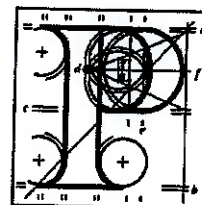


Our Case Number: ABP-309770-21

Planning Authority Reference Number:



**An
Bord
Pleanála**

Kevin O'Neill
Newtown
Coole
Mullingar
Co. Westmeath
N91 DF10

Date: 19 May 2021

Re: Proposed development of up to 15 wind turbines with a tip height of up to 175 metres and laying of approximately 26km of underground electricity cabling to facilitate the connection to the national grid, and all associated site development works
Townlands of Camagh, Carlanstown, Coole, Clonrobert, Clonsura, Doon, Monktown, Mullagh, Newcastle and other townlands, Co. Westmeath


Dear Sir / Madam,

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

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

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

Yours faithfully,


Eimear Reilly
Administrative Assistant
Direct Line: 01-8737184

BL50A

Tel
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

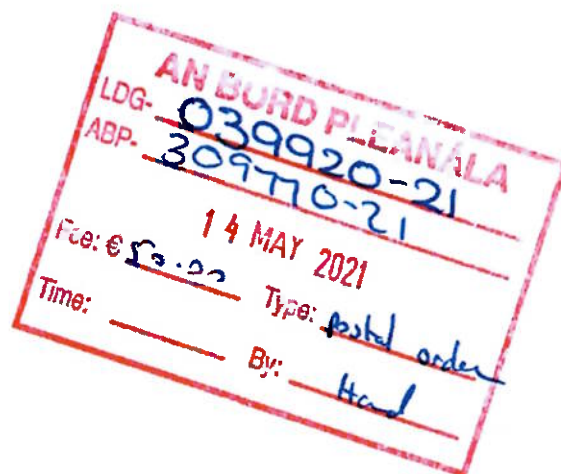
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

From: Kevin O'Neill,
Newtown, Coole.
Mullingar,
Co. Westmeath.
N91DF10



To: An Bord Pleanala,
64 Marlborough Street, Rotunda,
Dublin 1.
D01V902.

Regarding: Submission on Planning Application for Project all in County Westmeath by Kevin O'Neill.

Reference Number: ~~309770-21 (SID)~~ PA25M.309770

Description of Proposed Development:

Construction of a wind farm of up to 15 wind turbines with tip height of up to 175 meters, all associated foundations and hard standing areas, one on-site electrical substation including a control building, associated electrical plants and equipment, welfare facilities and a waste water holding tank. One temporary construction compound, provision of new site access roads, upgrading of existing access roads and hardstand areas. Excavation of one burrow pit, all associated underground electrical and communications cabling connecting the turbines to the proposed on-site substation. Laying of approximately 26 kilometers of underground electricity cabling to facilitate the connection to the national grid from the proposed on-site substation located in the Townland of Comagh to the existing 110 kilovolts Mullingar Substation located in the Townland of Irishtown. Upgrade the works to the existing 110 kilovolt Mullingar substation consisting of the construction of an additional dedicated bay to facilitate connection of the cable. Construction of a link road between the R395 and the R396 regional roads in the Townland of Coole to facilitate Turbine Delivery. Junction improvement works to facilitate turbine delivery at the N4 junction with the L1927 in the Townland of Joanstown on lands along the L1927 in the Townland of Culvin the L1927 and L5828 junction in the Townland of Boherquill and the L 5828 and R395 junction in the Townland of Corralanna. Site drainage, forestry felling, signage and all associated works site development works. This application is seeking a ten

year planning permission and 30 operation life from the date of commissioning of the entire wind farm.

Location of proposed project:

Townlands of Camagh, Carlanstown, Coole, Clonrobert, Clonsura, Doon, Monktown, Mullagh, Newcastle, Boherquill, Corralanna, Culvin, Joanstown, Mayne, Fearnmore (Fore by), Newtown, (Fore by), Simmonstown (Fore By), Ballinealoe, Shrubbywood, Clonava, Lackan (Corkaree By), Soho, Ballynaclonagh, Abbyland, Rathganny, Ballindorough, Cullendarragh, Cullineenabohoge, Ballynafid, Knightswood, Portnashangan, Culleen More, Farranistick, Irishtown (Moyashel By). County Westmeath.

Name of Applicant:

Coole Wind Farm Limited.

My Contact Details: Mobile Phone: 086 2640614 email:

artmedia.kevin@gmail.com

Fee enclosed is a cheque for 50 Euros.

My Submission

This Planning Application should be refused on the following grounds:

1(a). The proposed route for the grid connection will pass along the following adjacent townlands: Behabane, Ballinealoe, Coolnagun, Bottomy, Correal, Correalana, Camagh and Rincoolagh, collectively comprising approximately 6,000 acres of cutaway bog.

Granting permission for the 26km grid connection will have the inevitable effect of windfarm 'creep' throughout the upper Inny basin, mainly in the care of Bord Na Móna (BNM).

