



An
Bord
Pleanála

Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Sinead & Michael Kenny

(b) Observer's postal address

Geehanstown, Delvin, Co.Meath

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Not applicable

(b) Agent's postal address

Not applicable

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

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The agent at the postal address in Part 2

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Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

314271

- (b) **Name or description of proposed development**

Knockanarragh Wind Farm

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Clonmellon and Delvin Co. Westmeath and Co. Meath

Observation details

5 Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

The grounds for the observation is that this proposed development is contrary to proper planning and development.

1. Drainage: Appendix 7-4 Drainage Report for Turbine T1 Area, plate 4

demonstrates the extremely close proximity of the proposed location of turbine 1 to the Killacroy Stream. The proposed base required for the proposed industrial size turbines require foundation excavation then plant and machinery operating in close proximity to the channel bank for the stream. This stream is closely connected to the designated proposed Natural Heritage Area of Loch Shesk. Pollution at this location would create a damaging chronic effect on this ecosystem. This is an unsuitable activity in this area. Even without an accidental spill the run off from rain/storm water could collect infill from the turbine foundations and pollute. The proposed mitigation measures are not sufficient to ensure this valuable area of natural heritage is protected. The proposal to install silt fencing to prevent fugitive silt material in runoff around the site from entering the SAC and stream is not good enough as the fugitive silt material will already have entered the water course. This may be an industry standard practice but is not acceptable in protecting a proposed Natural Heritage Area. This is not a standard construction area. The implementation of sampling is not a mitigation measure as any unsatisfactory outcome will already have affected the watercourse. The protection of this area is required by the Meath and Westmeath County Development Plans.

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2. Department of Arts, Heritage, Regional and the Rural and Gaeltacht Affairs – Development Applications Unit (Nature Conservation) recommends that bird survey should also include the use of avian radar systems to detect nocturnal migrating birds. This was not completed. The risk of a negative effects on the bird population cannot be underestimated. The proposed large scale commercial development draws more similarities to an off shore wind farm than current on shore wind farms. Every study recommended should be completed and the results reported in a transparent manner to ensure all risks can be adequately assessed. Limitations with this lack of information affect the NIS and EIAR for this proposed development.
3. Marsh fritillary butterfly has been noted in the NIS .The habitat has been noted in this EIAR as being suitable. The Marsh Fritillary Butterfly is one of Ireland’s few legally protected Butterflies. It is protected under Annex II of the European Union Habitats and Species Directive. The Devil’s Bit plant used as a food source is present in the proposed development area. Further study is required to assess the impact of this wind farm and also the cumulative impacts of the other wind farms in the area on the Marsh fritillary butterfly
4. ‘It is likely the hen harrier will feature on the next Red-list of the Birds of Conservation Concern in Ireland’ (NPWS, 2022). The conservation of Hen Harrier is considered one of the most urgent bird conservation priorities in Ireland. Further studies should be completed in the proposed development area to gain more knowledge for a better risk assessment of the impacts of this proposed development on the hen harrier. Hen harrier is present in the proposed development area.
5. The interconnectivity and cumulative effects on the Annex 1 protected habitat H7140 Transition mires and quaking bog are not adequately assessed. The NIS identified ‘The risk of construction activity may result in the temporary lowering of

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groundwater levels which could result in changes to groundwater levels within the cSAC and cause changes to indicators or local distinctiveness and transitional areas between fens'. The area should not be disturbed prior to the Fen survey as included in action no.52 in the Irish Governments Prioritised Action Framework for Natura 2000, for 2021-2027. The effect on the fen habitat which also effects the

6. Ecological connectivity between the Proposed Development Site and European sites- River Boyne and River Blackwater cSAC and Lough Derravarragh SPA has been identified.
- The displacement of birds and their habitats could affect these site. For example the whopper swans supported by Derravaragh SPA are nationally important and it is possible the disturbances caused could have an effect on this SPA. The presence of the coot , tufted duck and pochard at the our wildlife is necessary. As ecological connectivity with the SPA cannot be ruled out, the proposed scale of this development is unsuitable at its current location. The adjacent proposed area of Natural Heritage is likely to be supporting the local SPA's wildlife. It would make sense that flying birds and wildlife of this proposed development site was not assessed as flights can be nocturnal. Coot was noted breeding at Newtown Lough. Coot are a qualifying interest of Lough Derravargah SPA. No evidence provided to show these were not connected to SPA. In the absence of comprehensive information, a cautious approach to protect nature would move between the rich ecosystems provided at each location. Whooper swan was observed flying, feeding and roosting within the Proposed Development Site. The flight height for whopper swans put them at direct risk of collision with the turbines.
 - Lough Derravarragh SPA is also designated for waterbird and wetland birds, 500 golden plover in one flock was observed within 500m of the proposed commercial wind turbine development. Wood sandpiper was observed within the Proposed

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Development site and cannot be excluded from being part of Lough Derravarragh SPA waterbird and wetland bird population.

- The cumulative effect of the many developments in the Lough Derravarragh SPA could already be cause for the whooper swan population decline. The NIS concludes that 'the proposed development could result in collisions with whooper swan, and possibly the other qualifying species, which may be a part of the SPA population.' When discussing the cumulative effect the documents note 'However, it can be expected that all such projects and plans will be subject to an appropriate assessment under the Habitats Directive'. I would be hesitant to accept this general statement. The purpose of the EIAR and NIS is to adequately assess the cumulative effect and this has not been achieved. Further study is required on the complete ecosystem and the cumulative effects of other developments on the ecosystem as a whole.

The potential adverse impacts through ecological connectivity is unacceptable.

7. The lack of respectful public consultation has been completely unacceptable. I first heard of this proposed commercial wind farm less than 10 days before the deadline for observations on the APB application. I live within 2km of the proposed development. When I found the <https://knockanarraghwindfarm.ie/> website after 1 hour I still could not find any link to the SID website with the planning documentation or any reference to the ABP application number. From speaking with other members of the community it is clear no public meeting was held. This has not been an open and transparent process. This feels like big business trying to overrun a small local community. I would dispute that the 'Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement', 2016 have been adhered to.
8. I would like to communicate that I have no issues with renewable energy when proper planning procedures are followed in a sustainable manner. This is not

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sustainable development. The large scale nature is not in keeping with proper planning. The 2006 Wind Farm Guidelines are being revised with a Q4 2024 publication date due. Developments of this nature should await proper planning guidelines. The Westmeath County Development Plan states 'The preferred locations for large scale energy production, in the form of wind farms, is onto cutover cutaway peatlands in the County, subject to nature conservation and habitat protection requirements being fully addressed.' This application is not onto cutover cutaway peatlands. The Westmeath Development Plan objectives also note they 'Encourage and support the development of smallscale 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.' I feel this is a very sustainable objective and would value a community led project for wind energy in the local area.

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Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

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No, I do not wish to request an oral hearing

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Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes