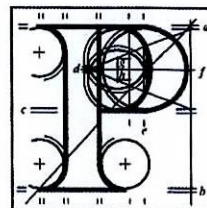


Our Case Number: ABP-316051-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Gabriel and Mairéad Seery
Moyvoughley
Moate
Co. Westmeath

Date: 27 April 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,

Kevin McGettigan
Administrative Assistant
Direct Line: 01-8737263

BL50A

Tell
Glaó Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1890 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.
D01 V902
21st April 2023.

Re: Observation on the Umma More Renewable Energy Development
Case Reference: 316051

To whom it concerns,

We wish to make our observations on the application by Umma More Ltd for a proposed renewable energy development in the townlands of Ballynafearagh, Raheen, Baskin High, Baskin Low, Lissanode, Umma Beg or Moneynamanagh and Umma More in County Westmeath. We are residents of the area and we own our family home which is located just over one kilometre from the nearest proposed turbine and it is quite close to the proposed onsite substation. We will outline a number of observations that we have on this application and we trust that they will, like all other observations being made, be taken into consideration by An Bord Pleanála.

Visual impact and noise concerns.

Firstly, we are hugely concerned about the visual impact that this development will have and problems with noise that are likely to develop if this wind farm is to be constructed. The layout of the landscape would be changed for the foreseeable future and for all of us who live in the vicinity of the site our lives will be very different going forward. We have chosen to live in this area and build our home here and we do not want to have a wind farm of this scale constructed near it. The proposal will result in the construction of some of the highest wind turbines in the country and their height will have a profound visual impact on this flat and unspoilt area. They would dominate the skyline and have an overbearing impact on family homes.

We have viewed the photomontages produced and we do not believe that they show an accurate representation of the visual impact. We would question the accuracy of the heights of the turbines presented in these photomontages as in some of them they possibly underestimate the height of them.

Another issue that we have with the photomontages is that they were produced during the summertime of year, they would be very different with no foliage on the trees if taken in winter. Indeed, many of the trees visible in the photomontages are ash trees and due to ash dieback they are unlikely to be there to partially block the view of any turbines by the time they are constructed.

We have grave concerns about the noise levels of the turbines also. At present it is possible to hear a milking machine that is over 1.6km away each morning while indoors in our home. In our garden we can hear noise from a quarry that is on the opposite side of the proposed windfarm site over 2kms away. Sound travels and we are fearful of a future where there will be noise that we have no control over when we go into our garden or go walking on our local roads. The roads around this site are very popular for people to come to walk and cycle on given the peace, quiet and safety along these roads. This development will have a profound impact on young and old alike. There will also be an impact on children playing in their gardens in the shadows of these industrial wind turbines. The lights on the top of these turbines will be visible from our bedroom windows at night. Nearly 75% of the land within the wind farm site belongs to absentee landowners who live well over 10km away. This development will have no impact on them. It is inequitable. We request that a more robust and comprehensive assessment be undertaken in relation to the potential visual impact arising from the proposed development considering the amount of people who live around the site and that use these local roads as walking routes.

Community Engagement and ASAI findings

We have serious reservations about the work done by the applicant in the area. Any contact that we have had with them has been less than satisfactory. It states in Appendix 2-2 Community Report that "to inform local residents about the Proposed Development, a project Community Liaison Officer (CLO) was appointed, Aidan Stakelum, who wrote to all householders within a c.2km radius of the Wind Farm Site in April 2021". We knew about the development long before this. We have a copy of a letter that was sent to people in this area in February 2019 and on September 11th 2019 a person in a Cork registered vehicle distributed a leaflet about the company and wind energy to houses in Baskin, Drumraney. On the following days it was distributed to many other houses in the local area. Why is there a need to doctor the truth in the planning application? There was a complaint made to the Advertising Standards Authority for Ireland about this leaflet. Please see the Case Report attached in Appendix 1 which concludes by stating that this advertisement should not appear in its current form again. <https://www.asai.ie/complaint/household-energy/> This leaflet was distributed making false claims about the effects of wind farms on health and property prices.

Were some landowners duped into believing these false claims and had they signed on the dotted line to hand over their land to this company before the ASAI findings were published?

