

Submission to: An Bord Pleanála, 64 Marlborough Street, Dublin 1

Person making the submission: Annemarie and Niall McGuinness Kilrush Lower Clonmellon

Observations regarding proposed: Knockanarragh Wind Farm ABP 319448

Submission date :22/5/24

Windfarm development including 8 turbines and all associated work

Proposed location Newtown Carynbrogan ,Cavestown, Rosmead and Galboystown Co Meath and Co Westmeath

Planning Applicant: Statkraft

The proposed development application assessed with observation in relation to;

- The implications of the proposed development for proper planning and sustainable development.
- The likely effects on the environment and surrounding areas of the proposed development
- The likely significant effects that the proposed development will have on a European site if carried out
- Its location beside a SAC
- Its location so close to the village of Clonmellon

1 Westmeath County Development Plan CPO 10 – Wind energy objective

This planning application contravenes with the Westmeath County Development Plan in that the wind farm is not proposed for cutaway bog but instead is being placed in rural flat land which is on an area which to the Northern 3 Turbines would impact a special area of conservation.

If Mitigation plans are put in place there is still risk to areas where the likely hood of habitat loss and biodiversity would be permanently changed

This proposes serious implications for the environment.

In the context of this policy, industrial scale/largescale energy production projects are defined as follows: Projects that meet or exceed any of the following criteria:

Height: over 100m to blade tip, or

Scale: More than five turbines, or

Output: Having a total output of greater than 5MW ‘

This proposed development is clearly contrary to this objective. This is a proposed large scale wind farm which would exceed the 3 criteria above. The environmental impact,

particularly concerning large-scale commercial peat extraction, tree felling, and effects on native woodlands is not in keeping with this objective.

Guidelines set put by the Department of Housing, Planning and Local Government Publications relating to Wind Energy Development and the DCCAE Code of Practice for Wind Energy Development in Ireland

This proposed development is not in line with this objective. The 2006 Wind Energy Development Guidelines are the most recent document, and this discusses wind farms that 'Currently may vary in height from 35 metres. This document was not designed to provide guidelines for 180m blade to tip height turbines. The 2006 Wind Energy Development Guidelines discusses turbines with a foundations size of 18 meters square. The foundations size of each turbine in this proposed development is 28 meters square. There is no comparison in the devastating large scale of the proposed turbines in relation to the current 2006 Wind Energy Development Guidelines. A review of this document is at an advanced stage and the Climate Action Plan 2024 sets out a timeline of Q4 2024 for publication of the final updated Guidelines. An application for a large-scale industrial development such as that proposed is more akin to the off shore wind farms. These large-scale industrial developments are much further from homes and communities with minimum distances of nearly 2km being achieved in the Irish context. At present guidelines are not present which would allow this objective to be achieved and the assessment **should hold until Q4 2024** for publication of the final updated Guidelines. Proper sustainable development can only take place when the legislative context has considered the advances in technology and size of this proposed development in producing planning guidelines.

Lough Shesk / Newtown Lake – pNHA area

Conservation Area – River Boyne and River Blackwater SAC (Site Code 002299) and the Lough Shesk Proposed Natural Heritage Area (Site Code: 000556). Lough Shesk area is a Special Area of Conservation at present, which is a site selected for the conservation and protection of plant and animal species and habitats.

The site of T1, T2 and T3 is in The River Boyne and River Blackwater SAC, all lakes and rivers are tributaries of the Boyne River, between Lough Shesk, Freffans Lough and Newtown Lake and nearby rivers i.e. Stoneyford River, such as pine marten, badger and Irish hare. Whooper Swans are known to come annually to Newtown Lake from Greenland, other protected species such as bats also use the area for their habitat. The environmental study conducted by Stat kraft stated no swan landed, however with local knowledge of the area, I can also confirm they do and breed here also.

A rare plant, Round-leaved Wintergreen (*Pgrola rotundifolia*) occurs around Newtown Lough. This species is listed in the Red Data Book and this site is its only occurrence in Co. Meath. There is no other place in the country where the full sequence of stages in the open water/peat bog transition is so well illustrated within a compact area. Therefore, this site has been rated as of national importance. The Birds and Habitats Directives are the

cornerstones of the EU's biodiversity policy. The two Directives also require that wind energy developments do not cause any significant damage or disturbance to species of Community interest.

The existing habitats and the proposed natural heritage area adjacent to the proposed development has significant potential to be adversely affected.

Application for Wind Turbine Farm is to include 3 turbines, T1, T2 and T3 on this site between these lakes on this area of national importance.

