

Submission on proposed SID- Knockshanvo wind farm **Co.Clare**

ABP case no 320705

ABP case reference PA03.320705

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To whom it may concern, please read this fully.

I wish to make a submission on the proposed FEi Knockshanvo wind farm case no 320705. There are a number of area's I would like to show that the proposed wind farm will impact on. I am very concerned that this proposed development will affect my family, my children, one of whom is on the autism spectrum and has sensory issues and fundamentally change the landscape and the community I live in. I believe it is not in accordance with any semblance of appropriate planning and appropriate sustainable development.

Please note that there is another application for a separate wind turbine farm at the same location submitted to ABP, proposed by Orsted, named Oatfield which consists of 11 turbines, which is awaiting a decision at the time of writing.

I wish I was able to list my house as a receptor number, or identify it on a map or document that was supplied by FEi as part of their submitted planning documents. However, none was included in the submission and so I cannot find out how much noise and shadow flicker my house will be subjected to if this wind farm gets the go ahead. I also cannot find out how much combined noise and shadow flicker from both Knockshanvo and Oatfield windfarms my house will be subjected to. I find this highly unacceptable behaviour from the two Irish companies, ESB and Collite, that make up FEi. We as a family feel threatened and disrespected by this obvious hiding of vital information from us.

I would also like to point out the lack of cumulative information of the impacts the two wind farms will have on us.

In 2005, my wife and I moved to rural East Clare from the suburbs of Limerick City. We love the super quiet, rural, friendly area full of peacefulness and calm. As I work shift, I am to this day amazed at the absolute stillness and absolute quiet I experience in the odd hours when I am going to or coming from work. Not a sound except silence itself. On a clear night the stars are amazing with no light pollution and at dawn the birds welcome the coming day with their chorus. I know and fear that the proposed development would impact all these moments. There is no industry in the area, heavy or otherwise. There are no tall buildings, there are no factories or industrial noise makers. The area is peatland, forest, and farmland. It is a beautiful area in its simplicity.

These huge industrial sized turbines coupled with the other proposed Oatfield development on the same site means the number and the size of turbines proposed would irrevocably change this landscape and community.

It is not fair and is cruel that such massive constantly moving structures could be placed so close to so many people's houses and inflict noise and flicker and reduce the enjoyment and amenity of their own houses.

Autism

In 2008 our son was born and in 2011 was diagnosed with Autism. He is a wonderful kind soul who has taught me what it is to be human, what it is to accept people for who they are and that difference is good. I love him dearly and want to protect him from the things that are hard for him to cope with.

Being autistic does not mean you have an illness or disease. It means your brain works in a different way from other people. It's something you're born with. If you're autistic, you're autistic your whole life. Autism is a condition that affects how a person thinks, feels, interacts with others and how they process the information and stimuli of the world around them.

Autistic people may:

- find it hard to communicate and interact with other people
- find it hard to understand how other people think or feel
- find things like bright lights or loud noises overwhelming, stressful or uncomfortable
- get anxious or upset about unfamiliar situations and social events
- take longer to understand information
- do or think the same things over and over.

Our son faces these challenges and as mentioned above can find things like bright lights or loud noises overwhelming, stressful or uncomfortable, and can get anxious or upset about unfamiliar situations. I am deeply worried about the effect this

proposed wind farm development will have on him. It will be directly visible from our house. It will be very close by. These turbines are huge. I am deeply concerned about the effect noise from the turbines will have on him. I am deeply concerned about the effect of shadow flicker will have on him.

The developer will state that there will be no noise from these huge structures that have aeroplane like propellers on them, but this area is so quiet they will be very audible. The small valley we live in is an echo chamber, as our dog can prove by barking at her own barks which echo reflect back perfectly at her. In fact when i call her in, i can hear the same bark in stereo , one in my right ear the other in the left. This stereo and echo effect makes me even more concerned about the noise especially as this has not been considered by the developer and the noise will echo across our small valley.

Our son often goes outside to stim. Stimming is when a person repeatedly makes the same movements or sounds. Stimming is used to regulate felt emotions like dealing with anxiety, overstimulation or to calm down.

Some of the more common stimming forms, broken down by the senses and parts of the body they relate to:

- Auditory (hearing and sound): Humming, whistling, repeating words/phrases or continuous throat-clearing.
- Olfactory (smell or taste): Repeated sniffing or licking.
- Tactile (touching or feeling): Hand-flapping, finger-tapping, skin-rubbing or other types of repetitive hand movements (for example, stretching fingers or clenching and unclenching the fists).
- Visual (sight-related): Blinking, eye-rolling, lining up objects or staring at lights.
- Vestibular (movement): Rocking, spinning, twirling or pacing.

I am deeply deeply concerned that going outside to stim and self regulate his emotions will no longer be viable and available to him due to the proposed new giant turbines, the noise of them and the constant movement of the blades being visible to him and any actual shadow flicker.

The constant moving and spinning of the turbine blades visible to him will have a major effect on him even in the absence of any noise or shadow flicker.

Shadow flicker or shadow movement on top of the noise and constant visible movement would have a serious effect on him and his life. There are no workable enforceable mitigations proposed by the developer for this and I don't believe any mitigation exists apart from not having turbines directly in front of and around us. I believe that the developer has used a calculation based on 10 times the rotor diameter to calculate an impact zone around each turbine for shadow flicker. I'm no engineer but if an object or building is going to cast a shadow surely the height to the

top of that structure should be used?. The sun doesn't care about rotor diameters, it cares about how high the structure is as that will cast the shadow.

The tip height of these turbines are 185m which at the same 10 times calculation would give an impact zone of 1.85km around each turbine. This would materially affect more people, more houses and dwellings, and affect the people inside the "wrong" 1.6km zone even more than assessed. All of these factors have not been assessed by or even considered by FEi and their consultants.

How much worse will the noise and shadow flicker be, from the Knockshanvo wind farm, when combined with Oatfield?

There would be flicker outside the house as well, in our garden and surrounding area, which was not considered and it would ruin the use and amenity of our house, and also seriously impact our son's ability and likelihood of going outside to play and stim.

There are currently 2 ASD (Autism spectrum disorder) units in Sixmilebridge National School and one if not 2 ASD units at Broadford National School. These units are over subscribed. There is no analysis or consideration of any of the people with additional needs and or sensory issues in any of the affected areas. The proposed developer does not know how many people or even how many houses have people with additional autistic needs that would be severely impacted by this development. Because the ASD units are oversubscribed there are children in the localities that cannot get a place in these units but are still on the Autism spectrum. When my son asked about the turbines and what they are and what they look like, he immediately said he didn't want to see or hear the big "spinnny things" as in the turbines. He indicated this would cause him distress. For this reason and this reason alone I implore the inspector, the ABP board and anyone else who reads this with the relevant powers, to deny this proposed application.

Please.

Community and Consultation

It has come as a shock that various companies including Coillte, FEi and Orsted have been studying and plotting to build wind farms on the Oatfield site for a decade or more. It comes as a shock as they hid this for years from the very communities and people they claim they have "consulted" fully. If you were to properly consult with a community it would involve calling a public meeting to inform the communities of their plans at the start of the process and start the process to agreement on size, location, areas of concern and any other issues.

They would seek to keep the number and size of turbines appropriate to the area with selected locations, so as not to impact people and entire communities in a hugely negative way and to seek to protect the environment to the maximum level

possible. That is consultation.

What we had instead was a couple of brochures, one presentation in a hotel room in a different county. The presentation was interesting due to the presence of beneficial landowners who were quite vocal and intimidating in enquiring if attendees were there to see their wind farm. Since then this proposed development has divided the communities involved between those few whose land is needed by FEi and the majority rest who aren't in favour of the proposal. This isn't consultation and community engagement. Complaints and statements were also made to Gardai with pulse case numbers generated over the theft of anti wind farm signs from private land. It is sad to see the effect this proposed development has had already on our community.

On a wider viewpoint, wind farm developers have been lobbying local politicians for years in relation to the various county council development plans. What is clear is that the vast majority of the people from Sixmilebridge to O'Briens Bridge to Broadford to Kilkishen and the 12 O'Clock hills areas did not know or were aware of what was in these plans. That is a failure of developer, community and political consultation with the communities listed.

Fairness and structural defects in the planning process

These companies like Orsted and FEI have an army of highly paid consultants and so called experts, with years to study and put together 4000 page documents to support their case. Local communities don't have these resources in terms of time, money, highly paid consultants and they don't have 10+ years available to respond. These armies of consultants, planners and "experts" can bamboozle and overwhelm ordinary working people who will be affected by this development. The huge amounts of technical detail, highly specialised language and topics, are often intentionally designed to intimidate and hide the full facts and information. It's up to the affected communities to spot the lies and half lies, to spot the inconsistencies and contradictions and to spot the many pieces of information left out or buried because it does not support the developer's case.

The old phrase of "He who pays the piper calls the tune" applies here. As the army of consultants and experts are paid for by the wind farm developer there is an inbuilt structural flaw in this process. The paid-for-consultants obviously don't want to disappoint their paymaster and don't want to get a bad reputation amongst the other wind farm developers and are motivated by this reality. If these consultants were to include all the data, all the implications, all the information and all the negative impacts then many planning applications would never make it to the planning stage at all with the consequence being that these consultants would not be appointed or hired again.

