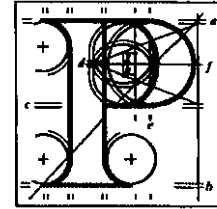


Our Case Number: ABP-316051-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Moyvoughley TurbineAwareness Group
c/o Peter Thomas Cunningham
Moyvoughley
Moate
Co. Westmeath

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

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64 Marlborough Street
Dublin 1
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The Secretary,
An Bord Pleanála,
64 Marlborough St,
Dublin 1.
D01 V902.
1st May 2023.

Re: Observation on the Umma More Renewable Energy Development. Case Reference: 316051.

A Chara,

We, the Moyvoughley Turbine Awareness Group (MTAG), wish to make our observations on the proposal by Umma More Limited (the Applicant), to build a wind farm consisting of 9 turbines of height 185 metres, to be known as the Umma More Renewable Energy Development (the Development).

MTAG was founded in 2019 to facilitate community discussion of emerging proposals for wind farms in the area. Moyvoughley was formerly the location of a national school and a post office, the catchment areas of which encompassed much of what is now the proposed wind farm site. As we are a community group of local people living within the surrounds of the proposed development, we will be basing much of our collective observations on the Community Report aspect of the application, as well as covering some other key matters. Numerous additional issues will be addressed in individual submissions.

Advertising Standards of Ireland (ASAI) findings

In the EIAR Appendix 2-2 Community Report, the consultation with the local community is noted as having begun in April 2021. This is factually incorrect. The Applicant (p. 2) states that 'To inform local residents about the Proposed Development, a project Community Liaison Officer (CLO) was appointed, Aidan Stakelum, who wrote to all householders within a c. 2km radius of the Wind Farm Site in April 2021.' This chronology altogether overlooks the CLO's previous two years of work in the area during which he called to landowners and homeowners on multiple occasions.

On one of those visits in 2019, the Enerco Energy CLO distributed locally a leaflet entitled *Renewable Energy Project Wind Information*. This significant item has not been included by the Applicant among the appendices of the Community Report.

Enerco Energy were subsequently reported to the ASAI (Ref. 35165) by a local resident for promoting in its leaflet unsubstantiated claims relating to the impact of wind turbines on human health and property

values. Details of the ASAI's subsequent investigation can be found at:

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

The full text of the Conclusion reached by the ASAI is included below as **Appendix 1** to this observation.

The ASAI described the claims made by Enerco Energy with regard to the effects of wind farms on health and property prices as unsubstantiated and lacking evidence.

On the issue of property prices, the ASAI found that some of the reports cited are from entities that are part of the wind energy industry and therefore have inherent bias. It also noted that 'none of the research related to the Irish market.'

On 10 February 2021 the ASAI Executive produced its finding. It upheld the complaint and found that Enerco Energy had breached ASAI standards. Enerco were required to desist from circulating their advertisement in the form that had been given to locals in 2019.

Enerco Energy advised the Advertising Authority of Ireland that they were no longer distributing leaflets which incorrectly quoted the World Health Organisation.

There is no evidence to show that these errors were clarified by the CLO within our community.

The Community Report fails to address the problems caused by this mis-information. This approach on the part of the Applicant serves to undermine whatever credibility they seek to claim for their Community Report and their consultation efforts.

Wind Measuring Mast

It is necessary to mention yet another fiasco that preceded the arbitrary April 2021 cut-off date that the Applicant has adopted in the Community Report. A wind measuring mast was erected on the proposed wind farm site on 12 March 2021. Some relevant photos can be found below in **Appendix 2**.

Apparently as a result of poor construction methods, the mast broke in two and collapsed two days later on 14 March 2021. This caused further alarm amongst the local community as people began to wonder how a company that with pretensions to install 185-metre-high wind turbines could not securely erect a simple wind measuring mast.

On 2 April 2021 the *Westmeath Independent* carried an article headlined 'Calls for Clarity on wind farm bid near Moyvoughley, Drumraney and Ballymore'. This article reflected the fear and uncertainty that had been unleashed by wind farm developers in the local community up to that point, with Cllr. Tom Farrell quoted as stating that the mast had 'frightened a lot of people'. The report described recent approaches from several developers to local residents involving up to twenty-two turbines as well as solar panels.

The 2 April newspaper report also carried a confirmation from Athlone-based Sergeant Andrew Haran

that a report had been received that approximately €10,000 worth of damage had been caused to the mast. Rather than admit liability for poorly constructing the steel mast the applicant was seen to go on the offensive by accusing local people of criminal damage. Nothing further was heard of these allegations.

The wind farm controversy was raised at the April 2021 meeting of the Athlone-Moate Municipal District, with a motion recorded as follows:

(j) Cllr. Vinny McCormack: 'To call on the Municipal District of Athlone-Moate to immediately enforce planning regulations regarding the erection of a wind survey mast at Ummamore, Moyvoughley. Can the District also contact Enerco Ltd to outline this Council's frustration at the erection of this mast without prior consultation with the Planning Department'.

Details of this meeting are available on the website of Westmeath County Council

<http://www.westmeathcoco.ie/en/ourservices/yourcouncil/meetingsminutesagendasandreports/municipaldistrictofathlonemoate/2021/ammdmeetingapril2021.html>).

On 10 April 2021 the Wind Measuring Mast was re-erected in the same location. Remarkably it was to fall down for a second time on 20 January 2022. This second collapse reinforced fears among the local community, as it gave us further real cause to question how far the Applicant can be trusted when it comes to building and operating industrial wind turbines. On this second occasion there was no suggestion of a Garda investigation and the remains of the mast were removed from the site on a trailer.

We have not been given access to the Wind measurements taken on the site by this Mast. However, we would ask that the measurements are made available given that it ceased to function on several occasions.

There is no mention of this mast debacle in the Community Report nor in any other section of the EIAR and planning application. The CLO was certainly fully aware of concerns relating to this issue, as it was inevitably raised during subsequent community consultations. As with the ASAI finding, this landmark episode in the early planning stages of the proposed development has helped substantially to shape perceptions among the local community of the entire project to date. Its absence from the Community Report further challenges any notion that that document provides a record of a consultation that took account of 'the views and concerns of all' (p. 1).

