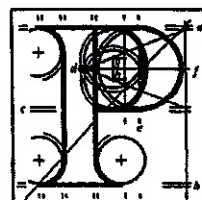


Our Case Number: ABP-309770-21



**An
Bord
Pleanála**

North Westmeath Turbine Action Group Ltd
c/o Jen Gallagher
Clonsure
Castletown-Finea
Castlepollard
Co. Westmeath

Date: 28 February 2023

Re: Proposed development of up to 15 wind turbines with a tip height of up to 175 metres and laying of approximately 26km of underground electricity cabling to facilitate the connection to the national grid, and all associated site development works
Townlands of Camagh, Carlanstown, Coole, Clonrobert, Clonsura, Doon, Monktown, Mullagh, Newcastle and other townlands, Co. Westmeath

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

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 Westmeath County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

PA09

Tell
Glao Áitiúil
Facs
Lálthreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
bord@pleanala.ie

64 Sráid Maolbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Niamh Thornton

From: SIDS
Sent: Friday 24 February 2023 15:56
To: Niamh Thornton
Subject: FW: Observation on FI Coole Wind Farm
Attachments: NWTAG Ltd Observation on FI 23rd Feb23.pdf

From: North Westmeath Turbine Action Group <[REDACTED]>
Sent: Friday 24 February 2023 10:33
To: SIDS <sids@pleanala.ie>
Subject: Observation on FI Coole Wind Farm

Please find attached an Observation on Further Information on case Nos 309770-21 Coole Wind Farm SID.

We submitted an observation previously under the name of North Westmeath Turbine Action Group Ltd so there is no fee to pay.

Please can you send me a receipt as confirmation.

--

Caroline Pilkington
Secretary
North Westmeath Turbine Action Group
Coole
Co Westmeath
Tel: [REDACTED]



North Westmeath Turbine Action Group Ltd
c/o Jen Gallagher
Clonsura,
Castletown-Finea,
Castlepollard,
Co. Westmeath
~~North Westmeath Turbine Action Group Ltd~~

SID Further Information
Planning Dept
An Bord Pleanála
64 Marlborough St
Dublin 1
SENT BY EMAIL TO sids@pleanala.ie

23rd February 2023

Dear Sir

We, the North Westmeath Turbine Action Group Ltd (NWTAG)., wish to make an observation on the Further Information supplied in relation to Case reference: PA25M.309770: Townlands of Camagh, Carlanstown, Coole, Clonrobert, Clonsura, Doon, Monkstown, Mullagh, Newcastle and other townlands, Co. Westmeath.

Proposed development of up to 15 wind turbines with a tip height of up to 175 metres and laying of approximately 26km of underground electricity cabling to facilitate the connection to the national grid, and all associated site development works.

As we have previously submitted and paid for a submission as NWTAG Ltd. on the original Coole Wind Farm SID in April of 2021 we do not need to pay the 50 euro submission fee.

2023 Further Information, Coole Wind Farm

NWTAG wishes to comment on the Further Information provided by Coole Wind Farm in response to a request from An Bord Pleanála.

In these paragraphs in particular, we wish to comment on the 2022 report submitted by the archaeological consultancy, Tobar which was engaged by Coole Wind Farm. This report was prepared in response to NWTAG and other submissions on Planning Appeal No. 300686.

Tobar make much of their standing as qualified, professional archaeologists. In fact they repeatedly quote this standing as underlying their opinion, where their views disagree with those of others. See "Tobar Archaeological Services, Further Information and third party responses raised concerning the proposed Coole WF, County Westmeath", dated 5/09/2022.

Tobar correctly state that "there is no legislative distance or industry standard approach for the assessments of impacts on the setting of cultural setting assets." They conclude that their assessment "is based on professional judgement and experience". On that basis and in response to

concerns raised by NWTAG and others in 2018, their assessment repeatedly finds no adverse impacts. We disagree.

NWTAG expertise

NWTAG is a voluntary community group which is composed of individuals with expertise in several professions, as follows, archaeology, design, history, education, horticulture, agriculture, construction, public service and home-makers.

