

Flan Quilligan
Cloughoolia
Sixmilebridge
Co. Clare
V95 H597

29th October 2024

Re. Knockshanvo Windfarm planning application - Observation to An Bord Pleanála

Reference Number: ABP-320705-24

Applicant: FuturEnergy Knockshanvo DAC

Dear Sir/Madam,

I wish to make an observation regarding the above windfarm known as Knockshanvo Windfarm.

1. Subject matter of the Observation

I lived all my life in this area and grew up a short distance from the above address and was brought up on the family farm at this location. I now live at the above address which is on the R471 between Oatfield and Cooleycasey. My wife and I raised our family at this location which is a quiet nonindustrial rural area populated mainly by young families. From what I have observed from other similar locations where large-scale windfarms have been developed this is all about to change in a negative way if this proposed development is granted permission as it's currently proposed.

I am totally in support of renewable energy and as a part time farmer I have participated in all agri-environmental schemes over several years. (REPS 1, REPS 2, GLAS, ACRES). I believe that wind energy is an essential part of the plan to tackle climate change. However, the difficulty with this proposal is the location of these giant wind turbines so close to people's homes and the overall huge scale of the project as well as negative knock-on impacts from this such as:

- construction traffic snarl up / safety on our roads,
- shadow flicker,
- noise and vibration,
- landscape and visual impact
- property devaluation
- land sterilization / rural depopulation
- Impact on Air Safety

These are just a few examples of what is definitely going to result if this project goes ahead. There are examples from many other countries where large scale windfarms have been developed but the minimum set back distances from people's homes are much greater and in general site locations for windfarms are away from populated areas and not impacting people's homes. I believe there should be a change of approach by the powers-that-be with regard to land zoning locations and overall current guidelines for development of windfarms.

2. Subject matter of the Observation

2.1. Shadow Flicker – If this proposed development goes ahead our home would be impacted by shadow flicker. The applicant's submission is using long out of date guidelines from Department of the Environment, Heritage and Local Government (DoEHLG), 2006 and the 'Best Practice Guidelines for the Irish Wind Energy Industry' (Irish Wind Energy Association, 2012). These guidelines were never meant to be used for size and scale of turbines currently being proposed. Proposed Turbine TO1 is located approximately 2km from our home. An assessment of shadow flicker is presented at section 5.8 of the EIAR in the applicant's submission. In this assessment the EIAR identifies shadow flicker effects at several sensitive receptors. Our home does not appear to be included in this assessment despite the fact that its located approximately 2km from proposed Turbine TO1. A previous study in the EIAR for the Oatfield Windfarm proposal which is located on the same site stated that *"the shadow flicker that would be experienced is significant and adverse"*. Our home is within this general area of the so called 'sensitive receptors'. It is not acceptable that we would be forced to live with this 'significant and adverse' shadow flicker for the rest of our lives.

2.2. Noise and Vibration – Within the applicant's submission Chapter 12 of the EIAR considers the potential noise and vibration effects of the Proposed Development. The applicant's submission is using long out of date guidelines from Wind Energy Development Guidelines published by the Department of the Environment, Heritage and Local Government in 2006 and recommendations set out in the Department of Trade & Industry (UK) Energy Technology Support Unit (ETSU) publication *"The Assessment and Rating of Noise from Wind Farms"* (1996). These guidelines were never meant to be used for the size and scale of turbines currently being proposed.

Proposed Turbine TO1 is located 2km approx. from our home. This is a very quiet rural area where the only day-time noise comes from the dawn chorus (birds singing) and very little other day-time noise outside of peak traffic times from work commuters. At night you can hear a pin drop in this area. I have reviewed the studies of noise effects carried out in the applicants submission and consider that their methodology and noise impact assessments are inadequate. Also, it is considered that the standards used for acceptable noise levels are long out of date and not fit for purpose for current times.

With regard to infrasound/low frequency noise and vibration resulting from the operation of wind farms the applicant's submission states that *"There is a significant body of evidence to show that the infrasound associated with wind turbines will be below perceptibility thresholds and typically in line with existing baseline levels of infrasound within the environment"*. All of the evidence from existing operational windfarms and from other research points to low frequency noise being a major disturbance factor for distances much greater than distances outlined in the applicants submission. Therefore, the findings here are not accepted and respectfully submit that the applicant's conclusions here are incorrect.

