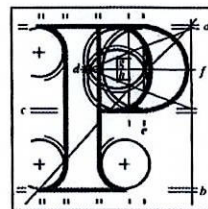


Our Case Number: ABP-316051-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Michael Blighe
Ballynacurra
Ballymore
Co. Westmeath
N91P7Y8

Date: 05 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 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

Tell
Glaao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

The Secretary,
An Bord Pleanála,
64 Marlborough St,
Dublin 1.
D01 V902.
26/04/2023

Observation on Ummamore Renewable Energy Development. Case Reference: 316051

Dear Sir/Madam,

I, Michael Blighe, house number 54 on planning application map, am making a submission against the proposed Ummamore Wind Farm, ref number 316051. I believe that this development should not be given permission to go ahead. With the amount of information submitted in the application it is almost impossible to review it all to highlight any incorrect statements, facts, or calculations. With only 6 weeks to review over two years of work by the applicant, I have noted the following from the information provided.

Enerco/Ummamore LTD

From the first time the Applicant announced their presence on our community there has been nothing but false information, sneaky tactics and a complete ignorance of the very people who will have to suffer the consequences should this go ahead.

From the beginning of this circus, the applicant had originally called this project Ballynacorra Wind farm even though there are no turbines proposed in this area. It was not until a resident of Ballynacorra made them aware of this fact, well over a year since the first literature was released, they decided to change it. Already grumblings had begun about who was signed in from Ballynacorra and this did cause some anxiety amongst the immediate community. The local village is Ballymore and for some reason the Applicant have barely recognised this fact on any literature. This can only be seen as an attempt to try and shield the local village about the plans, sizes, and location of the turbines and to this day on the Ummamoreinfo wind farm page the project is still showing as being located "approximately 7KM to the north of Moate town".

Circulation of false information

Whilst it is up to all property owners to make themselves aware about how a local windfarm would impact on their lives, the distribution of leaflets from the Applicant with unsubstantiated information. All homeowners within 2km of the proposed development received leaflets titled *Renewable Energy Project Wind Information*. This leaflet, after a complaint was made to the Advertising standards of Ireland (ASAI), was ordered not be distributed due to the inaccurate claims that turbines did not affect people's health or the value of their property.

<https://www.asai.ie/complaint/household-energy/>

This leaflet was circulated by a dishonest company at a time where they were trying to gather support from the local landowners and community. Is it any wonder local residents were beginning to wonder if they could be trusted.

Falling mast

The next absolute fiasco that the Applicant went about was the erection of a wind measuring mast on the 12th of March 2021. With no prior consultation or advanced notice, the wind measuring mast was erected on the proposed wind farm site. This mast then broke in two and collapsed, the company that are trying to persuade the local community that they can put up 9 number 185 metre wind turbines, could not put up a wind measuring mast safely. What if this had happened with personnel on the ground or the farm owner, or livestock? I'm not sure if anyone was sacked for incompetence or how the Applicant treated the incident but looking in from the outside nothing was done. With the mast re-erected it was to collapse again in January 2022 and removed from the lands. a diabolical attempt at commencing their works in the community.

Community report

Included in the planning application is the community report carried out by MKO for the Applicant, which is a like for like copy and paste from another community report from Slievacurry. The community report may as well be thrown in the bin, statements like "people were happy" and "the general reception was good" are not a true reflection of the feelings on the ground so please do not fall for this Waffle compiled by the Applicant. Submitting plans that have excluded the homes of local residents within the 1-kilometre line, which they have done, is not going to make anyone happy. If they cared about the community why wasn't their local meeting in any of the communities that form the circumference of the proposed development, Drumraney, Ballymore and Moyvoughly, all with facilities to host information evenings. Instead the Applicant decided to host these events in Rosemount and Tullamore. Both locations, nothing to do with the Ummamore windfarm but on the route of the proposed cable route, which does not form part of this application. How the Applicant can state the local community is happy with the engagement is preposterous considering they have completely ignored it from the start of their plans.