Perhaps the way forward to rectify these inbuilt flaws, is that all reports and technical data must be commissioned and paid for by the relevant state agencies, which the applicant developer must pay up front to the state agency, but the developer does

not get to choose or pick the firm or the consultants to carry out this work. Now the motivation for the firm of consultants is to provide the full data and full information, warts and all, to the state agency and if it turns out they have not done a full and proper job then this firm of consultants would more than likely not be re-hired by the state agency responsible. The issue of cost is still for the developer to bear as it should be.

Environmental impacts

Habitats

I am no environmental expert but I have lived in this landscape since 2005. We have birds of prey, all sorts, visible around us, we have deer, stoats and other slinky creatures, squirrels and foxes, smaller birds of all varieties and bats, lots of bats amongst countless others. We have had bats fly into the house at night on a number of occasions, and in the evening around dusk or later you can see them outside above your head or at least be aware of them as they are so very fast. All these fauna and their habitats are under immense threat from this proposed development.

While I'm sure the developer has given some small consideration to the impact on the habitats of the important and noteworthy fauna, like the hen harriers, who are apex predators, has any consideration been given to the impact of all the habitats under the apex that the apex predator relies on?

I'm sure the developer has "mitigations" but the hen harriers don't know about this. They just know that their preferred habitat and area is now off limits with work traffic, turbines and destruction of the land they rely on to exist.

As one of the developers' own ecologists stated to me, they cannot guarantee that no hen harrier or other birds will be killed by the turbines and associated works, it's just that they hope to minimise the number that are killed. Given the highly protected status of the hen harrier and coupled with its declining numbers, how could this development be approved?

Traffic

You don't need to be an expert to read between the lines and realise that tons and tons of peat will be removed. The 100+ hectares of forestry that will be felled. The tons of concrete that will be poured and installed. The habitats that will be removed, destroyed and/or put beyond use. The thousands of HGV and other site traffic on really small narrow country roads, that are so small and narrow in numerous places that 2 normal sized cars cannot pass each other and one of them has to reverse some distance. This is acceptable in a quiet local area with low levels of traffic at the moment, but would not be acceptable with the extra thousands of site traffic journeys on these roads.

Peat slippage and water contamination

We have all seen the debacle of Derrybrien and seen landslides and peat slippages

with huge disastrous environmental consequences happen at various places around the country associated with wind farms.

Nearly everyone around the proposed development, including ourselves, sources their own water from ground wells, and pays for the softening, filtration and sanitisation of their own water. Water generally flows down hill, from the proposed development site and if that or the ground waters get polluted by any aspect of the wind farm and its development, it would be catastrophic and disastrous for each household. There is no second chance in this regard.

12 O’Clock Hills

We, as a family , are so lucky that we live looking out onto the broader 12 o’clock hills area, and have used it as an amenity for many years. The trails have been improved over the years and it is a well organised amenity with 2 car parks to facilitate the thousands of people who access it yearly. It has a variety of walks that we take as a family and we experience great enjoyment and relaxation from these. It also has such a positive impact on our autistic son, as it is quiet and beautiful, away from all distractions. I know many, many people who use the 12 o’clock hills and state the positive impact it has on them and their mental health and the ability to get away from it all. Both this proposed Orsted development and the FEI Knockshanvo proposed development would change this amenity irreparably. The 12 O’Clock hills and the 2 proposed wind farm developments are not compatible.

Climate Change Impacts

Finally, has the applicant assessed the likely impact climate change will have on the proposed development. Are the turbines designed to withstand stronger winds and more violent storms? Has the applicant assessed the impact from climate change that more rainfall will have on the development site? Will this lead to large soil and or peat slippages with the resultant human and environmental impacts?

Safety

There are so many questions about the safety of this development.

- Safety in terms of landslides, peat slippages, water and ground well pollution.
- Safety in terms of noise and flicker. Safety in terms of the impact on autistic residents? Safety in terms of the impact on human mental health?
- Safety in terms of chemicals used in the manufacturing of the turbines, chemicals used in the on site construction, lubricants and gearbox oils etc.
- Safety in terms of fire. Turbines go on fire, when that happens do any of the materials or chemicals used in their manufacture, on site construction or ongoing maintenance become noxious, carcinogenic or harmful to the environment including the aquatic environment? Safety in terms of collapse and fire spread.
- Safety in terms that the applicant states 2022 had the highest number of large individual wildfires recorded in two decades, setting a new record over the previous year. The applicant states that the proposed development site would

support and spread wildfire.

