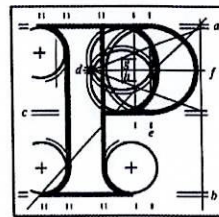


Our Case Number: ABP-309770-21

Planning Authority Reference Number:



**An
Bord
Pleanála**

Johnny Guirke TD & Sorca Clarke TD
Sinn Féin Constituency Office
Mullingar Road
Castlepollard
Co. Westmeath

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 Eimear Reilly

Eimear Reilly
Administrative Assistant
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AN BORD PLEANÁLA	
LDG-	040009-21
ABP-	
17 MAY 2021	
Fee: €	50
Type:	Cash
Time:	15.45
By:	hand

To Án Bord Pleanála, 64 Marlborough St, Dublin 1

We wish to make a written submission on behalf of our party, Sinn Féin and local constituents in relation to the Planning Application by Coole Wind Farm SID (i) the upgrading, reorientation and expansion of an electricity substation in the townland of Camagh, Co. Westmeath. The proposed development of up to 15 turbines with a tip height of up to 175 metres in the townlands of Camagh, Carlanstown, Clonrobert, Clonsura, Doon, Monkstown, Mullagh, Newcastle and other townlands, Co. Westmeath; (ii) the installation of approximately 26km of underground cable between the proposed substation and the national grid at the existing Mullingar 110kV substation in Irishtown, County Westmeath; and (iii) associated site works and ancillary developments.

An Bord Pleanála Case reference: PA25M.309770:

We urge that this Strategic Infrastructure Development be refused for the following reasons:

"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 no. 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 Pleanála issued the decision to grant permission for the wind farm on 27th March 2020. (chapter 12).

PWIN 6 and CPO 10.132/ 10.143

Throughout this planning application it is stated repeatedly, and incorrectly, that the 13 turbine Coole Wind Farm is permitted when conversely, the facts are as follows. In June 2017 Coole Wind Farm sought planning permission for a thirteen turbine industrial wind farm in north Westmeath. Westmeath County Council sought 53 additional information points in order to fully process the application. In response, Coole Wind Farm Ltd withdrew their application for planning permission.

Later that same year Coole Wind Farm reapplied to Westmeath County Council with an identical planning application. In December of 2017, Westmeath County Council denied planning permission for Coole Wind Farm on the grounds that it contravened PWIN 6. In response, Coole

Wind Farm appealed the rejection of its planning application to An Bord Pleanála who, after lengthy deliberations, overturned the local authorities planning refusal for the 13 turbine industrial wind farm known as Coole Wind Farm.

The North Westmeath Turbine Action Group (NWTAG) successfully secured a Judicial Review on An Bord Pleanála's decision to grant planning permission to Coole Wind Farm Limited. The case has been heard in the Commercial High Courts and is yet undecided. It is therefore disingenuous for Statkraft to claim that the thirteen turbine wind farm known as Coole Wind Farm Limited is permitted. This important fact is known to Coole Wind Farm SID and their misrepresentation of the status of their previous application is reflected in many other factual points throughout their application for CWF SID.

It should be also noted that in late spring of 2020, Statkraft applied to Westmeath County Council for planning permission for a Grid Connection for Coole Wind Farm Limited along the exact same route as it proposed for CWF SID. They subsequently withdrew this planning application from Westmeath County Council.

Clearly therefore, Coole Wind Farm Limited and Coole Wind farm SID are in complete contravention to the PWIN 6 clause in Westmeath County Council's 2014-20 county development guidelines and CPO 10.143 (formerly 10.132 in the draft Guidelines) in the adopted 2021-27 guidelines. These guidelines were put in place by Westmeath County Council to protect residents from the damaging effects of industrial wind turbines sited too close to homes. It should be noted that they provide for the following minimum separation distance between turbines and residential dwellings.

