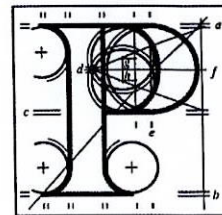


**Our Case Number:** ABP-309770-21

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Kevin Brady & Others  
Camagh  
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](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,

*PP Eimear Reilly*

Eimear Reilly  
Administrative Assistant  
Direct Line: 01-8737184

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<b>AN BORD PLEANÁLA</b>	
LDG-	<u>040010-21</u>
ABP-	
<b>17 MAY 2021</b>	
Fee: € <u>50</u>	Type: <u>cash</u>
Time: <u>15:45</u>	By: <u>hand</u>
	May 13, 2021

Dear Sir/Madam

We wish to make a written submission/observation in relation to:

**Case reference: PA25M.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.**

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

### **Population and Health**

Within the blast site there are 4 individuals with autism. They will be affected. Children are involved here, how is this acceptable, their quality of life will be affected. Who is the advocate for our children and the impact this will have on them?

There are 4 small children who are being subjected to the erection of these wind turbines in house number 14 which is 702m from their house. Where is the justice in this? Not only is our household being subjected to 1 turbine but it is going to be subjected to 3 turbines under 1km from our house. Where is the justice in this? Their health and well-being and safety are all being put at risk both at home (House No. 14) and during their school day in Scoil Mhuire Coole if this project succeeds.

The massive amounts of concrete will have its own effect. Concrete is alkaline and leaches into the soil the bog is acidic. Will it change the fundamental structure of the bog? Has anyone thought of the consequences here?

"There are no key identified tourist attractions" – How can this statement be made? If you are reading this letter you need to come and visit this bog road. People young and old are constantly walking or cycling the bog road at Camagh or you will find them along the banks of the River Inny fishing for the entire day, this is one of those quiet rural areas that can only be appreciated by paying a visit to

No actual turbine has been selected as this will be put out to tender if planning is granted. How can planning be granted on an installation that has not been fully disclosed. We have to state our plans and full dimensions and finish on domestic housing so how can a large scale project be granted on plans that has no detailed specification or dimensions for turbines, surely this is not acceptable?

### **Developmental Welfare and Health of our Children.**

Extremely large 175 metre high turbines will tower over our school (Scoil Mhuire Coole) with constant noise and shadow flicker. Noise will be well over 30 decibels high which is recorded in the Co. Development Plan as the highest acceptable noise level. Our children should not be exposed to the constant noise impact of such industrial turbines on a daily basis. It is our duty and the duty of our Co. Council to safeguard the health, welfare and development of all our children and provide for them the best possible learning environment where children can concentrate. Flickers as well as noise are known to impact negatively on concentration, temperament, epilepsy and many other medical conditions which can be regular to children. Coole National



School seek to include all children from our community in our school without elimination or exclusion where children with AST and other additional needs would be unable to attend due to exposure to high noise levels and constant flickers. How can this be ignored?

Turbine blades: Light flicker

“Possibility of 33 out of 55 properties may exceed the DOEHLG guidelines”

5.7.2: “The DoEHLG Guidelines state that at distances greater than 10 rotor diameters from a turbine, the potential for shadow flicker is very low. “

Rotor length?

“For the purposes of this assessment, a turbine with a rotor diameter of 155m is modelled in order to assess the worst-case scenario”

155mx10=1550m

5.9.3.9 : Coole Wind Farm Ltd. continues to commit to zero shadow flicker at occupied residential receptors within 10 rotor diameters of the Proposed Development. Proposed Mitigation Measures

“The closest Coole Wind Farm, Co. Westmeath - EIAR Ch 5 Pop & Human Health F - 2021.03.22 - 200445 5-32 occupied dwelling H14 (i.e. dwelling not involved with the Proposed Development) is located at a distance of approx. 700 metres from the nearest proposed turbine T11. There are 2 no. dwellings, H18 & H24 which are located at distances of 638m and 679m from T15 respectively however these are individuals involved with the proposed development.”

Suggestion of coole wind farms...”may not be witnessed if curtains or blinds in the bedroom are closed”

“4 and 5 are participating properties” that is 2 out of 55...that is not a good uptake

How safe are Turbines?

