

Our Case Number: ABP-318446-23



**An
Bord
Pleanála**

Kaye Mullaney and William O'Grady
Skeheens
Ballymacarbry via Clonmel
Co. Waterford

Date: 30 January 2024

Re: Proposed construction of Coumnagappul Wind Farm consisting of 10 no. turbines and associated infrastructure.
In the townlands of Coumnagappul, Carrigbrack, Knockavanniamountain, Barricreemountain Upper and Glennaneanemountain, Skeehans, Lagg, Co. Waterford. (www.coumnagappulwindfarmSID.ie)

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development 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.

The Board will revert to you in due course with regard to the matter.

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.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email sids@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,

Niamh Hickey
Executive Officer
Direct Line: 01-8737145

PA04

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Kaye Mullaney & William O'Grady,
Skeheens,
Ballymacarbry,
Via Clonmel,
Co. Waterford.

Phone: [REDACTED]
[REDACTED]

20 January 2024

An Bord Pleanála
64 Marlborough Street
Dublin 1

To whom it may concern;

Subject: Objection to planning application Coumnagappul Wind Farm, Co.
Waterford [Bord Pleanála Case reference: PA93.318446](#)

Objector: Kaye Mullaney & William O'Grady

We refer to the above subject matter and herewith, wish to lodge a formal objection to the Planning application ref [Bord Pleanála Case reference: PA93.318446](#) filed by EM Power consisting of a proposed Wind Farm of 10 wind turbines, electrical substation and associated works in the townlands of Coumnagappul, Carrigbrack, Knockavanniamountain, Barricreemountain Upper and Glennaneanemountain, Skeehans, Lagg, Co. Waterford. (www.coumnagappulwindfarmSID.ie)

We are opposed to the developments on the following grounds:

Plain English

The Environmental Impact Assessment Report (EIAR) for the proposed Coumnagappul Wind Farm, Co. Waterford that was compiled by Fehily Timoney Consultations for EMP Energy Limited (EM Power) is difficult to read and much of the information is convoluted, acting as a barrier to citizens to interpret and understand. Minister for Further and Higher Education, Research, Innovation and Science Simon Harris TD launched [Adult Literacy for Life – a 10 year adult literacy, numeracy and digital literacy strategy](#) on Wednesday 8th September 2021. Under 3.1 Pillar Two: Access, direct reference is made to the 'use of complex language, instructions that make application processes difficult to navigate'. The EIAR document is, in my view,

unjustifiably complex and dense. Neither is the document available in Irish or any other language.

3.2 Pillar Two: Access

3.2.1 Plain and Accessible Content

One of the barriers to making education and wider public services more accessible is the use of complex language, instructions and conditions that make application processes difficult to navigate. The Department of Public Expenditure and Reforms' 'Our Public Service, Development and Innovation Framework for the Public Service', commits to key actions relating to improving service for the public and making services more accessible for all.¹³ In line with this, it is essential that all services designed to support literacy and associated needs communicate clearly using plain language and easy-to-read principles.¹⁴ This will require plain language training and plain language editing capability.

The Cross-Government Implementation Group should ensure that each of its constituent members has a clear plan in place to ensure communication in plain language, with a nominated person responsible for coordinating action to deliver on this.



Development

The construction of 10 x 185metre turbines in a residential agricultural area will have an adverse effect on residential and rural amenities, special landscape character, views and prospects, Natura 2000 sites, protected structures and aircraft flight paths. There will be a immense visual impact to the Comeragh mountain area, an area renowned for its visual beauty.