- 500m where the height of the wind turbine generator is greater than 25m but does not exceed 50m.
- 1,000m, where the height of the wind turbine generator is greater than 50m but does not exceed 100m.
- 1500m where the height of the wind turbine generator is greater than 100m but does not exceed 150m.
- More than 2000m where the height of the wind turbine generator is greater than 150m.

In 3.6.1. one of the constraints refers to separation distances from sensitive receptors which includes occupied dwellings. Two occupied dwellings close to the proposed Coole Wind Farm SID are situated less than 700m away from turbine no 15 at (638m and 679m). This is less than the setback distance of four times the tip height away from a residential building as recommended in the Draft Revised Guidelines 2019.

Bypassing local planning laws and the applications SID status

CWF SID is attempting to present Coole Wind Farm as having full planning permission in an effort to make their application seem a more moderate proposal that increases the development's energy output to make more use of the already permitted wind farm. This, we contend and as explained above, is a blatant falsehood and is evidence of a discredited application that is dismissive of the well founded concerns of the vast majority of local people who are opposed to the siting of an industrial wind farm on the bogs around Coole and its vicinity.

It is also the case that Statkraft and Coole Wind Farm are trying to circumvent the planning process and the law by attempting to add two turbines to the failed thirteen turbine Coole Wind Farm application to create the 15 turbine Coole Wind Farm SID.

By any objective assessment, the proposed project does not qualify as Strategic Infrastructure Development (SID) under the Planning and Development Act (amended) 2010 as it must meet at least one of the following criteria.

- a) 25 or more turbines b) Having an output of 50MW or more.

Coole Wind Farm SID fits neither of these criteria. If allowed to proceed, the proposed development will allow for the construction of fifteen turbines, 10 less than the minimum of twenty five listed above. It therefore does not qualify for SID status on this basic fact alone.

CWF SID does not qualify for SID status on output. In applying for SID status Coole Wind Farm SID has omitted the fact that wind is not a steady constant in Ireland. Ireland's wind output varies on a daily, weekly, monthly, seasonal and yearly basis. On average, the island of Ireland has usable wind between 27-33% of the time. For the purposes of estimating output versus capacity wind energy companies use an average of 30-35%.

The Midlands have some of the lowest wind speeds in the country. Mullingar, approximately 20 km from the proposed development, has the third lowest wind speeds in Ireland. Coole Wind Farm SID proposes to construct fifteen turbines with an estimated maximum capacity of 6MW (capacity is the maximum amount of energy that can be produced by a turbine operating when wind speeds are 100% 24 hours a day throughout the year).

If the above was the case CWF SID's estimations would indeed be correct as $15 \times 6\text{MW} = 90\text{MW}$ is the capacity if the wind was at 100% constantly. This of course is not the case and Statkraft should have included in their planning application the projected percentage a realistic time when there is usable wind. The calculation estimated between 30-35% of the capacity which gives a

more accurate actual output resulting in the following equation: $15 \times 6\text{MW} \times 30\% = 27\text{MW}$ and $15 \times 6\text{MW} \times 35\% = 31.5\text{MW}$.

In reality therefore, the output from Coole Wind Farm SID, if permitted and constructed, would be between 27MW and 31.5MW, considerably less than the claimed 90MW and nowhere close to the 50MW required for SID status.

Alternatives for generating clean, green energy in the Midlands

Sinn Féin believes there are other more suitable alternatives for renewable energy in Co. Westmeath including solar power, biomass, hydro, micro, small and medium energy projects. Industrial wind generation is not suitable because, as already stated, this is a low wind energy county. The generation of clean, green energy should not come at the expense of destroying the countryside and comprising people's health and well-being which will certainly be the case if CWF SID is permitted. There are far more environmentally friendly ways to generate sustainable energy sources and we note and welcome that planning permission has been granted for a solar farm on the outskirts of Castlepollard. This solar farm has been supported by the community and Sinn Féin which when operational will have the output to power half of Castlepollard.