The professionally qualified archaeologist on our group qualified with a BA from University of Galway (formerly UCG). His professional experience in archaeology can be quickly summarised
Site Supervisor at central Dublin Viking sites on Winetavern Street
Field Archaeologist with An Foras Forbartha, Dublin
Studies for postgraduate degree in archaeology, UCG (now University of Galway)
Curator of the first County Museum in ROI with extensive archaeology collections
He was also the Director of an important licensed archaeological excavation at the Black Pigs Dyke earthwork, County Monaghan. This led to-
Publication of preliminary reports on the dig at the Dyke, in both archaeological journals and local history books, (Emania 1987 and Clogher Record 1991, respectively)

Recent full publication, jointly with a colleague, of the Dyke excavation in "Materialising Power: The archaeology of the Black Pig's Dyke" Published by Wordwell Books, 2022.

The NWTAG archaeologist possesses experience and judgement equal or greater to that of other archaeologists. This experience and judgement cannot be simply set aside by the regular statements from Tobar that their views are "*based on professional judgement and experience*". NWTAG archaeologist possess these qualities also and he disagrees with Tobar's conclusions, on the basis of his professional judgement and experience. In the absence of the legislative distance or industry standard, cited by Tobar, professional opinion will be the deciding factors.

A matter of judgement

We note the regular statements by CWFs archaeological advisors that their "professional judgement and experience" underlies their findings. They find no adverse effect on archaeology and its settings and attribute this finding to their expertise. They correctly point out that "there is no legislative distance or industry standard approach for the assessments of impacts on the setting of cultural setting assets." This being the case, their judgement call is a matter of opinion. NWTAG takes a different view, informed also by "professional judgment and experience" of a qualified archaeologist on its team.

We disagree. NWTAG believes that the proposed turbine farm will degrade the beauty and integrity of an unspoiled largely pastoral landscape of North Westmeath and destroy its potential for community pride and tourism use.

It should be noted that the archaeological consultants acknowledge "a change to the wider setting of national monuments" but that they deem the effect to be slight or not significant. On the basis of our expertise, we disagree with this finding.

Westmeath County Council new policy and plans

The current Council Plan contains covers archaeological heritage and contains very supportive statements which the Wind Farm development will run counter. They state their Archaeology Policy Objectives to include-

"Seek to ensure the protection of archaeological sites and monuments and their settings and archaeological objects that are listed in the Record of Monuments and Places, in the ownership/guardianship of the State, or that are the subject of Preservation Orders or have been registered in the Register of Historic Monuments. Seek to ensure the protection and preservation of archaeological sites, which have been identified subsequent to the publication of the Record of

Monuments and Places

The planning application and appeal covers the townlands of Coole, Monktown, Camagh (Fore by), Doon, Carlanstown, Clonsura, Clonrobert, Mullagh, Boherquill and Joanstown. Within these townlands, at least 9 monuments are awaiting entry in the State's RPM. Because they are not currently entered does not invalidate their importance to archaeology, to heritage or to tourism. The Council Plan acknowledges their importance as quoted above.

World Heritage Site status for Uisneach

The CWF archaeologist looks at impact of the development on World Heritage Sites, National Monuments and Recorded Monuments, (Par 4.1.1) Tobar concluded that the Hill of Uisneach, 28km from the nearest turbine, would not be impacted. We disagree.

They fail to mention that the Hill of Uisneach was placed by UNESCO on Ireland's 'Tentative List' for UNESCO World Heritage Status. This was announced in July 2022. The Tobar report is dated September 2022.

Uisneach is part of a "tentative" list which is composed of 5 major archaeological sites, as follows- Macha in Armagh; Dún Ailinne in The Curragh, Kildare; the Rock of Cashel in Tipperary; and the Hill of Tara in Meath.

That's how important it is and its setting should not be jeopardised by the sight of industrial scale wind turbines, even on the horizon.

The impact of Coole Wind Farm SID on peat harvesting, drainage, birds and wildlife.

