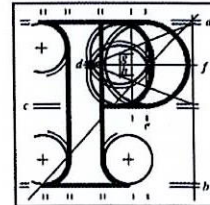


**Our Case Number:** ABP-316051-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Eileen Cunningham  
Derryveagh  
Kenagh  
Co. Longford

**Date:** 08 May 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,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

BL50A

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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
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The Secretary  
An Bord Pleanála,  
64 Marlborough St,  
Dublin 1  
D01  
24th April 2023

**Observation on Ummamore Renewable Energy Development Case Reference: 316051**

Dear Sir/Madam,

I would like to make my thoughts known on the planning application lodged with An Bord Pleanála by Umma More Ltd (the applicant) for the development of 9 wind turbines with a tip height of 185 metres in the Ummamore area of South Westmeath (the application).

I have tried to make my observations as clear and simple as possible so that the Board/Inspector can easily navigate through what I feel, based on my expertise, are very significant issues arising from this application.

**My Background, Experience and Expertise**

I have four years of experience working with the Road Safety Authority in an educational and promotional capacity. I have worked with road users of all kinds and all ages. I have provided road safety expertise to local community groups, educational institutions, sports clubs, and to state, semi-state and corporate organisations. I was a member of the Kerry Road Safety Working Group and a member of the Limerick Road Safety Working Together Group, ensuring the implementation of national road safety strategies at local level in both counties.

I have been working in the field of mental health since 2018. In my 5 years working in mental health, I have been employed within HSE Mental Health Services with Mental Health Ireland and with Pieta, Irelands leading suicide and self-harm charity. In the HSE Mid West (CHO3) and HSE Midlands, Louth, Meath (CHO8) areas, I managed mental health programmes at a regional level with HSE Staff, 3<sup>rd</sup> Level Students, Community Groups and Mental Health Service Users (both inpatient and outpatient). I am currently the Education and Training Manager with Pieta and have overseen the management of Pieta's education and training department nationally for the last two years.

I have an undergraduate degree in Physical Education and English from University of Limerick (1<sup>st</sup> class honours) and a postgraduate degree in Psychology from University College Dublin (1<sup>st</sup> class honours).

The observations and opinions expressed within this submission are my own and are not representative in any way of the opinions of my former or current employers.

**Traffic Observation and Road User Exclusion**

The applicant's assessment of traffic at the junction between the R390 and L5363 took place on the 9<sup>th</sup> of June 2022 (Appendix 14-1 Traffonomics Traffic Count Data). This is a junction on a busy regional road linking the regional towns of Mullingar and Athlone.

Surely one day of assessment, in June (secondary schools closed), of a junction is inadequate and does not represent the true traffic volumes at this junction?



Can the applicant give any assurances regarding the safety of all road users at this junction considering the speed of traffic on the R390? The volume of heavy vehicles that will be travelling to and from the wind farm site is a significant concern at this junction – especially when one considers that, between 2016 and 2021, in fatal road traffic collisions involving a HGV, 26% occurred at a junction, and in the case of serious injury collisions involving a HGV, 31% occurred at a junction ([https://www.rsa.ie/docs/default-source/road-safety/r2---statistics/hgv-road-safety-an-analysis-of-hgvs-involved-in-fatal-and-serious-injury-collisions.pdf?Status=Master&sfvrsn=3f2a50ec\\_3](https://www.rsa.ie/docs/default-source/road-safety/r2---statistics/hgv-road-safety-an-analysis-of-hgvs-involved-in-fatal-and-serious-injury-collisions.pdf?Status=Master&sfvrsn=3f2a50ec_3)).

Given the importance of sightlines at a junction, it is not clear to me from the application that the applicant has secured consent from the home on the Athlone side of this junction. Should the applicant not be required to secure an adequate sightline for heavy vehicles travelling to and from the wind farm site?

This assessment of the junction is also quite limited in its scope regarding road users. It only records cars, light goods vehicles, other goods vehicles, and buses.

Chapter 5 claims that “many construction workers and materials will be sourced locally, thereby helping to sustain employment in the construction trade”. The applicant does not consider walking and cycling because “travel distances will likely exclude any employees walking or cycling to work.”

Is this confirmation that there will be no local employment arising from the proposed development?

