
- concrete pours;
- temporary lighting;
- tree felling;
- dust;
- vibration;
- road closures;
- access disruption; or
- the duration and phasing of works nearest the Centre.

It also does not explain how residential silent retreats would continue during periods of significant construction activity.

A statement that construction will normally occur during standard hours does not resolve the issue. Those are the same hours during which meditation, teaching, contemplation and silent retreat take place.

## **9.1 Construction Management Measures Have Not Been Adequately Defined**

The Applicant has not proposed a Centre-specific construction management and retreat-protection protocol to be agreed before construction commences. The Applicant has not identified how construction activities would be programmed, monitored and managed to minimise disruption to the Centre's established religious and residential activities, including arrangements for communication, advance notification of disruptive works, complaint handling, monitoring and, where necessary, modification of construction activities.

The Applicant has not provided a sufficiently detailed or enforceable commitment including:

- a named liaison officer;
- consultation on the construction programme;
- advance notice of disruptive activities;
- identification of sensitive retreat periods;
- agreed quiet periods;
- restrictions on particularly noisy works during residential retreats;
- a direct complaints contact;
- attended or continuous monitoring where appropriate;
- rapid investigation procedures;
- authority to suspend or modify works; and
- regular reporting to Sunyata and the planning authority.

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## 10. Combined and Cumulative Effects

The Applicant continues to assess noise, shadow flicker, visual effects, aviation lighting, construction, human health and cultural matters largely as separate topics.

That structure does not reflect how the development would be experienced at Sunyata.

A retreatant may experience, at the same time:

- audible turbine noise;
- moving blades;
- altered landscape character;
- aviation lighting;
- shadow flicker;
- reduced visual seclusion; and
- construction or operational traffic.

The Centre's function depends on the combined experience of tranquillity, silence, natural setting and seclusion. The interaction of multiple individually moderate effects may therefore produce a materially greater overall effect on the Centre.

The Applicant has not provided an integrated, receptor-specific assessment of this combined experience.

The cumulative assessment should also clearly identify:

- all existing, permitted and proposed wind developments;
- the noise contribution of each development at Sunyata;
- combined operational noise;
- cumulative visibility;
- cumulative aviation lighting;
- cumulative shadow flicker;
- sequential effects when approaching and leaving the Centre; and
- the effect of possible future forestry changes.

A general statement that cumulative effects have been assessed elsewhere does not answer these receptor-specific questions.

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## 11. Human Health, Well-Being and Religious Practice

The Applicant identifies Sunyata as a sensitive receptor within the human-health assessment, but the analysis remains generic.

Sunyata provides an environment used by:

- residential retreatants;
- persons experiencing stress or anxiety;
- persons recovering from addiction;
- families and children;
- persons seeking respite from difficult circumstances;
- monastics;
- long-term practitioners; and
- members of the wider community.

The Centre's benefit to these users is closely connected to the quality of its environment.

The relevant question is not limited to whether turbine noise would cause a recognised medical condition. It includes whether the development would diminish an established environment used for meditation, spiritual practice, reflection and mental well-being.

The Applicant has not adequately assessed whether the combined changes to noise, landscape, darkness, seclusion and tranquillity would interfere with that function.

Similarly, identifying Sunyata as a cultural, tourism or community receptor does not adequately assess the practical ability to continue:

- worship;
- meditation;
- religious teaching;
- silent retreat;
- communal observance; and
- residential spiritual practice.

The Centre's religious use should be assessed directly rather than indirectly through generic categories.

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## 12. Consultation and Project Design

The Applicant's response does not demonstrate that meaningful engagement with Sunyata informed the design of the project.

The material does not clearly establish:

- when Sunyata was first identified;
- whether the Applicant visited the Centre;
- whether the trustees, residents or teachers were consulted;
- whether the retreat calendar was obtained;
- whether sensitive areas within the grounds were mapped;
- whether monitoring locations were agreed;
- whether alternative turbine locations were examined;
- whether the layout was modified because of the Centre; or
- whether the Centre's religious and contemplative use influenced any design decision.

The fact that Sunyata was used as a baseline noise-monitoring location demonstrates that the Applicant was aware of the Centre.

That makes the absence of a bespoke assessment and documented design response more—not less—significant.

Post-application acknowledgment does not substitute for engagement capable of influencing the project before the design was finalised.

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## **Mitigation Cannot Make the Development Acceptable**

### **13. Mitigation Cannot Remedy the Fundamental Conflict**

The Applicant relies upon mitigation to support its conclusion that significant effects would not arise. This reliance is misplaced.

The principal effects on Sunyata do not arise from minor matters capable of being corrected through landscaping, monitoring or complaint procedures. They arise from the introduction of nine large industrial wind turbines and associated infrastructure immediately beside an established silent Buddhist retreat centre.

The conflict is inherent in the location and design of the development.

