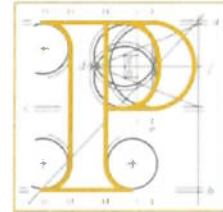


**Our Case Number:** ABP-319448-24



An  
Bord  
Pleanála

Eugene Carr  
Geehanstown  
Delvin  
Co. Westmeath

**Date:** 29 May 2024

**Re:** Proposed Development of an 8 no turbine wind farm development and associated works on land within the townlands of Clonmellon, Kilrush Upper, Kilrush Lower, Newtown, Ballinlig, Carnybrogan, Cavestown and Rosmead, County Westmeath and Galboystown, Co. Meath. ([www.knockanarraghwindfarmsid.ie](http://www.knockanarraghwindfarmsid.ie))

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](http://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,

  
Raymond Muwaniri  
Executive Officer  
Direct Line: 01-8737125

PA04

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Riomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

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

Person making the submission: Eugene Carr, Geehanstown, Delvin, Co. Westmeath

Observations regarding proposed Knockanarragh Wind Farm ABP 314271

Submission date 20<sup>th</sup> May 2024

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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 of the proposed development

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## Westmeath County Development Plan CPO 10.142 Wind energy objective

‘Have regard to the principles and planning guidance set out in 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 and any other relevant guidance which may be issued in relation to sustainable energy provisions.’

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.

## Westmeath County Development Plan CPO 10.143 Wind energy objective

‘Ensure the security of energy supply by supporting the potential of the wind energy resources of the County in a manner that is consistent with proper planning and sustainable development of the area.’

The proposed development does not align with this objective. It is clear that an industrial scale wind farm of the nature and extent of this proposed development is not consistent with proper planning and sustainable development of the Clonmellon and Delvin area and surrounds. Proper planning guidelines are no longer appropriate and publication is pending of the new guidelines (as outlined above). The nature and extent of the development is not in keeping with the local area. The proposed applicant has outlined an extremely extensive construction phase, culminating in extensive adjustment to the road network to allow delivery of these enormous structures. It is clear that nothing of this size or extent has ever travelled the local road network. This development is in no way appropriate for a small rural area. The proposed development crosses administrative boundaries between Meath and Westmeath but this is one single small rural community. The entire county of Westmeath is deemed to be of 'Low Capacity' or 'No Capacity' for the delivery of wind energy developments. In the absence of this guidance from the local authorities a cautious approach is necessary.

#### Westmeath County Development Plan CPO 10.144 Wind energy objective

'Encourage and support the development of small scale wind energy development and single turbines in urban and rural areas and Industrial Parks, provided they do not negatively impact upon environmental quality, landscape, wildlife and habitats or residential amenity. '

This proposed development is proposed by Statkraft, who are a private wind farm developer. In their own words are 'Europe's largest generator of renewable energy'. This proposed development is industrial in scale and more similarities can be found with off shore wind farms than onshore wind farms. A search on the Company's Registration office shows 'The Company has 6 directors who have also been the directors of 85 other Irish companies between them' The Company entered the Irish market in 2018. This is a private limited company with 100% shareholding by a Norwegian registered company. A google search of the Statkraft company portfolio shows it as a Norwegian state-controlled company. As per Westmeath Development Plan small scale wind development should be supported. This is not a community lead project and is not small scale or suitable for development in this area.

#### Westmeath County Development Plan CPO 10. Wind energy objective

*'To strictly direct large scale energy production projects, in the form of wind farms, onto cutover 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.

## Westmeath County Development Plan CPO 10.146 Wind energy objective

‘Ensure that proposals for energy development demonstrate that human health has been considered, including those relating to the topics of:

Noise (including consistency with the World Health Organisation’s 2018 Environmental Noise Guidelines for the European Region);

Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study);

Ground Conditions/Geology (including landslide and slope stability risk assessment);

Air Quality; and Water Quality;

Assessment of impacts on collision risk species (bird and bats). ‘

The EIAR (Environmental Impact Assessment Report) provided is not adequate for full assessment of the potentially devastating environmental impacts of the proposed large scale commercial wind farm. A comprehensive and transparent EIAR is required to ensure proper planning and sustainable development. Some issues identified with the EIAR are outlined below.

- The proposed height and scale are not allowing integration and embedding in the current landscape.
- Community Engagement – No open public meeting was held by the developers. I live less than 2km from the proposed development and only heard about it in May 2024 for the first time. No dialogue and zero trust has been established with the developers. When I reviewed the website for the proposed development I could not find any information regarding the SID application website or the APB reference number for the application. In fact nowhere on the proposed development website did I see an update to say planning permission had been applied for. No photomontage was taken from the local village Clonmellon which is less than 2km from the proposed 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. From a community meeting held by concerned residents I gathered that invitation only meetings with a list of pre-approved names occurred for representatives of local groups. The main topic of the conversations were community gain. An open transparent discussion within the community was not hosted by the developer. A more cynical approach to the Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement has been adapted. This has not created an open transparent relationship or any desire to work

with the developer over the 10 year proposed construction phase, the subsequent 35 year operating and the decommissioning phase.

