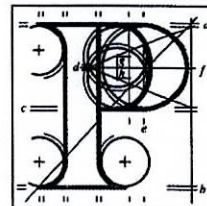


Our Case Number: ABP-316212-23



**An
Bord
Pleanála**

John Paul Farrelly
Matrinstown
Delvin
Co. Westmeath
N91XK11

Date: 06 June 2023

Re: Proposed development of 26 wind turbines and associated works
at the Ballivor Bog Group, County Meath and County Westmeath

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development 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.

The Board will revert to you in due course with regard to the matter.

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.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

PA04

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Glaao Áitiúil	LoCall	1800 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

30th May 2023

Submission to

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

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

Submission reference: PA25M.316212

Planning Application: 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 relation to Wind Farm Development including 26 turbines and all associated works reference number PA25M.316212.

I strongly request that the Inspector and the Board considers all of the points listed in my submission below.

1. Renewable Energy

The state is committed to generating up to at least 70% of electricity through renewable energy up to 2030. There is a huge demand on the National Grid System with the increase on data centres throughout the country. There needs to be a transformative approach to renewable energy and a consideration of all forms of renewable energy such as Biomass and Solar and not just a focus on onshore wind energy. No alternative options for green energy were included in the submission.

Carbon emissions and climate change are of huge concern and we understand the need to take action to help reduce emissions and move towards renewable energy. Offshore wind energy should be considered further as part of renewable energy requirements. The Programme for Government commits to the development of at least 5000mw of off shore energy by 2030. The enactment of the Martine Area Planning Act 2021 is key to offshore development proceeding and to meet defined set targets. I believe there are many benefits

to offshore energy, areas are not populated, no Shadow Flickering on houses or Noise Impacts, Visual impacts are less intrusive and less destruction to biodiversity. Offshore Wind Energy also has the potential to generate much higher amounts of energy with higher wind speeds than low capacity inland turbines will generate. Consideration needs to be given by ABP for alternative options.

2. Health effects

Section 5.1.4.1 Health Impact Studies fails to address or reference any published credible scientific evidence. The scoping opinions from Government Departments received by Bord na Mona should have all opinions attached for review purposes by the public however response received from the HSE were omitted from the Submission. Having this response available would allow people to be able to see what the HSE's views are in particular when the Health Service Executive (HSE) published a position paper in 2017 addressing the rise in wind farm development and concerns regarding potential impacts on public health. The paper discusses previous observations and case studies which describe a broad range of health effects that are associated with wind turbine noise, shadow flicker and electromagnetic radiation.

Evidence base for Health effects-

- A number of studies have been carried out around the world in regards to adverse health effects as a result of living near Wind Turbines. 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.

The above evidence shows that the risk of adverse health effects should be considered further before more and more wind energy developments are approved in populated areas.

The local Community particularly in the Raharney, Ballivor and Coolronan areas have a number of schools located in the area that have special needs units. The adverse effects on children with sensory needs are not taken into consideration in this proposal nor are the occupants of the households within the 2km area or wider where property owners have children with special needs, sensory issues, people who suffer from headaches, have tinnitus or other conditions that may have adverse effects on their health. No mitigation measures are put in place to show how families that may be affected by Health related concerns following the introduction of these turbines will be met. The Board and Inspector must take all of the above points into consideration when reviewing the proposal and seek mitigation measures for health effects.

3. Transportation and Roads

The sheer volume of traffic that will go to and from the proposed site over the proposed construction phase is immense. Consideration needs to be given to the local roads in particular R156 which is not fit for large Lorries and a full engineering should be commissioned to be undertaken by an Independent Engineer. The submission showed no direct contact with the local schools who will be effected by this increased traffic causing a bottle neck during drop off and pick up times and the Health and Safety aspects associated with the volume of large lorries travelling by the school during peak times.

4. Biodiversity

There are a number of species listed within the proposal that have been seen and recorded. 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. Barn owls are a protected species in Ireland. It is a national offence to cause disturbance to these species and they should not be interfered with in anyway. A nest box for the Barn Owl is situated less than 400 metres from one of the turbines (gird location details not provided due to sensitivity but can be provided if required). An assessment of direct habitat loss is required. Birds were recorded flying over the Wind Farm Site and within 500m of the proposed turbine layout. The potential for displacement exists. Although the barn owl was not recorded flying over the Wind Farm Site by Bord na Mona within the potential collision risk zone as per Section 7 this does not mean a collision risk assessment is not required as its close vicinity means that flight collision

⁴ <https://www.environmentmed.org/article.asp?issn=2468-5690;year=2021;volume=6;issue=3;page=65;epage=87;aulast=Dumbrille;type=0>

risk in the area is high. Therefore Table 7-11 Avifaunal Receptor Evaluation and Selection Criteria Rational should be reviewed again in full and independently by ABP.

Golden Glovers have also been noted in the area and can be seen in large flocks of over 200-500 at a time. Again there is a high risk of collision with potential turbines if they are constructed. The cuckoo can be heard from my back door during the summer months. As they are declining in Ireland their existence should also be protected. The Whooper Swans are seen during the winter months and pass over my house and other houses in the area and many on a daily basis before crossing the proposed Bord Na Mona wind farm area. All these birds are at high risk of collision if the turbines go ahead. A number of mammals also occupy the site area where the turbines will be located in particular Badgers which are mentioned in the proposal. Disturbance to badger sets and habitats will occur where excavation at site locations take place. Wind turbines can cause chronic stress in Badger 5 (see Journal reference from May 17, 2016 in footer). The Curlew has been noted in the submission at 7.4.11 and were observed on five occasions during vantage point surveys between April 2020 and September 2022 (see Appendix 7-4, Figure 7.1.10). There were three observations within 500m of the proposed turbine layout and two observations within the potential collision height. Observations were only made in non-breeding season. I urge the board to commission and engage a specialist and a Nest Protection Officer to do a full survey of the area before any decision is made on the application including during nesting time. The National Parks and Wild Life Services should also be commissioned to do a full review of the area to ensure that this area is protected and that turbines are not constructed in these areas to allow Curlew a better chance of nesting and rearing young chicks before they become further extinct. Additionally the Marsh Fritillary also seen in the area is Ireland's only insect with legal protection. It requires SAC Protection and needs to be protected in the area. Many of the reviews within the submission are outdated and were taken in 2020 and 2021. A full independent review of biodiversity should be undertaken.

5. Forests

32.8 hectares of forest will be felled to allow for site development and this will in turn effect roosting bats who use the high trees in the woodland habitats. Bats are protected and the large numbers recorded in the proposal will be disturbed during construction and felling. There are beautiful flora around the site of the proposed turbines. The loss of the oak-ash-hazel woodland as stated in the submission represents a permanent moderate negative effect on this habitat at the local scale. I think this is understated and the loss of Ash trees along the haul route will also be extensive.

⁵ <http://en.friends-against-wind.org/health/wind-turbines-cause-chronic-stress-in-badgers>

6. Visual Impacts

My house and property although located outside the 2km mapped area distinguished by BnaMona however the vast skyline of the proposed wind farm will be behind my property with no mitigation for visual impact due to the open nature of the areas. I will be adversely effected visually as a result of this windfarm development and also with the approved 9 Bracklyn turbines also visible from our back garden. Cumulative landscape and visual impacts is a huge concern to me and the wider community who are also impacted visually by the proposed development due to the scale and size of the proposed turbines. The landscape behind our property in low lying to the front and is situated in the River Deel low lying catchment area. There are no tall trees, hedges or other structures that will block the view from our property and on a clear day the Dublin Mountains can be viewed in the skyline. No mitigation measures are made for properties like mine. These will be some of the highest Wind Turbines in the county. Also the photomontages carried out by Bord Na Mona do not provide a true reflection of the visual impact to the areas landscape as they were taken during the summer when trees and foliage were in full bloom and acted as a partial obstruction to their true enormous size and no comparison was made for winter photomontages. Photomontages in a number of cases were conveniently taken in areas where panoramic views are not taken into full account such as views from Tower of Llyod or Hill of Tara and no Photomontage was taken from the Hill of Uisneach. These views are our heritage and are of archaeological significance. They need to be protected from these monstrous turbines. Ireland is steeped in splendid historical buildings, great estates and scenic landscape which are the forefront of our tourism market where cultural heritage and our natural landscape should be preserved for future generations. Heritage shapes our identity and it becomes part of who we are as a county. It's the heart of our tourism industry. We don't want large scale industrial turbines visually seen in the background of our designated heritage areas ruining our magnificent landscape and structures where turbines will be visible and seen at several sensitive receptor areas as listed in the planning application. A full independent review should be taken of the impacts these will have on heritage areas. This full impact review should be done by an Independent company appointed by An Bord Pleanala.

The Cumulative visual impact within the area are not addressed appropriately in particular around the cumulative impact that approved Bracklyn windfarm combined will have on the landscape and skyline and the additional visual impact this will also have on households in the area. The scale of both layouts situated side by side will cause visual clutter. The magnitude of impact visually of other proposed windfarms in the area will be strongly adverse. The Heritage Policy Research Paper⁶ sets down the urgent need to robustly assess the cumulative effects and impacts when several wind farms and their associate structures are proposed within an area where the impacts can be transboundary therefore increasing the need for a

⁶ The Onshore Wind Farm Sector In Ireland, Planning in Harmony with Heritage Policy Research Paper, Volume 1, Final Report October 2013

case by case side by side cumulative impact approach. This application does not set down enough detail around how both the proposed Bord na Mona 26 wind turbine farm and the approved Bracklyn Farm will cumulatively impact the area. It doesn't consider the combined aspects of noise/ shadow flicking and cumulative effects to cultural heritage, landscape, habitats, water (flooding), soil and impact to peat cannot be clearly identified. There is a need for the National Landscape Policy and Strategy for Ireland 2015 - 2025 - Department of Arts, Heritage and the Gaeltacht to research and monitor in full the impact on landscape and to ensure the European Landscape Convention and UNECE Convention are adhered to. The board should consider as part of their review that it fully adheres to the National Landscape Policy and Strategy.

7. Noise and shadow flickering & Transport.

Noise levels are predictions and do not a true reflection of how noise will occur if the construction and operation of the development takes place. There is a current requirement for statutory Guidance in relation to permissible noise levels. Windfarms should not be considered until Government agree a review and put into law a proper statutory guidance. Studies on noise do not take into account agricultural farms in the areas where livestock would be effected by noise, It does not take into account any local school or outdoor community groups that would also be impacted by noise or increased traffic during construction or noise that would affect children with intellectual disability or people with tinnitus. Vibration from construction of turbines may cause structural damage to houses and properties in the area also roads, rivers and peatlands surrounding the area and could cause subsidence. More consideration around the impacts are required. As predicted noise levels are an indication only it is noted that there will be worst case levels of noise predicted and will be limited to some properties. It should be noted that not all properties in the area have the same noise threshold levels, some houses have old style windows, are timber based and may not block out the noise levels that could occur. Each property in the proposed area should have an individual assessment of noise impacts prior to construction as background noise and wind direction based on a property location will be different depending on wind type (Downwind, cross wind, upwind).

5.2.2.1.1 on shadow flickering discusses Property usage and occupancy:

"Where shadow flicker is predicted to occur at a specific location, this does not imply that it will be witnessed". Potential occupants of a property may be sleeping or occupying a room on another side of the property that is not subject to shadow flicker, or completely absent from the location during the time of shadow flicker events". "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". Setting down mitigation measures to put up blinds to block out the shadow flickering is inappropriate and 2019 Draft Guidelines need to be taken into account before its too late. It should be noted that Shadow Flickering can only be determined by predictions until the development is in place. The likelihood is that shadow flickering will

effect properties in the vicinity of the proposed turbines more than is estimated. I urge that the above point be considered by the Board when reviewing this proposal.

8. Property Valuations

The impact that the windfarm will have on my property is of grave concern. There is a huge risk that my property and many other in the area will be devalued as a result of the turbine development. No compensation for devaluation of farm land or property will be considered by Windfarm providers or the State. This is disappointing at a time that national governments are requesting us to value our properties and increase our property tax values when the reality is that our homes and land adjacent to these structures will devalue significantly with no mitigation measure for property devaluation.

I would urge the Board to consider all aspects set down above as part of our observation on the planning application number PA25M.316212 made to An Bord Pleanala.

Yours sincerely,

John Paul Farrelly