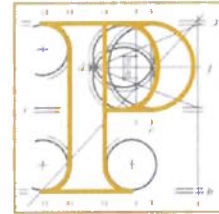


Our Case Number: ABP-318446-23

Planning Authority Reference Number:



An
Bord
Pleanála

Anne Sweeney
15 Parklane Drive
Abbeyside
Dungarvan
Co. Waterford
X35 W303

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

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Anne Sweeney
15 Parklane Drive
Abbeyside
Dungarvan
Co. Waterford
X35 W303

An Bord Pleanála
64 Marlborough Street
Dublin 1

28th January 2024

€50 fee is enclosed

An Bord Pleanála Case reference: PA93.318446

Proposed construction of Coumnagappul Wind Farm consisting of 10 no. turbines and associated infrastructure in the townlands of Coumnagappul, Carrigbrack, Knockavanniamountain, Glennaneanemountain, Skee-hans, Lagg, Co. Waterford.

To the Members of the Board,

I am strongly opposed to the development of Coumnagappul Wind Farm. My daughter, son in law and three grandchildren live just over 2km from this proposed development.

The water supply to their home comes from the mountain. I am very concerned that if this development is approved, their water supply will be contaminated. The deep construction works will have a huge impact on the watercourses in the area, not to mention the risk of a landslide.

AA Screening and NIS

The table below states “76,270 seconds logged in the potential collision height”. How many times did this protected bird fly through the collision zone when bird watchers were not present. The Applicant mentions that Dyrick Hill Wind Farm will have a cumulative impact on the Golden Plover, but fails to mention Scart Wind Farm which was determined a SID on

the 17th January 2024 case reference number 315920. Scart Wind Farm is in close proximity to Dyrick Hill Wind Farm, therefore, it must be considered that it will also have a cumulative impact.

Q/ SQ	Conservation Objective	Attribute	Measure	Target	Potential For Adverse Effects on Site Integrity from Proposed Development	Potential effect in-combination with other plans or projects	Duration of Effect in the absence of mitigation	Conclusion
Golden Plover (Pluvialis apricaria) (A140)	To maintain the favourable conservation condition of Golden Plover in Dungan Harbour SPA	Population trend	Percentage change	Long term population trend stable or increasing	<p>No Potential for Adverse Effects</p> <p>Recorded on vantage point surveys in the flight activity survey area, with 76,270 seconds logged in the potential collision height. Golden Plover breed on open upland habitats (which includes blanket bogs, heather dominated areas and marginal grasslands), where they are known to favour areas of short vegetation (<10 cm), particularly dominated by heather mixed with grasses (Parr, 1980; Whittingham et al., 2001). The species has a restricted range in Ireland, breeding in upland areas in the north-west. No birds were noted during the breeding season, and birds appear to use the site and surrounding areas only in the non-breeding season, thus suggesting that habitats are not suitable for breeding birds on site. All observations were of birds flying through the site without landing in potential suitable habitat. Looking at a worst-case scenario, there will be a loss of 13.19 Ha of suitable habitat which equates to 12% of total available suitable habitat for the species within the red line boundary (noting that the red line boundary has intentionally been kept tight to the footprint of the works so as to limit habitat damage).</p> <p>Loss of wintering and/or foraging habitat will be a Long-term Slight Effect Locally and a Long-term Imperceptible to Slight Effect at a county level (Criteria: EPA, 2022).</p>	<p>No projects (including those within plans) identified for in-combination impacts that would impede the movement of the species, reducing population percentage significantly.</p> <p>Whilst it is not possible to determine with certainty, Dyrick Hill will likely have a cumulative impact on golden plover in terms of land-take and displacement/disturbance. In terms of collision risk, it will have a cumulative impact and would increase the predicted collision rate of 0.136 per annum to 6.346 per annum which increases the county local population loss by 0.18% (0.004% increases to 0.184%) per annum.</p>	N/A	No potential for the project to affect this target either alone or in-combination with other plans or projects exists

“Ireland holds a small breeding population of Golden Plover (<100 pairs), which is suffering an acute (<84%) long term decline.”

