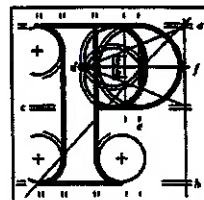


Our Case Number: ABP-309770-21



**An
Bord
Pleanála**

Jennifer and Gavin Gallagher
Clonsura
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	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: Monday 27 February 2023 10:33
To: Niamh Thornton
Subject: FW: Coole Wind Farm
Attachments: Jen and Gavin CWF SID 2023 further i.docx

From: jen gallagher <jgallagher@hotmail.com>
Sent: Friday 24 February 2023 16:56
To: SIDS <sids@pleanala.ie>
Subject: Coole Wind Farm

Jennifer and Gavin Gallagher

Clonsura,

Castletown-Finea,

Castlepollard,

Co. Westmeath.

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To sids@pleanala.ie

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 Jennifer and Gavin Gallagher so there is no fee to pay.

Please can you send me a receipt as confirmation.

We, Gavin and Jennifer Gallagher request that the planning application be refused for the following reasons.

APPENDIX 7

LANDSCAPE AND VISUAL

Item 1 of the Request for Further Information requests clarification on the range of turbine envelope configurations sought for planning permission. 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.

For consistency and context, these new photomontage visuals are incorporated as additions to the Volume 2 Photomontage Booklet that was previously submitted as part of the EIAR (ABP Ref No. 309770-21).

The new photomontage booklet is included as Appendix-7 of this FIR. 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.

RESPONSE

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The photomontages referenced in Appendix 7 are we believe deliberately designed to minimise and obscure the visual impact an industrial wind turbine 175 metres in height has on the landscape using a variety of techniques that are applied in software packages such as Photoshop. This may include adjusting and desaturating colours and applying filters that along with airbrushing etc can make a significant difference in the way we view the printed image.

This type of image manipulation is made all the easier when the original image being worked on has been taken in a way that already softens their impact. For example, a photograph taken of a wind turbine against a background sky similar in colour to the proposed turbine greatly minimises the visual impact these industrial turbines would have on the landscape because of what might be described as a "blending effect".

Similarly, the angle and viewpoint from where a photo is taken of a large object can greatly lessen or enhance their scale and impact on the surrounding landscape.

QUESTIONS FOR FURTHER CLARITY

- 1. Why have CWF SID continued to use the same techniques in their photomontages to visually reduce the impact these turbines would have on the North Westmeath landscape in and around Coole, not least how their height would dominate a mostly flat undulating landscape where even on cloudy days you can see for miles in most directions, as they have done in their previous submissions?**
- 2. Why, if CWF SID are serious about providing a more authentic representation of how these turbines will impact the local landscape, do they not provide more realistic modelling examples of how they would look during, for example different weather and atmospheric conditions?**

- 3. If the above assertions regarding photo manipulation are incorrect, can CWF CID produce evidence to show this such as producing for An Bord Pleana the digital photos in their raw format which should include time stamps showing when the photos were taken in their unaltered state?**

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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.¹

RESPONSE

- 4. There is nothing “reasonably limited” about the range as claimed above. The facts are there is a 6m difference in rotor diameter which is over 20 feet. This is a significant increase in the size of the turbine so how is it that planning permission can be permitted for three different turbine configurations with this much of a width variation?**
- 5. Why would such latitude be given to an industrial wind farm development and how does this compare to revised planning applications with similar size increase for structures such as houses etc?**

The above point emphasises a blaise approach to CWF's planning application that's scale makes it difficult to comprehend to even the most visual of people. Adding 6 meters to giant metal blades that are already 149 metres in diameter might seem insignificant to the developers of the proposed wind farm which is perhaps understandable considering the overall scale of the turbines.

- 6. The above point begs the question would such a range difference be allowed in a residential or commercial building in either an urban or rural settings and if not why should they be deemed acceptable for a windfarm**
-

application that if permitted will have some of the biggest industrial structures in the country?

Maximum Rotor Diameter and Minimum Hub Height - Presented for All 22 No.

Viewpoints in the Appendix 7 - Photomontage Booklet (and was presented in Volume 2 of the EIAR). • Maximum Tip Height - 175 metres • Minimum Hub Height - 97.5 metres • Maximum Rotor Diameter - 155 metres It is emphasised 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. Page | 4

- 7. In the above statement, it should be again highlighted that the CWF SID seems to be claiming a 20-foot difference in rotor diameter is not significant or that the scale of these giant industrial turbines is already so massive that an additional 20-foot difference would matter little in terms of its impact on the environment. Can they confirm if this is the case?**
- 8. Will CWF state more precisely, and in clearer language, that our interpretation of what they are claiming is either correct or incorrect what exactly do they mean?**

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 FI LVIA Response FI LVIA Response Appendix 6 - FI LVIA Response - 2022.10.26 - F -200445-g 3 long-range views (Viewpoints 14 - 16.5 km from the Proposed Development).