The Applicant's approach as detailed above is all the more puzzling given the emphasis routinely placed on adhering to best practice in community consultation concerning wind energy development. For example, the Code of Practice for Wind Energy Development in Ireland: Guidelines for Community Engagement (2016) contains the warning that 'Ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation.' The Applicant's Community Report is clearly intended to satisfy the requirements set down in the 2019 Draft Revised Wind Energy Guidelines (DWEG). The Report (p. 1) actually quotes the DWEG on the issue of community consultation: 'In order to promote the observance of best practice, planning authorities should require applicants to prepare and submit a Community Report with their planning application...'

The Umma More Ltd Community Report can hardly be said to reflect 'best practice'. Is it 'best practice' to deliberately omit a disastrous first phase of so-called community engagement?

In EIAR Chapter 11 Noise & Vibration, the Applicant states (p. 11) that 'Simultaneous wind speed/direction data were recorded within the site at various heights using a LIDAR Unit.' This unit was apparently installed in February 2022, although at the time the CLO pointedly refused to inform locals of its whereabouts on the site. This stance further reflected the air of general mistrust that had come to surround the relationship between the Applicant and the local community. Moreover, why did the Applicant not simply use the LIDAR technology from the outset? Their preferred approach instead caused a good deal of unnecessary aggravation and annoyance amongst the community, which spilled over into local media and politics.

A Duplicate Community Report

The website of Clare County Council contains a copy of the Enerco (Slieveacurry Ltd)/MKO Community Report for the proposed Slieveacurry Wind Farm. As with Umma More, there was a Community Liaison Officer (CLO) in place at Slieveacurry for a while, before another one took over. In fact, it was the same two Enerco company men who did the liaising in both places: Aidan Stakelum and then James Crowley.

The two reports appear to duplicate the following key passages as follows:

Slieveacurry (March 2020)

(p. 3) 'Overall, the general reception was good. People were happy with the continued consultation and with the general flow of information. General queries related to turbine heights, noise levels, over-head lines and the potential impacts of construction traffic and were all satisfactorily addressed there and then. As turbine height had yet to be finalised, residents were informed that this detail would come at a later stage.'

Umma More (April 2022)

(p. 3) 'Overall, the general reception was good. People were happy with the continued consultation and with the general flow of information. General queries related to turbine heights, noise levels, over-head lines and the potential impacts of construction traffic and were all satisfactorily addressed there and then. As turbine dimensions had yet to be finalised, residents were informed that this detail would come at a later stage.'

There is a difference of one word between the two passages.

Furthermore, the description of the respective wind farm public consultations are as follows:

First to Miltown Malbay Community Centre on a Tuesday afternoon in September 2020 (Slieveacurry Community Report pp. 4-5).

'The main queries raised during this stage of the consultation, as recorded by Enerco Energy Ltd. staff and MKO staff at the sessions, were:

1. Proximity of houses;
2. Community Gain Scheme;
3. Number of Turbines;
4. Near Neighbour Scheme;
5. Noise;
6. Height of turbines;
7. Visual Impact; and
8. Wind Farm Amenities.

Following the public information sessions, CLO, the Community Liaison Officer followed up with any queries raised at the consultation.'

And now on to the Umma More-related public consultations in July-August 2022 (Community Report, p 5).

'The main queries raised during this stage of the consultation, as recorded by Enerco Energy Ltd. staff and MKO staff at the sessions, were:

1. Proximity of houses;
2. Community Gain Scheme;
3. Number of turbines;
4. Near Neighbour Scheme;
5. Noise;
6. Height of turbines;
7. Visual Impact;
8. Wind Farm Amenities; and
9. Impact on Biodiversity.

Following the public information sessions, the CLO followed up with any queries raised at the events.'

Other passages supposedly referring specifically to our community's views are also copied, if less

blatantly so (e.g. compare the second paragraph on p. 6 of the respective Reports).

Suffice it to say, we are not satisfied that the CLO has addressed many of our queries.

The 2015 *White Paper on Energy* notes (p. 42) that 'For large projects An Bord Pleanála requires project proposers to demonstrate in-depth community consultation, public engagement, and a thorough understanding of the concerns of affected communities.' The Applicant has elected to demonstrate their 'thorough understanding' of our concerns by recycling content from an earlier company report. We would submit that this approach is both unprofessional and offensive to our community concerns.

Earlier this year, the Department of Rural and Community Development published a *Guide for Inclusive Community Engagement*. We recommend it to the Applicant.

We simply cannot accept the validity of the Applicant's follow-up statement (p. 5) that 'Feedback received at and since the public information evenings has been noted by the prospective applicant and the design team. The feedback has continued to inform all refinements to the project design and all concerns have been fully addressed in the EIAR and NIS that accompany this planning application.' We do not accept this statement. Can the Applicant actually highlight even one single important aspect of the proposed wind farm design that has been shaped by community feedback?

A further key point from the 2019 DWEG, which the Applicant clearly wishes to be seen to be adhering to, also merits attention. The Guidelines advise (p. 149) that 'developers should provide feedback on how and why points were or were not accepted and this should be outlined clearly in the Community Report submitted with the planning application.'

The Applicant appears to have made no effort at all to comply with this recommended approach.

Change of Project Name

Had the Applicant engaged properly with the community, they might have realised that their appropriation of the name Umma More for their unwelcome industrial project is also rather objectionable. The townland name carries national, if not international, cultural significance, primarily due to its use in the title of a 1983 book by William Magan: *Umma-More – The Story of an Irish Family*. William Magan (1908-2010) was a high-profile writer and former British army officer/MI5 agent, descended from the Magan family of Umma More. His book was re-issued in 2000 with the new title *The Story of Ireland: The History of an Ancient Irish Family and Their Country*. The Magans were a prominent family who against the odds preserved their land and faith at Umma More down to the nineteenth century. The family mausoleum is the centrepiece of the recently restored St Owen's Graveyard in Ballymore, while the site of the present Catholic Church in the village was also donated by the Magans. The long history of Umma More can indeed stand for *The Story of Ireland*. On top of the disreputable behaviour detailed above, the Enerco chapter in this story involves a proposal to effectively leave Umma More House to fall down because the wind farm would render it altogether uninhabitable. This is a further source of angst for the community. The deliberate ruination of this prominent local landmark at

a location that holds substantial significance for us in terms of both tangible and intangible cultural heritage in no way reflects the wishes of local residents.

An Unsuitable Site

Wind Speed?

