

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

Person making the submission: Edel Mulligan, Castletown, Delvin, Co. Westmeath, N91 HN96

Observations regarding proposed Knockanarragh Wind Farm ABP 319448

Submission date 22nd May 2024

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

1. Public Consultation – non existent

This was minimal, no advertisement of a meeting we could attend. Company refused to hold a public meeting and we live only 2km from this proposed giant industrial development.

The addendum in the EIAR listing the public consultation has mentioned a virtual consultation room. This is inadequate 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

2. Westmeath County Development Plan CPO 10 – Wind energy objective

To restrict direct largescale energy production projects, in the form of wind farms, onto cutaway peatlands in the County, subject to environmental, landscape, habitats and wildlife protection requirements being addressed. 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.

3. Guidelines set out 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.

4. 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 Statkraft stated no swan landed, however with knowledge of the area I 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.

LoughCrew, 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.

5. 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 roding NW of turbine T7.

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. Clonyn Castle and Delvin Castle also in the vicinity, which are both adversely affected. This can be seen from photo montages completed by Statkraft.

6. Unspoilt area of the Country

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 in this beautiful unspoilt part of Country.

7. 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 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.

8. Properties Devaluation

Significant property depreciation of houses land located near the proposed turbine farm. We own a portion of land on which is suitable for housing. We feel this land has being completely devalued as no one will wish to purchase a site for a new house in such close proximity to such an industrial sized wind farm.

9. 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". Article in Irish Times in 2020.

Wind Turbine Syndrome is a huge concern for residents in the area, also those with hearing aids. We raised this issue with Statkraft at their only visit to our house. Therefore, we would request further noise testing be completed, from actual residential houses affected by wind direction at different times through-out the year.

10. Shadow Flicker

Huge concern to local people, it is not possible to have zero flicker farm wind turbines. I have spoken to individuals living close to turbines and a shadow flicker, if there is no object to stop it, can travel up to 3km. These turbines in the locality of those I spoke to have blades 5m smaller in length. Statkraft state a zero-flicker policy, but the explanation we received is not convincing of this. We feel further information should be provided in relation to this. Other occurrences of these industrial scale wind turbines in Ireland are usually offshore and have at least a 3km clearance of any residential properties, therefore reducing the possibility of shadow flickering affecting residential homes.

11. Television and Phone Signals

Representatives of Statkraft admitted to me there are issues with signals and phone coverage. Wind turbines, like all electrical equipment, produce electro- magnetic radiation, and this can interfere with broadcast communications. Due to the close proximity of homes (<1km and villages <2km Clonmellon village) this is significant issue. With regard to point-to-multipoint signals, UHF- and VHF-type signals such as the radio and television services operated by 2RN (on behalf of RTÉ) can be affected by turbines.

12. Possible Construction Phase

The Stoneyford 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.

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. The small Rosmead proposed for delivery routes 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.

13. 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 proposed Natural Heritage Area surrounding Lough Shesk and within 1km of residential 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. This is devastating to the Delvin area, and a permanent change to the landscape.

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.

We believe these industrial sized wind farms should be located offshore, as are those 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 protected structures, and area of natural conservation and a proposed pNHA of as per County Development plans for both Meath and Westmeath.

Please note: knockanarraghwindfarmsid.ie states on all documents the Bord Pleanala reference on all documents is 314271, which is misleading when this case closed in August 2023 and could result in some observation submissions being disregarded as invalid as a result. There is no mention on the sid website of Bord Pleanala Case Reference for this Development 319448.