The professionally qualified agriculturist in our group works in the agricultural industry, is also a farmer and has a Bachelor of and Masters in Agricultural Science from UCD Dublin.

She was assisted in this section by several members of the group. One member has a keen interest in ornithology, two of the assisting members have a BA Oxon and a MA London: Historic Building and Decorative Arts, two other members are self-employed; one as a builder with over 60 years'

experience in both modern and traditional building methods having renovated many historic buildings and the other in architectural salvage and restoration.

The Integration of existing onsite peat harvesting activities with CWF SID

Coole Wind Farm Response to FI Item No.1.1

In this section Coole Wind Farm outline the various different blade lengths

Coole Wind Farm Response to FI Item No.1.5

2.1.6.2 EPA Licencing

"The licenced peat extraction installation boundaries of Bord na Móna sites as shown on the EPA mapping relative to wind farm location are shown in Figure 2-1"

Figure 2-1 does show the Bord na Móna licenced peat extraction sites but as the proposed wind farm is not outlined on the map it is not showing their location relative to the proposed wind farm site.

Coole Wind Farm Response to FI

2.1.6.3 Future Peat Harvesting

"Should the peat cutting operations permanently cease, any rehabilitation or repurposing of the site will be the subject of ecological assessment, Screening for Appropriate Assessment or full Appropriate Assessment and any such assessment would take account of the potential cumulative effects of any permitted or proposed wind farm."

If rehabilitation of bogs within the turbine boundary were to be considered would the presence of wind turbines and associated drainage required hamper the rehabilitation process and to what extent would it prevent rehabilitation?

In the Natura Impact Statement Table 5-1 Impact Assessment - Whooper Swan states *"The wind farm site is dominated by cutover bog, this is not considered suitable for wintering whooper swan."* The proposed site for T15 is located on and surrounded by grassland which is designated foraging area for geese and swans which will be greatly encouraged in the area by farmers applying for ACRES - the purpose of which is to manage the area to encourage birds to forage there. This change in management of grassland particularly in the area of T15 has the potential to increase the number of swans foraging in close proximity to the proposed turbine increasing risk of collision. Conversely would the presence of a turbine on land managed for swans foraging discourage them from actually foraging there rendering the efforts of the ACRES participant useless?

Coole Wind Farm Response to FI

2.2.2.2.6 Ornithology -Nocturnal Bird Surveys

The following paragraph is quoted from 2.2.2.2.6 Ornithology -Nocturnal Bird Surveys

"It is noted in Appendix 7-2 of the EIAR, that winter vantage point surveys finished/started the hour after/before sunset/sunrise. These surveys were specifically designed to overlap with these previously mentioned periods of low light to ensure that commuting flights of waterbirds including whooper swan and Greenland white-fronted goose would be recorded. This survey approach is in line with best practices and follows the recommendation of SNH (2017). SNH (2017) states in Table 1.3 that vantage point surveys targeting swans and geese should be undertaken "between and including dawn and dusk."

This paragraph is a contradiction. Surveys should be undertaken in between dawn and dusk and not just an hour before and an hour after. It is also noted that Barn owl was not recorded in any of the surveys. This may be due to the limited nocturnal surveys conducted. I have only ever spotted the barn owls resident in the area hours after dusk. I would not have confidence in the methodology applied to this survey. If the barn owl was not spotted, what else was missed by not conducting surveys later into the night?

Whooper Swan

The DAU raised concerns relating to the impact of the proposed development on whooper swan (DAU submission Section 1.3.6). Coole Wind Farm response to this further information noted that *"many of the flights were short and some of these flights are noted to be descending presumably to local foraging grounds. If the wind farm were present in the landscape the swans could continue to follow the river along the western margins of the site without the development acting as a barrier."*

What are the proposals for persuading or informing the swans of the direction they would prefer them to fly in?

Would these short descending flights not increase the likelihood of impact with a turbine?

Will the whooper swans movement between local foraging grounds be effected by the presence of the proposed turbines?