Despite erecting a wind measuring mast, however faulty, and installing a LIDAR unit, the Applicant has not to our knowledge yet made public any data relating to the wind speeds recorded on the site. We can point to examples, for example at the planned Bracklyn Wind Farm or the planned Ballingree Wind Farm, where the developer has been happy to reveal wind speed information with a view to reassuring locals of the viability of the project. There are several good grounds for concern regarding the availability of sufficient wind at Umma More. The SEAI *Wind Atlas*, for example, indicates low average wind speeds for the site. We do not accept that the Wind Farm can credibly generate the necessary 50 MW to achieve the Strategic Infrastructure Threshold. The Applicant's lack of transparency and failure to reveal any details of recorded wind speeds has further affected public confidence in the proposed project.

Flood Risk

Given that the proposed site is comprised for the most part of a low-lying and very flat river plain encompassing the Dungolman and Mullaghmeehan rivers, locals are quite rightly concerned about flood risks. It is stated in Appendix 9-1 Flood Risk Assessment that 'Turbines T2 and T4 are located on the edges of the mapped PFRA flood zones, along with sections of existing roads and proposed new roads.' The maps within this section of the application clearly show that these turbines are situated perilously close to a Flood Zone. The recent ecological disaster at Meenbog, Co. Donegal, inevitably comes to mind.

The proposed location of T4 is particularly concerning given its proximity to the Dungolman River and the fact that the applicant intends to remove 6.4 hectares of forestry and import tonnes of gravel, steel and concrete. T1 is effectively sited as close as is possible to the river, with the application drawings indicating that the turbine blades would over sail the stated 50m riparian buffer zone (Drawing 201050-08). Following the episode at Meenbog, has the Applicant ever paused to consider that the Dungolman River Plain may not actually be a suitable location within which to squeeze in a wind farm?

We also notice that the flood-related site surveys were carried out in May and June 2021. These months are hardly a fair reflection of the annual rainfall in the area. Most local people could tell you that the Dungolman River regularly bursts its banks during the winter months.

A Working Landscape

The proposed wind farm site and its surrounds is a working landscape. Many active farmers who have not agreed to participate in the development would end up having to work in close proximity to

Industrial turbines for the rest of their lives. This reflects the extremely constrained nature of the proposed site. In the application for Sheskin South Wind Farm currently with ABP, MKO (Chapter 3 p. 12 Alternatives) listed 'separation distance from neighbouring landowners' as one of the key 'facilitators' of that proposed project. For Umma More, the issue is simply ignored.

If the 'windtake' buffer outlined in the Wind Energy Development Guidelines were taken account of, only one of the proposed turbines (T8) would satisfy the requirement for siting two turbine diameters (324m) from a site boundary. There are a number of locations adjacent to the proposed site where more modestly sized turbines could potentially be installed, in line with current government policy on encouraging microgeneration. The proposed design layout precludes microgeneration on adjacent lands. The Applicant has not demonstrated any evidence for the consent of adjacent landowners to this infringement. At least four of the turbines would, if they fell over, land partly on property owned by non-participating landowners. The idea of a turbine falling over might seem implausible, but then so does the chances of a wind monitoring mast falling down twice within nine months in a 'low wind' area.

The very narrow extent of the land actually available for development is best illustrated in Figure 3-2 of Chapter 3 Alternatives. When the 740m buffer from third-party residences, the flood risk areas, the watercourse buffers and the telecoms buffers are all displayed together in one map, there is hardly any land left for turbines. In their mapping the Applicant has omitted buffers around 'participating properties'. We would welcome a clarification on the criteria for determining a 'participating property'. It is certainly not the case that the Applicant has demonstrated consent for their project from all of the owners/occupiers listed as 'participating' properties. Should the appropriate buffers around them be included on the maps, the land left for turbines would appear to shrink further again.

Curtilages and Separation Distances

The Applicant is careful to stress repeatedly that they are complying with the set back requirements laid down in the 2019 DWEG. In Chapter 5 Population and Human Health, for example, it is stated (p. 65) that 'The Proposed Development achieves the four times tip height (740m) separation distance recommended in the draft Guidelines which explicitly addresses residential visual amenity'. The Applicant seems, however, to have overlooked one very important word in the relevant guidelines: 'curtilage'. The 2019 DWEG specify (p. 129) 'a setback distance for visual amenity purposes of 4 times the tip height of the relevant wind turbine shall apply between each wind turbine and the nearest point of the **curtilage** of any residential property in the vicinity of the proposed development'. Thankfully An Bord Pleanála have been paying due attention to curtilage in recent cases.

It appears that when curtilage is taken into account, some of the turbines are actually too close to residences. Working without the benefit of the technology available to the Applicant, it nonetheless appears to us that T4 is less than 740m from the curtilages of house nos. 5, 7 and 11. T9 is less than 740m from the curtilage of house no. 10 (a property omitted from the Applicant's map in Figure 3-2 of Chapter 3 Alternatives). T5 may be too close to the curtilage of house no. 3, and T6 to the curtilage of house no. 6. T1 may be too close to the curtilage of houses nos. 2 and 12. The Applicant in several places asserts that the shortest distance between a proposed turbine and an occupied

house is 757m. Like many other points made by the Applicant, we do not accept this proposition. If the Applicant wishes to ensure compliance with the set back rules in the 2019 DWEG, we would strongly argue that they must revisit this issue and take account of curtilage.

When the planning consultant MKO was working for Bord na Móna on the proposed Derrinlough Wind Farm, the site constraints and buffers it identified (Chapter 3 Alternatives p. 12) were informed by 'the proposed requirement for a 4 times tip height separation **distance from the curtilage of properties** in line with the new draft guidelines'

In working on the Umma More Project, MKO instead refers (Chapter 3 Alternatives p. 15) to 'the requirement for a 4 x tip height separation **distance from properties** in line with the new draft Guidelines.'

We do not see the justification for this inconsistency.

A Valued Walking Route

The Umma Road that forms the southern boundary of the proposed wind farm site is very popular as a walking and cycling route due to the relative lack of dangerous corners, the presence of wide grass verges and the peaceful surrounds. This area was historically a callows-type flood plain (Thomas O'Neill Russell, *The struggles of Dick Massey* (Dublin, 1860), p. 3) which explains why the road took the shortest and straightest route through it. A number of residents from adjacent roads walk their dogs here on a daily basis because it is safe and enjoyable to do so. In 2016 a charity walk involving several hundred people took place on this road. The proposed turbines would visually dominate this walking route and produce undesirable noise effects. It would damage the amenity and recreational value of this road. On at least one occasion, the Enerco CLO gave a verbal undertaking that a new walking path would be created through the wind farm site. This has not come to fruition. In any case, the Umma Road currently provides a walking route that is more than adequate for local purposes and much more restorative than walking around giant turbines. It ought to be designated as a 'sensitive receptor'. Moreover An Bord Pleanála records show that it is aware of the need for special consideration of walking routes. The topic was discussed at the pre-application consultation that took place with the Applicant on 21 June 2022. The recent pandemic reinforced our awareness of the importance of the local landscape as a vital support to the maintenance of mental and physical health and general wellbeing. 'Our two kilometres' would be severely negatively impacted by the installation of industrial turbines.