How can the applicant claim that during the construction, operational and decommissioning phases of this development that there will be only “slight to imperceptible negative effect on existing road users” when several road users have been excluded from their data assessments?

The Road Safety Authority categorises pedestrians, cyclists and younger people as Vulnerable Road Users. The applicant has stated in Chapter 5 Population and Human Health that 29.3% of the 1279 people in the area assessed are students – one could infer that these are younger people. If those working on the proposed development will not be walking or cycling, then they will be driving for work. According to the Road Safety Authority, those driving for work pose risks not only to their fellow workers, but to “members of the public and road users, especially vulnerable road users such as pedestrians and cyclists.”

Are the local rural roads that people have walked and cycled on for years to become unusable for such purposes during construction and decommissioning? With the addition of lorries carrying concrete, gravel, steel, turbine blades – where do people walk? Where do people cycle? Or in the opinion of this applicant, are those modes of transport not relevant to the health of individuals and the planet?

I propose that the best solution here is the “Do Nothing Scenario” where there will be no additional traffic generated or works carried out on the road network and therefore no effects with respect to traffic.”

#### **Road Safety on Rural Roads – Vulnerable Road Users, Increased Traffic, Potential Biodiversity Loss**

The road closures and diversions that the applicant has planned are quite worrying from a safety perspective.

The roads around this development are local, rural roads. With a statistically higher level of fatal collisions occurring on rural roads in Ireland, surely the addition of heavy goods vehicles (HGVs) into the mix will lead to further road safety issues stemming from this development.



Between 2016 and 2021, a higher proportion of fatal collisions involving HGVs occurred on rural roads (74%). In the majority of fatal collisions between 2016 and 2021 involving HGVs either the driver of the other vehicle or a pedestrian is killed. Those killed include 33 pedestrians, 8 pedal cyclists, 3 motorcycles, 18 private car passengers and 70 private car drivers. In the same time period, 41 pedestrians were seriously injured by a HGV and 42 cyclists were seriously injured by a HGV.

Is this what local people will be living in fear of during the construction, operation and decommissioning of the proposed development? On local, rural roads, we are used to people dropping children to school buses at already busy junctions, teenagers walking home from the school bus drop off, people driving to work, children walking or cycling to a friend's house, people cycling or walking to a neighbour's house, grandchildren walking or cycling to their grandparents' house. I urge you to consider the road users and roads in this application carefully.

The proposed local roads are narrow and winding and are used primarily by residents, farm machinery and vulnerable road users (pedestrians and cyclists). Can the addition of HGVs and development related traffic be considered safe for local road users?

In case PA09.300746 the Board states:

'Having regard to the nature, structure and condition of the existing public road network serving the development, which includes substantial sections of substandard legacy roads and to the extensive cable trenching works proposed it is considered that the proposed development could have significant adverse effects on the long term structural integrity of significant elements of the local road network, is thereby likely to give rise to the creation of traffic hazards and to potentially increased maintenance costs to the local authority. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.'

If approved and this development is operational during the months of April to September, it is also likely that the applicant will need to request that hedging be cut back for road safety purposes on these narrow local roads. In a biodiversity crisis, this will add insult to injury for more local hedgerows and wildlife.

### **Mental Health**

The World Health Organisation describe mental health as a state of mental well-being that enables people to cope with the stresses of life, realise their abilities, learn well and work well, and contribute to their community.

Chapter 5 Population and Human Health cites numerous studies that tell us there is no association between wind farms and psychological distress or mental health problems. Research is also used to tell us that "Wind Turbine Syndrome" and any associated health problems are, essentially, all in the head of individuals and don't really exist.

Where have we heard this before when it comes to mental health?

Throughout history, people were accused of demonic possession and witchcraft, told they were lunatics or retarded, dismissed as hysterical women with wandering wombs.

Let's look at mental ill health diagnosis down through the years. There are two primary texts used in the diagnosis of mental illnesses: The International Classification of Diseases (ICD-11) and the Diagnostic and Statistical Manual of Mental Disorders (DSM-5-TR).



The ICD is a medical classification list by the World Health Organization (WHO). It contains codes for diseases, signs and symptoms, abnormal findings, complaints, social circumstances, and external causes of injury or diseases.

The ICD has reached its eleventh edition.