Operational turbine noise cannot be eliminated while the turbines are operating. The visual presence and movement of the turbines cannot be screened reliably over the operational life of the development. Aviation lighting cannot restore dark night skies. Construction liaison cannot prevent construction noise, traffic, dust

and vibration. Closing blinds does not preserve an existing environment from shadow flicker; it requires Sunyata to modify its use in response to a development imposed upon it.

The mitigation advanced by the Applicant would therefore manage complaints or reduce certain effects at particular times. It would not preserve the environmental qualities upon which the Centre depends.

The Applicant's response refers to measures that may be applied, local mitigation that may be considered and turbine controls that may be introduced if required. Such language demonstrates uncertainty about:

- what measures would actually be implemented;
- when they would be triggered;
- which parts of the Centre they would protect;
- whether they would operate automatically;
- who would determine whether intervention was required;
- how compliance would be verified;
- what would occur if the measures proved ineffective; and
- what remedy would be available to Sunyata after the damage had occurred.

Sunyata should not be required to wait until the wind farm is operational and its retreats are being disturbed before attempting to prove that the Applicant's predictions or mitigation measures were inadequate.

A complaints procedure is not environmental protection. Monitoring does not prevent an effect. Curtailment imposed after disturbance has occurred does not restore the original setting or compensate for interrupted retreats, lost attendance, damage to the Centre's reputation or the erosion of its religious and contemplative environment.

The deficiencies are especially serious because Sunyata's sensitivity was known to the Applicant. The Centre was used as a baseline noise-monitoring location. The Applicant was therefore aware both of its existence and its proximity before the application was submitted. Nevertheless, no bespoke assessment appears to have influenced the selection of the site, the positioning of the nearest turbine or the overall project layout.

The missing assessment was required before the development was designed and before permission was sought. It cannot properly be deferred until after permission through conditions, compliance submissions or agreements between the developer and Sunyata.

The mitigation proposed does not make the development compatible with Sunyata's established use. It confirms instead that the Applicant expects effects to arise and proposes to manage them only after the development has been authorised.

That is not an adequate basis for granting permission.

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## **14. The Deficiencies Require Refusal of Permission**

The matters identified in this submission are not isolated technical omissions. Taken together, they demonstrate a fundamental failure to assess and address the effect of the proposed development on Sunyata Buddhist Centre.

Permission should be refused for the following reasons.

### **14.1 Sunyata was incorrectly characterised**

The Applicant assessed Sunyata principally as an ordinary residential receptor, a single dwelling, a tourism feature and a community destination.

Those classifications do not reflect the Centre's actual use as:

- a place of worship;
- a silent residential retreat centre;
- a setting for meditation and religious observance;
- a year-round spiritual community;
- a place of outdoor contemplation and walking meditation; and
- a charitable facility providing access to retreat and spiritual practice.

Because the receptor was incorrectly characterised, the significance of the effects was also incorrectly assessed.

### **14.2 The environmental assessment does not address Sunyata's defining sensitivity**

The Applicant has not assessed the extent to which the development would alter:

- tranquillity;
- natural soundscapes;
- visual seclusion;
- the experience of immersion in nature;
- dark night skies;
- freedom from industrial movement and sound; and
- the sense of withdrawal essential to residential retreat.

These characteristics are integral to the Centre's established use. Their loss cannot be dismissed merely because general residential thresholds may be satisfied.

### **14.3 The noise assessment is not fit for this receptor**

The Applicant relies upon a predicted cumulative level of 38.5 dB LA90 and compliance with a residential criterion.

It has not demonstrated that this level would be compatible with silent meditation and retreat. It has not adequately assessed the audibility, character, repetition or duration of turbine noise during the Centre's quietest periods. It has not separately assessed the multiple sensitive spaces across the property.

The conclusion of no significant effect is therefore unsupported.

#### **14.4 The Applicant predicts an exceedance of the shadow-flicker guideline**

The Applicant acknowledges that Sunyata would exceed the recognised 30-minute daily shadow-flicker guideline before mitigation.

This is not merely a theoretical concern raised by an observer. It is an adverse effect predicted by the Applicant's own assessment.

The response does not provide sufficient certainty regarding the buildings and spaces affected, the duration and frequency of the effect, or the operation and enforceability of the proposed controls.

The development should not be permitted on the basis that an acknowledged exceedance may subsequently be managed.

#### **14.5 The visual and night-time effects remain unassessed from the Centre**

The Applicant has not provided a proper visual assessment from the places where retreatants live, meditate, worship and contemplate.

The assessment does not adequately address:

- the scale of the turbines at close proximity;
- continuous blade movement;
- intermittent visibility above and through trees;
- forestry removal or change;
- cumulative wind energy development;
- aviation lighting; or
- the permanent alteration of the Centre's secluded setting.

The lack of representative visual evidence prevents a reliable conclusion that the effect would be acceptable.

#### **14.6 Construction would be fundamentally incompatible with the Centre's operation**

The construction phase would involve industrial activity immediately beside a facility whose central purpose requires silence and tranquillity.