The Band Model used by MKO is identified as (Band et al 2007) The calculations from this standard model should be updated by more recent refinement as detailed by D.Christie and B. Urquhart as published in the New Zealand Journal of Zoology 2015. This refinement extends the Band Collision spreadsheet by allowing for oblique approach angles and wind speeds. Under more representative conditions the true risk for large birds is shown to be substantially greater.

The use of post construction monitoring reports for the three U.K. Wind farms is not a valid comparison for the Coole Windfarm site. The topography for the U.K. Windfarms is flat arable farm land not the topography of North Westmeath with bogland lakes and SPA's. Bird movements and mortalities are unlikely to be the same.

Impact on golden plover an Annex 1 listed species.

According to CWF SID *"The predicted collision risk for golden plover was 34 collisions per year which equates to approximately 1,020 over the lifetime of the operational phase, which is half of the estimated County population of this Annex I listed species"*

However, *"The Department would like to highlight the Westmeath County Development Plan 2021-2027 Natura 2000 sites' policy objective CPO 12.6, "Ensure that any plan or project that could have a significant adverse impact (either by themselves or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 Site or would result in the deterioration of any habitat or any species reliant on that habitat will not be permitted."*

Surely in this instance the development should not be allowed given its potential impact on this annex 1 protected species?

4.1 With regard to the peat depth at T12:

In 2020 MKO used a method of measuring peat depth called 'Rotary Core Borehole' and at T12 it gave a peat depth of 12.5 metres.

In 2022 MWP Engineering used a 'peat probe' method to test peat depths and at T12 gave a depth of 8.7-9.0 metres. A difference of 3-4 metres.

MWP Engineering say this difference is because the Rotary Core Borehole process cannot tell the difference between soft peat and a soft limestone clay found underneath the peat – when two soft substances meet the soft clay feels like soft peat and it becomes mixed up.

If a peat probe is a more accurate form of measuring peat depth then why have CWF not used this method in all turbine locations? There is a difference of almost 4 metres at T12. This is significant.

8.7 – 9.0 metres depth of peat is still very deep. Can CWF SID guarantee that there will not be issues with stability at this depth?

Will the soft clay underlying the peat make the location for T12 even more unstable?

Regarding the stability and angle of the slope:

In 2020 MKO used 'hand held' equipment and 'contour survey plans' giving a slope at T12 of 3 degrees.

In 2022 MWP used LiDAR which they say gives a more accurate reading than the 'methodologies' used in 2020. This gave a slope angle reduced to 1.5 degrees – 50% less than the original.

If the methodologies used to assess depth of peat and the slope of the site in the original CWF SID planning application have proven to be inaccurate to between 30-50% then all of the 15 turbine sites should be revisited to check depths, angles and the base material. Why has CWF SID not done this work?

NWTAG understand that a further report was carried out by Fehily Timoney (FT) using LiDAR to check slope angles on the other turbines and that these were not 'significantly different to those recorded' – where is this data?

Changes in the original turbine specifications

"The following design requirements shall be complied with: a) The hub height shall be within the range of 103.5 metres to 120 metres, and the blade length shall be in the range of 58.5 metres to 75 metres. The overall tip height shall be in the range of 175 metres to 178.5 metres" Page 20

The tip height which was not to exceed 175m in the original planning application has in this application the potential to be raised by 3.5 metres a difference of over 11.6 feet. This is half the height of a dormer bungalow. Why is this variance allowed for in this instance when it would not be allowed in a domestic setting?

Clarification relating to the nature of foundations

The above lack of accurate knowledge of depth of peat is also relevant to the request for further information on '*Clarification relating to the nature of foundations*'. CWF response to this (page 57) is that *"the size of the foundation will be dependent on the design of the wind turbine and thus the turbine manufacturer – which in turn will not be known until it has gone to Tender"*

This is NOT enough information for a planning application of this magnitude. It wouldn't be enough for a residential house let alone an industrial scale wind farm.

Is soft peat and soft clay suitable for pile foundations?

Will a larger amount of peat need to be extracted?

