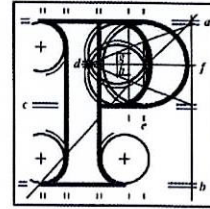


**Our Case Number:** ABP-316051-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Ballymore Community Childcare Facility Ltd  
Market Hill  
Ballymore  
Mullingar  
Co. Westmeath  
N91D264

**Date:** 27 April 2023

**Re:** Renewable energy development comprising 9 no. wind turbines and associated infrastructure.  
Umma More and adjacent townlands, County Westmeath.

Dear Sir / Madam,

An Bord Pleanála has received your observation or submission in relation to the case mentioned above and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

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.

For further information on this case please access our website at [www.pleanala.ie](http://www.pleanala.ie) and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

Kevin McGettigan  
Administrative Assistant  
Direct Line: 01-8737263

BL50A

**Teil**  
**Glaao Áitiúil**  
**Facs**  
**Láithreán Gréasáin**  
**Ríomhphost**

**Tel** (01) 858 8100  
**LoCall** 1890 275 175  
**Fax** (01) 872 2684  
**Website** [www.pleanala.ie](http://www.pleanala.ie)  
**Email** [bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

---

## **Ballymore Community Childcare Facility Ltd**

---



Market Hill, Ballymore, Mullingar,  
Co. Westmeath, N91 D264

Tel: 044 9356006 Ref: 09WH0057  
Email: [info@ballymorechildcare.ie](mailto:info@ballymorechildcare.ie)

Re: Strategic Infrastructure Application.

Applicant: Ummamore Development Ltd.

Project Number: 316051

Dear Sir/Madam,

We refer to the Strategic Infrastructure Status which is sought by Ummamore Development Ltd. for the development of a wind farm in County Westmeath. We note that the applicants contend that this windfarm which will comprise 9 turbines, with a rotor diameter of 162 metres and an overall height of 185 metres (hereinafter called 'the Windfarm') should be afforded strategic infrastructure development status in accordance with section 37A (2) a of the Planning and Development Act, 2000, as amended.

We are making this collective observation as both the Director, Designated Person in Charge and Employees of a Community Based Early Learning and Care Centre known as 'Ballymore Play-School', hereafter called "the service".

We serve the needs of an average 84 children per week ranging in age from 2 years and 8 months and 12 years of age. As a Community based service, we are registered with the Access and Inclusion Model (AIMS) Scheme (D.C.Y.A, 2016). This is a national scheme which is designed to support the participation of children with disabilities, including Autism within our service. The number of our children in the service with Autism would exceed the national average by virtue of our participation in the AIMS scheme. Our service is in the village of Ballymore, which the developers confirm is 2km from the proposed windfarm. On this basis, our service would be a Noise Sensitive receptor as defined by the Wind Energy Guidelines.

We note that the MKO non-technical summary indicates that that they were advised by the HSE in September 2021 to consult with all Sensitive receptors. We also wish to highlight that the scoping responses (which include the HSE response) are illegible on the Ummamore/An Bord Pleanala link. We can confirm that we have not received any personal correspondence from the Developers nor have they visited our service, in accordance with the HSE direction.



In addition, their Environmental Impact Assessment Report indicates that the impact of the wind farm on all noise sensitive locations has been assessed. However, quite remarkably MKO fail to refer to the existence of our service on any of their scoping reports.

Children with Autism are diagnosed according to a scale known as the Diagnostic and Statistical Manual, commonly known as DSM 5. While we cannot reveal the personal medical circumstances of any of the children within our service, we can confirm that the DSM 5 lists sensory perception disorders as a factor for an autism diagnosis as it is so common (Boucher, 2012).

A child with sensory perception disorder has a hyper-reactivity to sensory input. They are unable to filter or differentiate between irrelevant back ground noises and normal sound. The background noise generated by Wind Turbines is an industrial sound, to which children are particularly vulnerable (Evans, 2021). This inability to differentiate causes sensory overload, distress and in certain circumstances physical pain (Boucher, 2012).

In addition, children with hyper-sensitivity to sensory input are unable to differentiate/discern artificial foreign objects from natural objects in the skyline which similarly causes considerable anxiety, fear and distress. The proposed wind farm will be directly visible from the children's outdoor play area.