The following extract is taken from the **Good Neighbour Policy** from the Wind energy Ireland website. (<https://www.windenergyireland.com/images/files/9660bd0afdf6072c39.pdf>)

"In order for these responsibilities to be fully met within individual project developments, key stakeholders will be expected to: Enter into constructive dialogue with a view to working towards agreed positions on issues up for negotiation Assist, where possible, in identifying other key stakeholders within the community Assist, where appropriate, in identifying the full range of local opinion about the development of local benefits."

Nowhere within the community report are the concerns of residents highlighted and are being ignored. "People were happy with the continued consultation and with the general flow of information" is stated in the community report. This may be true for the few landowners signed up that live in the local area and are waiting for their money, but it is not a true reflection of the actual situation on the ground. Please do not be fooled by this document submitted in the application.

Shadow flicker assessment

In the shadow flicker assessment houses all homes within 1.62km are assessed for shadow flicker. Whilst listing out these houses some were listed as participation properties who had sacrificed their land as part of the project. This list is incorrect, after contacting a local neighbour who was down as a participating property he denied having ever signed up for the project and was disgusted that he was thought to have been part of it. After talking to other 'participating property owners' there are 7 property owners who have been mistakenly, intentionally, or unintentionally, marked on this document as been signed up.

Whilst the shadow flicker report is already contaminated with incorrect information regarding participating properties as I mentioned above, please note the following sentence from the report 5.7.6.1, "Of the 115 No. properties modelled; it is predicted that 70 properties may experience daily shadow flicker levels in excess of the Guidelines threshold of 30 minutes per day". So, of the 115 houses within the 1.62km distance of the turbines, 70 may be affected, or 60 percent of the homes. But again, Enerco say everyone is happy with this in their report.

Please note the position of my dwelling number 56, we will have turbines on 3 side of our house but according to the flicker report no mitigation strategy is required. Our home was designed and built following all planning guidelines and designed in such a way that we could harness the heat from the sun on the south facing side of our house, a lot of and large triple paneled glass windows and doors. We have one door that measures 4.5 metre wide by 2.1 metres high and all in glass (photo below). Note on the assumptions of the flicker report 5.7.5.3 *"Each window measures one-metre-high by one-metre-wide, and tilt angle is assumed to be zero. The centre height of each window is assumed to be two metres above ground level and no screening due to trees or other buildings or vegetation is assumed. It was not considered necessary or practical to measure the dimensions of every window on every property in the Shadow Flicker Study Area"*. Basically, the flicker report allows for an area of 4 square metres of glass while on one door alone at our dwelling there is 9.45 metres.

Sitting at the west facing side of our house our panoramic view will take in all nine turbines. Will I just be expected to pull the blinds on every window of my house throughout the day as it "may" not affect me as suggested in the report. 5.7.1.5 - *even if there is a bedroom on the side of the property affected, the shadow flicker may not be witnessed if curtains or blinds in the bedroom are closed.*



This door is located on the bottom right-hand side of the photo, how can Enerco say that my house will not be affected by flicker when they have carried out their report using 4sq metres as the baseline. For reference, the window at the centre of my house upstairs is 4sq metres in area so their whole report is based on one of these windows on each side of my house which cannot be correct.

In section 5.7.3 it states direction from the HSE that *"The assessment should include identification of the room use in properties potentially impacted by shadow flicker"*. Has this been carried out by Enerco ahead of the submission, to my knowledge it has not been carried out at my property.



A house that was built to harness as much heat as we possibly could by installing as much glass as possible within the regulations, will now be surrounded by turbines on 3 sides of it. If the proposed development goes ahead and given the L-shaped nature of the development, we will be faced with a future of having 9 turbines completely towering over our home from the West right around to the Southeast. Not only is this a complete intrusive but it will also have a resounding impact on the visual amenity of our home. the Applicant states that " We are led to believe that vegetation will play a key role in screening our view of these turbines but considering that manner of the ash trees in the area are already showing signs of Ash Dieback it is hard to envisage how vegetation will be able to provide us with any adequate shelter or screening.