Will larger amounts of concrete and hard core need to be used?

If so then this will have a significant effect on the drainage and knock on effects on the European sites.

Issues with the existing peat harvesting drainage and its effects on the quality of water in European sites.

4.2: Mitigation measures used by peat harvesting operations to prevent water contamination have been very poor to date; silt ponds rise to the same levels as the rivers and streams crossing the site, silt traps are lower than the high water level so water and silt pours over the top or around the sides where the water strength has eroded around the concrete silt trap. Because of this the River Inny, from the Clonsura bog area down to Coolnagun area and out to Lough Derravaragh has a large amount of peat sediment in it that has been taken downstream into Lough Derravaragh.

All the watercourses crossing the proposed Wind Farm site lead into the River Inny which in turn leads down to Lough Derravaragh (SPA) along the edge of Garriskil Bog.

The Revised AASR and Revised NIS lists the following sites as those that are '*within the likely zone of impact*' and are therefore likely to be affected by deterioration in water quality during the construction, operational and decommissioning phase of the development due to the release of pollutants:

Lough Owel SAC & SPA
Lough Ennell SAC & SPA
Lough Derravaragh SPA
Garriskil Bog SPA
Lough Iron SPA

These SPA and SAC sites are very important to the core of the landscape of Westmeath and to the flora, fauna and biodiversity of the area. These European sites should be protected against all odds and should not be subjected to any forms of pollution. To date no INDEPENDENT survey on the amount of pollution present in the waterways, of this area, caused by peat harvesting, has been carried out. This is despite the fact that recently NWTAG have brought a section 160 against CWF, Cavan Peat and Westland Ltd where the drainage, mitigations used to protect the rivers and lakes of the area and water quality were questioned in depth.

If CWF, Cavan Peat and Westland are so confident of the quality of the drainage and its effects on the local watercourses then why have they not commissioned an independent survey? What are they trying to hide?

Taking into consideration the amount of concrete and hardcore that will be poured into the bog to replace the 97,980 cubic metres of peat that will be excavated (see Revised NIS section 5.4.1.3.11 page 90) the amount of excess water will be vastly greater than at present. No matter how many mitigation measures are put in place this quantity of water will find its way into these European sites.

If you were to fill the Aviva Stadium to a height of 12 metres that would be the rough equivalent to the amount of peat extracted. Where is this peat going to go?

4.3 Request to demonstrate sufficient control over the existing drainage systems:

In the revised NIS 5.4.1.1 Mitigation by Design it states: *All major infrastructure such as turbines, substations and site compounds will be over 50m from any main watercourse (identified on EPA watercourse mapper) and 10m from any large drainage channels on the site.*

This is incorrect:

The Crane Pad and Hardstanding area for Turbine 1 is actually built **over** a watercourse.

The sweep of the turbine rotor of Turbine 5 goes over the River Glore. There are no exact measurements for foundations so it is impossible to know how far away the foundations will be from this river.

The Crane Pad Hardstanding area for Turbine 15 is also built **over** a watercourse.

How will these watercourses be dealt with as the design does not mitigate pollution in these cases?

In this same section it refers to *'The second crossing will comprise a new 5m clear-span bridge to provide access to T15'* – it would appear from the drawings that this new bridge will replace a 19th century stone bridge photographed here.

This beautiful stone bridge was built on a Right of Way – is the plan to demolish the stone bridge and all it stands for and to take away an ancient Right of Way?

4.4 HES's response to the request for more detailed information relating to water quality

This request for monitoring just shows a table of parameters that will be monitored with testing of water on the River Inny and River Glore though Visual inspections and 'hand held' probes. It does

not give further information as to what action will be taken should pollution be found in any of the inspections or mitigation in this case. Mitigation is non-existent in this case.