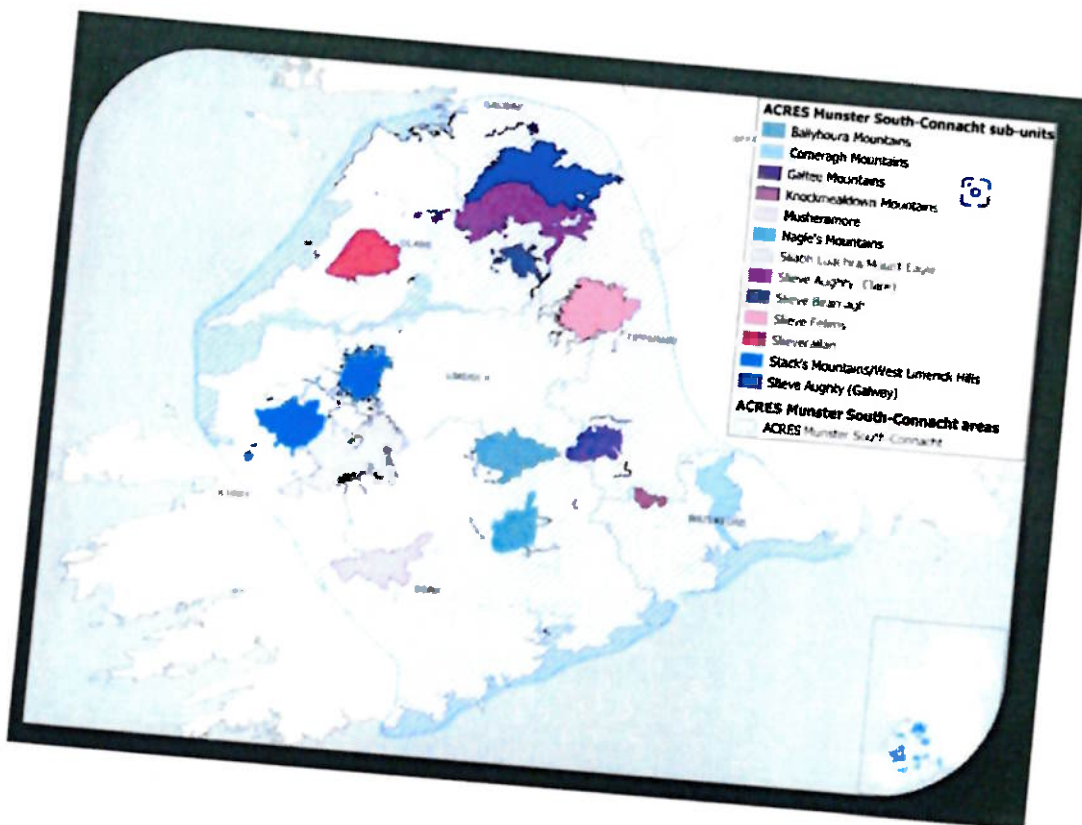
We are a 4th generation dairy, beef and hill sheep farm in the Skeheens area with hill rights for the commonage on Bleantasourmountain and Kilkeanymountain. Our farm is located off the Sweep Cross Roads on both sides of the road and our farmyard is located at 52.225577, -7.674635 (Google Maps coordinates).

According to the planning application, this is the access route for the underground cable but also for the vehicles that will travel carrying materials, concrete, pylons and cables. We are objecting to this, as farmers in the area, we move animals and are supplying milk to Tirlan on a daily basis by truck or carriage from the farmyard down toward the Sweep Crossroads and out to on the local roads toward the R672. We move sheep, by road (from the farmyard and fields) toward the Sweep Cross Roads and to Kilkeanymountain to family owned land at 52.242970, -7.672693 & 52.244113, -7.671331 and by

waymarked roads at 52.23917, -7.67173 as per agreement with another farmer. The proposed industrial development will have a negative effect on our sustainable driven enterprise and on our ability to move animals with safe passage and with respect of animal welfare.

We are farming in accordance with Munster Acres Scheme ([Munster - Acres \(acresireland.ie\)](http://Munster-Acres.acresireland.ie) and Tirlan Sustainability Scheme [Sustainability | Tirlán \(tirlan.com\)](http://Sustainability.Tirlan.com)).

We have committed to clover incorporation on grasslands, planting of native trees and hedgerows, protection of watercourses and maintenance of peatlands. We keep blackface breed on the Commonages on the hills, a breed that is known for its hardiness and is well adapted to graze on upland habitats such as heaths and bogs. They prefer an open habitat where they can easily move around and selectively graze on different wildflowers and grasses ([Blackface Mountain Sheep | Irish Native Rare Breed Society \(inrbs.ie\)](http://BlackfaceMountainSheep.IrishNativeRareBreedSociety.inrbs.ie)). These type of sustainable farming actions are in harmony with the natural environment.



