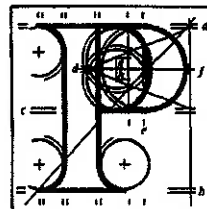


Our Case Number: ABP-316051-23



**An
Bord
Pleanála**

Ingrid and Anthony Dowd
The Rookery
Moyvoughly Moate
Co. Westmeath
N37F780

Date: 08 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

Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maolbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Ingrid & Anthony Dowd
The Rookery
Moyvoughly Moate
Co. Westmeath
N37F780

MTAG Observation re Umma More Wind Farm. Case Ref. 316051

The Secretary,

An Bord Pleanála,

64 Marlborough St, Dublin 1. D01 V902.

1st May 2023.

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

To An Bord Pleanála,

We wish to make observations on the proposal by Umma More Limited to build a wind farm, to be known as the Umma More Renewable Energy Development, in Moyvoughly consisting of 9 turbines at a height of 185 metres, near our home. I would like to draw your attention to the fact that Enerco has been purposefully deceitful, misleading, dishonest and untrustworthy in many aspects of this proposal.

Observation 1

This is an Unsuitable Site

The SEAI Wind Atlas indicates low average wind speeds for the proposed site.

The Dungolman River Plain seems to be an unrealistic location to construct nine 185m wind turbines as it is prone to flooding. I am very concerned about the potential risk of flooding as the proposed site is predominately a low-lying and very flat river plain consisting of the Dungolman and Mullaghmeehan rivers.

The facts are, the maps within this section of the application clearly show that these turbines are situated precariously close to a Flood Zone. Appendix 9-1 Flood Risk Assessment that 'Turbines T2 and T4 are located on the edges of the mapped PFRA flood zones. The proposed site for Turbine 4 is in close proximity to the Dungolman River. It is imperative to note that the flood-related site surveys were carried out in May and June 2021 which does not reflect the annual rainfall in this area.

Flood plains and low-lying lands with low wind speeds are not conducive to a viable Wind Farm. Our questions on this issue are,

Why Umma More, what is the allure to Umma More, a low wind, flat flood plain?

Why was the flood related site survey not carried out November through April when the Dungolman River regularly bursts its banks?

How is it possible that the removal of 6.4 hectares of mature forest is even considered in this application?

Observation 2

No Agreement

We have not agreed to be part of this proposed 185m wind turbine development. Should this development be sanctioned we would be expected to farm, live & work in close proximity to industrial turbines for the duration of our lives. The Applicant has not secured the consent of adjacent landowners for this obtrusion. At least three of the turbines would, if they fell over, land partly on property owned by non-participating landowners.

Observation 3

Protect our Landscape

The Umma Road is a very popular walking route for people living in the area and attracts people from other areas. There is a 6km loop that we and many others walk which is a source of physical and mental well-being, a peaceful and undisturbed area which we value. This walkway would be adversely affected if this proposed industrial sized windfarm is developed. Our views of this beautiful countryside would be completely obstructed.

Please refer to the following Government strategy for guidance.

National Landscape Strategy for Ireland 2015 - 2025 Department of Arts, Heritage and the Gaeltacht
[gov.ie](http://www.gov.ie) - [National Landscape Strategy \(www.gov.ie\)](http://www.gov.ie)

[N Landscape Strategy ENGLISH - inside.indd - 388d4758-50c1-42bd-9adc-0bdf1291765.pdf \(www.gov.ie\)](#)

STRATEGY AIMS 1.1 LANDSCAPE STRATEGY VISION

"Our Vision

Our landscape reflects and embodies our cultural values and our shared natural heritage and contributes to the well-being of our society, environment and economy. We have an obligation to ourselves and to future generations to promote its sustainable protection, management and planning the importance of safeguarding and improving the landscape for the benefit of all. The Strategy recognises the importance of landscape protection and its interconnectivity with biodiversity and climate change green and blue (water) spaces can provide a wide range of environmental benefits including flood water storage, urban cooling, improved air quality and habitats for wildlife as well as contributing to human health and well-being. Conserving and enhancing these networks through appropriate land use and management is critical."

Ireland has also signed and ratified the Council of Europe's European Convention which came into effect on March 1st 2004. The Convention obliges Ireland to implement policy changes and objectives

concerning the protection and management of the landscape. Our landscape in Moyvoughly has a right to that protection as it is a landscape of immeasurable value to the people and wildlife that live here and those that farm and visit the area.

The Applicant has not considered the devastating impact on the visual landscape in relation to the Hill of Uisneach a Prospective UNESCO World Heritage Site. I sincerely hope that An Bord Pleanála recognises the value of this heritage site with regard to tourism. The Hill of Uisneach could create a lot of employment for the midland area.

Observation 4

Our Wildlife

Wind energy developments are the most recent of many pressures on bird communities and their habitats. The negative impact of this proposed development on our bird and wildlife species is significant.