- The proposed height of the turbines and the close location to trees could adversely affect the collision risk species. The possibility that rehabilitation / even natural regeneration would create an ecological trap increasing collision rates has not been considered adequately. All four Irish 'high collision risk' species were recorded during surveys (common pipistrelle, Leisler's bat, Nathusius' pipistrelle and soprano pipistrelle). The habitats within the proposed Main Wind Farm Site are considered to be of 'high risk' for bats, as defined by NatureScot (2021) guidance. The proposed main wind farm site contains numerous suitable buildings, trees and other structures with moderate-high roost potential, confirmed roosts within or in the vicinity of the proposed main wind farm site, suitable bat foraging habitat and connectivity to the wider landscape by a network of strong linear features. The document 'Wind energy development and Natura 2000, published 2011' refers to bat's low annual reproductive output and long life expectancy', so they may be suitable to even small additional mortality. According to Eurobats the building of wind turbines near forestry will create new linear features which may attract more bats to forage in the direct vicinity of the wind turbine and the risk of mortality will increase if clearing is not wide enough.
- Direct loss of habitat to the developments' infrastructure, including turbine foundations, buildings, roads, quarries and borrow pits; • Degradation of habitats through alteration or disturbance, in particular arising from changes to hydrology that may alter the surface or groundwater flows and levels, and drainage patterns critical in peatlands and river headwaters; • Fragmentation of habitats and increased edge effects; and • Degradation and loss of habitats outside the development site, especially the habitats in the proposed natural heritage area of Loch Shesha that may arise from pollution, siltation and erosion originating from within the development site.
- Disturbance during the construction and operational phases leading to the temporary or permanent displacement of birds from the development site and its environs; • Collision mortality • Barotrauma effect, the vortices created by turbines are known to cause injury and mortality of bird and bat species. These vortices extend beyond the physical footprint of the turbine; • Barrier to movement, • Direct loss or degradation of habitats for breeding, feeding/ foraging and/or roosting purposes, particularly in wetland, woodland and riparian habitats.
- Issues in relation to peat stability and flood risk surveys have been identified at locations within the proposed development.
- Environmental effects of the proposed development the introduction of Japanese Knotweed to the area. At present no Japanese Knotweed has been identified within the proposed development site.
- The potential for shadow flicker due to the proximity of housing. The proposed 'zero shadow flicker' policy is not adequate to ensure no shadow flicker occurs. Residential properties are located within 1km of the proposed industrial scale turbines. The proposed main wind farm site is within 1km of the village of Clonmellon and less than 3km of Delvin, in Co. Westmeath. Other occurrences of these industrial scale wind turbines in Ireland are usually offshore and have at least a 3km clearance of any residential properties.
- In relation to the close proximity to homes (<1km of 180m turbines) and villages such as Clonmellon (<2km) and Delvin (<3km), the protection of human health is paramount. The WHO (2018) states 'there is no clear evidence on an acceptable and uniform distance between wind turbines and residential areas, as the sound propagation depends on many

aspects of the wind turbine construction and installation' and concludes 'using distance to a wind farm as a proxy for noise from wind turbines in health studies is associated with high uncertainty'. Separation distance alone cannot be relied upon as a mechanism to accurately control noise levels. This is due to a variety of factors which are not directly related to distance but which can affect the transmission of noise, including: • topography (line of sight has a significant impact on noise propagation); • ground absorption; • directionality of the source; • wind speed and direction; and • atmospheric conditions. The large scale of these wind turbines are usually associated with off shore wind farms with a proximity to homes of 3km or more.

