S. 37

File With _____

SECTION 131 FORM

Appeal NO:_PL 310789 **Defer Re O/H** ☐

TO:SEO

Having considered the contents of the submission dated/ received 31-01-23 from

Adrienne Diamond I recommend that section 131 of the Planning and Development Act, 2000 be/not be invoked at this stage for the following reason(s):. Not circulated pending Board review

E.O.: Lisa Quinn **Date:** 8/2/23

To EO:_____

Section 131 not to be invoked at this stage. ☐

Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.:_____ **Date:**_____

S.A.O:_____ **Date:**_____

M _____

Please prepare BP _____ **- Section 131 notice enclosing a copy of the attached submission**

to: _____

Allow 2/3/4weeks – BP_____

EO: _____ **Date:** _____

AA: _____ **Date:** _____

S. 37

File With _____

CORRESPONDENCE FORM

Appeal No: PL 310789

M Carleton

Please treat correspondence received on 31-01-23 by e-mail **as follows:**

1. Update database with new agent for Applicant/Appellant _____	
2. Acknowledge with BP 20	**1. RETURN TO SENDER with BP** _____
3. Keep copy of Board's Letter ☐	2. Keep Envelope: ☐
	3. Keep Copy of Board's letter ☐

Amendments/Comments
Adrienne response to S.131 response.
Damond.

4. Attach to file	**RETURN TO EO** ☑
(a) R/S ☐ (d) Screening ☐	
(b) GIS Processing ☐ (e) Inspectorate ☐	Lita / Lisa.
(c) Processing ☐	

	Plans Date Stamped ☐
	Date Stamped Filled in ☐
EO: Liz Clerke	**AA:** Cathy Carleton
Date: 01-02-23	**Date:** 03/02/23

Lisa. Lita

Aisling Reilly

From:	Adventure Gently <adventuregently@hotmail.com>
Sent:	Tuesday 31 January 2023 11:24
To:	Appeals2; Lita Clarke
Cc:	Adventure Gently
Subject:	submission:Case Number ABP-310789-21
Attachments:	A G submission ABP. re RFI. 31st Jn 2023 .pdf; 1. Supporting material Alun Evans Open Journal of Social Sciences 2017.pdf; 2.Supporting material Planning report p20:120 28th May 2021 Executive Engineer Environment Department Ursula Corcoran. Leitrim CoCo.pdf

Good Morning,

Please find attached our submission in relation to ABP case number 310789-21.

We have also attached two supporting documents to the submission.

Please could you confirm that you have recieved this email and that have been able to open the attachments.

Kind regards and thanks,

Adrienne Diamond

Adrienne & Graham
ADVENTURE GENTLY
Guided Canoe Tours of North West Waterways, Ireland.
00353 (0) 851 821 547
http://adventuregentlyireland.com
http://facebook.com/AdventureGently

Adrienne Diamond & Graham Robertson
Friendly Farm
Beagh,
Dromahair,
Co Leitrim
F91 KD73, 0851 821547

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902

Case Number ABP-310789-21
Planning Authority Reference Number 20120

31st January 2023

Re: Construction of 8 Wind turbines, electrical substation, partial demolition and alteration of two agricultural buildings and all associated site development works. An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement have been prepared. Bargowla, Boleymaguire, Braudphark, Derreens, Derrybofin, Derrycullinan, Derrycullinan Beg, Drummanacappul, Garvagh, Garvagh Glebe, Glassalt, Lisfuiltaghan, Seltan Sheena and Tinnybeg, County Leitrim.

Dear An Bord Pleanála,

This is our submission in relation to submitted information from MKO on behalf of the Applicant to the Board on 8th December, 2022.

As a family living close to the site of the proposed wind farm development we have a *"direct and vital interest"* in the result of this appeal. We would be directly affected by the wind farm if it were to be built.

We make the following observatons.

AWN Consulting

4.0. Amplitude Modulation (AM)

ref: https://hayesmckenzie.co.uk/news/amplitude-modulation-in-wind-farm-noise

Hayes McKenzie consultants in acoustics. News 18th Jan 2019

Acoustic 'character', such as tonal or impulsive content, is anything that makes noise more noticeable than if it were a bland steady-state noise. Regular or irregular variation in noise is called amplitude modulation (AM) and, for wind turbine noise, this can be a regular variation caused by the rotation of the blades. Not all wind turbines exhibit AM at levels that cause annoyance, but where AM levels are sufficiently high it can cause disturbance to residents around a wind farm site.

What is Amplitude Modulation of Wind Farm (or Wind Turbine) Noise?