We met the new CLO James Crowley when he dropped by our home on 27-4-22. We raised our concerns about the initial leaflet that was distributed, and he dismissed it as a "**typo**" and said "it is only when something goes out into the public

domain that people notice errors in it." Is this what the Applicant hopes will happen with this planning application too? There are many errors throughout it. We trust that An Bord Pleanála will not allow the Applicant to explain away all the many errors in this application as "typos". We have no doubt that many of these errors will be pointed out by other observers.

In 2.1.1 it is claimed that "during the lengthy consultation period the CLO has continued to liaise with any interested parties and answer any questions as promptly as possible." I asked him to acknowledge that they had presented false information to landowners and householders. He refused to do so. This claim of liaising with people and answering questions for everyone is untrue. We attended the information evening in the Bridge House Tullamore in July 2022. We would not describe what happened there as "engagement" or "consultation". There were many displays erected for us to view and we were told this is what is happening. They did not care what we had to say or how we felt about the development.

Population and the risk of depopulation.

In 5.5.2 and 5.53 the population trends and population density information are outlined. We think that a population density of 23.46 persons per square kilometre is pretty high for a rural area, but the conclusion arrived at is that the "Population Study Area has a low population density." Obviously, wind energy companies see areas of low population density and immediately view them as a window of opportunity but we see it very differently.

I (Mairéad) was born in the Umma DED and I am the 5th generation of my family to live here. In 2002, myself and my then fiancée decided to build our own home and raise a family in this wonderful rural location. In the last three years we are aware of three couples who have explored the idea of building their family homes here too. They had house plans drawn up and percolation tests done and were on the verge of applying for planning permission but the threat of having these wind turbines around their homes have driven them elsewhere to buy or rent homes. People who live here cherish this landscape and we believe that if this development proceeds it will lead to the depopulation of the area. Future development of family homes will be severely curtailed if this development proceeds and it will effectively sterilise lands surrounding wind turbines and dissuade people from living in the area resulting in population decline. In fact, the majority of land owned by my family is within 750 metres of the turbines and it is in close proximity to the onside substation also. It leaves it very unlikely that my siblings or any of the next generation will be able to reside in the area.

In making a decision on the planning of this wind farm please assess if this would be in the best interests of the people living here who have been targeted because of their decision to live in this area of so-called low population density. When we raised

the issue of depopulation with Mr James Crowley on 27-4-22 his response was one of silence. There was no "consultation" or "engagement" on this issue of huge concern for us.

County Westmeath Development Plan, 2021-2027.

This application shows no regard for the Westmeath County Development plan. It is stated that "the preferred locations for large scale energy production, in the form of windfarms, is onto cutover cutaway peatlands in the County ". (CPO 10.146) Does this company see our working agricultural land as bogland? This planning application for nine wind turbines with an overall ground-to-blade tip height of 185 metres is not in line with the county development plan. It is stated in the development plan that wind energy is an important renewable energy source but the wind energy resources in the county should be "harnessed in a manner consistent with proper planning taking visual impact, impact on residential amenity and impact on wildlife and habitats into consideration." This application does not appear to take these into consideration as they have done their very best to facilitate 9 turbines within their land bank to obtain Strategic Infrastructural Development status.

Alternatives.

In chapter 3, 3.2.6.2.1 Proposed Layout Iteration No. 1 Figure 3-3 we see a layout with twelve turbines that is being put forward as an alternative layout of the wind farm site (dated 2-2-2023). We were shocked to see this image as our house is surrounded by wind turbines in it. They state, "It was determined that it would be more environmentally sensitive and efficient to allow for fewer turbines and a larger turbine model within this area." This was never really a valid alternative because the landowners where T9, T10, T11 and T12 are in this image refused to allow wind turbines anywhere near their land.

"The Wind Farm Site went through 8 separate iterations. All 8 turbine layout iterations have not been included." Why not? It is very difficult to imagine what these could possibly have been because the site is too small to explore any other alternatives.

In the application currently with An Bord Pleanála 316212: at the Ballivor Bog Group, County Meath and County Westmeath, MKO said there is a detailed "Comparison of environmental effects of previous design iterations when compared against the final 26 turbine layout" in Table 3-7. In that application there seems to be a genuine comparison of three of the four iterations of the layout of the site. There is no such work done in the Umma More Ltd application.