Turbines proposed to be erected at this site will be the tallest in Europe. We feel this site so close to a school is not appropriate for such turbine experimentation, Should a blade brake off and fly the consequences would be devastating if it were to land in our school yard full of children. This decision should not be taken lightly, is someone willing to accept responsibility in the event this could happen? What evidence is there that this has never happened? The village of Coole would definitely be put on the map for all the wrong reasons then, all aspects of health and safety need to be considered when it comes to peoples safety especially those of children, something like this would destroy a community.

## **Biodiversity**

### **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 –this has been 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. We live in this area and have witness pine martens, deers and red squirrel very frequently. 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.

Pine Martens are one of Irelands most elusive and important small mammal species which need to be protected. Our area is full of pine martens, construction of these wind turbines will have an adverse effect on their population. Reflecting on the importance of this indigenous mammal to the Irish environment the Pine Marten has been listed as a protected species under Irish, European and International legislation.

The studies conducted for non-volant mammals 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 the wind farm and 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

## Birds

### Re Windfarm Submission

#### 1. Questionable assessment of bird collision rates

- 1.1 The potential mortality rates used in models for predicting the impact of particular wind farms are based on the majority of 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.
- 1.2 Even when collision rates are low this does not necessarily mean the mortality is insignificant. Even relatively small increases in mortality rates maybe significant for populations of some birds especially long lived species with generally low annual productivity rates and notably when their numbers are in decline.
- 1.3 There are todate *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 comparison is alarming because these prior risk evaluations are an integral part of the procedure of accepting or rejecting permission of new wind farms.

#### Questionable use of 2003 study to assess magnitude and significance of potential impact

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 not a scientific study and was not subject to a peer review process. It was a desk-top study of available literature, some of which dated as far back as 1989, on windfarm impact on birds from around the world, none of which had been undertaken in Ireland. Whilst some attempt was done to match habitats these did not, in the main, match the bird species in Ireland.

To use a desktop study with data not generated in Ireland and some eighteen years old cannot be said to represent an accurate assessment relevant to this particular windfarm application in 2021.

We have a Nesting pair of Herrings in the forest in close proximity to the wind turbines. There is also numerous birds of prey including buzzards and owls.

The Wind turbines are in the direct flight path of swans flying from Derravaragh Lake to the Derragh Lake.

## Land Soils and Geology

- 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 top soil will have to be scraped off, stored and put back once the borrow pit is finished with.
- In the 2017 planning application the borrow pit was the same size, 6.21 Ha, they were to extract 200,000 cubic metres (only 13 turbines) but only 38,000 cubic metres of top soil was to be cleared and then put back.
  1. Why is there now double the amount of top soil to clear?
  2. Where is this huge amount of top soil going to 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. It is thought the L5755 will be used.

- 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 from the Borrow Pit to the site and for many of the concrete lorries coming to the site will be along the L5755. A single track lane that cannot take 2 large lorries passing each other, let alone up to 18,000 lorries heading up and down the road. No where in the application is it mentioned that the L5755 is to be upgraded, widened or made into a road suitable for this amount of traffic.
- A high volume of air pollution, dust, noise and other pollution will be caused by this amount of traffic on a very small, country road.
- If 600 cubic metres of concrete are being poured into each turbine base as a foundation, it would be presumed, that as most of the turbines are going to be sited on bog, that 600 cubic metres of peat will have to come out. However, it states that peat will only be extracted at 2 turbine sites – this seems strange.
- It states that the extracted dry peat will be used for ‘landscaping’. This peat has no nutrients in it and is therefore rendered useless as a growing medium, not a good way to landscape.
- Road Safety and our Children in Scoil Mhuire Coole- The school lane is a narrow lane, room for only one way traffic. Currently it is congested every morning and afternoon with cautious parents who give way to children walking or on bikes. There is no room for larger industrial vehicles whose primary care is centred around industry rather than the safety of young children who may at any stage run or cycle out in front of oncoming traffic.
- School Policy - Many of our children cycle to school and as Scoil Mhuire is a “Health Promotion School” this is encouraged. However with huge numbers of large vehicles travelling through our village and up the school lane then cycling to school would have to stop. This would go against National Health Promotion Plans for schools.