- 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.
- Eurasian badger, Eurasian red squirrel, Eurasian otter, Irish hare *Lepus timidus*, pine marten and west European hedgehog *Erinaceus europaeus*. There is the potential for these species to be present within the proposed main site of the proposed large scale commercial wind farm. Further in-depth studies should be completed to form the basis of the EIAR to ensure that all available information is included in relation to the effect of the proposed development on rare and protected mammals. The EIAR identified significant residual effects identified including the loss of breeding territories to Eurasian woodcock at the local scale
- Hen harrier - The peak count (N=1 for both seasons) in the context of the County Westmeath population (14.29%). Based on the above, the population within the study area is of county regional importance. This information taken in conjunction with the cumulative effects of other wind farms in the area, the plan would result in unacceptable cumulative adverse ornithological impacts, including for the hen harrier. Having regard to the Hen Harrier population decline nationally since designation this would have significant impact on a county/regional level.
- Mallard Amber-listed, so protected as part of Westmeath County Council's and Meath County Council's policy on natural heritage (paragraph 12.10 and objective 35, respectively). Flight activity was at a moderate level throughout the study period. The peak winter count (N=180) is significant in the context of the ROI population (2.22%). The peak breeding season count (N=20) is significant in the context of the County Westmeath population (2.16%). Based on the above, the winter population within the study area is of national importance and the breeding population is of county / regional importance. Wind farms may influence birds indirectly by presenting movement barriers, vibration disturbance, high noise, and electromagnetic radiation]. Wind farms can thus have impacts in terms of displacement, movement-pattern changes, and effects on breeding success which may eventually result in declines in species number and abundance at both global and national scales
- Merlin The peak winter count (N=1) is significant for the County Westmeath population (8.33%). Based on the above, the winter population within the study area is of county / regional importance.
- Mute swan - the breeding population within the study area is of county / regional importance and the impact of the proposed development should be strongly considered in this context.
- Barn owl Red-listed, so protected as part of Westmeath County Council's and Meath County Council's policy on natural heritage (paragraph 12.10 and objective 35, respectively). Based on information provided in the EIAR, the populations within the study area are of county /



regional importance. Barn owl was heard and seen during a bat survey in 2022 near Rosmead House (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.

- Annex I habit within the development area. RSK report recommended to minimise the potential impacts on Annex I habitat, and to maintain the ecological integrity of this fen peat habitat mosaic development in area. Also the current conservation value and future potential restoration value of this fen peat habitat mosaic should be considered as a whole and in relation to habitat connectivity for species such as the marsh fritillary butterfly which ~~was- should be observed during habitat study~~ within the development area.
- 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.
- 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 located 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.
- This proposed large scale commercial development has significant potential to adversely affect the landscape area with the proposed height and scale of the structures. The proposed project is located in the River Deel Lowlands and the proposed height and scale are not allowing integration and embedding in the current landscape. At present the large scale is not in keeping with the area and planning and development as set out in the two counties development plans.
- Loch Shesk is designated a proposed natural heritage area in the Meath and Westmeath County Development Plans. This proposed development is not in keeping with protection of a natural heritage area. Natural Heritage Areas (NHA) are a national designation introduced by the Wildlife (Amendment) Act 2000 to protect natural heritage of national importance. Loch Shesk was designated a proposed natural heritage area and as such as it is an area of significance to wildlife and habitats and are therefore considered to be a constraint for windfarm development.
- 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~~significant risk of impacting key habitats adjacent to Lough Shesk and Newtown Lough.

- 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.
- Whooper Swans winter regularly at several locations along the Boyne and Blackwater Rivers. The available information indicates that there is a regular wintering population of Whooper Swans based along the Boyne and Blackwater River valleys. The population is substantial, certainly of national, and at times international, importance. I have spoken with other local people who have confirmed whooper swans within the proposed development area.
- The Alkaline Fens located within the vicinity of Lough Shesk and Newtown Lough. Are listed in the on Annex I / II of the E.U. Habitats Directive. These add to the ecological value of the site, as does the presence of a range of Red Data Book plant and animal species and the presence of nationally rare plant species. The ecological value of Lough Shesk and Newtown Lough and the linking the two areas cannot be understated. This proposed development will have effects on the two ecosystems.
- The rare plant Round-leaved wintergreen (*Pyrola rotundifolia*) occurs around Newtown Lough. This species is listed in the Red Data Book and this location is the only occurrence in Co. Meath. This is an example of the importance of the proposed Natural Heritage area in terms of ecological importance. Other species listed in the Red Data Book which occur in the area are the pine marten, badger and Irish hare. Please note the National Parks and Wildlife Service Site Synopses for the sites in close proximity to the proposed development. The proposed development is not in keeping with the protection of these sensitive locations of national importance.
- The proposed turbines height and scale will impact significantly on the landscape in this nature by virtue of their number, size and layout. The impact on the skyline, the many access paths, substations and power lines will be significant. In relation to landscape impact a cautious approach is necessary. The height and scale of the turbines will visually dominate the landscape. The scale and extent of the proposed windfarm will cause noticeable changes in the character of the environment. The Westmeath County Development Plan states the 'Council will encourage wind energy, provided such developments would not have an adverse effect on residential amenities, tourism amenities, special landscape character, views or prospects, Natura 2000 sites, protected structures, aircraft flight paths or by reason of noise or visual impact'.
- 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'.
- 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 surround Loch Shesk and within 1km of residential homes should ensure a cautious approach with full detailed information ~~is~~-available.

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.

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- 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.
- 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 over taken 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.

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Whilst I understand that the above list may not constitute reason on an individual basis for a refusal, I would urge that the complex interrelationship between the proposed large scale commercial wind development and a small rural area with a rich valuable environment will create devastating and grave damage to the environment. This is not sustainable development. The existing habitats and the proposed natural heritage area adjacent to the proposed development has significant potential to be adversely affected.