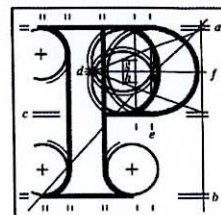


Our Case Number: ABP-309770-21

Planning Authority Reference Number:



**An
Bord
Pleanála**

Cariosa and Darren Fagan
Clonsura
Castletown-Finea
Co. Westmeath
N91 PP98

Date: 24 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,

PP *Nicholas Reilly*

Eimear Reilly
Administrative Assistant
Direct Line: 01-8737184

BL50A

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AN BORD PLEANÁLA
 LDG- 040006-21
 ABP- _____
 17 MAY 2021
 Fee: € 50 Type: cash
 Time: 15.45 By: hand

We wish to make a written submission/observation 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 urge that this Strategic Infrastructure Development Application be refused for the following reasons:

We live with our children in house number 20 as it is referred to in the planning application and have the potential to be exposed to 54 minutes of shadow flicker daily. We are not screened by topography and/or vegetation/built form i.e. adjacent buildings, farm buildings, garages or barns. We can only hope for cloudy days for screening as is suggested in the planning proposal (Chapter 5 - 5.7.6.1 Daily and Annual Shadow Flicker) Our living area of the house is at the back and will be exposed to shadow flicker from Turbine 2, 3, 4, 5, 6 and 15 from early evening until sunset which is when we frequent this area the most. I resent the suggestion to mitigate against shadow flicker that we should close curtains or blinds in affected rooms. Why should we have to eat our dinner with the blinds closed and the lights on? Surely this type of measure could not be deemed acceptable. As for planting screening vegetation we have purposely not planted any vegetation that would block our view from the back of the house across the fields and distant treetops. We should not have to choose between mitigating measures for shadow flicker from turbines or enjoying and preserving our views.

Destruction of ecosystem would have an adverse impact on biodiversity

The EU water Framework Directive (2000/60/EC) requires all Member States to protect and improve water quality in all waters. Water quality of the Gleng and Inny rivers at sampling points closest to the proposed turbine construction is moderate to good. The scale of this construction and its proximity to waterbodies will neither protect nor water quality as required under the directive. Lough Bane is only 10m from the nearest road infrastructure and 50m from the nearest turbine – yet even with this close proximity Coole Wind Farm are claiming there will be no direct effects and no potential for indirect effects. Habitat map 6.4 distinctly shows the lack of a buffer zone between the peat harvesting area and the Inny River – this along with the lack of functioning silt

traps would likely be contributing to the poor water quality. The proposed wind farm is intended to coexist with peat harvesting on the same footprint. This would lead to a cumulative effect potentially reducing water quality even further and consequently having a detrimental effect on biodiversity in the immediate vicinity and down stream.

Flora and Fauna

Table 6.8 NPWS records for rare and protected species –referred to but not included.

Non-volant mammals

“Evidence of additional non-volant Mammals was not recorded during the site surveys. However it is likely that species such as Pine marten, Irish Stoat, Red squirrel, Pygmy shrew etc. occur within the study area at least on occasion.”

Pine Marten and Pygmy shrew are plentiful in the area. The fact that they were no recorded sightings of these animals within the footprint of the site would require one to question their capabilities. The red squirrel population in this area is increasing. All efforts should be made to ensure available habitats are protected to aid their survival and allow them to flourish.

The studies conducted for non-volant mammals for this planning proposal focused only on the construction phase of the development and have not referred to the operational phase of the wind farm and its effects on non-volant mammals living in it's vicinity. Lopucki et al 2017 states that “greater weight should be given to the effects of wind farms on non-volant wildlife than is currently the case. Investors and regulatory authorities should always consider and attempt to mitigate the likely impact of wind farms on terrestrial animals during environmental impact assessments. The impact of a wind farm should be considered in terms of not only the construction but also the operational phase.”

“Wind turbines may have a stressful impact on some species of small mammals living in their proximity.”(Lopucki et al 2018) The main factors “include permanent exposure to the aerodynamic noise of wind turbines and episodes of mechanical noise. These factors may increase the general vigilance of animals by masking the acoustic warning signals from the environment most of the time and by exposing animals to sudden, unexpected mechanical sounds repeated many times throughout the day.” (Lopucki et al 2018)

Marsh Fritillary

Marsh Fritillary (*Euphydryas aurina*) are protected under the EU habitats directive and listed as vulnerable. NPWS 2013 states that the population and future prospects are inadequate and the overall trend for this species is declining. Peat extraction is deemed a medium threat to its habitat and anthropogenic reduction of habitat connectivity is ranked as a high threat to their habitat. The two activities would surely have a cumulative negative effect

on its habitat which is the cornerstone to the survival of this species in Ireland. They have been identified as present in N36, N37, N45 and N36 hectads which are in the footprint of the site.

Do nothing effect

"An alternative land-use option to developing the Proposed Development would be to leave the site as it is under its current planning permission." Which is "designed to co-exist and operate independently of land use practices of commercial peat harvesting and forestry to minimise impacts." (Chapter 6 Biodiversity, Pg 6-69)

"A second potential Do-Nothing scenario exists for this project i.e. assuming that the permitted development is not constructed. In this scenario the existing baseline environment will evolve in one of two potential ways, either the peat extraction ceases and a rehabilitation plan is developed or the peat extraction continues and then a rehabilitation plan is developed." Therefore the construction of the wind farm will eliminate any possibility of rehabilitation of cutover bog which would be a condition of the terms of an EPA licence for peat extraction. This would prevent successful applications for EPA licences and therefore peat extraction rendering option one of the 'do nothing effect' an impossibility. Therefore peat extraction cannot co-exist with the previous or current proposed wind farm developments.

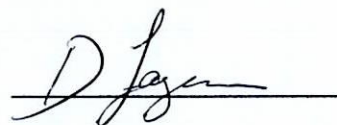
References

Lopucki R, Klich D, Gielarek S. Do terrestrial animals avoid areas close to turbines in functioning wind farms in agricultural landscapes? Environ Monit Assess. 2017; 189(7):343 (<http://creativecommons.org/licenses/by/4.0/>)

Lopucki R, Klich D, Scibior A, Golebiowska D, Perzanowski K. Living in habitats affected by wind turbines may result in an increase in corticosterone levels in ground dwelling animals. Ecological Indicators, Volume 84, January 2018, Pages 165-171



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