Also, in the Ballivor Bog Group application we see that "windtake" was taken into consideration "The selection of turbine numbers and layout has also had regard to wind-take." There is no reference to "windtake" in the Umma More application and

we know it was not taken into consideration. Some wind turbines are located on the map too close to land where the landowner is not consenting.

Also, some of the turbines are too close to the **curtilage** of residential dwellings which the Applicant appears to have completely ignored.

The Applicant was unable to come up with any alternative layouts of the site because the site is **too small**.

On 3.2.6.2.2 Proposed Layout Iteration No. 2 we see seven alternative locations for the substation. The chosen location for the substation is none of these seven options. They have chosen to locate it where it is closest to three family homes (houses 5, 21 and 55 in Appendix 2-2-Community Report on the Proposed Development Layout) which we object to. It would be preferable if the substation was located pretty much anywhere else on site given that the application site is over 337Ha in size. Surely it would make more sense to locate it near turbines 7,8 or 9 as on the map on 3.2.6.2.2 Proposed Layout Iteration No. 2 in Chapter 3 Alternatives where it would be further away from residential dwellings and it could exit onto the road at a point closer to its destination.

As underground cabling from the substation will be needed it will cause traffic disruption to us on our way to work and school daily. Surely it would make most sense to exit from the substation as close as possible to Raheen. The other issue that we have with the substation's location is that traffic diversions will be necessary and we have serious traffic control and road safety concerns. The road (land commission) outlined in Section 1 in APPENDIX 14 - 2 Grid Connection Traffic Arrangements and Diversion Routes is a narrow and winding road not suitable for diverting traffic onto. It is a road used primarily by farmers and the residents of two homes (numbers 55 and 86). At one point on this road when meeting oncoming traffic it is necessary to reverse back around a corner and at another point one has to reverse on the road for up to 150 metres to allow oncoming traffic to pass. To use this road as a diversion is both impracticable and unsafe. Surely a Stop/Go system along the R390 to Athlone or Mullingar substations would provide a much safer alternative. Our road along with the other two roads to be used as diversions until the cabling gets to Horseleap cannot accommodate two way traffic during a diversion and it is too long to implement a stop go traffic control without causing serious delays to those who use it as they go about their everyday lives.

Uisneach

Due to the proximity to the ancient site at Uisneach we feel there needs to be a further assessment done on the impact this wind farm will have. There was no photomontage produced from Uisneach so we can only imagine what visual impact it will have. In the Westmeath County Development plan one of their Core Strategy

Policy Objectives is to continue to promote the Hill of Uisneach and to create walking and cycling connections with the Old Rail Trail Greenway. (CPO 6.35) This will increase tourist numbers at the site. As Uisneach is on Ireland's "Tentative List" for UNESCO World Heritage Status. It is worth bearing in mind that "World Heritage is the designation for places on Earth that are of outstanding universal value to humanity and as such, have been inscribed on the World Heritage List to be protected for future generations to appreciate and enjoy."

<https://whc.unesco.org/en/faq/19>

Shadow flicker

In Chapter 5 on population and human health we see that daily and annual shadow flicker has been recorded for a total of 115 No. receptors within the Shadow Flicker Study Area. In 5.9.3.10 it is mentioned that there will be mitigation measures to deal with shadow flicker and if these are not successful then wind turbine control measures will be implemented.

In the wind energy guidelines it states that "A **condition** should be attached to **all** planning permissions for wind energy development to ensure that there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property and that the necessary measures outlined in the shadow flicker assessment submitted with the application, such as turbine shut down during the associated time periods, should be taken by the wind energy developer or operator to eliminate the shadow flicker"

We attach a quote of a condition for planning from the Inspector's Report ABP311565-21 for a windfarm at Ballagh, Billinstown, Ballynacarr and Bracklyn, County Westmeath and Coolronan, County Meath. "Appropriate software shall be employed on each of the turbines to ensure that there will be no shadow flicker at any existing nearby dwelling. Turbine shutdown shall be undertaken by the wind energy developer or operator in order to eliminate the potential for shadow flicker. Reason: In the interest of residential amenity."