Amplitude modulation of wind turbine noise relates to the change in amplitude (loudness) occurring at the blade passing frequency (three times the rotational speed for three-bladed machines). This is commonly described as swish, whoomp, thump, or whoosh.

We have 10 years experience of living and working close to the existing wind farm (Garvagh Glebe wf, Leitrim).

For us the reality of AM is a loud, repetitive thumping noise. To separate AM from the measured audible Db noise is a scientific process and theoretical and does not relate in reality to the noise that the turbines produce or that we hear.

We, (our neighbours) have made an environmental noise complaint re the noise from Garvagh Glebe wind farm. (Leitrim Co Co. currently ongoing.)

We have not complained specifically about AM as it is one and the same thing for us..... we have complained about the polluting environmental noise that we hear in our homes. Please consider our real life experiences of living close to turbines.

We worry about adverse health effects from the existing wind farm, Garvagh Glebe and are very concerned about further health issues arising as a direct result from the proposed development.

REF: 1. Environmental Noise Pollution: Has Public Health Become too Utilitarian. Alun Evans Open. Journal of Social Sciences. 2017. https://file.scirp.org/pdf/JSS_2017051214293370.pdf

The Board must have no scientific doubt that there will be absolutely no adverse effects on our health and wellbeing in relation to any type of noise from the proposed wind farm. If doubt can be established, the wind farm should be refused. Doubt does clearly does exist in the circumstances of this proposed project together with the existing over-saturation of turbines in the area which is quite unprecedented in an Irish context. The precautionary principle must be applied.

We would also like to draw your attention to the applicant's supporting research from Salford University 2007. (page 4) The relevance of 16 year old material is questionable in relation to this modern technology and in the important issue of protecting the health of people.

We completely disagree with the following statement that is drawn from the 2007 research.

'The research has shown that AM is a rare and unlikely occurrence at operational wind farms'

All the turbines that are in our area produce this swish, whoomp, thump or whoosh noise (115 turbines)

Relating to the final paragraph 5.0 Conclusion (page 6)

'The submitted noise impact assessment is robust and has been carried out in line with current standards and best practice guidelines (ie Planning Guidelines for Wind Development 2006 and IOA GPG)'

As the Board noted that the proposed development is located in a low noise environment. We do not consider the submitted noise impact assessment as robust or that 17 year old guidelines are adequate.

Reference: CJEU CASE 24/19 2006 guidelines.
Non-compliance with the requirements of the SEA Directive.

In addition we draw the Board's attention to:

Leitrim County Council's Executive Engineer, Environmental Department, Ursula Corcoran,

The full report is attached to this submission as support material.

REF: 2. Planning report p20/120 28th May 2021. Executive Engineer, Environment Department Ursula Corcoran. Leitrim Co. Co.

ENVIRONMENT DEPARTMENT
(Air, Noise & Water Pollution Control),
Carrick-on-Shannon, Co. Leitrim
Tel: (071) 9620005 Ext 808

PLANNING SECTION
LEITRIM COUNTY COUNCIL
29 MAY 2021
REF. P. 20/120

Sent To:	Planning Reports Only
CC:	Marie Mulligan SEE Environment & Vivienne Egan, Planning
Ref:	**P20/120 Significant Further Information**
Applicant:	**Coillte**
Location:	Townlands of Bargowla, Boleymaguire, Braudphark, Derreens, Derrybofin, Derrycullinan, Derrycullinan Beg, Drummanacappul, Garvagh, Garvagh Glebe, Glassalt, Lisfuiltaghan, Seltan, Sheena and Tinnybeg Co. Leitrim
Date:	**27/05/2021**

I have reviewed the water quality aspects of the significant further information submitted for this planning application and the associated documents.

It is important to highlight that if the 2019 Draft Revised Wind Energy Guidelines (or very similar) are adopted during the planning application process. The applicant will be expected to demonstrate how this application will comply, relative to the proposed operational noise limits given in the EIAR (Table 11-14 refers, Wind Turbine Criteria Curves). Likewise, you will be expected to demonstrate how this application will comply with the zero-limit proposed in the Draft Revised Wind Energy Guidelines regarding shadow flicker.

I have reviewed the significant further information submitted; all aspects of the proposed wind farm development could have a significant impact on water quality and the wider environment, and this development has the potential for a cumulative impact on these receptors due to the cluster of existing proximate wind farms. Such developments create a high risk of increasing the nutrient and suspended solid loading in the downstream receiving waters and receiving environment. This is a major concern for the Environment department and Leitrim County Council is obliged to improve the water quality status of all waters to 'Good' water quality status under the Water Framework Directive

We have serious concerns regarding the effects on ground and surface waters as a result of the interference with the landscape arising from the construction phase and the resulting permanent damage to the hydrology of the area in the future. This will, by itself and in combination with the plethora and over-saturation of wind turbines in the immediate area, have serious consequences for the waters and receiving environment.