The impacts cannot be resolved by notifying Sunyata in advance or attempting to coordinate works with its retreat programme. Sunyata operates throughout the year. Its daily activities occur during the same hours proposed for construction.

The burden should not be placed upon a longstanding charitable and religious institution to cancel, relocate or reorganise its activities around the construction of a development that has not adequately accounted for its existence.

#### **14.7 The combined effect has not been assessed**

The Applicant has not assessed how turbine noise, moving blades, shadow flicker, aviation lighting, landscape change and construction disturbance would operate together.

The omission is fundamental because it is the combined environmental experience that determines whether Sunyata can continue to function as a place of silent retreat.

The absence of an integrated assessment means that the Commission does not have the information necessary to conclude that the development would not materially interfere with the Centre.

#### **14.8 The shortcomings cannot be cured by conditions**

Planning conditions cannot:

- retrospectively correct the failure to characterise Sunyata properly;
- supply a missing assessment of likely significant effects;
- redesign the turbine layout;
- guarantee the preservation of tranquillity;
- remove the visual presence and movement of the turbines;
- recreate dark night skies;
- eliminate operational turbine noise;
- prevent construction disturbance; or
- restore the Centre's established setting after it has been altered.

Any condition requiring later agreement, monitoring or mitigation would defer essential matters until after permission and place the risk of failure upon Sunyata.

The Commission should not grant permission first and leave the question of whether the Centre can continue to operate to be resolved afterwards.

#### **14.9 The location creates an unacceptable planning conflict**

Sunyata has existed at this location since 1998. Its religious, charitable and contemplative use is established and depends upon the qualities of this particular setting.

The development would introduce large-scale industrial infrastructure immediately adjacent to the Centre. The conflict is not the result of Sunyata seeking absolute immunity from all change. It arises from the exceptional scale, proximity, duration and character of the proposed development.

The Applicant has not demonstrated that this conflict can be avoided or reduced to an acceptable level. Permission must therefore be refused.

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## 15. Conclusion

The Applicant's Response to Observations does not remedy the central deficiency identified by Sunyata.

The Centre is now acknowledged in the Applicant's documentation, but it has not been assessed in a manner that reflects its actual character, function or environmental sensitivity.

The Applicant's own response confirms that:

- Sunyata is an established Buddhist retreat centre;
- the Centre lies approximately 90 metres from the wind farm site boundary;
- the nearest proposed turbine would be approximately 891 metres away;
- Sunyata was known to the Applicant and used as a baseline noise-monitoring location;
- cumulative operational turbine noise of 38.5 dB LA90 is predicted;
- the assessment applies criteria intended for conventional residential amenity; and
- the recognised daily shadow-flicker guideline would be exceeded before mitigation.

These facts do not support the Applicant's conclusion that no significant effects would arise. They demonstrate that a uniquely sensitive place of worship and retreat would be exposed to predicted noise, visual change, shadow flicker, aviation lighting and construction disturbance from a major industrial development immediately beside it.

The Applicant has not adequately assessed:

- the difference between ordinary residential amenity and the conditions required for silent retreat;
- the multiple sensitive buildings and outdoor spaces within Sunyata;
- the audibility and character of turbine noise during silent practice;
- the effect on worship, meditation, teaching, sleep and outdoor contemplation;

- the consequences for retreat attendance and the Centre's continued operation;
- shadow flicker across the full property;
- representative visual and night-time effects;
- the reliability of forestry as screening;
- construction disruption during residential retreats;
- the combined effect of all environmental pathways; or
- whether the project layout should have been fundamentally redesigned because of Sunyata's proximity.

The Applicant's reliance upon mitigation does not resolve these matters. The effects arise from the location and design of the development. They cannot be removed through monitoring, complaints procedures, advance notification, closing blinds or measures devised after permission has been granted.

Sunyata has operated at this location since 1998. Over more than twenty-five years, its trustees, volunteers and wider community have preserved and developed the Centre specifically as a place of tranquillity, religious observance, meditation and refuge. The qualities of silence, seclusion and immersion in nature are intrinsic to that use.

The proposed development would fundamentally and permanently alter those qualities.

Renewable energy development is necessary, but it is not necessary for this development to be located and designed in a manner that places an established religious and contemplative sanctuary at unacceptable risk. Climate objectives do not remove the obligation to select appropriate sites, assess sensitive receptors accurately and avoid disproportionate effects where they cannot be satisfactorily mitigated.

The information before the Commission does not demonstrate that the proposed Knockshanvo Wind Farm is compatible with the continued religious, contemplative and charitable operation of Sunyata Buddhist Centre.

**Sunyata therefore respectfully requests that An Coimisiún Pleanála refuse permission for the proposed development.**

No alternative determination would adequately protect the Centre from the fundamental and irreversible effects identified in this submission.

Yours Sincerely,  
Sarah-Jane Burton  
Chairperson on Behalf of Sunyata Board of Trustees

Sunyata Buddhist Centre,  
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