In chapter 3 Statkraft show that it has not considered any alternatives to industrial wind in Westmeath and in this part of their submission they only make the case for wind generation in north Westmeath. No consideration is given to micro, small and medium scale wind energy alternatives or solar, bio mass, hydro options and instead 3.1.1 and 3.10 present giant industrial turbines as the only solution to generating sustainable energy.

Moreover, in no part of chapter 3 do Statkraft or Coole Wind Farm reference off shore wind generation as a viable alternative to land based developments such as Coole Wind Farm. One example they could have provided is The Kish Bank off the Dublin Coast would be an excellent alternative location for a highly effective off shore wind farm situated close to our capital city which is in huge need of renewable energy.

Onsite peat milling on site of CWF SID

In 3.2 it is stated that Statkraft plan to allow commercial peat harvesting to continue onsite should Coole Wind Farm be built meaning there will be further significant damage done to the bogs and the plant, bird and animal life dependant on them for survival. This reckless policy shows that protection of the local environment is of little or no concern to the authors of CWF SID with the result that there will be no chance for the bog to be fully rewetted, reseeded, regenerated and restored as a fully functioning carbon sink and ecologically valuable wetland.

The fact that the proposed wind farm is intended to coexist with peat harvesting on the same footprint will have a cumulative destructive effect potentially reducing water quality even further and consequently having a detrimental effect on biodiversity in the immediate vicinity and downstream from CWF SID.

Damage to the environment and local water sources

When considering the above, it should be noted that 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 Glenties and Inny rivers at sampling points closest to the proposed turbine construction is currently moderate to good. The scale of this construction, and its proximity to water bodies will neither protect nor improve water quality as required under the Directive.

The drainage from the Windfarm, from the field drains, the main drains, through settlement ponds and soak aways, all run into the River Glenties which itself runs into the Inny.

Moreover, a huge quantity of ground water will be displaced by the turbine foundations, access road, hard stands, and new roads. This displaced water will drain into the River Inny and from there into Lough Derravaragh. The Inny is a boundary for Garriskill bog, with the water system running on to Scragh Bog. All of these sites are are NHAs and SPAs.

Any rise in water levels by excavation work on the wind farm, or any pollution by excess peat, concrete leakage or other chemicals would run through the Inny Basin into Lough Derravaragh, and Garriskill bog, which because of the latter's relatively good condition is considered to be one of the best remaining examples of a raised bog ecosystem in the eastern half of the country'.

This could have a major environmental impact on the structure of the bog; the water quality of Derravaragh and the surrounding streams and water systems. 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 Hydrogeology of Garriskill and Scragh Bogs, both of which are protected under EU law. Lough Derravaragh is considered at risk from acidification and this is likely to worsen with the large quantities of peat (acidic in nature) that will be disrupted and moved during construction of the proposed wind farm.

Implications for broadband

In fig. 3.2 it appears that turbines 2, 6, 9 and 13 are in the path of the buffer zone for Three Ireland. Three provides the only reasonable broadband coverage in this part of the county. Remote working will be impossible in this area if the currently fair internet coverage is degraded by blockage and disruption from the proposed turbines. This goes against proper planning and sustainable development for the area.

It should be further noted that Three Ireland placed a communications Mast in Coole Village about 15 years ago. The sightline from Coole Mast to the Finea Mast crosses the centre of the wind farm. This has been ignored and not shown on the map of Masts in the region (14.3) – which is probably an intentional omission unless they plan to decommission this mast.

Implications for local people and the landscape

We are aware of at least four individuals with autism living within the blast site for the borrow pit. It is also the case that when operational, turbines of the size and scale proposed in CWF SID are not silent when operational. Those with autism often suffer with noise sensitivity. For those local residents living so close to a wind farm of size and scale the noise will likely be unbearable.