What is going on here? How can a company submit so much documentation and get so much wrong about the local community, landowners and where the people live that have signed up for the project. The amount of documentation submitted is enormous and it is hardly fair to expect people who are not experts in this field to pick it apart and highlight all the incorrect information hidden inside these documents within their own time.

Westmeath Development Plan

Beyond the suitability of these companies to operate in the wind market, the area is not the place for a wind farm of this size. In accordance with the Westmeath development plan a windfarm development must adhere to the below guidelines

10.23.2 Industrial Scale Wind Farm- The preferred locations for large scale energy production, in the form of windfarms, is onto cutover cutaway peatlands in the County, subject to nature conservation and habitat protection requirements being fully addressed.

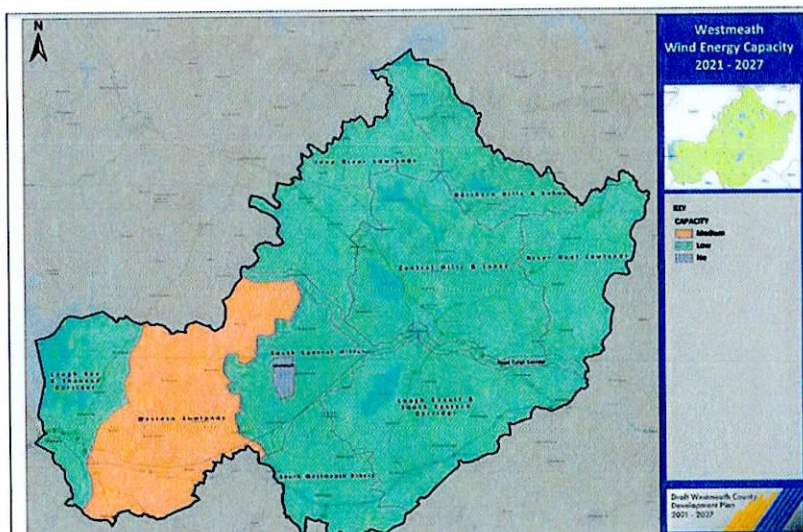
The proposed area is not a cut away bog, but rural farmland.

CPO 10.146- To **strictly** direct large-scale energy production projects, in the form of wind farms onto cutover cutaway peatlands in the County, subject to environmental, landscape, habitats and wildlife protection requirements being addressed. In the context of this policy, industrial scale/large-scale energy production projects are defined as follows: Projects that meet or exceed any of the following criteria:

- Height: over 100m to blade tip, or
- Scale: More than five turbines, or
- Output: Having a total output of greater than 5MW.

Westmeath county council Wind capacity Map.

The proposed site for the turbines is a designated medium wind area and only approx. 3kms from a designated low wind area, how does it make sense to put turbines here? The area is called the western lowlands and is relatedly flat, is this the reason for the turbines having to be 185 metres high to harness enough wind. Surely the most viable option is locating the turbines in rural mountainous areas or peatlands, not on low lying farmland. Why not install a solar farm on this land of the landowners have signed up, surely there is better ways than dropping these monstrosities into rural Ireland against the will of the majority.



If this development proceeds it will not be adhering to the local guidelines that we had to strictly follow when we constructed our own house.

Noise

It is my belief that the noise assessments carried out by the Applicant are below the standard required for such a development. The Applicant has chosen to ignore the cumulative impact of two working quarries and wind turbines.

The Environmental Health Service recommended to the Applicant:

'The potential cumulative effects of other windfarms, industry, quarrying etc in the vicinity of the development should be assessed as part of the noise survey.'

The Applicant's excuse for not addressing this scoping response is no consolation to the people that will be subjected to the noise of both industries. As the operator of this quarry, I am fully aware that we make a considerable amount of noise but over the past three decades or more I have always tried to have the utmost respect for my near neighbours. Especially given the fact that our own home is in such proximity to the quarry.

The Applicant should stop to consider that the people living near the quarry already have to deal with a significant amount of noise in their lives without adding to this with the noise of wind turbines. If the development goes ahead these people will have to live with quarry and turbine noise during the day and turbine noise during the night. An area can very quickly become uninhabitable.