The ACRES areas are denoted in the map above. The priorities of the scheme in the Comeragh Mountains include water quality, vulnerable groundwater resources, upland peatlands (Red Grouse) and archaeology. Turf cutting in the

Bleantasour mountains has ceased in the last 20 years to allow the biodiversity of the area to flourish.

The area is between less than 1 km from the Nire Woodland, an EUROPEAN UNION HABITATS (NIER VALLEY WOODLANDS SPECIAL AREA OF CONSERVATION 000668) REGULATIONS 2017. In terms of biodiversity, the wild flora and fauna including birds, wild hares, red squirrels, stoats, foxes, butterflies and bees (as all listed under [IWM 116 Checklists Protected and Threatened Species 2019.pdf \(npws.ie\)](#) are all seen by us as we work these lands. It makes little sense to us as farmers that the lands, flora and fauna would be protected adjacent to the Nier SAC but flora and fauna that stray on the periphery would not be protected.

Water sources

The EIAR describes significant impact to the watersources of the Comeragh mountains.

The Comeragh Mountains SAC has small, corrie lakes at altitudes of c.380-520m that are likely to contain an upland variant of the isoetid habitat 3110, and/or the acid oligotrophic habitat (3160). The Comeragh Mountains are an Old Red Sandstone (principally conglomerate) plateau with deep corries, recessional moraines and often very large erratic boulders (Parkes et al., 2012). Green (2008) stated that there are 13 lakes in the Comeraghs within nine distinct areas. Most are small, the largest being Coumshingaun (c.15ha), which was surveyed in 1978 (Heuff, 1984). Pater Noster lakes are found at Coum Iarthar and Sgilloge (Parkes et al., 2012). Further study of these upland lakes is required. Information relating to all attributes is provided in the lake habitats supporting document for the purposes of site-specific conservation objectives and Article 17 reporting (O Connor, 2015).

The drainage of considerable amounts of rain and surface water from the environs of the Coumnagappul, Carrigbrack, Knockavanniamountain, Barricreemountain Upper and Glennaneanemountain, Skeehans, Lagg into the Colligan Mahon river catchment area is sensitive to any development in the area. As farmers in the area, who have sought to protect the streams and rain water systems draining into the Colligan, running parallel with our land, we are objecting to the following:

- Forestry Felling of 5.4 hecatares (53,995m²) to facilitate construction (Chapter 1- Introduction, page 3)
- Installation of medium voltage and communication cabling underground between the proposed turbines and the proposed on-site substation and associated ancillary works

- Installation of significant amounts of industrial concrete into the peatlands and the transportation of such materials to the proposed foundation sites
- Drilling into the ground in the areas concerned may damage the underground waterways and potentially contaminate the private wells and natural springs in the area including ours.
- The developer cannot guarantee that the water table will be unaffected and in turn our private water supply will not be poisoned or destroyed. In the planning application our private wells are not located or mentioned in the Environmental impact study or geological survey.

Further to this, Waterford City and County Development Plan 2022-2028 (Chapter 9 Climate Action, Biodiversity and Environment) states that Waterford City and County is heavily dependent on groundwater for its water supply. At present, groundwater is extracted as a source of public water supply for the majority of the city and county population.

Due to the fact that over large areas of the County the depth to bedrock is less than 3 metres, the continued preservation of the quality of the groundwater in these areas is essential to sustaining communities. The Geological Survey of Ireland (GSI) compiled the Groundwater Protection Scheme for County Waterford which identified the main sources for groundwater within the County and the vulnerability of such resources to environmental pollution.

An effective on-site wastewater system requires regular maintenance and must be properly located in a setting that will not give rise to hydraulic issues or groundwater pollution. All proposals for development that entail the discharge of wastewater to ground will be discouraged and will be required to comply with the EPA Code of Practice for domestic wastewater treatment systems.

The Council will use statutory powers under relevant planning and environmental legislation to protect groundwater, including planning and environmental impact assessments, integrated pollution control and /or water pollution legislation in balancing the need for development with the need to protect the environment. The Ground Water (Amendment) Regulations (2016) provide for clear environmental objectives and groundwater quality standards to strengthen the regime for the protection of groundwater.

