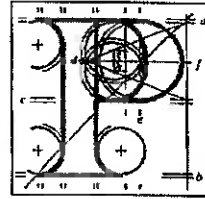


Our Case Number: ABP-309770-21



An
Bord
Pleanála

Caroline and Patrick Pilkington and Others
Simonstown House
Coole
Co. Westmeath

Date: 23 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 recent 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 with regard to the 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

PA04

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

Niamh Thornton

From: SIDS
Sent: Friday 17 February 2023 14:29
To: Niamh Thornton
Subject: FW: Further Information Observation
Attachments: Observation on FI Caroline & Patrick Pilkington & others.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

From: Caroline Pilkington <patpilkington@gmail.com>
Sent: Friday 17 February 2023 12:42
To: SIDS <sids@pleanala.ie>
Subject: Further Information Observation

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 Caroline and Patrick Pilkington & Others so there is no fee to pay.

Please can you send me a receipt as confirmation.

Best wishes

Caroline Pilkington

--
Caroline Pilkington
Simonstown Architectural
Coole
Co Westmeath

~~Simonstown Architectural~~

~~Simonstown Architectural~~

SIMONSTOWN HOUSE, COOLE, CO WESTMEATH

Tel: [REDACTED]

Email: [REDACTED]

SID Further Information

Planning Dept

17 February 2023

An Bord Pleanála

64 Marlborough St

Dublin 1

SENT BY EMAIL TO sids@pleanala.ie

Dear Sir

We, Caroline and Patrick Pilkington, Simonstown House, Coole,
Brenda and Gabriel Glynn, Simonstown, Coole,
Brian and Winna MacGowan, Ballinaloe, Coole
Martin and Ann Craig, Simonstown, Coole
Sharon and Ian O'Keeffe, Simonstown, Coole
Sean and Fiona Butler, Simonstown, Coole
Joan Gunning, Lower Coole
Anna Baggallay, Kiltoom, Castlepollard

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.**

We wish to make a point on access to the Further Information. The files of FI were available to view online on Coole Wind Farm SID's own website and hard copies were available to view in Westmeath Coco and An Bord Pleanála's offices. However, ABP requested further information on a number of points raised in the Dept Housing, Local Government and Heritage's observation made in April 2021. This observation was not included with the hard copies. On five occasions I telephoned ABP and was put through to 'Public Access' to see how we could see a copy of this or to make an appointment to come and see it at ABPs offices. All my phone calls to 'Public Access' went to their answer

phone, I left messages but never received a call back, making it extremely difficult to get access to this observation which has not been seen by this party.

POINTS RELATING TO FURTHER INFORMATION:

In a number of the points of FI it refers to the 'existing permitted windfarm' of 13 turbines on the site of the proposed wind farm of 15 turbines. This permission is still in the High Court awaiting a decision and did not include the 26 kms of grid connection – it is irrelevant to this SID application.

The FI on the actual size, make and model of the 15 turbines is no clearer to the original, we are told it will be put to tender and the manufacturer who is the winner of the tender will dictate the ACTUAL size of the turbines and the size and design of the foundations. These vague dimensions leave many questions relating to the effects of the turbines in construction where foundations are very close to waterways and thus the effects on the European sites downstream.

Despite further bird surveys in the FI as requested there is not enough information given to bird migratory routes or to nocturnal flight patterns as there are no night time screening results.

It must also be pointed out that with regard to Whooper Swans. 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." How do the whooper swans know the direction they would prefer them to fly in? Would these short descending flights not increase the likelihood of impact with a turbine?

CWF have ignored the recent changes to the bog since peat harvesting has stopped. Wet areas have undergone a growth of shrub and ground cover that the Whooper swans are now using as foraging grounds meaning that movement between local foraging grounds will be affected by the presence of the proposed turbines.

With regard to point 4.1 and 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 4 metres.

MWP 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.

In response we say

- i) surely a 'peat probe' should be used as a more accurate measure on all Turbine locations
- ii) 4 metres is a big difference
- iii) Presumably a depth of 8.7 – 9.0 metres is still very deep peat with a stability issue
- iv) If there is soft peat on 'soft clay' it would seem to make the location even more unstable – is this the same with all the turbines?

With regard to 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 these methodologies of 'rotary core borehole' and 'hand held' equipment have been used throughout the site and accuracy on angles and depths are 30-50% inaccurate we would say that ALL turbine sites should be revisited to check depths, angles and the base material. We 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?

Point 4.2 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. It may be that the soft peat and soft lower level of clay is not suitable for pile foundations meaning that larger amounts of peat will need to be extracted and larger amounts of concrete and hardcore used. All this will have a significant effect on the drainage and knock on effects on the European sites.

4.2: Mitigation measures used by peat harvesting operations have been non-existent, 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 of the silt trap or around the sides where the water strength has eroded

around the concrete. 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. In short at present there are no mitigating measures to protect European Sites.

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 – maybe because it would be a disturbing result?

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 polluted 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 will this peat be going?

Point 4.3 Requests 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.* We would like to point out that on Turbine 1 the Crane Pad and Hardstanding area is actually built over a

watercourse, Turbine 5 the sweep of the turbine rotor goes over the River Glore and the foundation area is only 40metres from the river (but as there is no exact measurements for foundations it could be closer) and for Turbine 15 the Crane Pad Hardstanding area 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:



Presumably this beautiful stone bridge was built for 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?

In point 4.4 HES's response to the request for more detailed information relating to water quality monitoring just shows a table of parameters that will be monitored with testing of water on the River Inny and River Glore through 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 measures in this case.

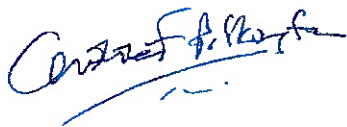
In Conclusion the proposed area for Coole Wind Farm is a bog which by definition is:

an area of wet muddy ground that is too soft to support a heavy body

Let alone built roads, crane pads and turbines without impacting on the drainage of the area and thus the pollution of all downstream waterways.

The Further Information Site Notices were only placed at 6 junctions on the 26 kilometre long grid connection. As the grid connection is included in the site boundary, Notices should be placed at every junction of the site and a public road. This is certainly not the case.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Caroline Pilkington', with a horizontal line drawn underneath.

Caroline Pilkington

A handwritten signature in blue ink, appearing to read 'Patrick Pilkington', with a horizontal line drawn underneath.

Patrick Pilkington