As appropriate software is available no person should ever have to experience shadow flicker in their home or workplace in the future. Should we expect any less from the Umma More development? This is the least we would expect if this development is to proceed but from reading the application this company has no intention of using appropriate software. We would request that this would be a condition of planning if Umma More Ltd is to obtain planning permission.

Met mast and Wind Speeds.

On March 12th 2021 we witnessed a met mast being erected in Ballynacorra and then on Sunday 14th it had fallen over. This was the topic of discussion in the locality for quite some time afterwards. On April 2nd an article entitled "Calls for clarity on

windfarm bid near Moyvoughley, Drumraney and Ballymore" was published in the Westmeath Independent about the mast and a possible windfarm. In that article Mr Aidan Stakelum is quoted as saying "We are currently carrying out site investigation works to confirm that the site is suitable for such a development." [Article](#) At that time we believed that the met mast that was erected would be an integral part of determining the suitability of the site especially as we witnessed it being re-erected again without delay before April 10th 2021. This second mast fell on 20th January 2022.

When Mr James Crowley called to our house on April 27th 2022 the first question we had for him was "Was the wind mast up for a sufficient amount of time to gather the required data on wind speeds?" He told us that he didn't know what data was gathered from them but at present there is a LIDAR unit onsite in place of the mast and it was gathering data on wind speeds in conjunction with the sound monitors at various locations and that data collected would be made available in the planning process. He refused to tell us where on site the LIDAR unit was for security reasons, seeing as there was an investigation into damage caused to the first met mast. When asked about the damage to the mast, Mr Stakelum, of Enerco, told the Westmeath Independent that "this was being investigated further." We believe no damage was caused to this mast and it fell because it was badly constructed.

In Chapter 11 Noise & Vibration, the Applicant states that "Simultaneous wind speed/direction data were recorded within the site at various heights using a LIDAR Unit" and in chapter 3 Alternatives it states "On-site monitoring of the wind resource, which is ongoing, will further verify that with a sufficient turbine height and blade diameter, the wind resource of the site is commercially viable."

As the Westmeath County Development Plan shows in Map 69 Volume 2 this area is designated as a Low Wind Capacity area and as the data gathered from the wind masts and LIDAR unit is still ongoing, we fail to see the logic in applying for planning permission for a wind farm in this area as there is no guarantee that there will be wind for it to function effectively.

Also worth noting that in Section 4.6 of the Wind Energy Guidelines it states "Whilst the potential location of a wind energy development will be informed by data on wind speeds and directions, it will be necessary to ensure the feasibility of a particular site before detailed work is undertaken." Why has Umma More Ltd carried out detailed work to the point of applying for planning permission before ensuring the feasibility of the site?

Health

In 5.5.1 of Chapter 5 on Population and human health and in Appendix 5-2 on WIND FARMS & HEALTH LITERATURE REVIEW – CHAPMAN 2015 we see that every effort has been made to convince the reader that wind turbines have no adverse effect on human health. However, on reading we see no references made to people with any disabilities or ASD. According to the Centers for Disease Control and Prevention (CDC), about 1% of the world's population has autism spectrum disorder. Based on the population of 1279 in the Population Study Area in 2016 that is approximately 13 people who have been disregarded and the adverse effects wind turbines may have on them is deemed insignificant. We are aware of seven children in the Population study area who have an ASD diagnosis.

We would hope that you are aware many people on the autism spectrum are vulnerable to change and are sensitive to noise. There is insufficient research to show that the development will not have a detrimental impact on the health and wellbeing of residents with ASD or other disabilities. In the UK, planning authorities have refused permission for wind turbines on the grounds of people living with ASD in the vicinity. On February 17th, 2015 Deputy Regina Doherty asked the Minister for the Environment, Community and Local Government his plans "to issue guidelines to planning authorities to mitigate the impact of wind turbines on those living with autism". [Question](#) The following was given as part of the answer "My Department will continue to liaise with the Department of Health particularly in relation to the findings of any further international peer reviewed research on this subject, including the potential implications for people with autism." It really is unethical that there are still no provisions to do a study on the impact that wind turbines have on those with ASD especially given the anecdotal evidence. Will vulnerable people be forced from their homes? If this application is to get the go ahead it could have a traumatic and life changing impact on susceptible people. We believe that the construction and operation of nine turbines of this size could have severe adverse consequences on some people in our community and these can never be outweighed by the benefits of the scheme.

