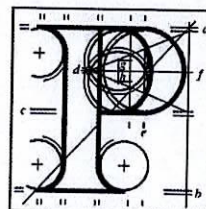


Our Case Number: ABP-309770-21

Planning Authority Reference Number:



**An
Bord
Pleanála**

Anthony and Catherine McGuire
Waterlane
Castlepollard
Co. Westmeath

Date: 19 May 2021

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 observation or submission in relation to the case mentioned above and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the Local Authority and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at www.pleanala.ie and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,


Eimear Reilly

Administrative Assistant
Direct Line: 01-8737184

BL50A

Tell
Glaos Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

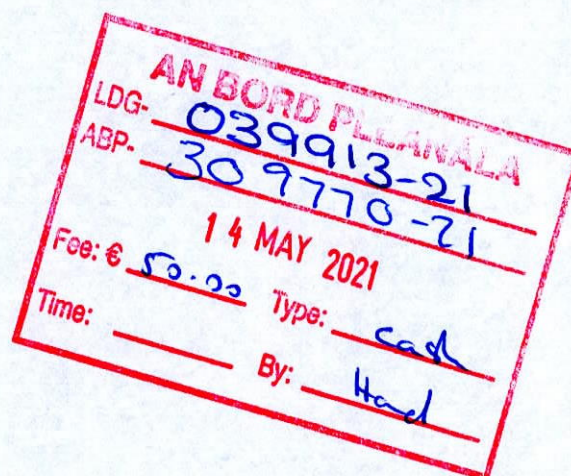
Tel (01) 858 8100
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Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

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

Mr & Mrs Anthony McGuire
Waterlane,
Castlepollard,
Co Westmeath.

Date: 12th May 2021

To: The Secretary,
An Bord Pleanala,
64 Marlborough Street,
Dublin 1



Dear Sir/Madam,

We, Anthony McGuire, and Catherine McGuire of Waterlane, Castlepollard, Co Westmeath wishes to make a written submission/observation in relation to the Planning Application PL25M.309770:

Townlands of Camagh, Carlanstown, Coole, Clonrobert, Clonsura, Doon, Monktown, 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.

Statutory Fee of €50 cash enclosed

This new application is for the erection of 15 Wind Turbines which is now 2 more than the original 13 turbines which was previously applied for. Throughout the new planning application by Coole Wind Farm Limited they are referring to the previous application for 13 Wind Turbines as follows, "As detailed in Section 2.5.1, Chapter 2 of this EIAR, there is a current grant of permission on the Proposed Development site for a wind farm consisting of up to 13 wind turbines with a tip height of 175 metres, upgrading existing internal access roads, providing new internal access roads, an on-site substation, underground cabling, temporary construction compound, and ancillary infrastructure. An Bord Pleanala issued the decision to grant permission for the wind farm on the 27th of March 2020". This statement is incorrect, misleading and is carried on throughout the current planning application. To clarify the matter, Westmeath County Council refused planning permission for the proposed 13 turbine wind farm in December 2017 under the PWIN6 clause that was in their County Development plan. Coole Wind Farm brought the case to An Bord Pleanala in January 2018. After two delayed decisions An Bord Pleanala granted planning permission in March 2019. The North Westmeath Turbine Action Group sought a Judicial review on this decision. The Judicial Review was granted and was heard in the High Courts in March 2020. NO DECISION has been made on this case to date. This means that the grant of planning permission is not currently valid as it is in contention. Their subterfuge is blatant, now they are looking to enlarge their number of wind turbines by applying to SID status to avoid the current planning deadlock.

We urge that this planning appeal application be refused for the following reasons.