Population Density

While the Applicant stresses that the population density is well below the national average, when urban areas are properly excluded from the calculation, the local density of 23.46 persons per square kilometre in the 2016 Census is actually quite close to the average for Irish rural areas. Moreover it is much higher than many of the districts usually targeted for wind farms. Around the planned Coole Wind Farm in North Westmeath, the population density is 10.5 persons/sq. km. Around the planned Seven Hills Wind Farm in Co. Roscommon the population density is 5.9 persons/sq. km. At Croagh in Sligo/Leitrim, the population density is 8.92 persons/sq. km. At Ballingree, Co. Cork, the population

density is 13.7 persons/sq. km. At the proposed Sheskin South Wind Farm in Co. Mayo, the population density is 1.7 persons/sq. km. At the Enerco-related Ardderroo Wind Farm in Co. Galway, the population density is just 0.2 persons/sq. km. Many more such examples could be cited. By comparison, our locality is relatively crowded. It is evident that the Applicant's reference to low population density in the area around the proposed site is out of context and overly simplistic.

Low Land and Tall Turbines

The EIAR emphasises the supposed screening effect of the low hills to the north, east and west, but this is only part of the picture that needs to be considered. The proposed site is better characterised as a 'river plain', rather than a 'river valley' as the applicant would have it. There are a number of houses situated on that plain, as well as on the near sides of the adjacent hills. The strategic photomontages submitted by the applicant do not sufficiently illustrate this reality. The homes on the Dungolman plain (for example nos. 3, 5, 6, 7, 11, 21) sit more or less at the same altitude as the bases of the turbines. What the Applicant describes (Chapter 12 Landscape & Visual p. 3) as 'siting of the proposed turbines at a low elevation relative to surrounding receptors' simply does not apply to these homes. On such flat terrain, we cannot accept that a four-times tip height setback is sufficient to protect residential amenity, particularly as the Applicant seems to have deliberately chosen not to properly undertake the necessary curtilage measurements.

The various pressing site constraints, and evidently the overriding priority to surpass at all costs the 50MW threshold for SID, have led the Applicant to propose developing a narrow L-shaped wedge of land where it is not entirely clear that the requirement for four-times tip height setback can actually be achieved while avoiding flood risks and other factors. The L shape means that the turbines align with the routes of populated local roads. In addition, a number of homes (for example nos. 3, 13, 6, 19, 31, 56) would be effectively surrounded by industrial turbines from the north-west through to the south-east. Given the emphasis in contemporary house design on extensive glazing to maximise the benefits of solar gain, thus reducing carbon footprints, the wind farm could be expected to have a pronounced sterilising impact on residential development in this adjacent neighbourhood, not to mention the intolerable imposition it would represent for existing residents.

The Umma More area conforms to the character of 'hilly and flat farmland' described in the 2006 Wind Energy Guidelines. The Guidelines state that 'Although hilly and flat farmland type is usually not highly sensitive in terms of scenery, due regard must be given to houses, farmsteads and centres of population.' We do not accept that the Applicant has given 'due regard'. On 'height' the Guidelines stress that 'Turbines should relate in terms of scale to landscape elements and will therefore tend not to be tall.' These recommendations are repeated in the 2019 DWEG. They have also been a major consideration in previous An Bord Pleanála refusals of permission for wind farms, for example at Castletownmoor, Co. Meath, in 2017 (PA0046). Regardless, the Applicant simply ignores this appropriate and measured advice about turbine height, which is geared towards proper planning and sustainable development.

On the issue of site suitability, it is worth noting the very different approach taken to site constraints by

the Applicant's planning consultant MKO in its Remedial EIAR for Cleanrath Wind Farm, Co. Cork (Chapter 3 – Alternatives, p. 5):

'Low Lying Valleys: Throughout Ireland the lower lying valley areas (below the 100 metre contour level) tend to have a higher concentration of population and settlements and generally have lower wind speeds available. The lower lying landscape also generally accommodates the main traffic routes and higher quality farmlands. In the interests of minimising impacts on population and maximising the return on the wind resource, the lower lying valley areas below the 100 metre contour level were discounted from consideration at a strategic level.

Wind Speeds: The average wind speeds available on any site are crucial in terms of the feasibility of any wind farm development. To identify the optimum site within the strategic site search area, the areas which have an appropriate annual wind speed were focused upon. The areas with low wind speeds are generally along lower lying areas and included the majority of lands already excluded under the low-lying valley criteria discussed previously.'

If the Applicant and their planning consultant considers low-lying lands with low wind speeds elsewhere in Ireland to be unsuitable for wind farm development, what exactly is the attraction of Umma More?

Home Omissions

It is hard to believe, given the magnitude of this development and the extensive team of 'experts' who have worked on compiling the EIAR, that any local homes would be left out of the relevant Noise or Shadow Flicker assessments. Yet that appears to be the case. At the end of Ballynacorra Boreen are two homes among the closest to the proposed wind farm site (Eircodes N91 ENR1 and N91 RW54). Only one of the two homes has been assessed for the above-mentioned impacts on their homes. For the local community, such an oversight places a further question mark over the reliability of the noise and shadow flicker reports.

Shadow Flicker

In the pre-application consultation meeting that took place on 21 June 2022, the Applicant was advised to have regard to the 2019 WEDG on shadow flicker. Best Available Technology can be used to entirely prevent the occurrence of shadow flicker. We should not need to say any more on the subject. Unfortunately, the Applicant remains stubbornly attached to the outdated 2006 Guidelines on this issue. As technology has moved on in the interim, the Applicant should move likewise. There is no excuse. Shadow flicker is a relatively straightforward issue.

