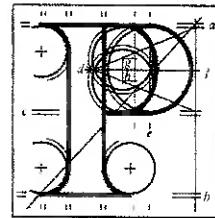


Our Case Number: ABP-320705-24



**An
Bord
Pleanála**

Shannon Airport Authority DAC
Paul Hennessy
Shannon Airport
Shannon
Co. Clare
V14 EE06

Date: 16 October 2024

Re: Proposed development of 9 no. wind turbines, 110kV substation and ancilliary development 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. (<https://knockshanvoplaning.ie/>)

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

As 'Shannon Airport Authority DAC' are listed as a prescribed body, there is no fee in making an observation.

A refund of €50 will be issued to the debit/ credit card used to make payment in due course.

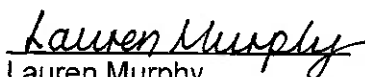
The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Lauren Murphy
Executive Officer
Direct Line: 01-8737275

Teil	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



The Secretary
An Bord Pleanála
61 - 64 Marlborough St.
Dublin 1
D01 V902

14th Oct 2024

Re: Case No. ABP-320705-24 (Private Development – Application)

Proposed Development of 9 no. wind turbines, 110 kv substations and ancillary development

– Knockshanvo Wind energy development within the townlands of Snaty (Massy), Hurdleston, Oatfield, Drumsillagh or Sallybank (Parker), Gortacullin, Aharinaghbeg, Knockshanvo, Cloontra, Cloghoolia, Ballycullen, Cloontra West, Formoyle More, Kilmore, Mountrice, Ballyvorgal South, Crag, Kyleglass, Glenwood, Snaty (Cooper), Ballykelly, Muingboy, Drumsillagh or Sallybank (Merritt), Kyle, Belvoir, Snaty (Wilson) and Cloontra East, Co. Clare and in the townland of Court, Co. Limerick

Dear Secretary,

Shannon Airport Authority DAC would make the following comments as a prescribed body in respect of this proposed development.

In this instance, Shannon Airport Authority were not provided by the applicant with notice of this submission as is required under Article 28 (1)(i) of the Planning and development Regulations 2001 (S.I. No. 600/2001) “*Notice to Certain Bodies.*” Previous engagements with MKO, the company representing this development on behalf of the applicant, FuturEnergy were undertaken regarding this site and as such a level of expectation would have been that consultations would have continued with both Air Nav Ireland and Shannon Airport as affected aviation stakeholders once the project was deemed as strategic.

In general terms, the siting of wind turbines at this location may have implications for the operations of the communication, navigation and surveillance systems used by Air Nav Ireland for the separation and safety of aircraft. The geographical siting of these turbines may also have implications for the flight paths of aircraft.

Shannon Airport Authority DAC has specific responsibility to define the airspace around its aerodrome which must be maintained free from obstacles to permit the intended aircraft

operations at the aerodrome to be conducted safely and to prevent the aerodrome from becoming unusable by the growth of obstacles around it. This is achieved by establishing a series of obstacle limitation surfaces (OLS) that define the limits to which objects (temporary or permanent) may project into the airspace. These surfaces may extend many kilometres outwards from the active runway strip at the aerodrome.

With specific reference to the Knockshanvo Wind farm – Aviation Assessment Summary report (Appendix 15-6) produced by Ai Bridges, we note the conclusions outlined therein but do not concur that there are no residual impacts arising from the proposed development of 9 no. turbines at this site.

Shannon Airport shares the major concerns of our colleagues in Air Nav Ireland who made an online submission on 27/09/2024 in which they have raised several technical areas of concern that at a minimum require more analysis, specifically:

- That this development would introduce new obstacles in the vicinity of Shannon Airport which have the potential to compromise several of the Shannon Airport specific Instrument Flight Procedures (IFP's) thereby adversely affecting the provision of safe and efficient air traffic services at the airport;
- That the proposed windfarm development would have a significant negative impact on the performance of the radar surveillance systems at the Woodcock Hill radar facility. The proximity and scale of the proposed development would lead to radar beam deflections, reflections, and shadowing from the wind turbines and there are no credible and implementable mitigations that could be applied to the Woodcock Hill radar to eliminate these effects;
- Since 2018, Air Nav Ireland, along with Shannon Airport Authority has engaged with multiple developers for this site (formerly known as Violet Hill wind farm development) and others in this area, outlining our reasonable concerns. On each occasion the proposed development has been objected to due to the negative impact it would have on the Woodcock Hill radar installation and the consequential implications for the provision of safe and efficient Air Traffic Services in Irish controlled airspace.

Shannon Airport Authority remains fully supportive of this position and the serious concerns of Air Nav Ireland as outlined above and therefore also objects to this development proceeding.

Please note: As general guidance for windfarm developments in the State, the following conditions/requirements must be imposed:

- If the turbines are within 45km of Shannon Airport's Aerodrome Reference Point (ARP) and are greater than 100m in height they will be required to be included in the IAA Electronic Air Navigation Obstacle Dataset.

- Also, the developer shall apply the following standard: *Chapter Q (Visual Aids for Denoting Obstacles)* of the Certification Specifications for Aerodrome Design – Issue 6 contained in the EASA aerodrome rules to the wind turbine development should it receive planning permission as it would be regarded as an extensive object.
- Finally, during the construction phase of the wind farm development if approved, any crane activity on the site must be pre-approved by the completion of the Shannon Airport Crane Operations application form at least 30 days in advance of any crane erection taking place. That is for the appropriate level of assessments to be carried out by the airport and Air Nav Ireland against possible interferences by cranes with communication, navigation and surveillance systems.

We would welcome acknowledgement of receipt of this submission.

Yours sincerely,

A handwritten signature in blue ink, reading "Paul Hennessy". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Paul Hennessy
Safety Compliance and Environment Manager
paul.hennessy@snnairportgroup.ie

Shannon Airport Authority DAC
Shannon Airport Terminal Building
Shannon,
Co. Clare
V14 EE06