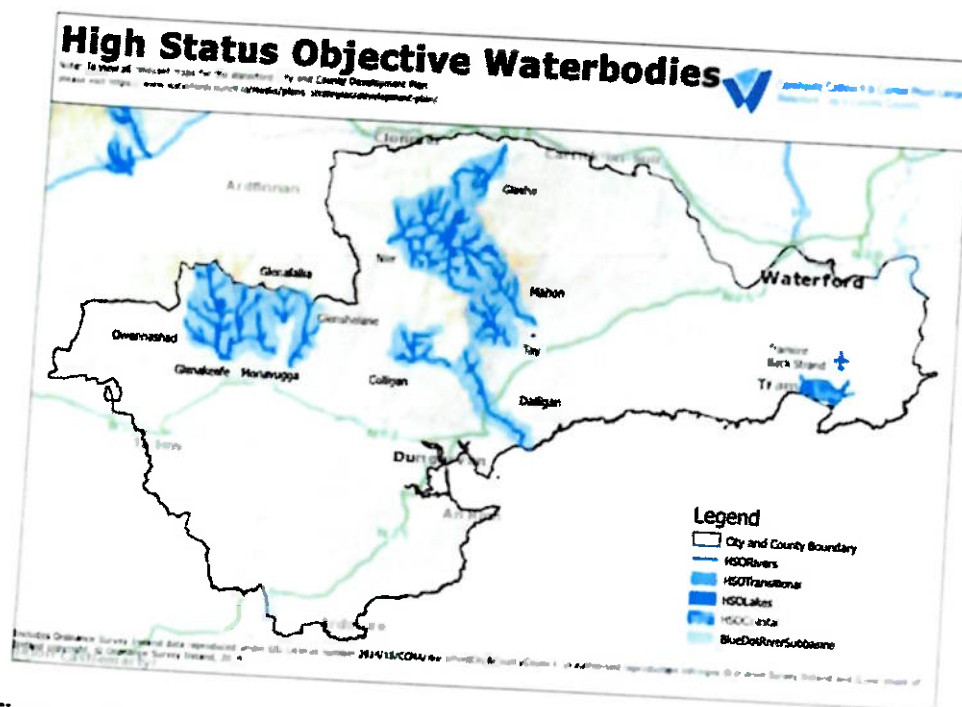


Figure 9.1 from Waterford City and County Development Plan 2022-2028
Chapter 9: Climate Action, Biodiversity & Environment | Waterford City & County Council (waterfordcouncil.ie) clearly identifies the Colligan Basin Catchment as a high status waterbody. For example, Chapter 14 of the EIAR suggests considerable impact to the Watercourse 3 (Unnamed tributary of the Skeekens Stream at coordinates 621231.261, 608261.279) and at Watercourse 4, Skeheens Stream (at coordinates 622466.431, 609322.014). Many of the streams in the area are open water courses in the farmlands and on Coillte or privately owned forestry areas, that are not fit for the amount of HGV traffic proposed which will pollute the water ways. As the bedrock is shallow, we experience water springs quite near or on the ground surface, particularly at times of high precipitation in line with mountainous regions where there is more rainfall. This can not but have a detrimental effect on the water systems of the Comeraghs.

We object to the proposed development as it will impact the water quality of the Colligan and its tributaries which run off the hills and heaths. Our farm watersource is from these springs as is our home at E91 FT91. We are among a number of families in the area that have for generations sourced our water from the natural springs in the hills above us. Any industrial sized development will significantly impact our households drinking water and also that of our animals.

Tourism

We meet many hill walkers, fell runners and mountain bike enthusiasts on the Bleantasour and Kilkeanymountain when we are about our hillsheep. The Comeragh Mountains and the Nire valley attract many urban based walking and recreational groups to the area and tourism is a major part of our community. Tourism will be impacted if this development were to go ahead. The Planning Authority shall have regard to the possible visual impact of a wind farm development on towns and villages, protected views, and amenity areas outside of the administrative area of Waterford County Council in the assessment of wind energy applications.