Please refer to the following article;

[The Society for Conservation Biology \(wiley.com\)](https://onlinelibrary.wiley.com/doi/10.1111/cobi.12501)

"Studies of birds in relation to wind energy development have focused on effects of direct mortality, but the importance of indirect effects (e.g., displacement, habitat loss) on avian community diversity and stability is increasingly being recognized. We used a control-impact study in combination with a gradient design to assess the effects of wind farms on upland bird densities and on bird species grouped by habitat association (forest and open-habitat species). We conducted 506-point count surveys at 12 wind-farm and 12 control sites in Ireland during 2 breeding seasons (2012 and 2013). Total bird densities were lower at wind farms than at control sites, and the greatest differences occurred close to turbines. Densities of forest species were significantly lower within 100 m of turbines in particular, reductions in forest cover adjacent to turbines was linked to the observed decrease in densities of forest species. Open-habitat species' densities were lower at wind farms, were negatively related to size of the wind farm."

We have reported, submitted and uploaded hundreds of birds and wildlife to Biodiversity Ireland and Bird Watch Ireland. Red and amber listed Birds of Conservation Concern

2020-2026 are living breeding and nesting within this area. Due to the sensitivity of information and for the protection of our rare birds breeding at this time we are reluctant to disclose any further details. You may contact the above organisations for further information or contact us personally.

Observation 5

Complaint to ASAI

A complaint was submitted to the ASAI Ref. 35165

The complaint was upheld by the ASAI.

Details of the ASAI's investigation can be found at:

<https://www.asai.ie/complaint/household-energy>

Synopsis of complaint submitted:

Consultation with the local community is noted as having begun in April 2021. Enercos project Community Liaison Officer Aidan Stakelum was appointed two years previous and was actively working in the area calling to landowners and homeowners on multiple occasions in relation to this proposed windfarm development. On one occasion in 2019, the Enerco Energy CLO distributed a leaflet to our home and others entitled Renewable Energy Project Wind Information. This fact has not been included by the Applicant among the appendices of the Community Report.

Enerco Energy promoted false claims in these leaflets in relation to the impact of wind turbines on human health and property values. Enerco incorrectly attributed a quote to the World Health Organisation stating, that there was no reliable evidence of adverse health effects caused by wind turbines and also stated that the proximity of wind farms had no effect on property prices, this is incorrect.

With regard to adverse health effects;

There is credible research to support the negative health effects from living in close proximity to a wind farm. Our family, friends and neighbours are very concerned. Research into this area is ongoing. Please refer to the research study below conducted in relation to Infrasound.

[Negative Effect of High-Level Infrasound on Human Myocardial Contractility: In-Vitro Controlled Experiment - PMC \(nih.gov\)](#)

Conclusions:

Exposure to high levels of infrasound (more than 100 dBz) interferes with cardiac muscle contractile ability, as early as one hour after exposure. There are numerous additional studies which support this conclusion. Numerous independent laboratory research from around the globe has been performed, resulting in similar findings supporting this conclusion. The effect of infrasound goes obviously beyond the direct mechanical effect in increasing the cross-bridge breakage and involves a wide range of processes, such as calcium metabolism und mitochondrial integrity. These results should be considered when looking at environmental regulations.

With regard to property prices;

The ASAI found that some of the reports cited were from entities that are part of the wind energy industry. As property owners ourselves we have talked to numerous property valuers and there is a direct link to our property being considerably devalued as a direct result of it being in close proximity to this proposed 185M windfarm.

Observation 6

Unstable Construction

A wind measuring mast was erected, on the proposed wind farm site on 12 March 2021 visible from my home with no consultation with our community or our household. 2 days later on the 14th March 2021 the mast collapsed as a result of poor construction. This unannounced installation and subsequent collapse caused our neighbours and ourselves a considerable amount of stress and anxiety. How can we trust a company to erect 185m industrial wind turbines in proximity to our homes when they are incapable of elevating a wind measuring mast?

This mast was erected in advance of signatures being obtained from many of the participating landowners.

On 10th April 2021 the Wind Measuring Mast was re-erected in the same location. It collapsed once again. The incompetency of the Applicant is evident.

How can the Applicant be trusted when it comes to building and operating industrial wind turbines that are proposed to stand 185m high?

How has the relevant wind data been collected within the required timeframe to support this windfarm proposal?

Observation 7

Untrustworthy

Enerco/MKO Community report undisputedly has copied and pasted their results or observations of the community meeting in relation to Slieveacurry and Umma More. This company shows absolute disrespect and blatant disregard for our concerns and our communities concerns about this proposed 185M wind farm.

The website of Clare County Council contains a copy of the Enerco/MKO Community Report for the proposed Slieveacurry Wind Farm.

Slieveacurry (March 2020) (p. 3) 'Overall, the general reception was good. People were happy with the continued consultation and with the general flow of information. General queries related to turbine heights, noise levels, over-headlines and the potential impacts of construction traffic and

were all satisfactorily addressed there and then. As turbine height had yet to be finalised, residents were informed that this detail would come at a later stage"

Umma More (April 2022) (p. 3) 'Overall, the general reception was good. People were happy with the continued consultation and with the general flow of information. General queries related to turbine heights, noise levels, over-headlines and the potential impacts of construction traffic and were all satisfactorily addressed there and then. As turbine dimensions had yet to be finalised, residents were informed that this detail would come at a later stage"

I attended this meeting and I can categorically say that,

People were not "happy"

General queries were not "satisfactorily addressed there and then"

Purposefully deceitful once again.

We trust that An Bord Pleanala will take all of our observations and concerns into consideration moving forward. If you require any further information to support our observations please contact us via the above postal address or info@anbordpleanala.ie

Yours sincerely,

Ingrid & Anthony Dowd