1. In the Westmeath County Development Plan 2021-2027, the Castlepollard area has been designated for tourism development with grant aid of approximately €500,000. In this plan the Westmeath County Council intends to extend the Westmeath Way through the area making use of the unique features of these sites such as the Pnha Lough Bane and the crannog onsite linking it to the Tain and Fore trails and Mullaghmeen trail and developing the Bronze Age walkway into a cultural stop off point. This will not happen if the Coole Wind Farm be built. Also, the development will impact visually on several areas of high amenity such as Lough Sheelin, Lough Lene, Lough Derravaragh, Lough Ennell and Lough Owel which also goes against the Westmeath County Development Plans for 2014-2020 and 2021-2027. With these wind turbine's looming overhead will not attract visitors to the locality for the quiet amenities that it has to offer, e.g., Mullaghmeen Forest. The increased traffic on these rural roads would see an increase in the road traffic incidents. The quiet country roads of previous where we would walk, and cycle would become more deadly for the RESIDENTS of all the communities on the proposed construction and delivery routes, as well as the primary location itself.
2. In relation to drainage from the windfarm, from the field drains, the main drains through settlement ponds and soak ways, these all run into the Rivers Inny or Glore, which itself runs into the Inny. A huge quantity of ground water will be displaced by the turbine foundations, access road, hard stands and new roads running into the River Inny and then into Lough Derravaragh. The Inny is a boundary for Garriskill bog, with the water system running on to Scragh Bog. All of these are NHAs and SPAs. In the winter of 2020, the Inny broke its banks in several places with quite extensive flooding's in low lying areas. This brings the water level of the silt ponds up to flood level and over the silt traps, allowing peat to flow directly into the river. Therefore, any rise in water levels by excavation work on the wind farm or any pollution by excess peat, concrete leakage or tother chemicals would run through the Inny Basin into Lough Derravaragh, and Garriskill bog which because of its relatively good condition the site is one of the best remaining examples of a raised bog ecosystem in the eastern half of the country. This could have a big environmental impact on the structure of the bog, the water quality of Derravaragh and the surrounding streams and water systems. Conservation works has been carried out to Garriskill Bog in recent years as Arterial drainage of the River Inny is likely to have impacted on the sire and may continue to pose a threat to the hydrological integrity of the site. Any work upstream from Garriskill Bog that may upset the Inny River and its relationship with the bog could have a negative effect on the Hydrology of Garriskill and Scragh Bogs. Lough Derravaragh is considered at risk from Acidification,

and this is likely to become worse with the large quantities of peat that will be disrupted and moved during construction of the wind farm.

3. On the previous application there were guidelines by Westmeath County Development Plan on the setback distance between a dwelling and Wind Turbines of 2000 metres, as set out in P-WIN2 for the County Council's Development plan and these were not adhered to with their proposed set back distances of between 700 to 1605 metres. Under that application they had stated that there was nothing they could do to reduce the set-back distance required for each Turbine without the reduction in the number of said Turbine's. With this new application they have increased the number of Wind Turbine's for the development. This submission contravenes the Current Westmeath County Development Plan 2021-2027 under CPO 10.143, " Provide the following separation distances between wind turbines and residential dwellings – 500m, where the tip height of the wind turbine blade is greater than 25m but not exceed 50m, 1000m, where the tip height of the wind turbine is greater than 50m but not exceeding 100m, 1500m, where the tip height of the wind turbine is greater than 100m but not exceeding 150m, more than 2000m, where the tip height of the wind turbine blade is greater than 150m". Taking this into consideration they have stated in their application that there are 18 dwellings that are within the 1 km radius, let alone the 2km radius distances that the above CDP2021-2027 requires. The CDP should override the guidelines that they have based their submission on considering that the CDP is the vision of where Westmeath sees itself going in the next number of years for the benefit of all its residents which does not include an invasion of Wind Turbines which do not comply with same. On this basis alone, the application for any Wind Farm that does not comply to these set-back distances should be dismissed out right. The health and well-being of all residents should be considered and not just the few who are being paid to comply which in the long run will not be of benefit.
4. North Westmeath has been designated as a low wind area (this designation has not changed under the current Westmeath County Development Plan) which is not suitable for Industrial Wind Farms. As this applies, there is the need to have permanent backup from conventional sources of energy (usually Gas, in this case a link to the current ESB network which is counterproductive) when the wind does not blow, and as a result will have little effect on the lowering of CO2 emissions. This effect will only set to increase the electricity prices, not what has been proposed in the application for the reduction of same and which will in turn create an even greater fuel/electricity poverty which is already an issue in Ireland. Met Eireann's Annual average monthly wind speed date for 1981 to 2010 has Mullingar (14.1kmph) having the third lowest average wind speed with only Kilkenny (12.8kmph) and Birr (12.4kph) lower. Whereas the average wind speeds off the coast for example Wexford, is 20.6kph which is nearly a 50% increase of average wind speeds to that of Mullingar. The question of why look to install a wind farm in a low wind area and not in a high wind area must be raised. If it is a question of higher installation costs, this would be outweighed by the increase in the power production. According to Energy Educate from the University of Calgary if the wind speed doubles the power output will increase eight times. This would mean the power generated on the

East Coast, e.g., Wexford, would be 4 times that generated in Mullingar. That is a 50% increase in average wind speed which would produce 4 times the output of power.