## Hydrology

The main point that arises from this chapter is that ALL the drainage from the windfarm, from the field drains, the main drains, through settlement ponds and soak aways, 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 which are NHAs and SPAs.

In the winter month of 2020 the Inny broke its banks in a number of places with quite extensive flooding 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 other chemicals would run through the Inny Basin into Lough Derravaragh, and Garriskill bog, which ‘because of its relatively good condition the site 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 big environmental impact on the structure of the bog, the water quality of Derravaragh and the surrounding streams and water systems.

Conservation work has been carried out to Garriskill Bog in recent years as ‘Arterial drainage of the River Inny (undertaken by the OPW in 1996 and initially during the 1950s) is likely to have impacted on the site 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 Hydrogeology 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.

## **Air & Climate**

The Emissions of Exhaust and Dust during the construction phase are dismissed as being 'negligible and short term'.

There is no figure placed on the number of vehicles or the type of vehicle arriving or leaving the site per day. 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 or the time needed to reinstate the borrow pit and thus how long the dust will affect the local residents from that alone.

**What are the applicants basing their 'negligible and short term' comments on?**

Table 10-9 Data Met Eireann Weather Station at Mullingar 1978 to 2008

Wind ((knots)

Mean monthly speed	7.6 knots = 3.8 m/s = 13.7 kph average per annum
Max gust	58.5 knots = 28.5 m/s = 102.6 kph average per annum
Max mean 10- minute speed	32.8 knots=16.4 m/s = 59 kph average per annum

This indicates the average monthly wind speed is 3.8 m/s which asks the question is this really the correct place to put a wind farm to give the best wind to power conversion?

Met Eireann's Annual Average Wind Speed data for 1981 to 2010 has Mullingar (14.1 kph) having the third lowest average wind speeds with only Kilkenny (12.8 kph) and Birr (12.4kph) lower. This again asks the question – if you are going to build industrial wind farms why are you building in the middle of the country, where the winds are lowest and not off the coast where the winds are substantially stronger? The average wind speeds at Wexford is 20.6kph for example, this is nearly a 50% increase of average wind speeds to that of Mullingar. The increase in installation cost would be outweighed by the increase in 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 as in at Wexford would be 4 times that generated in Mullingar. That is a 50% increase in average wind speed which would give 4 times the output of power. The centre of Ireland is not the place to erect industrial wind farms.

## **Appendix 10.1 Carbon Loss Calculations.**

The original Planning permission application which is under Judicial Review had very different values for the output for each turbine. Appendices 10.1 Carbon Calculations for the present, 2020, application has the Power Rating for one Turbine as 5MW to 6MW where as the same appendices in the original application, 2017, has the power rating of each turbine as 3.6MW to 3.8MW. This seems a very large increase per turbine with no qualifying of these figures other than a line in the documents to An Bord Pleanala that the blades on the turbines was to exceed the permitted length but staying below the 175m high blade tip maximum height. This must mean the hub height is to reduce

The 2020 figures give output of  $15 \times 5$  to  $6\text{MW} = 75\text{ MW}$  to  $90\text{ MW}$ . The capacity factor is quoted as 35%.

The 2017 figures give output of  $15 \times 3.6$  to  $3.8\text{ MW} = 54\text{MW}$  to  $57\text{ MW}$ . The capacity factor is quoted as 40%



**For the Wind Farm to quantify its saving of carbon and therefore helping of the Climate, the carbon figures are the centre pin of the whole application. This amazing improvement in the efficiency of the turbines should be explained. There are no figures to quantify how the applicants arrive at the figure of carbon loss for manufacturing, constructing and decommissioning the turbines, these should be quantified.**