It is clear that the control of noise at this windfarm will be hugely dependant on ongoing monitoring and enforcement of various planning conditions, actions and controls to ensure noise is kept to agreed levels. We are hearing horror stories from other operational

windfarm locations where noise levels are way above agreed levels in planning conditions and these conditions are not being enforced. This is already happening on windfarms in many areas so how can impacted residents have any confidence that planning conditions with regard to this will be enforced.

In the applicants submission it clearly shows our home would be located in a noise sensitive location which means we will have both swish noise and low frequency noise. It is respectfully submitted that noise and vibration from the proposed wind turbines is a significant issue and proper assessment of this has not been demonstrated by the applicant and from my own research of other operational windfarms and my review of the applicants submission I conclude that their methodology and assessments on this are inadequate, cannot be relied upon and that our home will have a very significant negative impact from noise.

It is considered that the proposed development will impact residential properties in the vicinity by reason of noise and disturbance and would therefore contravene Objective CDP11.47 of the Clare County Development Plan 2023-2029 for proper planning and sustainable development of the area.

- 2.3. **Landscape and Visual amenity** – According to the Fáilte Failte Ireland EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects (July 2023) the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are:
- Beautiful Scenery and Unspoiled Environment
 - Hospitality
 - Safety
 - Nature, Wildlife and Natural Attractions
 - History and Culture
 - Pace of Life

The Failte Ireland guidelines go on to state that these factors used for the promotion of tourism in Ireland are also barometers of sensitivity to change in tourism sensitive or dominant locations where development may have an impact upon the tourism asset.

I worked for almost 40 years in Tourism development and promotion with Shannon Development and Failte Ireland. The site for this proposed project is located within one of Failte Ireland's 4 national experience brands known as '*Ireland's Hidden Heartlands*'. (the other 3 are Wild Atlantic Way, Ireland's Ancient East and Dublin). Development of the Wild Atlantic Way was one of my projects during my time working with Failte Ireland and the most crucial part of this (or any similar tourism project) is protection of the natural landscape and visual impact.

The R471 is a very important connecting route for international visitors commuting between Shannon Airport and Lough Derg on the River Shannon. Lough Derg is the standout location within the '*Ireland's Hidden Heartlands*' experience brand. The visual impact on the landscape from the R471 is significant. The impacts on the landscape, visual amenity, Archaeology and cultural heritage of this area caused by this project will have a significant negative impact on one of the Country's corner stone tourism experience brands.

In consideration of the Failte Ireland guidelines outlined above it is submitted that the proposed development will negatively impact tourism visitor attractions in the surrounding area and facilities for tourism outdoor activities / public amenity importance. Areas impacted would include places such as the 12 O’Clock hills walkways and the many lakes and rivers in the area including Lough Derg, the River Shannon and the many lakes (including Doon Lake) all which have high tourism and amenity value. Coarse and game angling is a significant tourism product in attracting domestic and overseas visitors to this area. The assessments carried out in the applicant’s submission with regard to impact on Landscape and visual amenity and the findings presented are considered to be inadequate.

It is clear that the proposed development would be very visible from the R471 and many other tourism amenity areas and would negatively alter the character of this rural landscape. Contrary to the findings in the applicants submission it is submitted that this project will result in significant visual impacts in respect of tourism, heritage and amenity features with and around the study area. It is also submitted that the proposed development would not align with the above Failte Ireland guidelines and would contravene Objectives CDP14.2, CDP9.23A-L and CDP14. 7 of the Clare County Development Plan 2023-2029 and therefore would not meet the objectives for proper planning and sustainable development of the area.

