Our Case Number: ABP-319448-24



Patrick & Mary Fox Rathbrack Clonmellon Co. Meath

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)

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,

Raymond Muwaniri Executive Officer

Direct Line: 01-8737125

PA04

23rd May 2024

Patrick & Mary Fox

Rathbrack,

Clonmellon

Co. Meath

C15 N8E2

Objection to Knocknacarragh Wind Farm Limited Development Case reference: PA17.319448

Dear Sir/Madam,

I am writing to formally object to the proposed development of the Knocknacarragh Wind Farm Limited. As a resident of the area, I have serious concerns regarding the implications of this project on proper planning and sustainable development, as well as its likely effects on the environment and surrounding areas. Below, I detail my objections in several key areas.

1. Public Consultation

The public consultation process for this development has been grossly inadequate. No public meeting was held despite my request to Statkraft for such a meeting, which was refused. A small, invitation-only meeting was held at Clonmellon Community Centre, attended by just 3-4 representatives of local organizations, ignoring the broader community. Statkraft's approach of visiting individual houses on peripheral roads excluded many within a 2km radius of the site. Clonmellon National School was unaware of the development until late May 2024, highlighting the poor communication from Statkraft. Additionally, the virtual consultation room mentioned in the Environmental Impact Assessment Report (EIAR) addendum does not meet the recommended standards for public consultation as outlined in the Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement.

2. Conflict with Westmeath County Development Plan CPO 10

The proposed development contradicts the Westmeath County Development Plan CPO 10, which restricts large-scale energy production projects, like wind farms, to cutaway peatlands, subject to environmental, landscape, habitat, and wildlife protection

requirements. The proposed Knocknacarragh Wind Farm exceeds the plan's criteria for industrial scale: the height of turbines over 100 meters to blade tip, more than five turbines, and a total output exceeding 5MW. The environmental impacts, including large-scale peat extraction, tree felling, and effects on native woodlands, are not addressed adequately and are contrary to this objective.

3. Misalignment with National Guidelines

The proposed development is inconsistent with the 2006 Wind Energy Development Guidelines, which are the most recent guidelines but were designed for turbines significantly smaller than the 180m blade-to-tip turbines proposed. The foundation size of each turbine (28 meters square) also far exceeds the 18 meters square discussed in the 2006 guidelines. A review of these guidelines is in progress, with updated guidelines expected by Q4 2024. Approving this development now would be premature and not aligned with proper sustainable development practices.

4. Impact on Protected Areas and Species

The proposed site includes areas within the River Boyne and River Blackwater Special Area of Conservation (SAC) and the Lough Shesk Proposed Natural Heritage Area (pNHA). These areas host protected species like the whooper swan, bats, and the rare plant Round-leaved Wintergreen (Pyrola rotundifolia), which are threatened by the development. The environmental study by Statkraft inadequately addresses these concerns. The presence of protected species and habitats necessitates that wind energy developments do not cause significant damage or disturbance.

5. Impact on Cultural and Historical Sites

Several protected structures and cultural heritage sites, such as Lough Crew Cairns, the Tower of Lloyd, Trim Castle, and the Hill of Tara, are within proximity of the proposed wind farm. The visual and environmental impacts on these high-sensitivity areas are not satisfactorily mitigated in Statkraft's assessments. The potential harm to these historical sites and their cultural value must be a major consideration in the planning process.

6. Unspoilt Rural Landscape

The construction of an industrial-scale wind turbine farm with turbines 180m high will irreversibly damage the unspoilt rural landscape. The visual intrusion and industrial nature of the development are not in keeping with the character and beauty of this part of the country, which many residents value highly.

7. Water Supply and Water Table Levels

There is a lack of comprehensive information on the wells within the 2km radius of the proposed development site. The GSI well database used is incomplete, and no thorough community engagement was undertaken to gather accurate data on existing wells. The extensive construction phase could lead to run-off and water table changes, affecting local drinking water supplies and habitats.

8. Property Devaluation

Properties in the vicinity of the proposed wind farm are likely to suffer significant devaluation. The proximity to industrial-scale turbines will make the area less attractive for current and potential residents, leading to economic losses for homeowners.

9. Health Concerns

Health concerns related to living near industrial wind turbines, such as Wind Turbine Syndrome, have been documented, including adverse effects on those with hearing aids. These health risks warrant further investigation and consideration. Noise testing should be conducted at various residential houses affected by wind direction throughout the year to assess the true impact.

In light of these substantial concerns, I urge An Bord Pleanála to reject the proposed Knocknacarragh Wind Farm Limited development. Proper planning, environmental sustainability, and community welfare must be prioritized over the proposed industrial-scale development.

In conclusion, the proposed Knocknacarragh Wind Farm Limited development poses numerous significant risks to the environment, local community, and heritage sites. It does not comply with current planning guidelines or adequately address public concerns. Therefore, I strongly urge An Bord Pleanála to reject this proposal.

Yours sincerely,

Patrick & Mary Fox