The proposed area for Coole Wind Farm is a bog which by definition is *an area of wet muddy ground that is too soft to support a heavy body* let alone built roads, crane pads and turbines without

Response to 1.6

"Case RLM25.310547 as noted in the FI request relates to a Section 5 Referral, not a planning application as stated. The question asked was 'Whether the harvesting of peat is or is not development or is or is not Response to Further Information Request ABP-309770-21 Coole RFI-F2 - 2022.10.31-200445g SK311022 26 exempted development.' Westmeath County Council made no declaration in respect of the Section 5 request but referred the question to An Bord Pleanála. The conclusion of the Board was that the works comprised the industrial extraction of peat and the works are not exempted development"

The industrial harvesting of peat is not exempted development yet the bogs upon which Coole Wind Farm SID plan to put their proposed industrial wind farm have had peat extracted, milled and sold by a number of companies none of which have either current or even recent planning permission. These ongoing works have been continuing illegally without planning permission for well over a decade. If the illegal extraction had not happened then this would not be cut away bog. An illegal act is facilitating this wind farm. Coole Wind Farm SID are planning on going into business with the peat extractors should they get planning permission for their industrial scale wind farm. This in a time where the EU are encouraging countries such as Ireland to rewet and rehabilitate peatlands such as those in north Westmeath.

Homes affected by Noise and Shadow flicker

Coole Wind Farm SID list the derelict houses when referring to noise and flicker. There is a country wide shortage of homes to live in, we are in the midst of a well-documented housing crisis. Many rural homes are being renovated in north Westmeath. But no one is going to renovate a property located in the middle of a commercial wind farm.

Houses 13 and 14 still have noise above the legal limit.

How do Coole Wind Farm SID plan to fully mitigate against the dust and pollution caused by the construction and operation of this industrial wind farm?

Appendix 7: landscape and visual

The individuals responsible for assessing CWF SIDs response to Landscape and Visuals both have a Bachelor of Design from NCAD and have worked extensively in their respective fields.

In Appendix 7: Landscape and Visual CWF SID have provided further information as requested by ABP. *"As detailed in Section 2.1.2 of the main Further Information Response (FIR) document, the applicant is seeking planning permission for a range of turbine envelope configurations. The applicant has produced new photomontage visuals in order to present this range.....The following*

text discusses the new additions to the photomontage booklet and how the range of turbine envelope configurations relate to potential landscape and visual impacts."

These photomontages are disingenuous and do not reflect the impact these industrial scale turbines would have on the landscape of north Westmeath and further afield if built. The same techniques were used in the original planning application to disguise and diminish the visual impact these industrial turbines would have on the landscape if permitted.

Why have CWF SID continued to use the same techniques on their photomontages to visually reduce the impact these turbines would have on the landscape if permitted?

2.1 Turbine Envelope Range: Photomontage

"The dimensions presented below are the range of hub height, rotor diameter and overall tip height which constitute a 'reasonably limited range' and are included in the Photomontage Booklet – Appendix 7: Turbine Tip Height – Maximum height 175m, Minimum height 175m Hub Height – Maximum height 100.5m, Minimum height 97.5m Rotor Diameter – Maximum length 155m, Minimum length 149m"

There's nothing reasonably limited about the range in turbine diameter. There's a 6m difference in rotor diameter which is over 20 feet. This is significant. How can planning permission be given for three different turbine configurations with this much of a width variation?

This range would not be allowed in a residential or commercial building in urban or rural settings. So why should it be allowed in an industrial scale wind farm?

ABP requested that given the variance in turbine blade diameter and hub height additional wireframe images and photomontages were required in order to somewhat assess the differences in visual impact on the landscape of north Westmeath and beyond. *"It is emphasised"* according to Coole Wind Farm SID *"that irrespective of which turbine model (combination of hub height and rotor diameter) within the range outlined above is installed on site, the significance of residual landscape and visual effects will not be altered"*

Are CWF SID seriously claiming and expecting us to believe that a 20 foot difference in rotor diameter is not significant or are CWF SID claiming that the visual impact of these giant industrial turbines on our local landscape is so destructive anyway that a 20 foot difference in width doesn't matter? It's not clear from this statement.