Confusion over house numbers on maps

We want to bring to An Bord Pleanála's attention some information about maps that has caused some confusion to local residents. On their website <https://ummamoreinfo.com/> there are a number of maps showing various pieces of information that include a number assigned to each house. These maps are dated April 2021(Draft), April 2022 (Draft), May 2022 (draft). Also, there are maps that were presented at public information sessions in July 2022 and August 2022 which are labelled "site layout and dwellings". We received one of these maps by post also. See one such map in Appendix 2. In all these maps our house is H53.

In the planning application the map used in Appendix 2-2 Community Report has different numbers assigned to the houses. See Appendix 3. Our house on this map is H55. We want to make you aware that people may be making observations and for some reason they may be mentioning the number of their home on the map. They were never informed by the Applicant that the number of their house had changed on the map used in the planning application and there is a chance that they did not notice as we did the number assigned to their house on the map in the community report. We wonder why there was a need to change the house numbers? To create confusion for people?

Conclusion

We firmly believe that a wind farm of this size is not in the best interests of the community. It is unwanted by most people. It will destroy the landscape and the visual impact of it will be unbearable. Our quiet environment will be ruined. We will be subjected to shadow flicker in our homes during the days and lights shining around us at night. It could severely impact on the lives of those with live with disabilities including ASD. It will lead to depopulation as people will not want to live here.

This application has been rushed through without proper consultation and it is lacking detail. There is no data on wind speeds. The applicant has overlooked the objectives of the Westmeath County Development Plan. This land is too low, the wind speeds are low. The Applicant has ignored the Wind Energy Guidelines when it suits them. The turbines are located too close to the curtilage of residential dwellings. "Windtake" was not taken into consideration when the layout of the turbines was decided. The impact on the ancient site at Uisneach has been minimised by the Applicant.

The Applicant may not be capable of using proper methods to complete this construction to the highest standards based on some of the work done by them to date. The two met masts erected by them fell to the ground. The leaflet distributed by them in 2019 contained false information. The EIAR contains countless errors.

Industrial wind turbines of 185 metres in height are too big for this small site where there will not be enough wind to make this development successful.

We urge An Bord Pleanála to refuse permission for this application.

Kind Regards,
Gabriel and Mairéad Seery,
Moyvoughley,
Moate,
Co. Westmeath.

Appendix 1

Advertisement

- An information leaflet titled "Renewable Energy Project Wind Information Leaflet" included a frequently asked questions section that listed several questions and answers. Two of the questions featured were:

"Q. Do wind turbines affect health?

A. No, wind energy is one of the cleanest, most environmentally friendly energy sources. This subject area has been studied extensively and all reputable studies concur with the World Health Organisation's finding which states that "there is no reliable evidence to support adverse effects of wind turbines on health".

Q. Do wind farms affect property values?

A. Research carried out in the United States, the UK and Australia has proven there to be no statistical evidence that home values near wind farms are affected in the post-construction or post-announcement/pre-construction periods. To date, over 250,000 property transactions have been studied internationally to reach the above conclusions."

Complaint

- The complainant objected to the advertising leaflet on the following grounds:

Issue 1:

The complainant considered that the question and answer section titled "Do wind turbines affect health" in the Frequently Asked Questions section of the leaflet was misleading and contained false information that was being circulated widely in their community in order to persuade people to support the erection of wind turbines by the advertisers.

The complainant noted the reference to a quotation by the World Health Organisation; however, they were unable to locate the source of the quotation. The complainant noted that the World Health Organisation had stated in 2018 that:

"Further work is required to assess fully the benefits and harms of exposure to environmental noise from wind turbines and to clarify whether the potential benefits associated with reducing exposure to environmental noise for individuals living in the vicinity of wind turbines outweigh the impact on the development of renewable energy policies in the WHO European Region".

The complainant also referred to "Table 42, Summary of the assessment of the strength of the recommendations" from the Recommendations Section regarding wind turbines of the World Health Organisation's Noise Guidelines 2018 (1). The table comprised of two columns, one titled 'Factors influencing the strength of recommendation' and another titled 'Decision' and the complainant highlighted one section from the table - "Additional considerations or uncertainties" who's decision was stated as:

"There are serious issues with noise exposure assessment related to wind turbines".