5. The Topography is not suitable for wind turbines. There are Forests on the proposed site which are being cut down and scaled back, 16.53 hectares, to make the site suitable for these wind turbines. This is deforestation which is a red flag issue for any proposed planning application. We understand that this has been identified in this current application with the replanting of the 16.53 hectares having been designated to another County altogether, Co Roscommon. This may compensate for the trees being felled, but this still influences the immediate environment for wildlife which will not be migrating to the area designated for reforestation and as for drainage, this will create a higher chance of flooding for the area, regardless of what soak pit is installed. Note that the felling of this area is currently taking place even though planning permission was not finalized, as the grant of planning permission was being challenged through the courts and therefore not valid.
6. The borrow pit is 6.21 Ha in size. It is estimated that 251,915 cubic metres of hardcore will be extracted for use on the Wind Farm site. To do this, 74,400 cubic metres of topsoil will have to be scraped off, stored, and put back once the borrow pit is finished. In 2017 planning application the borrow pit was the same size. 6.21 Ha and they were to extract 200,000 cubic metres (only 13 turbines) but only 38,000 cubic metres of topsoil was to be cleared and then put back. Why is there now double the amount of topsoil to be cleared and where will this huge amount of topsoil be stored during the extraction of the borrow pit. Each Turbine foundation will require 600 cubic metres of concrete and lean mix. This will be coming in ready mix lorries, approximately 70 concrete lorries per turbine, making a total of 1,050 concrete lorries entering the wind farm site but no delivery route has been planned. To cart 250,000 cubic metres from the borrow pit to the various parts of the wind farm site will need approximately 17,000 lorries. The most direct route is the L5755 which is thought to be the route being used. This is a single-track road which would not accommodate two lorries in either direction or there is no indication that this road would be upgraded to accommodate the additional traffic. This is an extremely high volume of air pollution, dust, noise, and other pollution that would be caused by this amount of traffic on a small country road. There only seems to be an indication that there will be peat extraction on two turbines to accommodate the base to be poured, there are 13 other turbines that will be on bog land but apparently there will be no need to extract peat on them to accommodate the base, or so says the planning application. Any extracted dry peat has been stated as being used for landscaping, but this peat has no nutrients in it and is therefore rendered useless as a growing medium, not a good way to landscape.
7. These Wind Turbines will devalue property prices in the area and surrounding area's due to their size and impact on the surrounding communities. In looking at the photo montage that was provided, there are sections that do not look like there is much of an impact on the visual horizon due to topography, but there are other sections for which, they do impact not only on the visual horizon but also the right in your face vicinity,

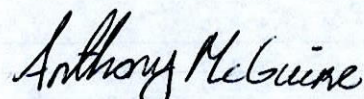
where residents will be left with these on their doorsteps daily with no reprieve from sight, sound or flicker and certainly won't be able to leave, as the question raised would be "WHO WOULD WANT TO LIVE THERE BY CHOICE?". There are several photo's which they have the turbines shaded in a particular way so as that they look in the pictures as to not seem to be imposing or as distinct as they would in real life. In the photomontage provided the colour and size of these wind turbines are not real to life and will have a detrimental impact on their surroundings. There are no photomontages of the turbines on the local roads traversing the site where 15 residences are situated between 700m and 1000m of one or more turbines and two residences are situated less than 700m from a turbine. The visual impact on the families living in such proximity of this proposed development has not been adequately assessed.

I would like to further state that it appears that if this planning application is approved for the 15 wind turbines, that this will be used as a gateway development for further larger scale industrial wind turbines developments on the surrounding bogland of Coole Co Westmeath as already they have gone from 13 Wind Turbines to 15 Wind Turbine's before the project has started. This Development is being used to export the electricity from our Country to the UK, the reasons for this is that the UK do not want any further Development with Industrial Wind Turbine's in their Country.

We are not opposed to the use or exploration of renewable energy in our area, we are opposed to the use of renewable energy that will negatively impact the community with little to no real gain in the renewable energy sector for the greater section of the community and the country. There is a 35-acre solar farm on Tullyally grounds which has received full planning permission from Westmeath County Council with no objections from the local community. This solar wind farm has the capacity to power half of Castlepollard when operational which, will have a more meaningful contribution to meet the Government and EU targets for the production and consumption of electricity from renewable sources and the reduction of greenhouse emissions.

We would implore you to take the above under advisement and reject this application on the above merits as mentioned.

Yours sincerely,


Anthony McGuire


Catherine McGuire