The DSM-5-TR is the product of more than 70 years of effort by hundreds of international experts in all aspects of mental health. It is published by the American Psychiatric Association

The DSM has been edited and revised eight times.

What do these texts have in common? Both have been revised on numerous occasions. Why so? To update text and references, overhaul diagnostic criteria, use more inclusive language and to include any new disorders.

It is, therefore, fair to say, that science, medicine, and psychiatry, are discovering new information and evidence related to the health and well-being of human beings on an ongoing basis. Dismissal of any symptoms in an individual is not only reckless, but unethical.

With the increase in wind turbines across the country and world, comes the possibility of "Wind Turbine Syndrome" becoming a diagnosed condition. Rather than dismiss the symptoms of individuals living near wind farms, surely it is incumbent upon the applicant to be balanced and share all available information with the board?

I feel that the applicant should also be required to provide a detailed account regarding the funding of the research they use to back up their conclusions. Are there any checks and balances done to ensure that this is not another case of the cigarette industry funding research showing that smoking is good for you?

For people living in the local area and opposed to the prospect of this wind farm development, it is not a matter of living near a wind farm and being annoyed about it – it is a matter of living in a wind farm and being affected by it. Unless the applicant plans to carry out baseline assessments of each individual's health (physical, emotional, social, spiritual and intellectual) before they commence this development, can any conclusion really be made on the impact of wind farms on the health of individuals living in the Umma More area?

It is also highly likely that the applicant is aware of the negative impact of wind farms on health but has chosen to discard this in their application.

People have been forced to abandon their homes due to the effects of living near a turbine.

We have seen cases where families were forced to leave their home because of the impact of wind farms (<https://www.farmersjournal.ie/wind-company-admits-nuisance-damage-to-neighbours-246465>, <https://www.irishtimes.com/business/energy-and-resources/siblings-who-became-ill-next-to-wind-farm-settle-case-1.4184636> ).

In 2019, the applicant distributed leaflets telling local people that there is no association between wind farms and psychological distress. The Advertising Standards Authority for Ireland described the claims made by the applicant with regard to the effects of wind farms on health as unsubstantiated and lacking evidence (<https://www.asai.ie/complaint/household-energy/>).

How can An Bord Pleanála, or local people, really trust anything that the applicant has said they have done or will do to mitigate the effects of their proposed development?



The financially backed experts associated with this development conclude that the wind farm would have 'no effect on human beings.' Based on my expertise and experience working across various fields of mental health, I wholeheartedly disagree with this statement and find it dismissive of, and insulting to, the high number of people experiencing mental health challenges in Ireland today.

### **Personal Observation**

I was fortunate to grow up on the Umma road, where the main noise was from cattle in the field and birds in the trees (mostly ash trees that are now dying). The main colour to be seen was green.

I gained employment in the midlands after 7 years working and living in the mid-west of Ireland.

Throughout those 7 years, I saved money with determination to get myself a job in the midlands and build my own home on family land near my parents, sister, and some of my childhood friends.

In 2020 that dream **almost** became a reality.

- ☒ I got the job.
- ☒ I picked a site at Folio WH14573F.
- ☒ I got the house plans designed.
- ☒ I paid the engineer/architect.
- ☒ I had a pre-planning meeting with the county council.
- ☒ The wind measuring mast went up...and fell down.
- ☒ The map outlining the proposed wind farm was delivered to homeowners.
- ☒ ...I then researched the impact of living beside a wind farm...

and I saw my dreams go down the Dungolman River.

T4 has been placed just over 470 metres from my family land to the West of our family home, and the proposed substation has been positioned just over 50 metres from our land to the East of our family home. With this potential development looming, the potential negative impact for decades to come, rising house prices and reduced availability, I had to look for a home elsewhere and ended up buying a house over 20 kilometres from home in Longford.

The main line that sticks with me in this application is how the wind farm will have "no effect on human beings". I cannot speak for the local community. I can speak for myself. I am affected. I have experienced psychological distress. Damage has been done before a sod has been turned.

Umma More was my home.

Umma More is my family's home.

Umma More is not an appropriate place and never will be an appropriate place for an industrial wind farm.

The site for this wind farm is too small and too flat and the turbines are too big and too close to homes.

I urge An Bord Pleanála to refuse permission for this inappropriate project.

Yours faithfully,



Eileen Cunningham