The most clear and obvious error that the Applicant has made in their EIAR documentation is contained within Chapter 5 Population and Human Health. In this chapter, 115 homes are assessed for the impact of Shadow Flicker within 1.62km of the wind farm site. We are told in Chapter 1 Introduction that 'there

are 41 inhabitable dwellings located within 1 kilometre of the proposed turbine locations with 8 of those properties belonging to the landowners who form part of the Proposed Development.' In the Shadow Flicker assessment there are not 8 but rather 7 homes marked down as participating properties. These are denoted as H2, H4, H6, H10, H13, H27 and H85.

The Applicant has made a remarkable blunder here. The homes at H10, H13, H27 and H85 are most definitely not participating properties in this proposed development. In fact, 7 homes within the 1.62km zone that are linked to participating landowners have been listed for a mitigation strategy. These errors undermine the credibility of the Umma More Shadow Flicker assessment.

Overall the assessment finds that 92 of the 115 houses within 1.62km will experience Shadow Flicker. The Applicant assumes that the best response is to plant hedges or close the blinds. On the contrary, the Applicant should commit to using the technology available to simply prevent this nuisance.

Noise

We are extremely concerned about the negative noise effects that a wind farm would produce. Ours is a quiet rural neighbourhood and the permitted noise from industrial turbines will destroy one of the real benefits of living where we do.

At the pre-application consultation with An Bord Pleanála, the Applicant was advised to have regard to the 2019 WEDG on the issue of noise. Unsurprisingly the Applicant has instead sought to cling to the 2006 Wind Energy Guidelines. The Strategic Environmental Assessment for the 2019 DWEG notes (p. 3) that 'The draft Guidelines have had regard to best international practice and seek to be consistent with World Health Organisation (WHO) Guidance in relation to noise emanating from wind turbines.' There is no excuse for relying instead on an outdated approach widely understood as not fit for purpose.

The Applicant was advised twice (by An Bord Pleanála in pre-planning and by the Environmental Health Service in scoping) of the importance of assessing the cumulative noise impact from turbines alongside the quarry adjacent to the proposed site. The 'quarry' is in fact two separate sand and gravel businesses, with a resulting duplication of machinery and noise. The residence denoted as House No. 3 lies just 200m from these quarries; it is among the closest to the proposed turbines; and it would be exposed to shadow flicker from six of them. This is an intolerable prospect for the occupants of this house and their neighbours. Yet the Applicant opts to dodge the request to assess the cumulative noise, insisting that it is not appropriate to do so (Chapter 11 Noise and Vibration p. 26). Within the space of a few lines, the expert view is set out: 'there is the potential for cumulative effects to occur ... the potential for cumulative noise effects is unlikely'. This is just not good enough. At a very minimum, it should not be difficult for the Applicant to outline the likely cumulative noise impacts for people forced to live, if only temporarily, between two quarries and an industrial construction site. If they cannot model quarries combined with turbines, then they should show us the worst case scenario. If cumulative noise effects are unlikely, the Applicant ought to compile and share data that can prove this.

The quarry facilities in question are both workplaces, with a range of offices, workshops and other facilities on site. These structures are situated far less than four-times tip height from the proposed T1. The Applicant has not shown any evidence of having considered relevant issues such as noise, shadow flicker or visual impact as it would affect the quarries. We would argue that such assessments are needed.

The Applicant attempts to head off any legitimate worries about noise by submitting as EIAR Appendix 5-2 a document entitled 'Summary of main conclusions reached in 25 reviews of the research literature on wind farms and health.' This document is eight years old, which is a lifetime in the world of scientific research. It is not at all robust. No methodology is provided to explain or to justify how the 25 reviews in question were selected. It is not a peer-reviewed study. This 'summary' does nothing to reassure us regarding wind farm noise.

Factual Inaccuracies in the EIAR

An Environmental Impact Assessment Report, as per Environmental Protection Agency guidelines, is supposed to be clearly written, comprehensive, and objective. However the EIAR contains various contradictions. The Applicant evidently believes that Athlone is the county town and (at 5.9.3.9) that 'renewable energy developments are an existing feature in the surrounding landscape, which will assist in the assimilation of the Proposed Development into this environment'. Yet a few pages later (at 5.9.5.2) it is stated that 'There are no existing wind farms in the surrounding area'. At 3.2.7.2 the Applicant's options for sourcing the enormous quantities of stone needed for the project include two companies based in Blyry Industrial Estate, Athlone: one a company that you might go to when in need of supplies for decorating a patio; the other a stonemason. For waste disposal (Appendix 4-2 CEMP, p. 130), the Applicant proposes to use Ballydonagh Landfill, a waste disposal facility that closed in 2010.

In Appendix 1 of the Community Report a leaflet previously circulated locally by the Applicant indicates that 'A community benefit scheme will be made available every year for the operational lifespan of the wind farm', which would be a minimum of thirty years. Yet a few pages earlier (p. 6), a community fund of up to €340,000 is promised for only the first fifteen years, in line with the availability of government price supports. In the EIAR Chapter 1 – Introduction (p. 19), the sum of €340,000 per annum is offered 'over the lifetime of the Proposed Development'.

There are numerous other examples of such incoherence and lack of rigour in the EIAR. We are genuinely shocked that all of this is what apparently passes for acceptable when it comes to a strategic infrastructure development application. Such sloppiness on the part of the Applicant presents an obstacle to public participation in the planning process. We, and ABP, are entitled to clear, coherent, and complete information. What the Applicant has provided instead cannot provide a sound basis for proper planning and sustainable development.

Uisneach – A Prospective UNESCO World Heritage Site

It is our opinion that the Applicant has not adequately assessed the impact that this wind farm would have on the Hill of Uisneach and its panoramic views. As the site lies just over 8km from the summit of Uisneach, there would be full visibility of all 9 turbines. The expanse of wind farm visible on the western horizon would detract from the landscape and setting of the site of Uisneach, which holds so much cultural and historical significance. The EIAR does not adequately address the impacts on the site, which has been included on Ireland's 'Tentative List' for UNESCO World Heritage Status as one of The Royal Sites of Ireland. In addition, the Applicants fail to address the cultural significance of the intervisibility between the Hill of Uisneach and Knockastia. The proposed windfarm will impact on the view between the two ceremonial sites. We would urge the Board to seek the opinion of an independent expert on World Heritage Properties concerning the potential impact on Uisneach and the likely implications for its possible designation as a World Heritage Site.

The significance of the potential visual impact is increased due to the outward looking nature of this heritage site. The fact that the Applicant has not been able to *generate* a photomontage or a detailed visual impact assessment from the site is an un-acceptable oversight.