Previous Planning Submission Refusals in the area

In July 2015 Ecopower Developments Ltd(EDL) were refused an application for a windfarm in the Baunfune/Sillaheens/Russeltown/Boolabrien Upper(Planning application ref no 1551) area of our community, this area is less than 7 kms away from our house. The ecological system, waterways etc are all the same so the reasons for the refusal on this application for Ecopower would apply to the Empower application also and has set a precedent for this area that should not be overturned.

The Waterford county Development plan 2011-2017 paragraph in appendix A8 clearly states that there are areas within a "preferred" zone which will **not** be suitable for wind energy development due to the specific aspects of those sites. The Coumnagappul area is the prominent mountain range in County Waterford, in more of the most scenic and biodiverse areas in County Waterford and must and should be protected from Visual intrusion. The Nire Valley is an area that relies heavily on hillwalkers, mountain bikers and many other third party groups who bring tourism to this area. This area would be considered as visually sensitive and visually vulnerable and has been designated as a **no go area**.

Shadow Flicker / Repetitive sunlight reflections/ Glinting:

Turbines create pulsating-strobing effect inside homes and across gardens, affects areas near turbines and farther away, more so when the proposal is for 10 Turbines 606ft/185m tall, which will be some of the largest in Ireland.

Homes affected will lose their right to enjoy their own garden and home as it is intended, with turbines spinning 24/7. We are objecting, on these grounds, to

Noise Pollution:

Vibrations of spinning turbine blades produce infrasound noise – this affects the body like the beat of a bass drum, this can cause disturbed sleep, raised stress levels, heart palpitations, and tinnitus and can affect/cause those with pre-existing medical conditions.

The WHO published guidelines report on noise which can be found at www.euro.who.int/data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf. This report highlights the adverse health effects of infrasound and low frequency noise emitted from Wind Turbines. The developer's noise survey is inadequate, incomplete, and not fit for purpose.

The Coumnagappul area is downwind of the proposed development and incorporates complex and difficult to judge terrain making computer analysis virtually impossible to predict with any real confidence. The winds in this area are more than likely to exacerbate the sound propagation and Ecopower cannot give any assurances that this will not happen and that they would not commit to immediate dismantling of the turbines if it does happen, which gives the community no confidence in their bona fides.

EMPower has also failed to identify and address the dust and noise that will be generated as part of the road openings works and wind turbine construction works on the people and communities in the area.

In particular, we object to T12 which is less than 500metres for our fields where we work (moving animals, spreading manures, animal husbandry, fencing and cutting of pastures for hay/silage) and which will adversely affect our health.

Traffic and Transportation

Chapter 14 of the main EIAR, Traffic and Transportation, states on page 21:

POI 18: Sweep Crossroads – Trailer suspension raise to oversail stone wall. Utility pole and hedge may need to be removed (to be

determined at a later date and appropriate consents sought in advance of works)

The permission needing to be sought would be to us as the landowners and we are clarifying that there has been no communication on this or permission sought to date. We will object to any such proposals. In our view, the roads which are country roads with local and farming traffic are not suitable for:

- HGVs carrying aggregates, pipes and other materials associated with construction of the internal access tracks, hard standings and drainage infrastructure;
- HGVs (Concrete wagons) carrying concrete for turbine foundations and substation foundations;
- HGVs carrying building materials for the substations as well as electrical equipment and cabling;
- HGVs carrying plant and fuel;
- HGVs exporting site waste;
- Cranes and associated elements for the main crane for erecting the turbines;
- Private cars and vans for the commuting workforce.

Potential financial penalties for people in the area:

Should the proposed development go ahead, the value of property in the surrounding area will be badly affected and any ability to acquire finance secured on these properties will be severely diminished..”

While we do not object to the generation of ‘green’ power, this development is not suitable for this location. So I would suggest the following, Co. Waterford has a coastline in which a great deal of wave energy could be harnessed, maybe this is something that the County council and/or EMP Energy Ltd could consider on the grounds of green energy generation and the prospect of employment through engineering of and construction of such wave energy capture apparatus and also the running of such an operation.

We ask An Bord Planula to not grant this application, based on the facts and precedents outlined above.

Thank you for your time,

Kaye Mullaney
William O'Grady

William O'Grady

Kaye Mullaney

Kaye Mullaney & William O'Grady

20/01/2024