## **Landscape**

*“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.*

- 1) This statement above is incorrect and is deliberately misleading. Westmeath County Council refused planning permission for the proposed thirteen turbine industrial wind farm called Coole Wind Farm in December 2017 under a clause in their County Development plan called PWIN 6. 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. The case was fully heard in the Commercial High Courts in March 2020. No decision has been made to date. Therefore the grant of planning permission is not currently valid as it is in contention. Coole Wind Farm makes this deliberately misleading claim throughout this planning application. If permission for the thirteen turbine wind farm had been fully passed in 2019 (not 2020 as also incorrectly claimed) then the thirteen turbine Coole Wind Farm would be built and operational by now, not seeking to enlarge itself to SID status to avoid the current planning deadlock.
- 2) 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. It does not.
- 3) The Midland Regional Guidelines 2010-2022 do not insist that industrial wind turbines go on peatlands. The Westmeath County Development Plan 2014-2020 and 2021-2027 both have clauses directing large scale turbines to ten times the nacelle height away from homes. Only two of Coole Wind Farm SIDs fifteen turbines fit this criteria.
- 4) There is a pNHA known as Lough Bane onsite very close to turbine no 2. Lough Bane also contains a crannog.
- 5) 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. The one wind mast that was erected without planning permission and is since removed was 80m high, 95m lower than the proposed turbines.
- 6) Proposed turbine no 15 is situated 638 m from one dwelling and 679 m from another dwelling. This does not conform to the Revised Draft Guidelines for Wind Energy 2019.
- 7 In the 2014-20 Westmeath County Development plan all areas of the county are designated low wind energy apart from Uisneach which is designated no wind energy. In the 2021-2027 Westmeath County Development Plan one area has been changed from low wind energy to medium wind energy.

## **Project Description**

- 8 The forestry cut down in order to accommodate a turbine will not be replanted onsite but in Co. Roscommon.
- 9 There are two homes which are not located greater than 4 times the tip height away from occupied dwellings according to the Wind Energy Development Guidelines 2019.



- 10 The turbines are at a height of 175m. Ground level is between 75m above sea level on the site itself. The highest local landmark is the Hill of Mael at 240m above sea level. This means that the turbines at 175m high will be 10m higher than the highest local landmark. This will have a detrimental visual impact on the area.
- 11 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.

### **Landscape and Visual Impact Assessment Criteria**

- 12 There is no way that any form of planting could possibly screen 175m high industrial turbines on this landscape.
- 13 The nature of this landscape is rural. Some areas are flat running into the rivers and lakes and some areas are hilly. The highest local landmark the Hill of Mael is 240m above sea level. Imposing industrial turbines on this landscape affects it dramatically and in a very bad way.

### **12.3.3 Guidance and other information used in the Landscape and Visual Impact Assessment**

- 14 While Ireland signed and ratified the European landscape Convention in 2002 the Guidance from The Department remains in draft form and Coole Wind Farm have relied on guidance developed primarily in the UK for Scottish onshore wind farms. Coole Wind Farm has also chosen to dismiss the guidance developed by Westmeath County Council who is the local planning authority. The Scottish landscape is very different to the Irish landscape. Scottish wind farms are located in a landscape that is very different to the Irish landscape. Scottish wind farms are located in a landscape that is very different to the Irish landscape. Scottish wind farms are located in a landscape that is very different to the Irish landscape. This UK guidance is not fit for purpose in the Midlands of Ireland.

### **12.3.4.1 Study Area**

- 15) The proposed wind farm will be visible from beyond the 20km radius assessed through ZTV and some photomontages.
- 16) Coole Wind Farm admits that the visual impact on the landscape could be significant.

### **Consultation**

- 17) 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.
- 18) 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

### **12.5.5.1 Landscape Value**

- 19) CWF acknowledge that the views from Lough Crom, Fennin Hill and Mullaghmeen and views of the lake lands have high aesthetic quality and are designated scenic amenity in the relevant County development plans. Coole wind farm if built will have a permanent detrimental effect on those and other scenic views in our landscape and will hugely damage the potential of North Westmeath as a tourism industry.
- 20) Westmeath county Council intend to extend the Westmeath Way through the area making use of the unique features of this site 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 should Coole Wind Farm be built.

#### **12.6.5 Route Screening Analysis Results – Roads within 5 Kilometres**

21) Coole Wind Farm admits that screening of the proposed turbines by trees and bushes is sparse at best in the roads between 1-3 km of the proposed turbine site.

22) There is no mention of screening analysis for the homes less than 1km from any turbine. Those of us living closest to the proposed turbines have not been considered at all.

#### **Photomontage Booklet**

23) There are no photomontages showing the impact of the turbines on the roads and homes closest to the proposed wind farm. Our homes will be devalued and the visual impact for us will not be fleeting as it will be to those travelling through this area but permanent and detrimental.

25) The proportions of the wire framed turbine images on the wire frame landscape and the photoshopped turbines on the photomontages are wrong and based on the narrower blade width turbines planned to be used for the non SID Coole Wind Farm. In the turbines planned for Coole Wind Farm SID 88.5% of the full turbine height consists of the diameter of the blade. The blade size in these images is based on the narrower turbine where 80% of the full height of the turbine consisted of the diameter of the blade. All of the photomontages are inaccurate and do not show the full impact of the turbines as the width of the turbines has increased by over 11% from 140m to 155m in diameter. To prove my point take a look at any of the wire frame images. The 13 turbine Coole Wind Farm images are drawn in green and the 15 turbine Coole Wind Farm images are drawn in blue. The proportions of the blades should have increased by over 11% from the green to the blue wireframe images. They have not.

26) The photoshopped images of turbines on the photomontages are not in keeping with the genuine width of the turbine blades and towers. For example in Photomontage 7, images 39-44 the images of the turbines in the photoshopped images are noticeably narrower than in the wire framed images. This is a deliberate attempt to fool people into thinking the turbines will have less of a visual impact on the landscape.

27) Photomontage no 3 taken 4.4Km from the nearest turbine on the regional road near Lismacaffrey shows the turbines completely dominating the landscape and looming over the hills in the background. This image clearly shows the industrialising effect these giant turbines will have on the rural landscape if built.

28) Photomontage no 4 taken 4.6 km from the nearest turbine in the townland of Cloonamore shows the turbines clearly over the treeline. This image shows the industrialising effect these turbines would have on our local rural landscape.

29) In photomontage no 5 the image comes from the townland of Ballywillan which overlooks the bogland and the beautiful Hill of Mael and Rock of Curry, two local landmarks and some of the highest landmasses in the area. In this photoshopped image the turbine are clearly visible in the landscape. They look to be almost the height of the local landmarks, tower above the bogland and break the otherwise unbroken skyline dramatically. This is bad enough. But this image is not at all accurate. Firstly the turbines themselves are 175m high situated on bogland 75m above sea level, making a combined total of 250m above sea level. The Hill of Mael is 240m above sea level. The turbines are to the fore of the Hill, therefore should appear larger than the hill. They do not. Secondly the turbines are a light white-grey colour not a dull light brown as portrayed in these photomontage images. This makes them appear less distinct against the winter landscape in the background. These images are deliberately misleading, disingenuous and inaccurate and are designed to fool local residents and An Bord Pleanála into thinking that the turbines will have a negligible effect on the landscape. This cannot be allowed.

30) Photomontage no 8 is not taken in the actual location of protected view no 51, but in the vicinity of the view, this is highly inaccurate and deliberately misleading.

31) The Hill of Mael and Mullaghmeen Forest are the highest landmarks in the county at 240m and 258 m high. In photomontage no 10 we see the protected view from regional road R195 looking towards Lough Gloire. In



this photomontage the turbines are clearly delineated against the sky and stand tall over the tree tops. However if you look at the size of the turbines it can be clearly seen that they are shown many metres shorter than the hills to their right. This is incorrect. The turbines are 175m high and stand on ground 75m above sea level. That means that they should each look to be 10m taller than the Hill of Mael and 8 m shorter than Mullaghmeen. The images shown in Photomontage no 10 are highly misleading and dishonest.

32) In photomontage no 11 the view from Sliabh na Callaigh at Lough Crew a national monument and protected view the turbines are depicted as being the same colour as the surrounding landscape and blending into the sky. While atmospheric perspective will add a slight bluish hue to the light white-grey turbines at an extreme distance on a hazy day it will not obliterate them from view completely as is indicated in these photomontages. This is disingenuous and deliberately misleading.