RESPONSE

The above statement which refers to selected viewpoints "are representative of short-range views (Viewpoint 07-1.26) is subjective and yet another example of CWF attempting to minimise the impact their proposed industrial wind farm would have on people living in the locality where it is to be sited.

- 9. If CWF were genuinely attempting to address the concerns and fears of people most effected by these giant turbines why does their submission**

not include viewpoints shown for the residences closest to the turbines one of which is my home which is located 760m from the nearest turbine?

10. Why have CWF SID chosen not to show wireframe or photomontages of the turbines in proximity to the residences within 1.55km of the nearest turbines?

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In the illustration below using the exact scale drawings include in CWF's submission we have attempted to illustrate the approximate size and distance the nearest of these turbines would be to our home in Clonsura. Whilst we acknowledge the image does not take into account geographical landscape features that whilst relatively flat would mitigate some of the impact of these turbines it is self-evident that their scale combined with noise and shadow flicker will have a seriously detrimental impact on our lives and those of other residents who will be forced to even closer proximity to these turbines.

11. An equally important point is that if we can produce such a visual representation despite lacking the resources, time and expertise of CWF why, if they are indeed serious about addressing the concerns we and others have, do they not use their nearly limitless resources to provide a proper visual representation of how their 175 metre turbines will likely impact on the people unfortunate forced to live in close proximity to the proposed industrial wind farm?

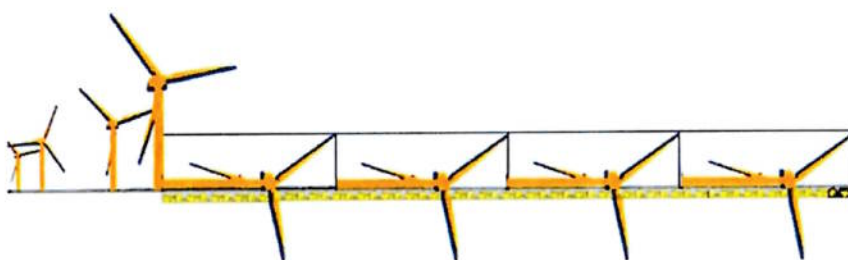


Fig.1 is a scale drawing estimating the size of the proposed turbines in comparison to our home based on the minimum 1/4 setback distance which for 175m turbines equates to 700 metres from tip height to tip height. Our home in Clonsura is located approximately 760m from the nearest turbine. The above illustration gives some idea of the scale of the turbines in relation to the height of our home based on its approximate size of 25m x 7m. It should be noted that the size of the turbines are based on CWF's scale modelling but the turbines may be even higher as it is unclear on their drawings where the base of the turbines end.

Fig.2 is a larger scale drawing of the size of the proposed turbines if they were sited beside our home, which would be 23 times its height. We estimate that 700 metres would approximately equate to 28 times the length of our home.



SWD 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."²

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RESPONSE

12. How can CWF SID claim in any meaningful way that the visual impact or the landscape will not be altered by 175 metres? This is either wishful thinking or baseless claims that ultimately mean nothing.

Submissions

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. The following section comprises a comprehensive response to these 3rd party critiques, demonstrating 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. However, it is noted that all of the points made below and any critiques made are in the first instance, immaterial to the determination of residual visual effects. It is submitted that even if all of the submissions were valid then this would not have any material impact on the determination of the significance of visual effects conducted. 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. 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.³

RESPONSE

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- 13. 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? Surely in the interests of accountability and transparency, why did they not the images in their submission assessed by an independent professional landscape and visuals company who have no vested interest in the proposed wind farm development?**
- 14. How accurate is CWF's statement that "no submissions from the Council or 3rd party individuals disagree with the significance ratings of visual effects in the EIAR"? What efforts have they made to come to a conclusion that in our opinion is both subjective and self-serving?**

Moreover, it is the case that none of the public submissions were included in full in this response or on any relevant website and in the time frame to submit submissions it would be very difficult to look for this information under, for example, The Freedom of Information Act.

