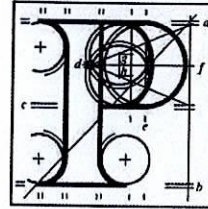


**Our Case Number:** ABP-309770-21

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

John and Susan McGuire  
Killmore  
Streete  
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, Monkstown, 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](http://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**  
**Glaó Áitiúil**  
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**Láithreán Gréasáin**  
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**Tel** (01) 858 8100  
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64 Sráid Maoilbhríde 64 Marlborough Street  
Baile Átha Cliath 1 Dublin 1  
D01 V902 D01 V902

Mr & Mrs John & Susan McGuire  
Killmore,  
Streete,  
Co Westmeath.

Date: 11<sup>th</sup> May 2021

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

AN BORD PLEANÁLA	
LDG-	039916-21
ABP-	307770-21
14 MAY 2021	
Fee: €	50.00
Type:	cash
Time:	
By:	Hend

Dear Sir/Madam,

We, John McGuire, and Susan McGuire of Kilmore, Streete, Co Westmeath wishes to make a written submission/observation in relation to the Planning Application PL25M.30977:.

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 onsite substation, underground cabling, temporary construction compound, and ancillary infrastructure. An Bord Pleanála issued the decision to grant permission for the wind farm on the 27<sup>th</sup> 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 Pleanála in January 2018. After two delayed decisions An Bord Pleanála 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. 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.
2. 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 data 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.

3. Noise, infrasound and shadow flicker from the proposed wind turbines and the electro-magnetic radiation from associated power lines will have an impact on the health of all the residents in the vicinity. Noise levels are meant to be below at least 40 decibels but until the erection of these wind turbines, noise levels cannot be accurately ascertained and therefore when it can be it could be considered as not viable to rectify. *"The closest Coole Wind Farm Co Westmeath \_EIAR Ch5 Pop & Human Health F-2021.03.22 – 20045 5-32 occupied dwelling H14 (i.e., dwelling not involved with the Proposed Development) is located at approx. 700 metres from the nearest proposed turbine T11. There are 2 no. dwelling's, H18 & H24 which are located at distances of 638m and 679m from T15 respectively however these are individuals involved with proposed development"* The suggestion by Coole Wind Farms to help mitigate the possible shadow flicker that could occur at occupied dwellings have said *"may not be witnessed if curtains or blinds in the bedroom are closed"* This is not a solution to a mitigating factor this is imprisoning people in their homes.
4. The bogland being used is unique and is an area of heritage and archeological interest. The Bogland has wildlife, flora and fauna which is unique to this un-spoilt ream. The effects of these Industrial Wind Turbine's will be detrimental to the existing Wildlife and Birdlife alike. From their study we can see that they propose a post-production Bird Monitoring Programme of which their solutions are not acceptable. It is not acceptable that the targeted bird collision survey or corpse search is carried out using trained dogs. There is obviously a threat to the bird population that has been identified through the surveys conducted prior for this application, it stands to reason that the erection of these Wind Turbine's should not go-ahead. Of the 12 responses due from the organisations consulted on the ornithology, only 3 of them have been received. I feel that there are some organisations that a response is needed on this, Bird Watch Ireland, Irish Wildlife Trust, and the Irish Raptor Study Group. In relation to the Irish Raptor Study Group who have recently released 2 pairs of the Marsh On the list of birds in the area are Buzzards, which are protected in Ireland and to kill or injure one is a criminal offence. Peregrine Falcon has also been identified on the list of bird's; these are not only protected in Ireland they are also protected under the EU Birds Directive (2009/147/EEC). The Kestrel has also been identified on the list of birds which is on the endangered birds list and is also protected. With these highlighted endangered species of wildlife and the other wildlife in the area, such as bats, which are protected under the Wildlife Act 1976, that the best we can do for their survival would be for us to wait for the post-production Bird Monitoring Programme to see whether they are being killed resulting from the erection of the Wind Turbines, which is a little too late for them. The post-production Monitoring Programme looks to me like they will be monitoring themselves which as we know self-regulation is no regulation. The potential mortality rates used in models for predicting the impact of wind farms are based on most studies which quote low collision rates and these in turn are based only on found corpses. This has led to a significant under recording of the actual number of collisions. Even when collision



rates are low this does not necessarily mean the mortality is insignificant. Even relatively small increases in mortality rates may be significant for populations of some birds especially long loved species with generally low annual productivity rates and notably their numbers are in decline. There are to date no studies comparing risk assessments published in wind farm submissions and the actual mortality rates recorded after a wind farm becomes operational. This lack of pre and post construction mortality comparisons is alarming because these prior risk evaluations are an integral part of the procedure of accepting or rejecting permission of new wind farms. The submission places a total reliance on assessing the magnitude and significance of potential effect on the assessment prepared by *Steve M. Percival 'Birds and windfarms A review of potential issues and impact assessment'* prepared in 2003. This was a desktop study of available literature which some was dated back to 1989, on windfarm impact on birds from around the world, none of which had been undertaken in Ireland. This desktop study is both irrelevant to this Country and outdated for this time and should not have any bearing on the decision of this application for the Wind Farm. We have already seen in recent weeks how fragile our ecosystem is with the horrendous fires that took place in Killarney National Park where a large chunk of the ecosystem was destroyed with many species affected will take years to recover. By bringing in man-made objects to an ecosystem it changes the dynamic of it, with the losers being the inhabitants of that ecosystem from where it may not be evident straight away of the impact that these may hold and may be too late or even too expensive to rectify by the Company involved. If this planning application is approved there is a real risk of destroying the environment for future generations to come.

