

From: [seamus gammell \(via Google Docs\)](#)
To: [SIDS](#)
Subject: Knockshanvo RFI response An Coimisiún Pleanála - Case reference: PA03.320705
Date: Tuesday 4 August 2026 22:20:27
Attachments: [Personal response to the Proposed Knockshanvo Wind Farm RFI.pdf](#)

You don't often get email from seamus.gammell@gmail.com. [Learn why this is important](#)

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seamus gammell attached a document



seamus gammell (seamus.gammell@gmail.com) has attached the following document:

To whom it may concern,

Please find enclosed our response to the recent Knockshanvo RFI submission. It is attached to this email and the text is also included below.

I would appreciate confirmation of receipt of this email.

Many Thanks

Seamus Gammell and Family
Cloghoolia,
Sixmilebridge,
Co.Clare
V95X003

To: An Coimisiún Pleanála
Re: Planning Reference ABP-320705-24 – Proposed
Knockshanvo Wind Farm

Date: 4th August 2026

Submission by Seamus Gammell and Family, Cloghoolia,

Sixmilebridge, Co.Clare, V95X003

Dear Sir/Madam,

I wish to register our strong objection to the proposed Knockshanvo Wind Farm. Having considered the Further Information submission by the applicant, including the aviation submission, and additional noise and flicker assessments, I believe that significant planning, environmental and public health concerns remain unresolved and that planning permission should be refused.

While renewable energy is essential in addressing climate change, developments of this scale must not proceed where they present unacceptable impacts on vulnerable cohorts of people with additional needs, local communities, public health, or critical national infrastructure.

We also have an additional personal consideration in that one of our family has additional sensory needs and is on the Autism spectrum. We are very concerned regarding the impacts of noise, both momentary and repetitive, and shadow flicker will have on them, if Knockshanvo and Oatfield progress.

Our principal concerns are as follows:

1. Noise and Loss of Residential Amenity

The applicant's own assessment confirms that the surrounding area currently enjoys an exceptionally quiet rural environment, with very low background night-time noise levels. Although the proposal may seek to comply with ETSU-R-97 noise limits, compliance with those limits does not necessarily mean that the development will preserve the existing quality of life enjoyed by nearby residents.

This was confirmed in the Rollo v Meenaclogspar/Ballyduff Windfarm High court case, which confirmed that achieving planning permission and compliance with that permission does not exclude the possibility that wind turbines can cause unacceptable noise nuisance to nearby residents.

What this case demonstrated was a failure in assessment in the planning stage, a failure in accepting developer-paid-for consultants reports as confirmation that no impacts would occur and finally a failure of enforcement where exceedance did occur, requiring citizens to resort to the legal process in order to enforce their amenity rights. So the question arises, how will ACP ensure another Rollo v Meenaclogspar failure does not occur again this time in the Knockshanvo and Oatfield context?

The introduction of up to twenty large turbines when Knockshanvo is considered cumulatively with the neighbouring Oatfield proposal would fundamentally change the area's acoustic environment. Residents would experience continuous turbine noise in what is currently a peaceful rural landscape.

The cumulative operational noise from multiple wind farms also raises practical concerns regarding monitoring, enforcement and accountability should noise limits be exceeded. Wind farms and wind farm developers do not have a demonstrably acceptable track record in adhering to noise limits including those limits imposed by way of ACP planning conditions, dealing with wind turbine noise exceedances and responding effectively to those exceedances.

Dog versus Applicants Consultants

As I mentioned in my previous submission, we live in a small U-shaped valley, we have a pronounced reverb echo audible at our location in the U shaped valley. This is demonstrated every time our dog barks outside and a second or two later her own bark echo is heard very clearly and loudly coming back. This then prompts her to

bark again and so their own bark-echo-bark sequence repeats itself. This raises fundamental issues regarding reverb/echo and enhanced turbine noise at our location, which is identified as a noise receptor site. I believe the developers noise consultants say they have modelled this, and that their model shows no reverb/echo issues. While they contend their modelling is correct, I can demonstrate in the real world that they are wrong or at least that their model does not match observable reality.

So, I believe it is entirely justified to ask ACP, are they fully satisfied regarding the applicant's noise modelling and that our house and receptor site will demonstrably not be adversely affected by excessive noise including enhanced reverb and echo turbine noise?

2. Shadow Flicker

Shadow flicker represents a further significant concern. Although the applicant proposes mitigation measures, shadow flicker can significantly affect quality of life through repeated moving shadows entering homes and gardens. This is particularly concerning where people spend extended periods at home or where properties are located within the zone of potential exposure.

The cumulative effects of multiple wind farms also require careful assessment, as the combined impact may be substantially greater than considering Knockshanvo in isolation. The submission identifies shadow flicker as one of the outstanding issues requiring careful consideration by the Commission.

We are a flicker receptor site and I believe from trying to interpret the applicant's maps that we will be one of the receptor sites that will exceed the current maximum allowable time of flicker. As stated above we have a child on the Autism spectrum and we see no analysis on how both the noise and the flicker will affect them and their right to normal amenity in their own house and garden.