- 15. The significance ratings of visual effects in the EIAR are simply ludicrous. How could the visual effect on the landscape of fifteen 175metre high industrial turbines situated on 65-70metre high ground in an attractive, low-lying landscape be "slight? imperceptible or moderate?"**

Like much of CWFs submission, they are using a biased supposition to justify and minimise the impact how 15 175 metre industrial turbines would have on a mainly flat, undulating landscape.

- 16. Moreover, the above point begs the question of who or how this "system" was created to justify a system of classification that is presented as factual?**
-

- 17. Was it created by an independent body or by the wind farm companies themselves?**
- 18. Why also if 175-meter turbines have only a “slight imperceptible or moderate?” impact on the landscape does CWF in other parts of their submission seemingly make a virtue out of “screening” these industrial turbines to minimise their impact on other locations? In our opinion, the CWF SID provides a very succinct response when it refers to “screening to block the views” of their own turbines.**
- 19. If industrial turbines have such a minimal impact on the landscape, why are they prohibited from areas of outstanding beauty or areas of historical or archaeological significance? The former is a particularly pertinent point as most areas of outstanding areas or outstanding natural beauty are mountainous and high above sea level where the mean wind speeds are much higher meaning the turbines would not have to be built anywhere as high as what is proposed for Coole and other parts of the Midlands.**
- 20. To cite one further example, before he became US President Donal Trump wrote to the then Minister for Tourism Leo Varadkar to say that a much smaller windfarm sited a considerable distance to his Doonbeg Golfcourse in Claire persuaded the present Taoiseach to directly intervened to stop the development because of the visual impact. This shows that industrial turbines, even ones a good deal smaller than the ones proposed by CWF have a significant impact on the landscape and how does CWF respond to this?**

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The following section comprises a comprehensive response to these 3rd party critiques, demonstrating 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.⁴

RESPONSE

We fundamentally disagree with the above statement not least because no photomontages produced by CWF show the visual effects of the proposed industrial wind farm on the residential homes located closest to the turbines, including our own home.

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This despite the fact that 158 plates and 22 different viewpoints have been photomontage in CWF's SIDs that constitutes additional significant information Appendix 7-Photomontage Booklet as requested by An Bord Pleanála. The distance from the nearest turbine to the viewpoint illustrated in each photomontage varies from 0.9km to 16.5km.

21. The facts are that there are a significant number 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 nor to our knowledge was any effort made include them. Why have they been excluded in the photomontages submitted in CWF's SID is so "comprehensive"?

22. 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 and whose occupant's health and general well-being will likely suffer the most from their presence if allowed?

23. 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?

24. Why do CWF continue to answer in a transparent and open manner the genuine and considered concerns and opinions contained in many third party "critiques" particularly if they are so open to working with the communities who are expected to live beside turbines that's size dwarfs the Dublin Spire on O'Connell Street, the highest structure in Dublin?

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. By doing so they would at least show that they are somewhat serious in attempting to allay the fears of local people including ourselves.

- 25. 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?**
- 26. To expand further on the above point, we and a number of our neighbours are willing to allow CWF SID access to our property, free of charge and at their earliest convenience, to take professional photos and measurements to create accurate photomontages and visualisations of how these turbines will impact on people living closest to the proposed industrial wind farm. This can be easily and quickly arranged and is this proposal something CWF will consider and provide a response too?**
- 27. By doing the above, CWF SID would at least participate in some genuine engagement with the people who if their development proceeds will be most affected by the presence of their industrial Wind Farm. We would also point out that such meaningful engagement is part of the albeit wholly inadequate legislation that is supposed to protect people from the worst affect industrial wind farms. Availing of the opportunity to create photomontages as suggest above which will go some way to providing a more accurate representation of how these turbines will impact on the homes located closest to the proposed industrial wind farm. Conversely if CWF refuse to proceed with this suggestion they are yet showing yet again that they have been playing lip service to engaging and consulting in a meaningful way with host communities whose health, general wellbeing, the devaluation of their property etc are both expendable and collateral**

damage in the drive to industrial the landscape of the Midlands. What is their response to this

In stating the above we have little confidence that CWF will avail of the offer of trying to properly assessing the impact of their development on the homes closet to the proposed Coole Windfarm. When we first expressed concerns about the proximity of the proposed turbines to our home and the visual and landscape effects of these giant turbines on our property located at Eircode N91 F201 and the local landscape in general we were told by one CWF employee "if you don't like the look of them, don't look at them". He thought this was quite funny. His crass remark was not only unfunny, it pointed to how our future concerns would be dismissed and ridiculed.