Per MCC Development Plan: it states it is now listed as a "Proposed Natural Heritage Areas in County Meath".

The turbine farm would be contrary to the Meath County Development Plan clauses which are designed to protect the environment, landscape, habitats, wildlife, designated sites of County Meath. The Birds and Habitats Directives are the cornerstones of the EU's biodiversity policy. The two Directives also require that wind energy developments do not cause any significant damage or disturbance to species of Community interest (i.e. those covered by the Directives) or their key habitats in the broader countryside (i.e. Where the wind energy development itself is located outside of a designated site but is likely to affect the protected species or their habitat 'throughout their natural range within the EU') This proposed development has significant risk of impacting key habitats adjacent to Lough Shesk and Newtown Lough.

Lough Crew, Tower of Llyod, Trim Castle, Hill of Tara and Uisneach are within proximity of the proposed wind farm also. Lough Crew Cairns (VP1), the Tower of Lloyd (VP2) and Trim Castle (VP32), which were all assigned 'Very High' sensitivity judgments. The corresponding significance of visual impacts at some of these key views were deemed to be 'Moderate' in Statkraft's study. We do not understand how the result of this testing by Statkraft is accurate given these areas are deemed 'very high' sensitivity.

The Irish Wildlife Trust have highlighted impacts upon areas designated as a Special Area of Conservation (SAC), Special Protection Area (SPA), Natural Heritage Area (NHA) or proposed Natural Heritage Area (pNHA) of the erection of wind turbines in the vicinity of these areas.

River Lamprey (*Lampetra fluviatilis*), Otter (*Lutra lutra*), Pine Marten, Badger and Irish Hare. Common Frog, Stoat and Red Squirrel occur within the site, are protected under the Wildlife Act, 1976. EIAR study conducted by Statkraft also confirmed these animals in the location of the development site.

2 Protected Structures within 3km of proposed Wind Farm site in Co Westmeath

Rosmead House and its gateway are protected structures listed on Westmeath County Development Plan and some of the other 5 turbines being proposed as part of this farm are located close to these structures. Rps No 009-034 and 009-048. Barn owl Red-listed, protected as part of Westmeath County Council's and Meath County Council's policy on natural heritage (paragraph 12.10 and objective 35, respectively) reside here. Barn owl was heard and seen during a bat survey in 2022 near Rosmead House (per EIAR study

conducted) (c. 360 SW of turbine T8), with feathers nearby suggesting that this species nests or roosts in the ruins. Sand martin, meadow pipit *Anthus pratensis* and Eurasian woodcock were recorded during bat surveys, where the woodcock was seen roosting NW of turbine T7. In relation to bats – 3 species were recorded in this area. As a result, I do believe a better location can be found for an industrialised wind farm, which is guaranteed destroying habitats and killing protected animals if constructed here. This is irresponsible of us as a society if planning permission is granted.

Killua Castle in Clonmellon Rps No 009-023 and numerous structures in the general area of the castle

Ballinlough Castle in Clonmellon Rps No 009-032 and numerous structures in the general area of the castle

3 The Cumulative effect on the landscape

The construction of an industrial-scale wind turbine farm with an overall tip height of 180m from ground level would be detrimental to the people living

REF.10.4 of EIAR NTS

The Cumulative effect of this wind farm's 8 turbines plus the wind farm at Bracklyn's 9 turbines 6km away, and the Ballivor Wind farm proposal 26 turbines 4.6 km is too much for the landscape and would have detrimental effect on the views, for the EIAR to state that this would not have any significant effect has no credibility, particularly affecting heritage areas, Low Crew Cairns, Hill of Tara, tower of Lloyd and Hill of Uisneach. Trim Castle. The night time effect of a cumulation of red lights in the sky would be also have a negative impact on the local environment but also on the areas listed above.

Ballinlough Castle is a listed structure but is only indicated in green on the map on Statkraft's website, it is not named and within 2km of a turbine, whereas Killua Castle 3km away from a turbine is listed and named.

4 Shadow Flicker

There is huge concern to local residents regarding shadow flicker in their homes a large population of people live in Clonmellon in the housing estates. As there has been a serious lack of public notice of the planning proposal, the size and scale of these turbines prove to be a permanent industrialisation of a small rural area. It is not possible to have zero flicker from these wind turbines. The scenarios in the planning illustrate the closeness of the homes the 200 homes in the study are homes to families this will have an impact on people of all ages. Having spoken with individuals living close to turbines and a shadow flicker, if there is no object to stop it, it can travel up to 3km. Statkraft state a zero-flicker policy, but the explanation given is not convincing of this. Further information should be provided in relation to this.