When working from home there is already noise coming from the property, the addition of any more noise will remove some of the last remaining pleasures of living in the countryside like sitting out on the patio on a peaceful summers evening unwinding in the tranquillity of the countryside.

Whilst these monstrosities will be in our environment, they will only be producing 30 percent of their maximum output, as stated on numerous sites supporting wind power. Destroying out countryside for a piece of equipment that is 30percent efficient does not make sense.

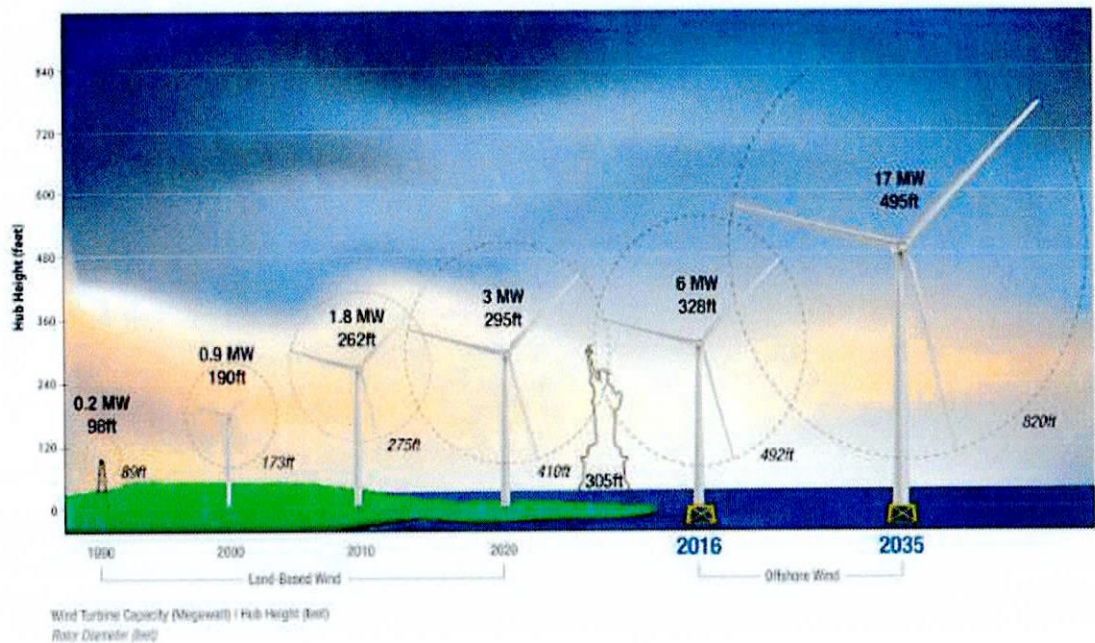
Population and human health

Throughout this report there are numerous studies, and report referenced supporting the presence of wind turbines and downplaying the effects on local residents.

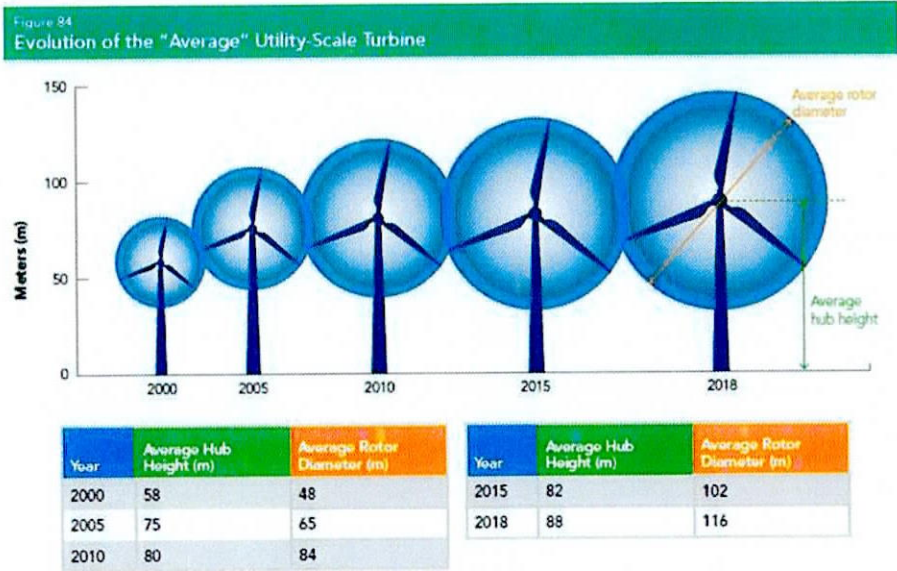
I have noted some as below:

- *Wind Turbine Sound and Health Effects – An Expert Panel Review*, American Wind Energy Association and Canadian Wind Energy Association, December 2009
- *Wind Turbine Syndrome – An independent review of the state of knowledge about the alleged health condition*, Expert Panel on behalf of Renewable UK, July 2010
- *'A Rapid Review of the Evidence'*, Australian Government National Health and Medical Research Council (NHMRC) Wind Turbines & Health, July 2010
- *Sustainable Energy Ireland Survey 2003*
- *Fáilte Ireland Surveys 2007 and 2012*
- *Jobs and Investment in Irish Wind Energy – Powering Ireland's Economy* 2009
- *Public Perceptions of Wind Power in Scotland and Ireland Survey 2005*
- *The Impact of Wind Power Projects on Residential Property Values in the United States: A multi-Site Hedonic Analysis*, December 2009

All of these reports were published over 10 years ago, and the information collected some years beforehand which the reports are based off. Wind turbines in 2010 were of an average height of 262 foot or 80 metres high as per snippet below (<https://www.energy.gov/eere/articles/wind-turbines-bigger-better>).



How can these reports be used to support all the idea of a wind farm when all the data is at least 12 years old. Turbines back at the time these reports were carried out were less than half the height, so presumably had half the impact. The below diagram from the American Wind energy association shows how turbines have increased in size since the early 2000s.



Source: AWEA

All these reports in the planning application from the applicant are outdated and should not be used to nit pick the points that suits and add them to their reports. As we know technology has

dramatically improved in the last 20 years, as has nature and the perception of the people. Imagine trying to build a motorway through a rural area but submitting a report from twenty years ago saying that the local people were happy it went ahead and there were no ill effects from it. I would most definitely be sceptical, as is the case with this application. Outdated data and reports, one which is from 20 years ago hold no relevance today.

Conclusion

This development has no place in our local community and is not wanted by the community. It would cause serious damage to the quality of life of the local inhabitants and will be another nail in the coffin of rural Ireland. When the children of all the local farmers and landowners want a place to live, will they pick a place surround by 180 metre lumps of metal standing over their home and the noise that come with it, I doubt it. They are too big, too many of them and the area in which they are been squeezed into, I'm almost sure is too small, even though their maps may suggest otherwise.

I would implore the inspectors on Bord Pleanála to visit the area, see all the signs that local have erected in response to this proposed development and get a feel of the mood on the ground, where your decision's will really matter. Any person who visits here cannot understand why turbines are proposed for this beautiful valley. It would be a complete intrusion on this low-lying landscape. Across all newspapers and news stations this week a report produced for Wind energy Ireland has highlighted funding is required at ports in Ireland to increase Ireland ability to harness wind energy at sea. This is where these turbines should be, out at sea where communities are not ripped apart. The Taoiseach is on record as saying a giant leap forward is needed in offshore wind energy, he is right, we do not need to lose anymore of our beautiful Irish landscape to these monstrosities.

If this development is granted planning permission, it will set an incredibly dangerous precedent for the standard of submissions that An Bord Pleanála deem to qualify for proper planning and sustainable. The Applicant have not taken into account many points of the Westmeath County Development Plan or the Wind Energy Development Guidelines, some of which I have highlighted above. The proposed development would contrast with proper planning and sustainable development of the area.

I request that An Bord Pleanála refuse permission for this development.

Yours faithfully,
Michael Blighe,
Ballynacurra,
Ballymnore,
Co. Westmeath.
N91P7Y8