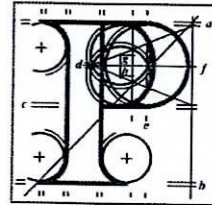


Our Case Number: ABP-316051-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Denise and Patrick Martin
Baskin High
Drumraney
Athlone
Co. Westmeath
N37HY26

Date: 09 May 2023

Re: Renewable energy development comprising 9 no. wind turbines and associated infrastructure.
Umma More and adjacent townlands, County Westmeath.

Dear Sir / Madam,

An Bord Pleanála has received your observation or submission in relation to the case mentioned above 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.

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.

For further information on this case please access our website at www.pleanala.ie and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

BL50A

Teil
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Facs
Láithreán Gréasáin
Ríomhphost

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

Proposed Umma More Wind Farm (South Westmeath)

Case Number: 316051

Name: Denise and Patrick Martin

Address: Baskin high, Drumraney, Athlone, Co. Westmeath

Eircode: N37 HY 26

May 4th, 2023

To whom it may concern,

As a resident of Drumraney living in Baskin for over 40 years and close to the proposed new wind farm development by Ummamore Wind Farm, I would like to raise my concerns and observations for the proposed 9 new wind turbines in the area.

Visual impact and shadow flicker:

With a proposed height of 185 meters, these turbines will dominate the local skyline. These, from my understanding, are some of the largest turbines planned in the state.

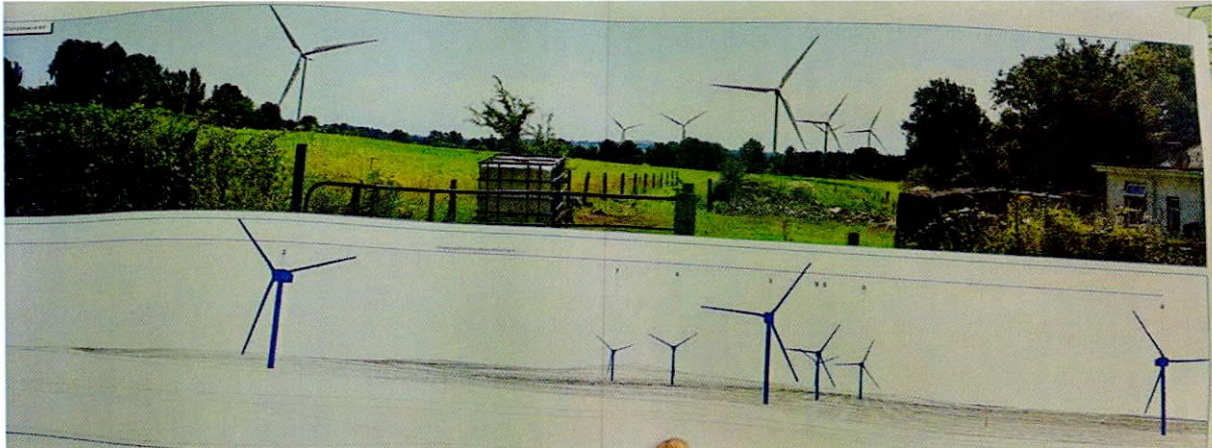
As highlighted in Environmental Impact Assessment Report, shadow flicker from the turbine blades will affect a number of residents including my own.

Residence in question:

- **House ID:** 15
- **ITM coordinates:** 618174
- **Nearest windmill:** 847 metres
- **Max. Daily Shadow Flicker Pre-Mitigation (hrs:min:sec):** 00:46:12
- **Max. Annual Shadow Flicker Pre-Mitigation (hrs:min:sec):** 109:54:00
- **Max. Annual Shadow Flicker Adjusted for Average Regional Sunshine (hrs:min:sec):** 33:02:47
- **Purposed Turbines giving rise to daily shadow flicker exceedance :** 1,2,3
- **Mitigation Strategy Required (Daily):** Yes
- **Mitigation Strategy Required (Annually):** Yes

The report on shadow flicker, which is the effect of rotating turbine blades causing brightness levels to vary periodically at locations where they obstruct the Sun's rays, indicates my place of residence will be impacted daily by up to 46 minutes of shadow flicker which will require a mitigation strategy.

Below image provided by Ummamore Wind Farm project shows the proposed wind farm will have a major visual impact to my residence (located 50 meters to the left) due to the short distance to these turbines (847 meters).



Local Wildlife:

The area proposed for the windfarm development is rural and has a vast array of wildlife that will be impacted if these proposed wind turbines are constructed. The Environmental Impact Assessment Report (EIAR) lists the broad range of wildlife that will be affected. There are many species of bird including sparrow hawks, owls, kingfishers etc. (see EIAR section 7.3.4 for full list of birds within 10KM) that have the possibility of been killed by the large blades proposed for these turbines. There are also a large population of bats in the area. As well as this the proposed site is located close to the Dungolman river. This river contains fish species such as perch, pike and brown trout and many more.

Umma More Ltd. are a shelf company of Enerco Energy. Previous developments, such as that carried out in Meenbog wind farm development in Co. Donegal by Planree Ltd., another Enerco Energy shelf company, have resulted in bog slides which caused an ecological disaster which resulted in river pollution. Planree Ltd. pleaded guilty in court in 2022 concerning its responsibility for this environmental disaster. Any similar impacts with the proposed development would have a major impact on the local wildlife.

There are also numerous apparent errors and omissions in the Environmental Impact Assessment Report (EIAR) submitted by Umma More Ltd. The EIAR does not meet the high standards demanded for clarity, objectivity and completeness.

Substantial height of proposed wind turbines

There is a proposed height of 185 meters for these new wind turbines. This points to the fact that the area selected for construction is not optimum. The reason behind needing such large turbines is the fact that the area is low lying and has low average wind speeds. The SEAI Wind Atlas reports low average wind speeds for the proposed site. The area was also designated as a low wind area in the Westmeath County Development plan.

Noise:

The existing low background noise levels in the area reflect that this is in fact a quiet rural region. Noise pollution emitted by these enormous industrial turbines will affect both me and other residents' quality of life. This is expected not only when operational, but also during construction and decommissioning phase. The current Irish planning guidelines for wind farms rely on a UK noise assessment model which dates from 1996. This model is widely recognized as not fit for purpose mainly due to the fact that there have been vast increases in turbine size and power. Due to this new unnatural noise, local residents such as myself are likely to experience annoyance and/or sleep disturbance. This raises serious health concerns for me, family members and neighbors.

Location: The area proposed for these 9 wind turbines is largely populated and located close to a number of villages, mainly Ballymore and Rosemount. The proposed grid connection via Rosemount and Killbeggan to Thornsberry 110KV substation in Tullamore, rather than to the closer substation in Athlone and Mullingar paves the way for a spate of wind farms across south Westmeath and north Offaly. The planned location is also close to the hill of Uisneach which has been shortlisted for nomination as a UNESCO World Heritage Site. This site has a great historical benefit to both the local community and Ireland as a whole. The proposed local of these 9 turbines will be visible from this location and impact on its natural beauty.

Other concerns:

- In 2021 and 2022 a wind monitoring mast erected by the developers collapsed on two occasions. This does not give us great confidence in the ability of the developer to safely install these 185 meters wind turbines
- Investigation by the Advertising Standards Authority of Ireland found that the developer behind the proposed wind farm had circulated a leaflet in the local community that contained misleading and inaccurate information in relation to human health impacts and impacts to house prices in the local area
- Size of these wind turbines goes against the Westmeath County Development plan.
- Road Safety in the area during the construction of these windmills on the main and Minor roads which will experience heavy vehicles and increased traffic in this residential area.