5 Noise

There has been no independent noise study conducted only the one carried out by Statkraft, we would request for an independent study to be done taking into that a lot of residents are living within the 1 km buffer zone some as close as 500-700m given the scale of these 180 proposed industrial Turbines.

6 Concerns about the Construction Phase

The Stonyford River was identified as being at risk during the construction phase. Planning for a 10-year construction phase has been applied for. The highest risk time for the water courses is during the construction phase.

Water Supply and Water Table Level

A lack of information provided regarding wells within the 2km proposed development site. The assessment notes that no wells are noted within the GSI well database which is noted as not an extensive list. It would be expected as part of the community engagement with all households within a 2km radius knowledge of existing wells could be gained and used for assessment purpose with mitigation measures assigned as required. This has not been completed. Proper knowledge of the water resources in areas classified as high vulnerability, in the area is essential for an accurate assessment to be completed.

The risk to the water table around Turbine 1 is of concern as there is no buffer of 50m

The risk of contamination from construction even if mitigation measures were successful do not guaranteed that damage to the water table and subsequently to water in habitants i.e. Will Salmonids and otters and other species be protected?

The extensive construction phase will mean run-off that could increase the water table and affect drinking water for animals and people in the area, also potentially damaging habitats.

The extensive road works listed in the Turbine Delivery Route document include hedge cutting, tree cutting, tree branch canopy removal and road widening. This is not on a scale with any previous developments in the area and is not in keeping with the scale and extent of appropriate development in the area. Also, the volumes of construction traffic that would be borne on regional and local roads over the proposed 10-year construction period would have a huge impact on an extremely busy used road N52 used hugely by articulated Lorries and people travelling across to the west of the country This is one of the most used routes from North to West. The small Rosmead road proposed for delivery routes is unsuitable for large loads unless extensive changes are completed. Negative impacts on human health and population arising from construction include noise, traffic and dust disturbance to residents of neighbouring dwellings and other road users. The cumulative effects of the construction phases for other proposed and approved wind farms in the local area would have a major impact on the local road network and road users.

Again, this N52 may also be used during construction of the other Wind farm in Bracklyn and Ballivor placing additional effects on the Road users.

EIAR – further independent testing we feel is required

Within the EIAR the information given in the technical chapters for noise, air and landscape are based on the specification for the turbines provided in the EIAR. These specifications for the turbines provide the minimum and maximum parameters for the rotor diameter and hub height. The installed wind turbine may not be either of the two candidate turbines models provided in the document. In section 1.13 the developer has stated that ‘the exact specification of turbine is not available at the time of lodging this application. The following elements therefore cannot be confirmed: • Hub Height, • Rotor Diameter, • Foundation Size, and • Hardstand Dimensions.’ This is completely unsatisfactory and does not allow a proper EIAR to be completed to ensure proper planning procedures are adhered to. The technical assessment for air, noise and landscape must have the specific information to allow for an accurate assessment. The close proximity of these proposed large-scale turbines to the homes should ensure a cautious approach with full detailed information available. We feel further independent testing is required to ensure no assumptions are depended upon when assessing granting of planning permission for this development.

Finally, the cumulative effect of the other wind farm developments in the area has not been assessed adequately. The cumulative wireline view from the n52 included on p N52 south of Balrath Demesne Viewpoint Ref: VP4 shows in approximately 30 red ‘in planning’ turbines from other development, along with in blue the 8 from this proposed development. It is not appropriate for one small rural location to be overtaken with large commercial scale developments and is not in keeping with proper planning and development. There are other development in the planning process within the area. This part of the countryside links Meath and Westmeath administrative areas but is one small rural community.

The application for a 10-year construction phase is in keeping with the large-scale commercial size of this project. This is not appropriate for a small rural location. Numerous Monument and Places (RMP sites, WM009-004, WM009-018 and ME023-010) Protected Structures (009-048 and 00903) are in close proximity to the proposed development. The impact on the displacement of animals, flora and fauna during the 10-year construction phase is not acceptable. The long construction period will ensure that the ecological impact to our local environment is catastrophic.

Biodiversity concerns

The EIAR studies on the bat population I would request further studies, the area planned for the wind farm has not fully identified the potential level of destruction of bat habitat or numbers that will most certainly happen with the operation of the wind farm along with the loss of significant habitat and roosting areas during construction.

Rosmead house a listed building itself is a huge derelict roosting area and it does not appear to be explored in the studies. The protection of the bat life and the accountability of their destruction is not addressed.

These are European protected species.

We are concerned that protected sepsis, red squirrel and hedgehogs will also become displaced and extinct because of this construction

The Cumulative effect of this proposal along with the two other windfarms in close proximity may also have a huge effect in the destruction of bats who may swarm in large areas.

The Mitigation of cutting back trees and vegetation alone does not protect these bats from flying into the turbines particularly if there are roosting in Neighbouring Rosemead house site or ancient woodland close by.

Again, the cumulative effect of numerous wind farms in one area will have effect in the loss of large numbers of European Golden Plover and common snipe and the wind farm may cause these species to become extinct from the area.

The presence of Protected species Marsh butterfly, the presence of Alkaline Fens which play such an important role in this current Biodiversity crises must be given protection at this time

I would object to this area being considered as an area for planning for this wind farm It is not the best place to put this proposal the biodiversity is rich here and of too much value to risk its existence.

I would recommend that alternative and better sites be explored for this project.

I would request more information on how this planned windfarm could be considered in an area so close to where there are such levels of protected species and a SAC. How the developers could consider this area as having suitability for this proposal instead of looking for a more suitable placement. The Cumulative effect of this and the other 2 large scale Wind farms particularly Ballivor can only wipe out this extremely important part of biodiversity in this area.

I would also request more studies done on the water birds particularly whooper swans particularly around Newtown Lough the EIAR states the study only found them flying over the Lough however I would question this as they have been heard and seen on the lake within the last 2 years. I would request further studies on their flight paths as the planned T1, T2, T3 are all in very close proximity to Newtown Lough and this would pose as a death trap to these large Birds.

The impact on birds cannot be adequately assessed due to lack of pictorial flight paths and the survey findings are significantly different from local knowledge on flight paths and lake roosting therefore an independent study is required.

No Night time studies particularly on birds such as Coot that fly at night time.

There is also regular siting locally of Kestrel birds in the area close to the Northern T1, T2

We believe these industrial sized wind farms should be located offshore or in a more suitable setting, off the Southeast coast of Ireland, which are a minimum of 8.5km away from any residential dwelling. They are unsuitable for a small rural community, in which there is no high-rise buildings whatsoever. The area in general is steeped with history and of environmental importance with protected structures, and area of natural conservation and a proposed pNHA of as per County Development plans for both Meath and Westmeath.

We have watched it being protected throughout the many generations that have lived here as a special area of conservation and we want it to continue to be protected as that it is imperative that the natural environment is heard also.

We request further more detailed studies on Birds, noise and bats in the area.

We request that you consider the importance of this area of conservation

We request you take into account the cumulative effect of the other two Windfarms on noise, landscape view and most importantly bat and bird life

Community health concerns

Settlements have been won by those who have suffered severe ongoing adverse health effects as a result of living in close proximity to industrial wind turbines in Ireland

Cases in Ireland of siblings in Cork who became ill from living beside a Wind farm. Irish Times 2020

Group families in Cork Village 7 families who took a case regarding ill health and noise pollution Irish Examiner June 2017

and there is more and more research and studies to support this now

Wind Turbine Syndrome and the effects of Infrasound is a huge concern for residents in the area, also This issue was raised with the Developer who was unable to give any guidance on the issue. Therefore, we would request further noise testing be completed, from actual residential houses affected by wind direction at different times through-out the year.

Additional concerns

Public Consultation has been lacking in the area proposed for this development

There has been no public meeting held by Statkraft their Rep was asked by several residents and TD Colm Troy in the interest of the community of Clonmellon could the

developer offer a public meeting in which a representative from Statkraft would attend to offer information but the Rep declined in favour of meeting people on individual level and use of leaflet drop. However, in contradiction to this they selected local groups which they met in Clonmellon Community Centre in 2023. The public were never informed of this. This does not adhere to the best practice advised by the Wind planning guidelines 2006. They visited the houses on the peripheral roads of the turbines, but not all houses within even a 2km radius of the site were notified. It is still evident now from speaking to the community residents to date that they are still unaware of the proposed planning and evidence of planning notices lacking in placement in the village where the majority of homes are situated.

The addendum in the EIAR listing the public consultation has mentioned a virtual consultation room. This does not fulfil the recommendation for public consultation events as outlined in the Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement

Due to this lack of public engagement how can the local communities feel they would be supported by the Developers if there were future problems with this development

There is no reference in the planning application to the effect or mitigation to human residents who have to live within close proximity to this scale of industrial wind farm