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. Due to the scale of this project, there would be major disruption to the area and surrounding areas, with the required new road layout's being proposed and underground cabling required, with extra traffic for these works and for the transport of the wind turbines themselves. On the construction of the proposed sub-station for which planning is also being sought, will increase traffic in the area and surrounding areas due to the necessary road diversions, that will no doubt have to occur, due to the size of the construction works proposed for the small road for which is not even two cars wide. Again, no consideration for the residents on the extra time and money that these works will have on them. All these facilities which they are proposing will encourage larger scale development in a rural setting that is not designed for this



purpose both for the residents and the environment itself.

7. The local tourist industry will be negatively affected and will be disrupted, both during the construction phase and operational phase of the development, to the detriment of local businesses and families alike. With excess noise levels and the visual impact on the rural landscape with the construction of these wind turbine's is not in the Westmeath Development Plan 2021-2027 which has marked funds to develop the tourist industry for the locality. 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.
8. These Wind Turbine's 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.
9. The proposed Industrial Wind Turbine being applied for are 175 meters in height. These are a larger scale Industrial Wind Turbines of which has not been previously used in this country before. They are three times higher than the Mullingar Cathedral and 25 times higher than a two-storey house. The proposed wind farm will be visible from beyond the 20km radius assessed through ZTV and some photomontages' Coole Wind Farm have admitted that the visual impact on the landscape could be significant. There is nothing in the area even remotely close to these heights as a result these will only create an abomination for residents and surrounding residents to endure not to mention the noise and shadow flicker which will occur daily, 24hours a day 365 days a year with no reprieve. The guidance and other information used in this application for the landscape and visual impact assessment have relied on those primarily relating to the UK and Scottish onshore wind farms. The Scottish landscape is more mountainous and rugged and very sparsely populated which in contrast to the landscape in the Irish Midlands bears little resemblance, and therefore is not fit for purpose for the Midland of Ireland.

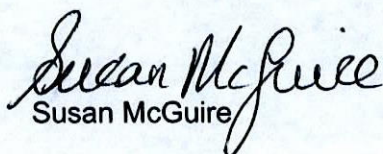


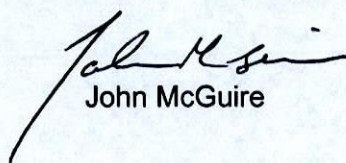
I would like to further state that it appears that if this planning application is approved for the 15 wind turbines, that this will be used as a gateway development for further larger scale industrial wind turbines developments on the surrounding bogland of Coole Co Westmeath as already they have gone 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. So therefore we as a Country will not gain any benefit from this with regards to the Carbon Emissions output (if there are any to be made considering point 2 above) The Governments policy are overseeing again that any natural resources are being sold off to the highest bidder for greed and not for the good of the Country, the Environment and certainly not for the Residents for whom are the greater stakeholder in any potential projects undertaken.

The above-mentioned planning appeal application is the 3<sup>rd</sup> application from Coole Wind Farm Limited. The first application by this Company had amalgamated 135 objections. The second application was being challenged through the courts for Judicial Review, from which I am unaware of any decision made on the case and now they have lodged another application but this time it is going directly to An Bord Pleanala instead of to the local County Council offices. I understand that the application process has been amended in this regard but by applying for a third time shows us that this Company has no regard or no interest in what the residents of Coole and surrounding area's want, which is NO to Industrial Wind Farming. The increase from 13 Wind Turbines to 15 Wind Turbines in this new application further shows the disregard to the local inhabitants. To this Company, the Coole/Finea area is just a place on a map. To the residents of this area the Coole/Finea area it is their home for them and their families. Their complete indifference is astonishing. Reading more of this planning application the more this project does not make sense in its establishment in the midlands of Ireland when you can see that there are other places/sites that would yield a greater return on investment. They say in the planning application that *'if the construction of the proposed grid connection does not proceed, the proposed development would not be constructed as it would not be viable without the grid connection. The potential to reduce Westmeath's and indeed Ireland's dependence on fossil fuels would be lost'* This sounds more like a threat of blackmail. Let us not jump to the sound of the so-called pied piper, being the Windfarm Companies, and let us take a breath and consider what this could mean for all for the future. Let us not repeat planning mistakes of the past and let us think long and hard before a decision which will affect the local population in a way that cannot be rolled back on so easily. To try and have a bit of foresight rather than a regrettable hindsight would make all the difference to the local community.

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

Yours sincerely,

  
Susan McGuire

  
John McGuire