

To: An Bord Pleanála

ABP Ref: PA03-320705

Knockshanvo Wind Farm, County Clare

Proposal by FuturEnergy Ireland (Applicant)

Date: 31/10/24

Observation/Submission of Nick and Helen Billingham of Woodfield House, Broadford V94 VH2Y

We are local residents living within 3.5 kilometres of this proposed wind farm and we OBJECT to the Applicant's application for planning permission for the following reasons:

1. Aviation safety

We have read the Applicant's submissions (both in their original application and in response to a subsequent request from ABP for more information) regarding the impact of the proposed wind farm on the safeguarding of operations at Shannon Airport. We have serious concerns that the proposed wind farm will interfere with the safe operation of the Airport both in terms of interference with radar communications and interference with the airspace, arrival and departure routes for aircraft given that the proposed turbines will penetrate the airspace around Shannon Airport.

We note that Shannon Airport and the IAA have both objected to the proposal for the above reasons.

The Applicant has employed various experts to claim that the risks to aviation safety are minimal and that Shannon Airport and the IAA are wrong to object. We would say to that:

- a) Any risk to aviation safety is unacceptable;
- b) Equally, any risk to the future operation of Shannon Airport is unacceptable. The Airport is a major contributor to the economic prosperity of the Mid-West and anything which might impinge on its operation and ability to expand its operations in the future is unacceptable and ignores the crucial part the airport plays in the generation of business and tourism in the Mid-West;
- c) The experts employed by the Applicant are employed and paid by the Applicant. They are "hired guns"; they are not independent experts and their evidence is bound to support the Applicant's case. It must therefore be treated with serious caution by ABP;
- d) On the contrary, the objections of the IAA and Shannon Airport must inevitably carry more weight. They have no hidden agenda against wind farms in general terms;

they are merely interested in aviation safety and the safeguarding of aircraft and passengers. Their views should necessarily outweigh and override any submissions made by the Applicant. Unless the IAA and Shannon Airport AGREE to the Applicant's proposal, ABP is bound to reject the application. It would be perverse in the extreme for ABP to reject Shannon Airport and the IAA's objections in favour of evidence put forward by the Applicant's paid experts.

2. Threat to protected species

The Hen Harrier and the Lesser Horseshoe bat are protected species at law. Under EU law any interference with their habitats is unlawful and anything which might risk fatality is also unlawful. The Applicant admits that there is a risk to both species and their habitats as a result of the proposed development and the risk of turbine collision. They claim that they can mitigate these risks; however, the law is clear: any risk to these protected species is unacceptable and unlawful. It is recognised that the Hen Harrier in particular faces potential extinction within 25 years unless it is properly protected. Allowing a development to proceed which could contribute in any way to the extinction of a species is morally offensive and a planning decision which no planning authority acting reasonably could possibly arrive at.

3. Cumulative impact

This proposal is on the same site as another wind farm proposal which is currently being considered by ABP (the planning application made by Orsted for the Oatfield wind farm - ABP Ref 318782). Although the two applications have been made separately by two separate applicants, the combined total of 20 wind turbines are in the same location and will constitute one large wind farm on the 12 O'Clock Hills with the Knockshanvo turbines interwoven among the Oatfield turbines. The applications should have been considered together by ABP to understand the true cumulative impact. Instead, Orsted were able to submit their application in advance of FuturEnergy. The effect of this is that the cumulative impact of both wind farms has not been properly addressed or considered by ABP. This ignores the third wind farm proposal in the area at Ballycar (ABP Ref 318943-24) which is less than 3km from the Knockshanvo and Oatfield wind farms and proposes a further 12 turbines just South of the 12 O'Clock Hills, also threatening to interfere with the operation of Shannon Airport and the radar facilities at Woodcock Hill. A further three wind farms are proposed within a 15 km radius of the 12 O'Clock Hills at Fahybeg, Lackareagh and Carrownagowan.

The cumulative impact of these wind farms on the flora, fauna, landscape, traffic, road infrastructure, hydrology let alone the residents of East Clare has not been properly addressed and unless ABP considers all these wind farms together it will not be able properly to assess from a planning perspective, the cumulative impacts of these developments on East Clare. Allowing this sort of piecemeal development is contrary to common sense and contrary to proper planning and sustainable development; it also

allows developers to take advantage of what is in effect project splitting to downplay cumulative impacts. As a minimum, ABP must carry out its own detailed analysis of the likely cumulative impacts of all these developments; any failure to do so would likely render any decision to allow this development to proceed perverse, irrational and unreasonable.

4. Size and spatial dominance

Put simply, the proposed turbines are simply too big and will dominate the skyline above Broadford in a way which is not consistent with proper planning or sustainable development.. The Wind Energy Guidelines which FuturEnergy rely on date back to 2006 when wind turbines were a fraction of the height proposed by FuturEnergy. The photomontages produced by FuturEnergy do not properly reflect the impact of these huge turbines on the immediate locality around Broadford. A lot of their photomontages are taken from considerable distances away from locations which disguise the impact on residential properties close to the turbines. Only a very small number of the montages actually show residential properties in proximity to the turbines. There is a deliberate attempt by the Applicant to downplay the impact on residential properties near to the turbines. They seek to portray the locality as being moorland upland with a very sparse population; this is untrue - the immediate locality of the 12 O'Clock Hills and around Broadford is one of rural/residential classification in planning terms.

5. Hydrology

We live beside Doon Lough. Doon Lough is a Natural Heritage Area. A stream which runs off the 12 O'Clock Hills and feeds into Doon Lough runs across our land. We have a private well which is dependent on an unpolluted underground water source. We have serious concerns that the proposed windfarm on its own or in conjunction with the Oatfield wind farm will impact on Doon Lough and the water quality of our well. The data relied on by FuturEnergy regarding private wells is incorrect and only identifies a fraction of the number of private wells in the locality. If their data regarding the number and location of private wells is incorrect, their conclusions on hydrology impacts are necessarily undermined and cannot be relied on. Incorrect data like this in any planning application calls into question the quality of other data relied on throughout the Application.

6. Community Consultation

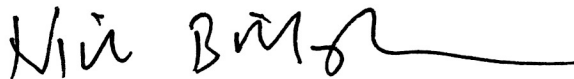
We met with two Community Liaison Officers who basically told us that the wind farm "would happen"; that consultation was a process which had to be "gone through" but would not stop the wind farm; and that if we were concerned about shadow flicker, that could be resolved by installing blinds on our windows! We found their attitude dismissive, condescending and frankly, rude. We also raised concerns about the consultation newsletters, one of which contained a reproduced OS map which was not to

scale and gave a false impression of the distance of the proposed turbines from people's homes. The layout of the proposed wind farm was not based on community consultation and no changes were made to the layout following consultation. The fact is that FuturEnergy had already decided on the layout and location of the turbines.

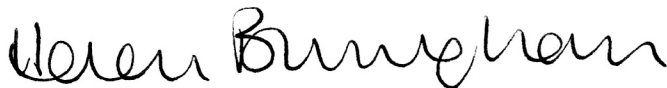
The company also laid on an event for residents to attend but it took place some 15km away in Castleconnell, a village which is not even in East Clare. The village hall in Broadford would have been a perfectly acceptable venue for the event but it is clear that the Applicant wanted to minimise attendance by locating the event away from the immediate locality of its proposed wind farm.

For all the above reasons, we OBJECT to this planning application.

SIGNED:



SIGNED:



DATED: 31 October 2024