Our Case Number: ABP-316212-23



John Paul Farrelly Matrinstown Delvin Co. Westmeath N91XK11

Date: 15 February 2024

Re: Proposed development of 26 no. wind turbines and associated works.

at the Ballivor Bog Group, Co. Meath and Co. Westmeath.

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email sids@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,

Ashling Doherty
Executive Officer

Direct Line: 01-8737160

PA36

Ashling Doherty

From:

Michelle Farrelly < michelleafarrelly@gmail.com>

Sent:

Monday 12 February 2024 13:33

To:

SIDS; board@pleanala.ie

Subject:

Fwd: Submission from John Paul Farrelly to An Bord Pleanala PA25M.316212.23

dated 12th February 2024.pdf

Attachments:

Submission from John Paul Farrelly to An Bord Pleanala PA25M.316212.23 dated

12th February 2024.pdf

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Board

Please find attached submission on case ref PA25M.316212.23 for further information.

Can you please confirm receipt of the attached email please

please note fees paid at earlier stage.

Thank you

Regards

John Paul Farrelly

12th February 2024

Submission to

An Bord Pleanala (The Board) 64 Malborough Street, Dublin 1 D01V902

Submission from: John Paul Farrelly, Martinstown, Delvin, Co. Westmeath N91XK11

Submission reference: ABP-316212

<u>Planning Application:</u> Wind Farm Development including 26 turbines and all associated works.

I wish to make a written submission with observations on the above planning application in respect of additional Information provided in relation to Wind Farm Development including 26 turbines and all associated works reference number ABP.316212.

I would like to express my strong disagreement with the above proposal reference number APB 316212 to install 26 large Turbines in the Meath and Westmeath areas. As a concerned resident of this Community, my Family and I believe such a decision would have detrimental effects on the environment including ornithology, ecology, visual landscape, shadow Flicker and heritage.

The installation of such large turbines in the Midlands of Ireland would significantly alter the natural landscape that we enjoy and cherish so much as citizens of Ireland and this can be taken for granted when these developments are considered in an area where there are a significant number of residents and also such picturesque areas of heritage. It will negatively detract from the aesthetic appeal of the area and will have negative implications for tourism.

Furthermore the noise and visual impacts can have serious consequences for health and well being of people living in the area in such close proximity to these structures.

Failte Ireland recently launched their Regenerative Tourism and Placemaking Scheme for Irelands Midlands for 2023- 2026. As part of this launch they are looking to support habitats and biodiversity while sustaining communities. It would be more economically beneficial to transform "Irelands Hidden Heartlands" by diversifying the areas with local walkways etc and

retaining our SPAs and SACs in the Midlands areas instead of granting large Turbine developments which will have a negative impact on the visual aesthetics of the area. The area where the turbines are proposed is in an area of ecological importance with an abundance of flora and fauna, Forests, Badgers, Barn Owls, Otters, Salmon, Whooper Swans, Curlew to names a few and Irelands only protected insect the Marsh Fritillary has also been documented in the area. It's important that all these are protected and the areas is developed as a protected ecosystem.

1. Renewable Energy

The state continues to be committed to generating 70% of electricity through renewable energy up to 2030. Very little emphasis on alternative options for green energy were included in the Additional Information submission. I encourage the Board to consider exploring other alternative renewable energy sources such as solar or geothermal power. By prioritising the preservation of our environment, we can ensure a brighter and more sustainable future for generations to come.

2. Health effects

The Additional information submission still fails to address or reference any published credible evidence of Health effects of Turbines on people.

I want to re-emphasis Evidence base for Health effects-

- A settlement for high court damages for the Kelleher Family in Cork was secured in 2020¹ where the children and their family became ill as a result of living near the turbines and had to leave their home in Cork. Noise, vibrations and shadow flicker all resulted in the family suffering various illnesses. An out of court settlement was agreed.
- In 2017 a group of families in North Cork settled an action in the high court against wind turbine operators Enercon Windfarm Services Limited and Carrigcannon Windfarm limited where they suffered adverse health effects and the Companies admitted liability and a settlement was provided.²
- A French couple Christel and Luc Fockaert were also awarded a settlement over health problems caused by Windfarms. The couple experience a range of health problems including Headaches, insomnia, heart irregularities, depression, tinnitus.³
- Recent research by Anne Dumbrille, Robert Y MC Murtry and Carmen Maria Krog sets down and indicates how occurrences of adverse health effects from living and working near turbines and being exposed to audible and inaudible noise annoyance can lead

¹ https://www.irishtimes.com/business/energy-and-resources/siblings-who-became-ill-next-to-wind-farm-settle-case-1.4184636

² https://www.irishexaminer.com/news/arid-30793550.html

³ https://www.news-europe.fr/countries/france/2021/11/08/french-couple-wins-legal-fight-over-wind-turbine-syndrome/

- to adverse conditions. Their analysis concluded that living near or working near wind turbines can result in adverse health effects in both people and animals⁴.
- Research by University of Galway In January 2023 should also be considered.
 https://www.universityofgalway.ie/media/researchsites/ceris/files/WP-2023-01.pdf

3. Transportation and Roads

Page 56 of the additional information submission prepared by MKO talks about increase in flow of traffic on the R156 and that the increase will be at maximum ratio of the flow to capacity and the mitigation provided is that they hope that as much material will be won from the on site burrow pits. The additional information does not address alternative routes that will be used for the area or how this will affect the local road infrastructure and only mitigation is on site burrow pits. The additional information also references a "visual pre and post construction survey" to be carried out. This is not adequate and a full in depth structural analysis should take place as these roads are not fit for the large amount of HGVs and the sheer volume of traffic that will go to and from the proposed site over the proposed construction phase is immense. Page 56 only mentions one school that shall be impacted from the increased traffic and does not mention other schools and creches in the area or indeed businesses or local residents that traffic flow will effect. MKO state that specific traffic management measures are not proposed for the school but only one measure may be considered to restrict HGV deliveries to the site at the start and of the school day. This mitigation measures needs further consideration as the impact of restricting HGV will have other knock on effects to construction such as extended timelines, extended hours of the day , increased HGV traffic at set times of day instead of it being distributed throughout the day. Not enough details has been provided and this needs to be reviewed by the Board, and further consideration given by the County Council and Health and Safety Authorities.

4. Biodiversity

These consist of nesting Habitats, mammals, birds, bats etc. It's important that these species are all protected and considered fully during this proposal review. Potential ecological impacts will occur during the construction phase and further ecological assessment proper mitigation measures need to be provided. A number of badger sets were located within the proposed site area. Although MKO mention NRA guidelines it does not mention the requirement to obtain necessary licences and permits from National Parks and Wildlife Service for set closures or relocation. Section 23 of the Wildlife Act 1976 as amended by the

https://www.environmentmed.org/article.asp?issn=2468-5690;year=2021;volume=6;issue=3;spage=65;epage=87;aulast=Dumbrille;type=0

Wildlife (Amendment Act) 2000 prohibits interference with Badger sets without a licence from NPWS. More emphasis on the importance of these specifies need to be considered during construction and infrastructural development.

On page 29 MKO references that the Greenland White fronted Goose was not recorded during the comprehensive surveys that took place. They made assumptions that there is no regular, migratory or commuting corridor for these species so therefore no significant effects this is contrary to reference on page 26 where they suggest that they would not be able to differentiate these specifies from the several other specifies of migratory winter birds that commute nocturnally. Again as raised by the DAU no attempt was provided to survey nocturnal migration and therefore this study is incomplete as collision risk has not been fully assessed.

A recurring repetition in the additional information under specific species comments were that the majority of important specifies are referenced as being irregular visitors to the wind farm site and therefore no significant effects predicted. This was mentioned for the King Fisher, the short Eared Owl, the Curlew and the Buzzard. This should not give an overall assumption that these species are only visiting because they were only viewed by MKO during the 6 month period. Further site studies and checks for nests are required to ensure that these specifies are protected by all means.

5. Forests

32.8 hectares of forest will be felled to allow for site development. I would like to advise the Board to consider the loss of woodlands in particular the Oak Ash Hazel woodland which is part of this felling. Its rare in a local context and is irreversible and permanent and was assessed as a habitat of local importance and higher value. It should be protected by all means.

6. Visual Impacts

The Hill of Uisneach is an important and symbolic centre in the Midlands which is currently in the process of seeking UNESCO status to help preserve and promote its cultural importance. Visual landscape impact from the top of Uisneach will significantly alter the view if the proposed turbines are granted. Its important that Ireland preserves and safeguards its tourism. Further consideration needs to be given by the Board on proceeding to grant this application.

I urge each of the Board members to carefully consider my submission and evaluate the merits alongside the potential impacts that granting this application will have on the environment and the local community.

Thank you for your attention on this matter.

Yours sincerely,

John Paul Farrelly