There will also be considerable disruption to the lives and health of local residents living close to the proposed wind farm if this development is permitted. There is no figure placed on the number of vehicles or the type of vehicle arriving or leaving the site per day during the construction phase. The area of the Coole Wind Farm is very rural and the roads are narrow. The large quantities of Lorries will negatively impact the area.

There are no figures on the duration of the excavation of the Borrow pit (quarry) or the time needed to reinstate the borrow pit and thus how long the dust will affect the local residents from that alone.

The site itself is on low lying peatlands but is adjacent to the Northern Hills and lakes which are the highest land masses in the county. The design layout should take those landscape characterisations into consideration but it fails to do so.

There are no large scale industrial buildings or structures of this size anywhere in this area. Homes are single or two storied dwellings. There are no large scale factories and the one wind mast that was erected without planning permission has since been removed despite its relatively modest tip height of 80m high, 95m lower than the proposed turbines. Unquestionably, these turbines, if permitted, would dominate the landscape for miles and be completely at odds with the pattern of existing and permitted buildings in the area.

It is also important to state that the turbines are at a height of 175m but where they are to be sited is roughly 75m above sea level. The highest local landmark is the Hill of Mael at 240m above sea level meaning the turbines actual height when built on this site will be 250m high and 10m higher than the highest local landmark. This will have a detrimental visual impact on the area.

The turbines are clustered together and connected to each other visually. The site location is flat with little screening. These industrial scale light white- grey turbine machines will completely

dominate this predominantly green and brown rural landscape and change it forever, not only ruining it now but setting precedence for further industrialisation to come.

There is no mention of screening analysis for the homes less than 1km from any turbine. People living closest to the proposed turbines have not been considered at all and it will be impossible to screen this proposed development if permitted.

The proposed wind farm will be visible from beyond the 20km radius assessed through ZTV and some photomontages a fact that Coole Wind Farm has acceded too in chapter 12 acknowledging that the visual impact on the landscape could be significant.

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 close proximity of this proposed development has not been adequately assessed.

The proposed development will impact visually on several areas of high amenity such as Lough Sheelin, Lough Lene, Lough Derravaragh, Lough Ennell and Lough Owel. This goes against WMCC development plans for 2014-2020 and 2021-27

Impact on tourism and the SME sector

Coole Wind Farm SID if built will have a permanent detrimental effect on the many scenic and protected views in the county and will hugely damage the potential of North Westmeath as a tourism industry.

Castlepollard was recently awarded almost €500,000 for regeneration and restoration with tourism very much in mind. This charming town is less than 7km from the proposed wind farm. Westmeath county Council plan to use the funds "To regenerate Castlepollard, building on the unique architectural heritage of the Town Square and Green, creating space for the community and visitors alike, restoring the Market House and delivering a Town Park, establishing Castlepollard as base, from where, visitors will explore the many sights of North Westmeath, enhancing the towns critical role as an economic driver for the region". This application for the installation of giant industrial-scale wind-turbines into the landscape of north Westmeath will damage the context, detract from the interpretation and destroy the character of the archaeological and historic sites of the area. It will run contrary to the Council's wish to see people explore the many sights of North Westmeath.

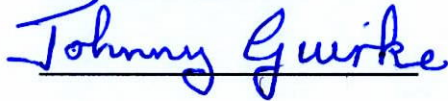
Conclusion

If allowed the construction of industrial wind turbines will succeed in industrialising the local landscape and will prevent future progressive initiatives to develop the tourism, farming and SME sectors in the region. It will set an unwelcome precedent that will likely result in additional giant size turbines and their present will impact and blight the lives of local people, devalue local properties and do untold damage to wildlife and fragile eco-systems.

For all of the above reasons and many more we strongly oppose CWF SID and will do everything within our power and locally elected parliamentarians to prevent its construction. The Midlands, particularly places like north Westmeath, have suffered greatly in terms of rural decline and lack of investment.

Johnny Guirke TD

Sinn Féin Meath West



Sorca Clarke TD

Sinn Féin Longford Westmeath