In view of the above the complainant considered that the statement quoting the World Health Organisation was misleading and could result in adverse effects on health.

Issue 2:

The complainant also objected to the question and answer section titled "Do wind farms affect property values?" on the grounds that the answer listing research from the UK, the US and Australia contained no references to the studies.

The complainant also considered that the answer was misleading as the independent body, the UK Spatial Economics Research Centre, funded by a grant from the Economic and Social Research Council (ESRC), released a paper entitled "Gone with the Wind: Valuing the Visual Impacts of Wind turbines through House Prices" (2) in 2014 which had stated on page 27 that:

"A wind farm with 20+ turbines within 2km reduces prices by some 12% on average, and the implied effect of the visual dis-amenity is around 15%."

The complainant included a further quote from page 27 that stated:

"However, even at 8-14km there is a 4.5% reduction in prices associated with large visible operational wind farms -28 -and the willingness to pay to avoid visibility is 6.5%."

The complainant considered that the circulation of the flyer could have an adverse effect on property values in the community.

Footnotes:

(1) http://www.euro.who.int/_data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf?ua=1

(2) <https://docs.wind-watch.org/Gone-with-wind-SERC-April-2014.pdf>

Response

- The advertisers stated that they had carried out an investigation into the complaint and responded to the issues raised by the complainant as follows:

Issue 1:

The advertisers said that after investigating the matter they noted that the quotation included had been inaccurately attributed to the World Health Organisation. They said that the quotation had been from the Australian Government's National Health and Medical Research Council. Following this they said that they would not be distributing any further leaflets that contained the inaccuracy.

Issue 2:

In response to the complaint regarding the effect of wind farms on property values, the advertisers stated that they did not agree that their statement was misleading. They referred to research from Australia by

Urbis titled "Review of the Impact of Wind Farms on Property Values", July 2016; the UK by Renewable UK titled "The effect of wind farms on house prices", March 2014 and the United States published by Ernest Orlando Lawrence, Berkeley National Laboratory titled "A spatial hedonic analysis of the effects of wind energy facilities on surrounding property values in the United States" Authors: Ben Hoen, Jason P Brown, Thomas Jackson, Ryan Wiser, Mark Thayer and Peter Cappers. The advertisers considered that the studies showed that there was no statistical evidence that homes near windfarms were affected in the post-construction or post-announcement/pre-construction periods and they provided the Executive with links to the studies in question.

Further information:

Issue 1

In carrying out research, the ASAI Executive sourced a position paper by the Health Service Executive titled "Position Paper on Wind Turbines and Public Health" by the HSE Public Health Medicine Environment and Health Group" (3).

The paper sets out issues that have arisen in Ireland re sustainable energy and included in that section is the following statement:

"A number of comprehensive evidence reviews have been conducted in recent years in order to examine the effects of wind farms and wind turbines on human health. While a range of effects have been reported anecdotally, there is no published scientific evidence to support adverse effects of wind turbines on health. However, there is a lack of high-quality evidence investigating possible relationships between wind farms and health outcomes, and further research is required."

In regard to the reference by the complainant to an extract from the World Health Organisation's Noise Guidelines, the ASAI Executive noted that the HSE Position Paper had also included a reference to noise which stated that:

"Noise

There is no direct evidence that exposure to wind farm noise affects physical or mental health. While exposure to environmental noise is associated with health effects, these effects occur at much higher levels of noise than are likely to be perceived by people living in close proximity to wind farms. Infrasound is sound that is lower in frequency than 20 Hz per second, the "normal" limit of human hearing. There is no direct evidence that considered possible effects on health of infrasound or low-frequency noise from wind farms. The World Health Organization states that "There is no reliable evidence that sounds below the hearing threshold produce physiological or psychological effects."

Finally, the ASAI Executive noted the following from The Solution section of the article:

"Further research is required to investigate the effects of wind farms on public health. Large-scale prospective cohort studies would be most informative for identifying potential health effects of exposure to wind turbine noise; further cross-sectional studies are unlikely to contribute meaningfully to the current limited evidence base."