(b). In concert with its much publicised "Brown-to-Green" campaign, aided by a Government grant of €108 million, BNM has engaged

Goodbody Stockbrokers to raise €1.8 billion internationally for windfarm development on our cutaway bogs. The proximity of their c3,000 acre site, along with Westland and Harte peat's sizable plots adjacent to the proposed grid route makes it inevitable that planning permissions will be applied for. This makes it impossible to realistically assess the environmental impact of the current project should permission be granted without reference to BNM's national strategy with specific reference to the above mentioned blocks of land.

With windfarms at Mount Lucas, Clonkreen, Ballivor already in train, it is certain that developing Coolenagun as a windfarm is their priority. That this 'what if' is absent from the 'Cumulative Effect' section of the accompanying EIA of this application renders the section not only incomplete but in my view, frankly mendacious.

(c). Section 3.5.7. of the Guidelines on the Information to be contained in Environmental Impact Assessment Reports covers the above scenario thus:

"...These are projects that may arise largely because of the existence of the principal project, though they are usually not carried out by the developer of the principal project. These can be very difficult to describe with precision – but can be usefully examined as a series of 'what if' scenarios that can be used as a context for decision-making by the CA".

(d). Planning Permission cannot be granted without reference to the likely Cumulative Effect upon the Inny river basin and its environs in these circumstances. The Cumulative Effect is referred to in section 4.7.1 of the Draft Revised Wind Energy Development Guidelines 2019 clearly stating that:

"...planning application for the grid connection must address the direct effects and any short, medium and long-term, permanent and temporary, positive and negative, indirect, secondary, cumulative and transboundary effects of the whole project"

2. In the absence of a national Strategic Environmental Assessment

(SEA) regarding onshore wind in our State legislature, exposure to legal jeopardy from both the CJEU and individuals is, in my view, both likely and justified. The absence of this SEA means neither I nor yourselves can address this issue coherently, as there is no common rules to which we can both refer to and argue our points.

3. The townland of Multyfarnham, containing the most populous area on the route, has been omitted from the townlands list of the proposed project. I insist this error in the Application be rectified and a corrected version submitted, should the applicant wish to re-apply.

Summary:

Unlike other cutaway bog sites being earmarked for, or currently hosting wind farms, the Inny river basin boasts the greatest asset to help restore the lands between lough Sheelin and Derravaragh and re-instate this carbon capture/sequestering asset. - *The Inny River itself.*

It is not too late to reverse the environmental damage done to date: first the draining of Derravaragh in 1867 (2 metres) and again in the 1960s, resulting in an overall drop in water level of 4 metres. This is both reversible and an invaluable asset toward re-wetting the valley, the Inny River itself probably the largest tributary of the Shannon river.

The removal of 40,000 tons of peat annually since the 1950s by BNM thankfully has not stripped the peat down to the limestone marl beneath, making the damage reversible. The mechanical stripping of the adjacent peatlands of Mayne and Ballinaloe bogs by Westland and Harte peat is now terminated thanks to a High Court decision implementing EU Law.

The notion that Coole Wind farm's proposal could be considered an SID without reference to the adjacent BNM site strikes me as perplexing (see attached map), unless of course it is your (Bord Pleanala's) current position to regard the entire Upper Inny River basin as being ripe for large scale wind farm development. If this is in fact your view, I believe it my right as a local citizen to be aware of this in order to be capable of contributing informed comment.

I recall a case against a developer in Cavan being successfully challenged when applying for planning permission for a grid connection after having obtained PP and subsequently erecting his windfarm. Planning for the grid connection was submitted separately at a later date but challenged. PP was refused on grounds that the original PP should have included . In this context, is it strategically prudent to grant permission to Stadkraft's farm and grid thereby jeopardising the validity of future PP requests for the rest of the upper river Inny basin?

Alternatively, your granting permission to the current applicant would create a 'trojan horse', encouraging further link-in to the grid leading to development neither referred to nor implied in the application before us here. In terms of the overall Strategic Infrastructural development of the entire Inny basin the BNM site is surely 'the elephant in the room' (see map below).

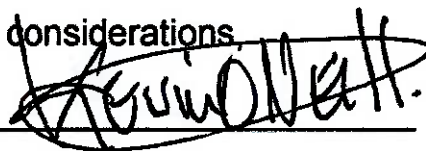
Finally, and lest this submission be tossed into the NIMBY basket, I would like to add that I fully endorse ESB and their plans for the Moneypoint proposal; incorporating hydrogen fuel cell technology is most welcome and ticks all the SID boxes in terms of National ownership as opposed to private enterprise.

I have spent a considerable portion of my 69 years doing my best to protect the environment without reward (though why I should have to schtump up €50 from my pension to be, with a bit of luck, heard here might become my next fight for justice!!).

Humour aside, I hope that this submission is given due attention as I consider myself well-informed with a long held interest in our country's future environmental strategies and well being.

Thank you for your kind considerations.

Signed



Kevin O'Neill

Date

13/5/2021

Map overleaf>>

Cutaway bogland adjacent to proposed development and likely to seek PP for windfarms and link in to grid connection.