Since last writing to the Board in August 2021 we have continued with the plans for our farm. (observation on this Appeal)

The Social Farming enterprise on our farm is doing well, although we still worry about the impact of the existing, Garvagh Glebe wind farm on the wellbeing of the vulnerable adults who visit us on a weekly basis.

Adrienne has started a new enterprise based on our farm.

Open access creative glass studio

The initial building blocks of the studio are:

- Sharing and discovery of skills and knowledge
- environmental awareness and practice
- inspirational place to work and study.

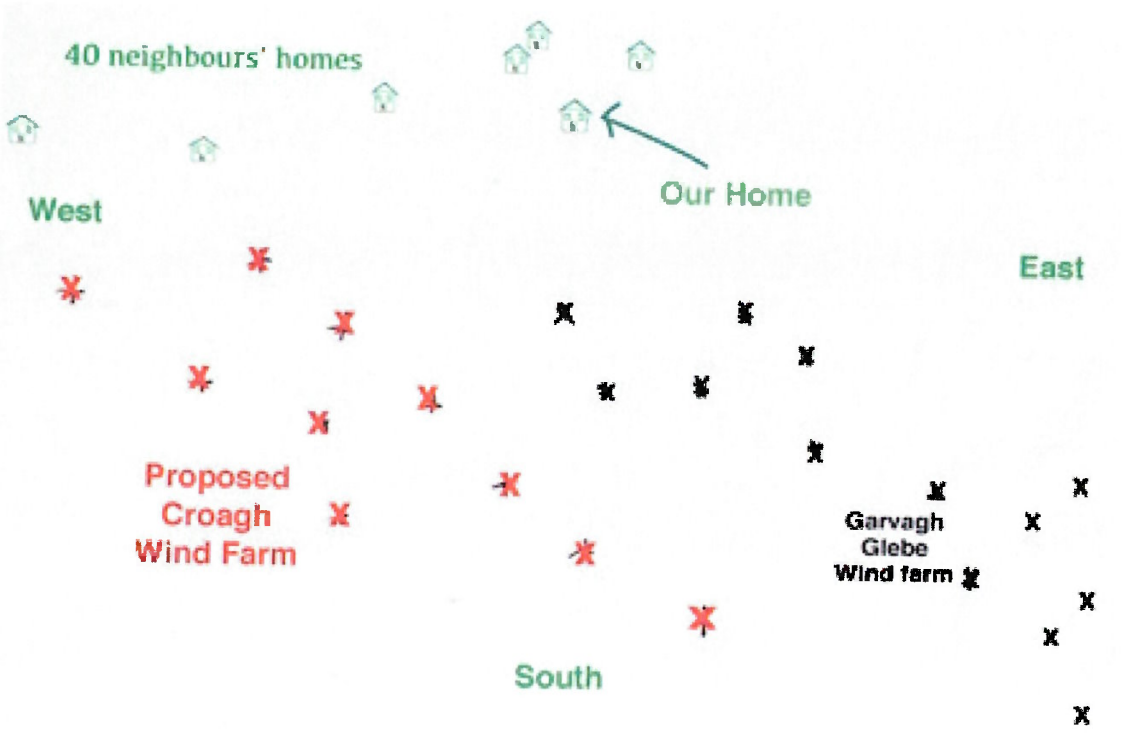
Creative glass workshops led by National / International master glass makers / artists
Studio facilities for rent to glass makers / artists
Community creative Glass making classes provided
Residency opportunities
Exhibition space provided
Green Glass studio space (A. Diamond)

Location:
Inspiration working space and wider environment with excellent cross discipline glass facilities in rural Leitrim.

To further enhance our lives, home, farm and biodiversity we are now in conversion to Organic Farming.

This is our home, place of work, our dream and we do not want to move.

If the proposed development were to go ahead our Social farming and Creative Glass Studio enterprises would be negated.



We ask the Board to consider the other 40 (plus) homes, families, young children, young people, farmers, teachers, health workers all of whom will be affected by this proposed development. Please protect our wellbeing.

We ask the Board to overturn this planning decision by Leitrim County Council.

Yours sincerely,

Adrienne Diamond. Graham Robertson.

Supporting documents:

1. Environmental Noise Pollution: Has Public Health Become too Utilitarian. Alun Evans, Open Journal of Social Sciences. 2017

https://file.scirp.org/pdf/JSS_2017051214293370.pdf

2. Planning report p20/120 28th May 2021. Executive Engineer, Environment Department Ursula Corcoran. Leitrim Co. Co.