And:

"Overall, scientific evidence of adverse impacts of wind farms on health is weak or absent. However, many studies of wind turbines and health have limitations and it may well be that our understanding of types of noise and types of sleep disturbance is not comprehensive. Anxiety and annoyance in itself, may lead to reduced quality of life and stress related health effects. International experience with uncertainty in environment and health issues such as this advocates a precautionary approach. We therefore welcome efforts to address concerns of local communities through revised national planning guidelines. In light of the uncertainties involved, evidence on what makes risks more acceptable to those most likely to be affected should be considered."

Issue 2:

The ASAI Executive noted

- that the UK study referred to by the advertisers had been published by Renewable UK and was joint research between Renewable UK, the trade body for the wind, wave and tidal industries, and Cebr, the Centre for Economics and Business Research.
- in regard to the Australian study, that the NSW Office of Environment and Heritage (OEH) commissioned Urbis to investigate the potential impact of wind farm developments on property prices in New South Wales, and
- in regard to the United States study, that it had been prepared for the Office of Energy Efficiency and Renewable Energy Wind and Water Power Technologies Office U.S. Department of Energy.

The ASAI Executive also noted that in regard to the study referred to by the complainant, that the Spatial Economics Research Centre was set up to provide a rigorous understanding of the nature, extent, causes and consequences of disparities in economic prosperity, and to identify appropriate policy responses to the disparities.

The ASAI Executive made enquiries with representatives of the property industry to see if any Irish studies existed on the impact of wind farms on property values in Ireland. The Executive were advised that no such studies had been carried out in Ireland, however, the industry's experience was that they were not seeing any evidence that property values were being affected. They noted that some buyers were happy to purchase in an area close to a wind farm while another buyer may not be.

As part of the investigation, the ASAI Executive conducted research, sourcing two research documents: The first titled

"What drives people's opinions of electricity infrastructure?"

Empirical evidence from Ireland by Valentin Bertsch, Marie Hyland and Michael Mahony, published by the ESRI (4).

The study discussed the results and methods of a nationally representative survey carried out in Ireland exploring people's opinions of different electricity generation and transmission technologies. In this study, the authors refer to research carried out in 2012 in Germany that concluded that energy related technologies, including wind power, could negatively impact property values.

The ASAI Executive reviewed the 2012 research document titled:

The Impact of Wind Farms on Property Values: A Geographically Weighted Hedonic Pricing Model by Yasin Sunak and Reinhard Madlener. (5) ,

The ASAI Executive noted that the aim of the study was to investigate the impact of wind farms on the surrounding areas through property values by means of a hedonic pricing model, using both a spatial fixed effects and a geographically weighted regression model.

The study's abstract concluded that:

"Focusing on proximity and visibility effects caused by wind farm sites, we find that proximity, measured by the inverse distance to the nearest wind turbine, indeed causes significant negative impacts on the surrounding property values. Thereby, local statistics reveal varying spatial patterns of the coefficient estimates across and within the city areas and districts. In contrast, no evidence is found for a statistically significant impact of the visibility of the wind farm turbines."

Footnotes:

(3)

<https://www.lenus.ie/bitstream/handle/10147/621467/HSE%20PHMEHG%20Wind%20Final%20PP%20Feb%202017.pdf?sequence=3&isAllowed=y>

(4) <https://www.esri.ie/system/files/media/file-uploads/2018-02/WP545-2.pdf>

(5) https://www.fcn.eonerc.rwth-aachen.de/global/show_document.asp?id=aaaaaaaaagvvtl

Conclusion

- Complaint Upheld.

The Complaints Committee considered the detail of the complaint and the advertisers' response.

Issue 1:

The Committee noted that the frequently asked question section titled "Do wind turbines affect health" had incorrectly attributed a quote to the World Health Organisation. The Committee noted that the attribution of the quote "there is no reliable evidence to support adverse effects of wind turbines on health" to the World Health Organisation was incorrect.

The Committee also noted that, in relation to the complaint issue of the product having any effect on health, the advertising content was definitive and unconditional in conveying that there were no health effects. The Committee noted the research material sourced by the ASAI Executive and in the absence of any evidence to substantiate the claim in the advertising, they considered that the advertising was in breach of Sections 4.1, 4.4, 4.9 and 4.10 of the Code.