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ADDITIONAL POINTS

In CWF photomontages there is a single photo of a house in Coole Village the location of which is in the mid foreground⁵. The reason for this photo's inclusion is that the specific angle from where the house has been photographed, 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.

28. The above is just another example of the "slight of hand" CWF have applied to their supposed comprehensive photo modelling and how do they respond to this specific point?

29. To further reinforce the above point, every other residence and building in the images presented by CWF 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. Why have they done this?

30. Moreover, no photograph has been taken from the view that the people living in these homes would when looking out their windows or standing in their gardens. If permitted, we will not be simply driving past these giant

⁵ Photomontage 17

industrial turbines but living with them for the foreseeable future. Why should we as residents of a isolated rural area, devoid of essential services such as reliable broadband, mobile phone coverage, public transport, sustainable employment be further subjected to having to view 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?

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It is ridiculous to suggest that turbines of these sizes which are the largest proposed for Ireland will only have a slight, imperceptible or moderate effect on the landscape and/or visual receptors. The fact of the matter is, that most of the Midlands is deemed suitable because it is expendable and by extension the host community can put up and shut up with turbines that need significant State subsidises to remain remotely viable and when their usage ends will likely be left to rot in the landscape.

If Coole windfarm is allowed to proceed how does CWF respond to the following:

- 31. Will home owners be compensated for the significant devaluation of our homes;**
- 32. Will they pay for the medical bills and other health related issues caused by giant turbines such as shadow flicker and noise pollution.**
- 33. How will they assist communities live with the challenge of being forced to reside in an industrialised landscape where the chance of developing heritage based tourism will be lost forever;**
- 34. Do they believe that scarring the landscape with 175 metre turbines will incentivise people like ourselves to live their lives in places such as North Westmeath;**
- 35. Will the successful rewetting of bogs that have occurred in other parts of the country and quickly establish natural wildlife habits, undo the impact of industrial peat milling and create carbon sinks that enhance the landscape be consigned to the dustbin in places where these industrial turbines are located. Indeed it is somewhat serendipitous that at the time**

of drafting this submission a report was published that highlighted the successful rewetting of the bogs and the creation of carbon sinks in places like had proven greatly successful. What is CWFs response to this as surely North Westmeath with its many bogs and lakes is ideally suited to benefit from such schemes?

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CONCLUSION

In our view there are far more cost effective, environmentally stable and permanent ways of reducing Irelands carbon footprint than the creation of giant industrial wind turbines which in the long term will themselves be reduced to rubbish which may remain in situ for generations.

Encouraging the regeneration of flora and fauna combining the unique beauty of the midlands and its rich heritage and history if promoted properly could make it greatly expand its tourist and in the process creating sustainable employment and enhancing the quality of life for people living here.

It is beyond the scope of this submission to go into many of the other problems that building an industrial windfarm in Coole will cause but they are worth referencing. For example, the planned Borrow Pit for quarrying the hard core needed for the construction of the turbine bases will result in an excavation estimated to be ten times bigger than Croke Park. During the construction phase this will have a significant impact on the lives of local people and will likely leave a massive scar on the landscape.

36. The reason turbines that the proposed turbines are to rise to a minimum height of 175m high is that they are being sited in a county with the second lowest mean wind speeds in the county. If we are wrong in that assertion then maybe CWF can enlighten us as to why they need to be this size?

37. Why is north Westmeath considered such an appropriate place to site industrial windfarms when it has some of the flattest topography in the country and as already stated the second lowest mean wind speeds in Ireland?

Maybe there are viable reasons for doing the above which CWF can explain in clear concise language. In our opinion however, constructing an industrial windfarm in Coole is the equivalent of putting a hydroelectric station in the arid landscape of the Sahara desert. The primary reason why these monstrous turbines are being located in places like Coole is because the landscape is deemed expendable and by extension the communities that live there.

PAGE 7 PERSPECTIVE (FINAL THOUGHTS AND VIEW)

"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." P7

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, greatly and adversely impact 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".

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The people of north Westmeath understand about scale, proportion and perspective. Additionally, we both have Bachelor of Design (Hons) from NCAD. Both of us 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 our 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.

As if this is not bad enough, they resort to patronising the people who have concerns about this in a way that would not be out of place in a comedy like Father Ted. What is most disconcerting about this approach, if this is what we can expect at the consultation stage of this process then how will we expect to be treated if work is permitted on the construction of this unwanted and unneeded windfarm at Coole?

Yours

Gavin and Jennifer Gallagher

24th Feb 2023