There were three additional viewpoints added to the photomontage booklet at the request of ABP. "The 3 No. viewpoints selected are representative of short-range views (Viewpoint 07 - 1.26 km from the Proposed Development), medium-range views (Viewpoint 21 - 5.32 km from the Proposed Development) and 3 long-range views (Viewpoints 14 - 16.5 km from the Proposed Development)."

Firstly there are no viewpoints shown for the residences closest to the turbines. Up to 12 residences are located between 740-1,250m from the nearest proposed turbine.

Why have CWF SID chosen not to show wireframe or photomontages of the turbines in proximity to the residences between 740m and 1,250m of the nearest turbines?

Secondly CWF SID claim that "it is extremely difficult to determine any difference that would arise from the use of differing turbine configurations within the range of dimensions proposed. Any difference is only identifiable in the wireframe visuals accompanying the photomontages, and these differences are only really distinguishable with the use of magnification. Irrespective of which turbine model is utilised within the proposed range, the residual landscape and visual impacts reported in the EIAR will not be altered."

Apologies for stating the obvious.

The wireframes and photomontages are reproduced in landscape format hardcopy on A3 paper. A3 paper is roughly 40cm wide by 30cm high. This is to a very small scale in relation to the actual scale of the landscape. The difference in visual impact between a number of photomontages and/or wireframe images of turbines on an A3 page and 175metre high industrial scale turbines on the actual landscape will be enormous. The differences will be clearly distinguishable as they will be greatly magnified. Many hundreds if not thousands of times depending on the image itself. In reality the increased visual impact on the landscape will be altered greatly and will be significant.

How can CWF SID claim that the visual impact will not be altered? This is either an outright lie by CWF SID or they are inept and haven't a clue what they are talking about.

Submissions relating to the visual impacts of CWF SID on the landscape of north Westmeath

"Several 3rd party submissions relate to the technical production of the photomontages and selection of viewpoints used in the Landscape and Visual Impact Assessment (LVIA) in Chapter 12 of the EIAR...An important point to be emphasised, prior to any discussion of the submissions made and before any consideration is given to this discussion, is that the specific critiques made do not, in the professional judgement of the Landscape and Visual Team at MKO, constitute any meaningful or fundamental critique such that a determination of significance in the visual impact assessment would be altered as a result".

If CWF SID is so confident of the accuracy of their photomontages and wireframe visuals why did they have them assessed by MKO, the company paid to create them? Why not have these images assessed by an independent professional landscape and visuals company?

Is it fully accurate to state fundamentally as CWF SID have that "no submissions from the Council or 3rd party individuals disagree with the significance ratings of visual effects in the EIAR"? None of the submissions were included in full in this response or on any relevant website. In the time due for submissions it would be very difficult to look for this information under the Freedom of Information Act. It is therefore almost impossible to verify if this is indeed a fact.

CWF SID claim that "it is important to state that no submissions from the Council or 3rd party individuals disagree with the significance ratings of visual effects in the EIAR. Submissions made by 3rd party individuals are solely based on the technical elements of the photomontages". Again this is very difficult to verify, but even if this statement was completely true the significance ratings of visual effects claimed by CWF SID in the EIAR are simply ludicrous.

How could the visual effect on the landscape of fifteen 155 metre high industrial scale turbines situated on 65-70metre high ground in an attractive, low lying landscape be slight, imperceptible or moderate?

Surely this classification is pure nonsense?

Who created this system of classification? Was it created by an independent body or by the wind farm companies themselves?

It is a contradiction to state that industrial scale turbines which rise to a height of 175m only have a slight, moderate effect on the landscape when CWF SID itself refers to screening to mitigate against the impact they have on the landscape.

If their visual impact is only slight or moderate then why are industrial scale turbines prohibited from areas of outstanding beauty or areas of historical or archaeological significance?

CWF SID claim that *"the photomontages have been produced correctly, selection of viewpoints was appropriate and that the LVIA included in the EIAR was both rigorous and robust."*

Yet there have been no photomontages produced to show the visual effects of the proposed industrial wind farm on the residential homes located closest to the turbines.

There are 158 plates and 22 different viewpoints in the photomontage booklet for CWF SID, these include the original images plus three additional viewpoints and some additional wire frame images as requested by An Bord Pleanála. The distance from the nearest turbine to the viewpoint illustrated in each photomontage varies from .9km to 16.5km.

There are numerous residences that will be located between 750m and 1.55km from the nearest turbine. None of these residences have been included in any of these photomontages.

Why does Coole Wind Farm SID continue to avoid creating photomontages of the homes most affected by the imposition of these giant industrial wind turbines?

CWF SID have almost unlimited resources and it would be simple for them to create photomontages of each and every home within ten times the tip height of the nearest turbine.

Why do CWF SID continue to avoid engaging with the residents of these homes in any real and meaningful way about the genuine anxieties they have in relation to the visual effects of these turbines and depreciation of their homes and property?

If CWF SID had actually engaged with the local community in a real and meaningful way then they could have easily sought permission for photos to be taken from the viewpoints of the homes closest to the turbines, rather than at a distance from the opposite side of the road. Why have they refused to do this?

One residence alone in Coole Village has been taken with the house in the mid to foreground this is in photomontage no 17. This is only because in this one case and from this specific angle alone the house which is 2.3km from the nearest turbine blocks the view of the turbines from the road due to

the topography of the land. Had the original photo been taken from the back garden of this home then a good percentage of the turbines would have been in full view.

Every other residence and building has been photographed in the mid ground or in the background and from the road, in most cases at a significant distance from the visual receptors adding hundreds of metres to the distance the turbines are being viewed from.

No photograph has been taken from the view that the people living in these homes would see each and every day from their windows and gardens. Residents not be simply driving past these giant industrial turbines if permitted; we will be living with them. This is not best practice; in fact it is exceptionally poor practice. Why should we as residents of this area be subjected to the views of these giant industrial turbines for the remainder of our lives simply to ensure increased profits for international corporations more interested in money than the environment or the people living in the areas subjected to these giant industrial wind farms?

Page 7

Perspective, proportion and scale in photomontage and wireframe images.

"Several submissions address the scale of the proposed turbines within the photomontages in relation to local landscape features...The photomontages presented in the EIAR are verified photomontages. They have been modelled and scaled and presented correctly."

NWTAG contend that the photomontages produced by MKO for CWF SID are misleading and inaccurate and that MKO have used a variety of techniques to minimise the visual impact fifteen 175m high industrial turbines would have on the landscape if permitted. The techniques used in the original images are the same ones used in the additional photomontage and wireframe images. It is possible to do this in images however in reality these turbines will if permitted destroy the landscape of north Westmeath.

If the visual impact of fifteen 175 m high industrial turbines on the softly undulating landscape of north Westmeath wasn't such a serious topic the highly patronising quotation below from the EIAR on the effects of distance on the visible impact of an object would be laughable.

"the visibility of the turbines will decrease with the distance from which they are viewed... all turbines are modelled to the same size specification, but with distance they appear smaller."

In all honestly do CWF SID and MKO believe that the residents of north Westmeath do not understand that people, objects and the landscape appear smaller in the distance?

It puts us in mind of the scene in Father Ted where Ted is desperately trying to explain perspective and proportion with the use of a small plastic cow and a view out a window.

Father Ted: *"OK one last time. These are small...but the ones out there are far away. Small...far away"*.

The people of north Westmeath understand about scale, proportion and perspective. Additionally there are two members of the group with a Bachelor of Design (Hons) from NCAD. Both of whom have extensive experience in their respective fields and have a professional understanding of

proportion, atmospheric and physical perspective and how these can be applied and manipulated in onscreen and hardcopy images.

In their professional opinion the photomontages and wireframes images are deliberately misleading and inaccurate do not accurately represent the visual impact fifteen 175m high industrial scale turbines will have on the rural landscape of north Westmeath and beyond if permitted.

Yours Faithfully,

Jen Gallagher
Chairperson NWTAG

Caroline Pilkington
Secretary NWTAG