Issue 2:

The Committee noted that the advertisement had referred to three studies which demonstrated that the proximity of wind farms had no effect on property prices, although the base in one study was insufficient to

determine effect. They also noted the research referenced by the complainant and sourced by the ASAI Executive which indicated that there could be an effect on property prices, although in one study caution was advised in interpreting the results.

The Committee also noted that none of the research related to the Irish market.

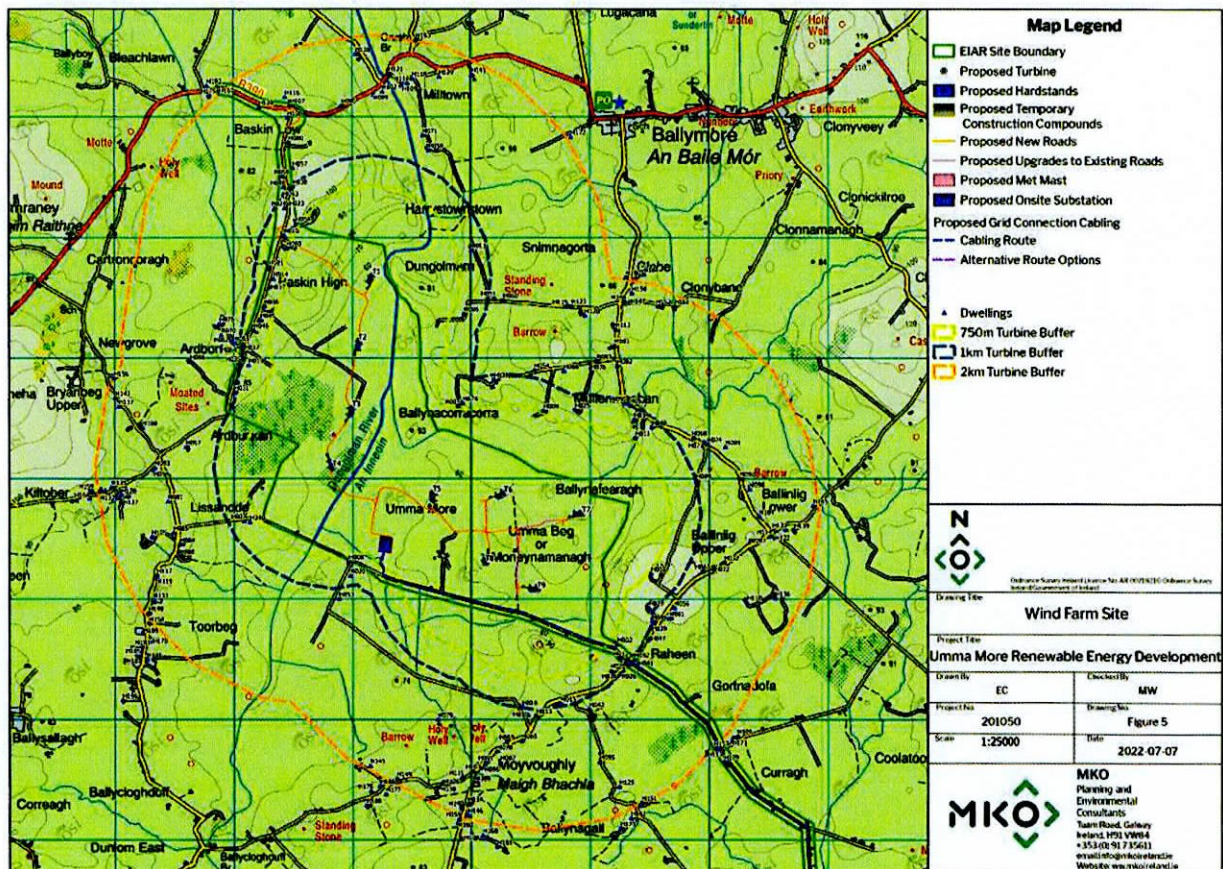
Given that there was conflicting evidence, even though the advertisement had referenced three specific studies, a definite statement that proximity of wind farms did not affect property prices had not been substantiated and was in breach of Sections 4.1, 4.4, 4.9 and 4.10.

ACTION REQUIRED:

The advertisement should not appear in its current form again.

The Committee noted that the advertisers had stated they were no longer distributing leaflets that incorrectly quoted the World Health Organisation.

Appendix 2



Appendix 3