Given the lack of effective monitoring and enforcement

associated with problematic turbine noise here to fore despite ACP planning permission and any conditions , it follows that concerns relating to monitoring and enforcement of problematic flicker are also valid.

3. Impacts on People with Autism and Other Neurodivergent Conditions

Particular consideration should be given to people with autism and other sensory processing disorders.

Many autistic individuals experience heightened sensitivity to environmental stimuli including:

:repetitive low-frequency noise,

:rhythmic mechanical sounds,

:flashing or moving light,

:visual motion and changing shadows.

Even where environmental effects comply with standard planning thresholds, they may still cause significant distress, anxiety, sensory overload and disruption to daily life for neurodivergent individuals.

Planning assessments based solely on average population responses may not adequately protect vulnerable members of the community.

The Commission should therefore ensure that the Human Health Assessment fully considers the needs of sensitive groups, including autistic residents and children with sensory processing difficulties.

Given the increasing recognition of sensory accessibility in public policy, these impacts deserve careful consideration before any permission is granted.

There is no analysis of these impacts on autistic residents. This is of particular concern for us and our family.

4. Human Health and Community Wellbeing

The proposal would alter the character of an exceptionally quiet rural environment through the combined effects of:

operational turbine noise,

low-frequency noise,

shadow flicker,
visual dominance,
cumulative industrialisation of the landscape.

These combined effects have the potential to diminish residential amenity, reduce wellbeing and adversely affect the quality of life of local communities. These combined effects have the potential to substantially diminish autistic residents' well being and affect their quality of life and by extension their families quality of life. This is of specific and enhanced concern for us.

5. Aviation Safety

In addition to community impacts, significant unresolved aviation concerns apparently remain. It is clear from reading all the aviation reports on Knockshanvo, Oatfield and Ballycar, that the proposed locations are just highly unsuitable for proposed wind farms due to aviation safety impacts.

Despite the first IAA/Airnav objection to a proposed Knockshanvo/Oatfield wind farm being recorded in 2008, and continuous IAA/Airnav objections to renewed attempts at development in 2015, 2020, 2023, 2024 and 2025, here we are in 2026 with IAA/Airnav and Shannon Airport still having to defend their position. Why aren't the aviation authorities' expert views, evidence and objections the deciding factor in the considerations regarding the Knockshanvo and Oatfield wind farms?

Why are prospective developers so eager and determined to place wind turbines on a site that is so demonstrably unsuitable in terms of impacts to aviation and aviation safety? Why are they so determined to ignore IAA/Airnav advice and attempt to pursue inappropriate development at an inappropriate location? IAA/Airnav and Shannon airport are the experts not the developers.

The previous multiple letters of objection submitted by IAA/Airnav and Shannon Airport in relation to Knockshanvo and Oatfield are clear concise warnings of impacts to critical safety national infrastructure, Shannon Airport and aviation safety. These cannot be ignored or superseded by any developer claims.

The submissions indicate that the proposal continues to raise unresolved issues regarding:
Woodcock Hill radar performance,
Instrument Flight Procedures serving Shannon Airport,
the absence of an any agreed radar mitigation solution,
uncertainty regarding future aviation procedure changes,
the reliance upon speculative future mitigation rather than proven solutions.

The applicant has not demonstrated that these safety-critical concerns can be fully resolved before construction proceeds.

6. EIAR- What it is meant to be and what it is not

The role of the EIAR is very clear under the EIA Directives. It is meant to be a report on the likely significant effects of the proposed development, assess the significance of any likely effects against recognised criteria, identify any mitigation and report on the residual impacts after mitigation and any monitoring requirements.

It is not meant to be a document to support the merits of a planning application or form opinion on 'balances' in the consenting process. Its role is to objectively inform the Consenting Authorities of the 'likely significant effects' of the proposed development.

Independent and Impartial

It is clear that the developers have paid a myriad of consultants to prepare the EIA in a certain fashion and they have produced an EIA that is wholly designed to support the merits of the Knockshanvo and Oatfield

projects. This is in direct contravention of the EIA directive. Should the applicant's reports be accepted by ACP when they do not adhere to the EIA directive?

This highlights the fundamental flaw in the Irish planning system whereby the proposing developer pays consultants to prepare "independent and impartial" reports when the consultants and their reports cannot be considered truly independent nor impartial. This is why, evidence and objections from truly independent organisations such as IAA/Airnav, Shannon Airport and the HSE, who have no financial interest in the proposed development, must be given the weight and consideration they deserve, over and above reports from consultants in the pay of the proposing developer.

Conclusion

For the reasons outlined above, I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed Knockshanvo Wind Farm.

The proposal would fundamentally alter the character of the local area through cumulative noise, shadow flicker and landscape impacts while raising serious concerns for residential amenity and the wellbeing of vulnerable people, including individuals with autism and sensory sensitivities. In addition, substantial uncertainty remains regarding aviation safety and the effectiveness of proposed mitigation measures.

Until these issues are fully resolved and demonstrated to be acceptable beyond reasonable doubt, the proposed development should not receive planning permission.

Yours faithfully,
Seamus Gammell and Family



Does this item look suspicious? [Report](#)

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94043, USA

You have received this email because seamus.gammell@gmail.com
shared a document with you from Google Docs.



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