33) In photomontage no 18 the view from Granard Motte the turbines dominate the landscape and can be seen clearly against the hills and landscape in the background. However the turbines have been depicted as dark grey in colour which they will not be. These turbines are too close to be affected by atmospheric perspective and have deliberately been darkened to diminish their effect on the landscape. This is disingenuous and deliberately misleading.

34) In photomontage no 21 the view from the cairn at Mullaghmeen (5.3 Km from the nearest turbine) the turbines completely dominate the flat lands of the landscape. They clearly show the industrialising effect these large scale turbines will have on the landscape if allowed to be built.

## **Archeology**

### **Contrary to goals for tourism and heritage in North Westmeath**

Castlepollard was recently awarded almost €500,000 for regeneration and restoration with tourism very much in mind. The town is less than 7km from the proposed windfarm. Westmeath County Council comments as follows on this funding, emphasising the exploration of North Westmeath. It says that the award is

**“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.

Coilte's long-established forest recreation area at nearby Mullaghmeen was selected recently as the Irish Time's' Westmeath hike of choice for Westmeath<sup>1</sup>. Mullaghmeen is an isolated area of forest, comprising the largest beech plantation in Ireland, rising above farmland to a height of 258m above sea level. This forest features on all hiking and outdoor sporting websites, such as Sport Ireland, Coilte<sup>2</sup> and Visit Westmeath.<sup>3</sup> A few kms to the west, the proposed 15-turbine wind farm will reach to almost the height of the Mullaghmeen summit. The turbines stand on land that is 75m above sea level. The turbines are 175m high. The turbine tip will therefore reach 250m in height above sea level. This intrusion cannot be reconciled with strategies to develop tourism.

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<sup>1</sup> <https://www.irishtimes.com/life-and-style/health-family/fitness/32-great-hikes-around-ireland-one-in-every-county-1.4514690>

<sup>2</sup> <https://www.coillte.ie/site/mullaghmeen-forest/>

<sup>3</sup> <https://www.visitwestmeath.ie/get-outdoors/walks-wilderness/mullaghmeen-forest-trails/>



## Material Assets

While the grid connection is being constructed on the road from Coole to Multyfarnham, the road will be closed while works are carried out at the crossings of the River Inny – twice. There is no time limit on the road closures. This will add 9 miles twice daily to all those, including pupils and teachers at Wilsons Hospital school, who use this road on a daily basis.

The L1826 road from Coole to Multyfarnham is not a proper 2 lane road – there are no white lines down the middle of it and if a lorry is passing a car, one of them has to pull over to the verge. There are soft verges all down this road as it runs across the bog. In many places the grid connection trench will be dug in the middle of the road, and the cable joint pits being 2.5metres wide x 6 metres long at every 500 metres will be in the middle of the road. On top of the actual construction and trench digging it is estimated at

*‘Approximately 15 truck movements per day to each works area to both remove excavated material and deliver appropriate infill material. A small number of truck movements will be required to deliver cable route components (ducting, membranes, etc) to site.’*

The application states that the road will stay open during most of the grid connection construction work. However, in the main the road is simply not wide enough to sustain a 2.5 metre hole in the middle, plus diggers, tipper lorries and construction traffic to be able to keep the road open. For over 6 months this will cause huge disruption and expense to those that travel to and from Coole every day.

14.3: Three Ireland placed a communications Mast in Coole Village about 15 years ago. This is ignored and not shown on the map of Masts in the region – is this intentional, or do they plan to decommission this mast? The sightline from Coole Mast to the Finea Mast crosses the centre of the wind farm

In the application it says: *‘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 is sounds like blackmail.

## Farming

Wind turbines are known to have serious adverse effects on livestock. People in this area have invested heavily in farms both beef and dairy.

The livelihood of families will be effected greatly as wind turbines are known for destroying the milk outputs and there is a known high rate of aborted animals associated with wind turbines.

We realise the negative impact that this project will have on our lives and object to it strongly. We do not wish to have this in our area.

Signed

  
Kevin & Majella Brady

Camagh

Castlepollard

Co Westmeath



*M. Brady*

Michael Brady

Camagh

Abbeylara

Co Longford

*Eileen Loftus*

Eileen Loftus

Drumbrade

Ballinagh

Co, Cavan