We were somewhat taken back by the developers comment at para 5.5 in their Non-Technical Summary which indicates that there is no published credible evidence linking wind turbines with adverse health effects. Wind turbines induce stress and psychological disorder which has implications for certain types of epilepsy and autism (Evans, 2017).


The developers would appear to be unaware of 'Wind Turbine Syndrome', a cluster of symptoms described by our Deputy Chief Medical Officer (2014) and Professor Alun Evans (2017). We have listed several esteemed research papers/ books which specifically confirm our concerns about the health of our children in the service.

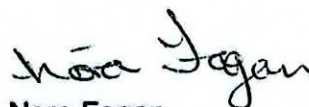
In addition, we note with concern that the applicants appear to be relying on the 2006 guidelines for their noise monitoring standards. A targeted review of these guidelines was initiated by the Department of the Environment, Community and Local Government in 2013, on the basis that these guidelines were no longer fit for purpose. We would also question the developers impartiality in their quest to dis-credit the W.H.O guidelines.

We have two employees employed within our service who act as Inclusion co-ordinators on the AIMS programme. In addition, we have four practitioners employed to provide direct one on one support to our children on the AIMS programme. The Inclusion Co-ordinators have also countersigned this observation to express their concern about the impact of this Windfarm on the children within service.




Yours faithfully,

  
Vincent McCormack,  
Director,  
Ballymore Community Childcare,  
Market Hill,  
Ballymore.

  
Nora Fagan,  
Designated Person in Charge.  
Ballymore Community Childcare,  
Market Hill,  
Ballymore.

  
Carmel Kelly,  
AIMS Co-ordinator,  
Ballymore Community Childcare,  
Market Hill,  
Ballymore.

  
Rachel Haugh,  
AIMS Co-Ordinator,  
Ballymore Community Childcare,  
Market Hill,  
Ballymore.

American Psychiatric Association (2013). *The Diagnostic and Statistical Manual of Mental Disorders*. (5<sup>th</sup> Edition) (DSM 5).

Boucher, J., (2012). *The Autistic Spectrum, Characteristics, Causes and Practical Issues*. London: Sage

Department of the Environment, Community and Local Government (2013). *Proposed Revisions to Wind Energy Guidelines 2006: Targeted Review in Relation to Noise, Proximity and Shadow Flicker*. (11 December 2013).

Department of Children and Youth Affairs (DCYA) 2016. *Access and Inclusion Model (AIMS)*. Dublin: Department of Children and Youth Affairs.

Evans, A. (2017). *Environmental Noise Pollution: Has Public Health Become too Utilitarian?* Open Journal of Social Sciences. [Online]. Available at: <https://doi.org/10.4236/jss.2017.55007TY>.

Evans, A. (2021). *Wind turbines and adverse health effects: Applying Bradford Hill's criteria for causation by Anne Dumbrille, Robert McMurtry, and Carmen Krogh – 'Big noises: Tobacco and Wind'*. Journal of Environmental Disease. [Online]. Available at: [https://doi.org/10.4103/ed.ed\\_24\\_21](https://doi.org/10.4103/ed.ed_24_21)

Frey, B.J. and Hadden, P.J. (2012). *Wind Turbines and Proximity to Homes: The Impact of Wind Turbine Noise on Health: A Review of the Literature & Discussion*. [Online]. Available at: [http://www.windturbinesyndrome.com/wp-content/uploads/2012/03/Frey\\_Hadden\\_WT\\_noise\\_health\\_01Jan2012.pdf](http://www.windturbinesyndrome.com/wp-content/uploads/2012/03/Frey_Hadden_WT_noise_health_01Jan2012.pdf)

Hanning, C.D. and Evans, A. (2012). *Wind Turbine Noise*. BMJ, 344, e1527.[Online]. Available at: <https://doi.org/10.1136/bmj.e1527>

Kanakri SM, Shepley M, Varni JW, Tassinary LG. (2017). *Noise and autism spectrum disorder in children: An exploratory survey*. Res Dev Disabil. 2017 Apr 1;63: p. 85–94.

Pierpont, N. (2009) *Wind Turbine Syndrome: A Report on A Natural Experiment*. K Selected Publications, Santa Fe, New Mexico.

O' Sullivan C., (2014). *Senior Doctor defends Wind Turbine Syndrome Conclusions*, The Irish Examiner, 6<sup>th</sup> March 2014.

Weis R. (2014). *Introduction to Abnormal Child and Adolescent Psychology*. Denison University Sage: