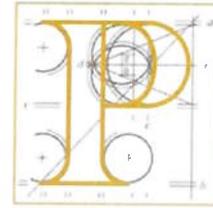


Our Case Number: ABP-318701-23



An
Bord
Pleanála

Martin Tighe
Kilbride
Ballycastle
Co. Mayo

Date: 19 February 2024

Re: 10 year planning permission for the proposed wind energy development consisting of 22 wind turbines and all associated infrastructure located in the townlands of Glenora, Altderg, Keerglen, Ballykinlettragh, Ballycastle, Ballyglass, Killeena, Glencullin and Lugnalettin, Co. Mayo. (www.glenorawfplanning.com)

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,

Lauren Murphy
Executive Officer
Direct Line: 01-8737275

PA04

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Kilbride,
Ballycastle,
Mayo

14 Feb 2024

An Bord Pleanála

Dear Board members,

Re: PA16.318701, Glenora Wind Farm

I object to this proposal.

1. I object to the siting of 15 proposed turbines outside of the designated areas of Mayo's Renewable Energy Strategy (RES). The planning report submitted with the application offers 3 justifications for this. All 3 justifications appear silly to me.

- a. The first justification offered is that the RES appears illogical and possibly erroneously implemented. Finding fault with how the RES was made, the application offers up its own version of the RES, implementing setback distances from relevant features and identifying suitable and unsuitable locations for windmills (Planning Report 3.3). They arrive at a very different conclusion to the RES and a more permissive one.

It is possible to argue that the applicant's assessment of suitable and unsuitable turbine locations is superior, or that Mayo County Council's RES has the superior approach. But the RES has been adopted by the elected representatives of Mayo and has real democratic legitimacy derived from the people. By contrast, the applicant's constraint's map is merely the work of a private concern with a material interest in the outcome of their own process. I can see no objective reason to disregard the RES in favour of the map produced by the applicant in support of their own ambitions.

- b. The second justification offered is that many of the turbines are outside of Tier 1 and Tier 2 of the RES, but they are not that far outside the boundary, and are nearly within the Tiers.

The RES itself has generously zoned almost half of the county as open to consideration for wind turbines. That seems to leave ample scope for developments to operate within it.

In particular, Tier 2 of the RES designates certain areas as open to consideration for wind turbines. That to me means that wind turbines can be permitted in these areas, but only if they are sufficiently justified, and with no guarantee of support from the RES. This application stretches the RES to say that some turbines should proceed, because they are only "close" to "open to consideration" zones, which appears to stretch things beyond sense.

It is a poor rule that can't work both ways. By the logic of this application, I could

equally object to wind turbines within Tier 1 and Tier 2 of the RES, arguing that they are “close” to undesignated areas. I am not making that argument, but I think it illustrates the weakness of the approach.

- c. The third justification offered by the application for including turbines outside of the RES designated zones, is that the RES does not explicitly say that turbines should not be built in the undesignated zones.

The RES has 2 tiers, one of which is called “open to consideration”, but the applicant is claiming that the undesignated areas are also open to consideration.

This is a disrespectful and unworthy argument. And I would encourage the Board to specifically mention and reject this sophistry. It is mere mockery of a planning document.

This application disregards Mayo’s Renewable Energy Strategy and places most of its turbines outside of the areas designated under the RES. The justifications offered in support of this are weak and self-serving. This proposal cannot proceed if the RES has any meaning in the planning system.

The Planning Report admits as much with its constant requests for the Board to set aside the County Plan to approve the development, or to ignore the RES and approve turbines based on “proper planning”. But the Board would be well to consider why it would depart from the County Plan, and why it would ignore the Tiers mapped in the RES. Can the Board justify the actions that the applicant is requesting?

2. I object to shadow flicker at my home and other homes in this area.

According to the application’s zone of theoretical visibility, between 16 and 22 turbines will be visible from my home, low on the horizon. This is supported by the view from Carrowmore, nearby to my home.

Using basic geometry, I calculate the turbines lie on a compass bearing between 225 and 254 degrees from my home (F26 A061). Using www.stellarium-web.org, I can track the ecliptic through the year and can predict the days that the sun will set between those bearings. I find that the sun will be in a line between my home and the visible windmills at the end of each day, from the end of December to the start of March, and again from the beginning of October to the beginning of December. Thus, I can expect 4-5 months of shadow flicker at sunset annually from this development.

I am not sure what an acceptable level of shadow flicker is. I would prefer to have none. But the prospect of having it at sunset for over a third of the year is a bitter pill to swallow.

The application’s non-technical EIAR document says “The shadow flicker prediction model indicates that no existing residential property will experience shadow flicker due to the operation of the Proposed Development. Therefore, there will be no effects in relation to shadow flicker”. But I invite the Board to repeat my exercise – work out the compass

bearings of the turbines from my property, use an astronomy software package to track the ecliptic against those bearings and work out which days of the year will have the sun set in line with the turbines and my home. You will find as I have.

3. I object to the turbines visibility from a number of scenic routes, and from Downpatrick Head -one of the signature points on the Wild Atlantic Way, and a treasured part of the natural heritage of Mayo and Ireland. When you look at Mayo County Council's website, or a Bord Failte tourism brochure, very often the first image you will see is Downpatrick Head and Dun Briste. It is an iconic piece of natural heritage, a major draw for tourists on the Wild Atlantic Way and a location of nationally important beauty.

16-22 windmills will be visible from this location, albeit at a distance. However, this is an especially sensitive site, and care should be taken to avoid doing anything that might take from its natural beauty, highly prized by State bodies, tourists and everyone who loves this country.

4. I object to the excessive height of the turbines, which makes them unnecessarily visible from these scenic routes and from Downpatrick Head. A more sensibly proportioned development would be far less visible.
5. I object to the visual intrusiveness and landscape impacts of this development. Mayo County Plan includes the following: "NEO 27: To ensure all development proposals are consistent with the Landscape Appraisal of County Mayo and the associated Landscape Sensitivity Matrix and future editions thereof.". The landscape sensitivity matrix referred to, is in the Landscape Character Assessment. This development appears to be in Policy Area 3, but visible from a large area of Policy Area 1. In both areas, Windfarms are deemed to have a high impact on landscape character and it is "unlikely that such impacts can be reduced to a widely acceptable level" in these areas. It is well said.

Martin Tighe