- 2.4. **Property devaluation** – Regardless of what the applicant or others might say in relation to this there is no doubt but windfarm development in close proximity to residential homes does have negative impact on the value of land and property. Studies from the US and other international locations presented by the applicant in its submission are totally irrelevant to the proposed Knockshanvo Windfarm. There are other numerous studies and reports now available which support property devaluation as a result of close proximity to windfarms. The applicant did not explore these many studies and was very selective in only presenting studies which support its claim that there are no negative impacts on property values from windfarms. A long-standing expert on this topic, John Earley of Property Partners Earley in Roscommon, estimates the value of a house located close to a Wind Turbine can decrease by 50% or more. He says, *"This has been my experience with properties within half a mile of turbines."*

Another report by Michael McCann, of McCann Appraisal, LLC based in Chicago, concludes that: *"Residential property values are adversely and measurably impacted by close proximity of industrial-scale wind energy turbine projects to the residential properties, up to 2 miles and a range of 25% to approximately 40% of value loss"*.

Due to the close proximity to residential dwellings, this project would seriously impact the quality of life of residents and would significantly reduce the value of properties (land and homes) in the vicinity and would contravene objective CDP11.47 of the Clare County Development Plan 2023-2029, "to strike an appropriate balance between facilitating renewable and wind energy related development and protecting the residential amenities of neighbouring properties" and therefore would not meet the objectives for proper planning and sustainable development of the area.

2.5. Land sterilization and rural depopulation – Securing planning permission for a person to build a home on their own family farm is already a major challenge with lots of strict planning criteria etc. A granting of permission for this proposed development would most likely rule out any possibility of future planning permissions for housing in the immediate area and result in large areas of land becoming sterile for future house building. One of our sons currently resides and works in London but has plans to eventually return home and build on our farm at Cloughoolia. As the location of proposed turbine TO1 is very close to our farm at Cloughoolia the opportunity to do this would no doubt disappear for our children and grandchildren if this proposed development is granted.

The position of having this permanent forced land restriction on the local community is considered to be most unfair.

It follows on from sections 2.4 and 2.5 above that the longer-term outcome for areas like this will be rural depopulation. If young people are not going to purchase homes in the area or cannot build on their own lands (or do not want to due to the negative impact of turbines) then areas like this will slowly become a depopulated wasteland. Surely common sense will prevail, and the correct decision to refuse permission will be made in order to protect this area for future generations.

2.6. Impact on Air Safety – The proposed Knockshanvo windfarm will negatively impact Air Safety, will impact the air routes into and out of Shannon Airport and will impact the navigation aids at Shannon Airport. The proposed windfarms will also seriously hinder air traffic controllers in vectoring aircraft into Shannon.

The competent authority for protection of Air Safety (AirNav Ireland) and the Shannon Airport Authority have previously objected to both the Orsted Oatfield Windfarm (ABP – 318782-24) and Ballycar Windfarm (ABP-318943-24) proposals which are located in the same geographical area as this proposal. In their letter dated 24th January 2024 to An Bord Pleanala, AirNav Ireland advise that the Oatfield Windfarm development would result in significant impacts on high-level traffic, in the attitude range 10,000 feet to 35,000 feet, which would not be acceptable to AirNav Ireland. A similar statement was included in the AirNav Ireland objection to the Ballycar Windfarm.

As the Oatfield and Knockshanvo Windfarm proposals are on the one site at the same geographical location the same negative impacts can be expected from the Knockshanvo proposal.

Air Safety is of significant importance from a Tourism and Industrial perspective due to the importance of Shannon Airport as an access point all along the Western Seaboard for international visitors to the West of Ireland including the Shannon Industrial Free Zone and the Wild Atlantic Way. Also a very high percentage of international tourism visitors use Shannon Airport as their access point into and out of Ireland. Any threat to this would have serious negative consequences for Irish Tourism and local economies across the country.

3. **Overall Conclusion** – Environmental Impact Assessment is meant to be an independent procedure that ensures that the environmental implications of decisions are taken into account before planning based decisions are made. There has been no independent Environmental Impact Assessment carried out regarding the environmental implications of this large-scale project. The consultants here are being paid to come up with the answers that will push this through the planning process regardless of negative consequences on a range of fronts, particularly on the residents in the area who have chosen to live in this quiet scenic rural location but are now landed with the possibility of this proposed development towering over them and all around them. I firmly believe that there is a place for windfarms as they are an important part of the equation to tackle climate change. However, site locations need to be more carefully chosen. The site proposed for this proposed development is totally unsuitable and I respectfully submit and request that An Bord Pleanála refuse permission.

Yours sincerely

Flan Quilligan