Ash Dieback

The Community Report-Appendix 2 contains a copy of a leaflet from July 2022 entitled 'Umma More Biodiversity'. This leaflet correctly states that 'Many mature ash trees are present within the hedgerows'. We are deeply troubled by the fact that the Umma More EIAR makes no allowance for the emerging significant impact of ash dieback on our local environment. According to Teagasc, 'Ash dieback (*Hymenoscyphus fraxineus*) is now widespread throughout the countryside and woodlands. It is estimated that up to 90% of ash trees will succumb to the disease, resulting in a major change to our landscape and woodland structure. This will have serious implications not only for timber production but also for amenity, biodiversity, carbon sequestration, landscape and culture.'

(<https://www.teagasc.ie/crops/forestry/advice/forest-protection/ash-dieback/legal-requirements---ash-dieback/>)

The vast majority of the substantial mature trees in and around the proposed wind farm site are ash trees. Most if not all of these trees are unfortunately now diseased and dying. This represents a significant change to the environmental 'baseline'. A number of landowners in the area have already begun the necessary task of removing ash trees in the interests of road safety. It may be reasonably assumed that within a few years there will be almost no ash trees left standing by the roadsides, while those away from the roadsides will also before long wither, fall, or be cut down. Leaving aside the proposed wind farm, in terms of visual and landscape impact ash dieback is easily the most significant 'development' occurring in our local environment in this century. It also inevitably impacts on the question of biodiversity.

The Photomontages produced by the Applicant show the significant presence of ash trees in every field

and roadside hedgerow around the entire area. For the purposes of a reliable Landscape and Visual Impact Assessment (LVIA), ash dieback must surely be taken into account, especially given the importance the Applicant has placed on the role that vegetation will play in screening their 185 metre turbines from view. The cumulative landscape and visual impact of turbines combined with ash dieback has the potential to be severe. We can point to cases of ash dieback being taken into consideration for LVIA purposes (see, for example, LVIA for Smith Hall Solar Farm, UK, 2014). An LVIA for the Umma More area that does not take account of the impact of ash dieback can hardly be considered as fit for purpose.

The Applicant is also proposing to remove 2,338m of linear hedgerow and tree habitat, to be offset with 3,350m of new planting. Quite a bit of the proposed planting seems to be designed to reinforce existing hedgerows, which the Applicant describes as 'gappy'. It is not at all clear how many trees and shrubs the Applicant would ultimately end up planting, or how exactly 'gappiness' is to be determined. It would be far more reassuring if the Applicant could give a straightforward commitment to add and maintain on site at least 6,700 semi-mature plants (one every 50cm for 3,350m).

Local Petition

As part of our response to the eventual submission of a planning application, MTAG organised two information evenings in Ballymore and Moyvoughley in April 2023. These events were well attended by a large number of concerned local residents. One of their concerns was the considerable effort required to attempt to get to grips with all of the paperwork contained in the application by Umma More Ltd so as to make a well-informed individual submission. With this in mind, we prepared a short and simple petition that people could sign if they so wished to express their opposition to the proposed development without necessarily undertaking the effort and expense of submitting their own observation. This document with signatures is contained in **Appendix 3** below.

Conclusion

We in the MTAG have at this point spent more than four years thinking and talking about the proposed Umma More wind farm. The period since 2019 would have been more than stressful enough already without the added burden of dealing with Enerco's misleading leaflets, its substandard campaign of landowner and community engagement, its inept mast installations and now its copied and pasted Community Report. This wind farm is unwanted by the vast majority of our community. It is infuriating to encounter in the EIAR so many faceless 'experts' telling us that the actual impact of unprecedented upheaval and environmental vandalism on our neighbourhood would be slight, or negligible, or that it would have 'a long term imperceptible cumulative effect', whatever that is supposed to mean. The paid experts tell us that the wind farm would have 'no effect on human beings'. They would have us retreat inside our homes with the company-supplied blinds closed so that the turbines can work uninterrupted in the sunshine. We cannot be expected to sit quietly and hope for the best.

In despair, some locals have already had their houses valued; others have elected to live elsewhere rather than risk settling under noise and shadow flicker. Incontrovertible damage has already been done here. We rely on An Bord Pleanála to protect us from further harm.

Renewable energy can surely be developed in manner more appropriate than what is being threatened on our locality. Put simply, the site is too small and too low. Following from that, the turbines are too big, too many, too close and too loud. The planning application is defective. The EIAR is littered with errors. This accordingly cannot provide a due basis for proper planning and sustainable development.

The proposed wind farm would visually dominate this rural area for decades to come. It would have a broad range of negative repercussions for the inhabitants forced to live beside it. It would seriously injure the amenity of properties in the vicinity. It would destroy the character of the landscape and would not be in accordance with the overall development objectives of the Westmeath County Development Plan. Furthermore, it would not align with the Wind Energy Development Guidelines in several important respects. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area. We urge An Bord Pleanála to refuse permission for this ill-judged project.

Yours in good faith,

Peter Thomas Cunningham

Moyvoughley,

Moate,

Co. Westmeath

Contact Number: [REDACTED]

For and On Behalf of

The Moyvoughley Turbine Awareness Group.

Appendix 1 (ASAI Findings)

Conclusion of the ASAI Investigation (<https://www.asai.ie/complaint/household-energy/>)

Complaint Upheld.

The Complaints Committee considered the detail of the complaint and the advertisers' response.

Issue 1:

The Committee noted that the frequently asked question section titled "Do wind turbines affect health" had incorrectly attributed a quote to the World Health Organisation. The Committee noted that the attribution of the quote "there is no reliable evidence to support adverse effects of wind turbines on health" to the World Health Organisation was incorrect.

The Committee also noted that, in relation to the complaint issue of the product having any effect on health, the advertising content was definitive and unconditional in conveying that there were no health effects. The Committee noted the research material sourced by the ASAI Executive and in the absence of any evidence to substantiate the claim in the advertising, they considered that the advertising was in breach of Sections 4.1, 4.4, 4.9 and 4.10 of the Code.

Issue 2:

The Committee noted that the advertisement had referred to three studies which demonstrated that the proximity of wind farms had no effect on property prices, although the base in one study was insufficient to determine effect. They also noted the research referenced by the complainant and sourced by the ASAI Executive which indicated that there could be an effect on property prices, although in one study caution was advised in interpreting the results.

The Committee also noted that none of the research related to the Irish market.

Given that there was conflicting evidence, even though the advertisement had referenced three specific studies, a definite statement that proximity of wind farms did not affect property prices had not been substantiated and was in breach of Sections 4.1, 4.4, 4.9 and 4.10.

ACTION REQUIRED:

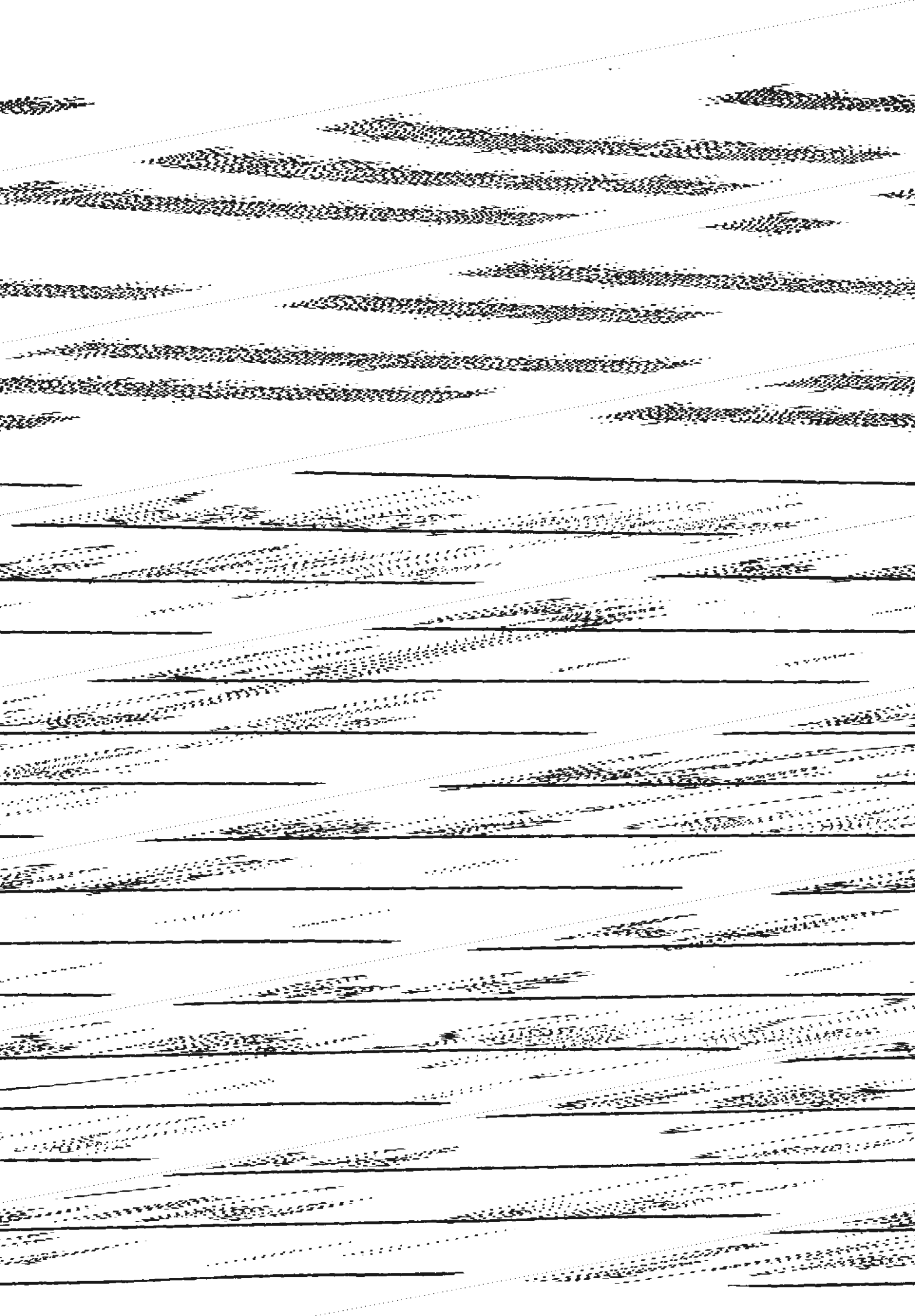
The advertisement should not appear in its current form again.

The Committee noted that the advertisers had stated they were no longer distributing leaflets that incorrectly quoted the World Health Organisation.

Appendix 2 (Wind Measuring Mast)







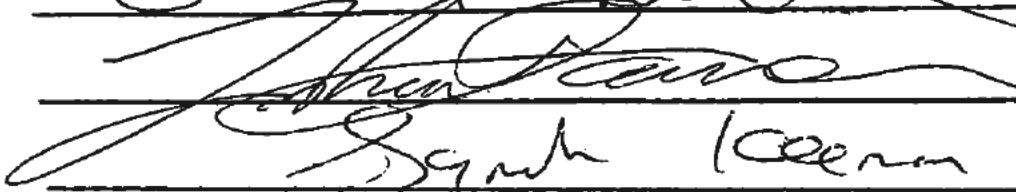
Proposed Umma More Wind Farm

I do not support the planning application Ref. 316051 submitted by Umma More Ltd in March 2023 for the construction of a wind farm (9 turbines, each 185m high, with associated infrastructure) in the parishes of Ballymore and Drumraney.

I believe that a development of this size and scale in the proposed location is not consistent with proper planning for the area.

I give my consent for this document with signatures to be submitted to the planning authority (An Bord Pleanála) as part of observation from the Moyvoughley Turbine Awareness Group.





John Keenan

John Keenan

John Keenan

Paddy Keenan

Niamh Murphy

Mullemeehan

David Murphy

" "

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Anthony Martin	Baskin Drumraney
Ciara Martin	Baskin, Drumraney
Dolores McGroude	Drumraney
John H. Cooney	Ballymore
Ronan McKeown	Drumraney
Ed. H. H.	Pollamore
Siobhán Mullen	Rosemount
Tom Mullen	Rosemount
Doreen Campbell	
Deise Harkin	Baskin, Drumraney
Stephen Quinn	
Helen Burke	
Lise Reilly	Baskin Drumraney
Lizy Martin	Baskin Drumraney
John Reilly	Baskin, Drumraney

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Gráinne O'Rourke, Ballinacorney

James Law "

Tom Moran Ballymore

Christine Moran Ballymore

Davy Sloan Mullaghmore, Ballymore

Rachel Haugh Ballymore

Stephen Rooney Ballymore

Theresa Meenan Ballinlig

Steven Hall "

Patrick O'Neill

Jane Haugh Ballymore

Anthony Haugh "

Lorraine Rooney High St, Ballymore

Maire Rooney " "

David Rooney " "

James Rooney " "

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Sarah Boland. Ballylig, Ballymore

Daniel Boland. " "

Cyril Dondrae Moyvoughley

Ashling Cunningham, Streamstown

James M. Corcoran Moyvoughley

Pat Buckley. Ballycloughdelt

Ciara Buckley.

Audie Lennette Rahen

Joe Fanning Rahen

Blair McElroy Mullaghmeen

Dominic Ledwith. "

Auril McLaughlin Ballycloughdelt

Cian McLaughlin "

Enda Kelly Moyvoughley

Arla Kelly "

Rachael Dunning Carr Park, Mount Temple

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Maria Mahon Ballymore
Conor Spiller Brough Loughlan, Ballymore
SHANE + EDEL WALLACE CRUICK BROTHER DRUMRANEY
Peter T Cunningham, Moyvoughley
Anthony O'Don Moyvoughley
Martin Garry Beshin Drumraney
Gerald Byrne Mullaghmore, Ballymore
Anthony Martin Ardara Drumraney
Viv McGinnock, 2 St. David's, Ballymore
Arling O'Rourke, Ballymore
Cathleen Reivera Ballymore
Liam O'Rourke, Ballymore
Alan Cripps, Ballymore
Frances J. Cunningham, Moyvoughley
Jonathan Hughes, High Street, Ballymore.
Jess Hughes, High Street

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Caroline Byrne. Ballinacorra

Geraldine Byrne. Ballinacorra

Eusan Carroll. Mullaghmeela. Ballymore

Shan P. Carroll. " "

Tracey Cuffe. Mullaghmeela. Ballymore

Jason Nugent. " "

Colm Geraghty. Baskin. Drumraney.

Suzanne Carter. " "

Shirley Mc Donnell. Temple Lin. Ballymore

Bobby Mc Donnell. " "

Ken O'Rourke. Ballinacorra

Lorna Kincaid Mollay. Ballymore

Martin Mollay. " "

Bernie Boland. Ballinty Cross

Donie Boland. " "

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Andrew Geary Curragh, Rosemount, Moate Co. Wick

Hubert Slavin Curragh, Rosemount, Moate

Aaron Byrne Fadden, Ashoe

M. Murphy Tarbag

Ken O'Rourke Ballinacorney

P.J. Byrne Mullachmeen

Sheela Maxwell, Whitehall

Roger Maxwell, Whitehall

Mairéad Seery Moyvoughley

Colin Seery

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Marie Mc Loughlin Ballyclough Duff

Brandon Mc Loughlin. 11

Brian Reenan Toorbeg

Doreen Toorbeg

May Lee Ballyclough Duff

Kenn Lee Ballyclough Duff

P S Mahon Ballyclough Duff

Angus Dowd Moyvoughley

Constance Succafun Moyvoughley

Brenda Mc Cormack Mount Temple

P S McCormack Mount Temple

Aine Doyle, Castledaly

Alan Doyle, Castledaly

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> 20/03/23 Nicky O'Callaghan, on the basis of improper planning.
m. O'Callaghan.

Aiden Cunningham High St. Ballymore

Arón Molloy, High Street, Ballymore

Mike O'Rourke Duncannon Ballymore

Thomas Carey Ballymore

Pat McLaughlin Ballymore

Anthony McKnight Ballymore

Paul Cunningham Ballymore

Willie Kelly Drumraney

Joe Cleary, Drumraney

Sivín & Gearóid O'Callaghan, High Street, Ballymore

Mark O'Callaghan, Ballymore

John Moore

11

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Nicky O'Callaghan - High St Ballymore
M O'Callaghan - High St Ballymore,
Pat McLoughlin - Clare Hill Ballymore,
Anthony McKnight - Moate Rd. Ballymore,
Pam

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E. H. C. Moyvoughley Moate

J. McAuley Moyvoughley Moate

L. McCull Moyvoughley Moate

Emma Melone Ballymore

S. W. H. Ballymore Moate

Mary Buckley Moyvoughley Moate

Carol Buckley Moyvoughley Moate

Barbara Buckley Moyvoughley Moate

R. Moyer Moyvoughley Moate

L. H. C. Moyvoughley Moate

Michael McCarty Bakeen Moate

P. & Denise Hughes Bakeen Moate

Elizabeth Bracken Lissanade Moate

Dorel Bracken Lissanade Moate

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Nicole McKenna Storeleigh Ballymore
Jackie McKenna Storeleigh Ballymore
Michelle Menkes High St, Ballymore, Mullingar
Mary Mahon Church Lane, Ballymore Mullingar
John Mahon Church Lane, Ballymore
Sarah Mahon Church Lane, Ballymore
Laura Mahon Church Lane, Ballymore Mullingar
Mena Reilly Market Hill Ballymore Mullingar
Pat Reilly Market Hill Ballymore Mullingar
Gary Reilly Low St Ballymore Mullingar
Rosie Molloy Keshoge
Biddy M'Loughlin Ballymore
Mary Heaton Donie
Mike Gibney Clonabán
Matthew Gibney Ballymore
Frank Gibney Ballymore

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Dominic Dowd. Mount Temple

Karen Irwin " "

Deirdre " "

Sarah " "

Liam Clancy " "



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Isaac Mc Cormack	Low	Street
------------------	-----	--------

Isabel Mc Cormack	n	n
-------------------	---	---

Elliot Mc Cormack	N	N
-------------------	---	---

Mary Mc Cormack	N	N
-----------------	---	---

Tommy Mc Cormack	N	N
------------------	---	---

Helen Kennedy	Low St.	Ballymore
---------------	---------	-----------

Aaron Kennedy	n	n
---------------	---	---

Rachel Kennedy	n	n
----------------	---	---

Donal Cusack	Ballymore	
--------------	-----------	--

Bernie Killmurray	Streamstown Rd.	Ballymore
-------------------	-----------------	-----------

Joe Killmurray	n	n
----------------	---	---

George Scally	Ballymore	
---------------	-----------	--

Martina Farrel	Toorevagh	
----------------	-----------	--

Michael High	Ballymore	
--------------	-----------	--

Gerald Convey	Ballymore	
---------------	-----------	--