- Safety in terms of how do the fire brigade put out a fire on top of a 185m turbine in the middle of the bog. Safety in terms of life, property , habitat and forestry surrounding the development. How would a turbine fire affect aircraft accessing and flying into or out of Shannon Airport?

Helicopters had to be called in to put out the last fire in 2023 at the development site. How will helicopters access the fire areas if the turbines are built?

- Safety in terms of ice sling? Will the forest trails and 12 OClock hills be closed when it's frosty because of potentially ice sling from the turbine blades?
- Safety in terms of the small narrow roads all around the proposed development, the huge increase in traffic and resultant jams and the narrow choke points?

Finally the applicant's in-house safety analysis is highly questionable. The worst case possible outcome from the identified events has the potential to be catastrophic in terms of environmental damage, human health impacts, and physical damage. They understate the impact and downplay the likelihood of any event happening. The resultant risk levels are not accurate. The mediation of these risks by their wholly inadequate “mitigation” measures also do not stand up to scrutiny.

Enforcement

I am acutely aware that there appears to be no effective enforcement regime by either ABP or County Councils or the various state agencies in relation to wind farm developers and operators who are flaunting planning conditions and stated objectives/requirements.

A quick Google search provides plenty of locations with thousands of people plagued by non conforming wind farms and that no entity appears responsible, able or willing to take on the task of enforcement . A free for all situation presently exists once planning has been granted it would appear .

Development Levy and decommissioning costs

Who pays for the decommissioning and reinstatement costs in 30 years time?

Will the landowner be responsible for these costs if the developer or subsequent owners walk away from their development or go bankrupt?

The full and total decommissioning/reinstatement costs should be calculated now while also using an average inflation percentage to account for inflation of the lifespan of the development.

This amount would require a 10 year pro rata lump sum to be deposited up front before construction begins, by the proposed developer. The remaining 20 year amount would then be paid off over the 30 year life span period by the owner or owners of the wind farm. A condition should be applied that any changes of ownership does not stop this financial requirement, as in whomever owns it continues to pay.

In the event of non payment of this levy by whoever are the current owners at any given time, that the wind farm is immediately shut down and payment for electricity is withheld to offset the costs incurred.

It should also be a requirement that all landowners are informed that they may be liable not just for decommissioning and reinstatement costs but also potentially liable for any nuisance the turbines on their land may cause.

Sustainable development

Is this development sustainable?

- County Clare is at the current time, almost self-sufficient in terms of electricity demand versus electricity generated by renewable sources in the county.
- There is no guarantee that if the proposed development is given the go ahead, that any of the electricity generated by it would be made available to the national grid/average consumer. There is a distinct possibility that the wind farm developer would agree to a corporate entity (CCPA) agreement and sell the electricity directly to that corporate entity like data centres. The average citizen in that state would derive no benefit from the electricity generated.
- 80 data centres in Ireland account for 20% of the country's electricity demand. There is one proposed data centre on the outskirts of Ennis Co.Clare whose energy demand alone would increase the entire county's energy consumption 3 fold.
- It is therefore a valid question to ask, is allowing the proposed wind farm development contributing effectively nothing to a net zero society? Is this sustainable?
- The wind farm developers and their lobby group often state that more wind production will lead to lower electricity prices. But this is not true. As has been discussed in the Dail, wind generated electricity is sold to the grid at whatever the wholesale gas price is at any given moment. Wind farms are not just wind farms, they are also a goldmine for the corporations and foreign companies that own them. If gas goes down as is the case today, electricity prices go down. It has nothing to do with wind or wind farms.
- At times of highest electricity demand in cold weather, the wind farms generate and contribute very very little to meet that demand. The grid remains reliant on alternate means of generation to meet the demand. It is a glaring fact that when demand is highest , wind farms generate and contribute the least.
- There are numerous proposed wind farms all around East Clare. The number of proposed turbines appears to increase each week and currently stands at 67 massive 180 m tall turbines. All these developments have a feel of the gold rush of 1848 about them, except now it's wind not gold in them there hills. Is turning East Clare into a wind farm park-sustainable? No.
- Is Allowing a proposed development that would have a serious impact on the environment, a serious impact on the visual aspect, a serious impact on protected species, a serious impact on the renowned 12 O'Clock hills amenity, a serious impact on people including the vulnerable, their houses, their water

,their lifestyles and their health, a serious impact on the functioning of Shannon Airport and Air Traffic Control, a serious impact on property values,and a serious impact on intra community relations, can this be deemed sustainable? No.

Please give due consideration to the huge impact this development would have on my family and especially our son, with no benefits accruing at all to my family, or to the vast vast majority in the community.

Reject this proposed development

Yours Sincerely.

Seamus Gammell and Family.