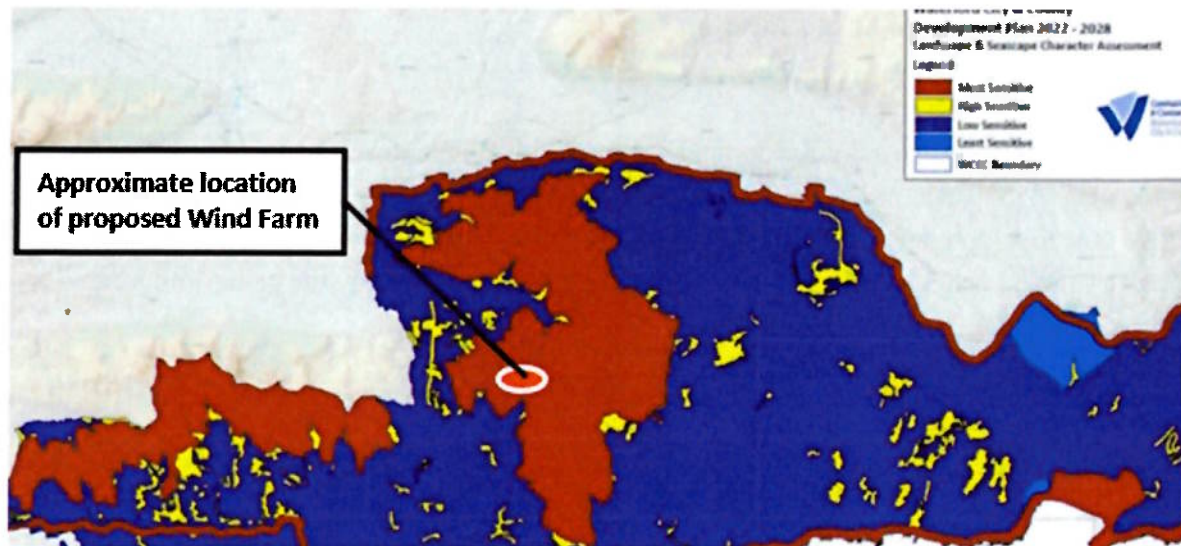
“Despite more than 30 years of effort to protect and conserve biodiversity under the EU Birds and Habitats Directives, the latest assessments under these Directives show declining trends in the conservation status of some of our most threatened species. The EU is also currently negotiating the Nature Restoration Regulation, which, if agreed, will involve legally-binding nature restoration targets. This Review of Birds on the Open Seasons Order is part of Ireland’s broader efforts to reverse these trends.”

(Review of Open Seasons Order (Birds) Background Paper for Public Consultation 2023, Prepared by the Department of Housing, Local Government and Heritage)

Chapter 4 – Policy

“The Proposed Development as a whole is not located in an area designated as the most sensitive from a landscape and visual perspective according to the County Development Plan”. (page 27 of 31)

The visual aspect of this development, i.e the turbines, are indeed located within areas designated as “most sensitive”. This is shown on the maps the Applicant has provided in the application, which are taken from the Waterford City and County Development Plan 2022-2028.



Along with this, the turbines will also be visible from many protected scenic view points and scenic drives in Co. Waterford.

“The policy context for the site and surrounding area is considered favourable for the Proposed Development, both from a national policy perspective with regard to renewable energy provision, and at a local level with respect to designations and the ability for the site to accommodate the Proposed Development” (page 26 of 31).

4.7.3 Local Policy Conclusion

“Local energy policies have been reinforced by the current Waterford City and County Development Plan 2022- 2028 which advocates for a plan-lead approach to wind energy development within the county. The immediate site area of the Proposed Development accords with all three strategic aims of the Waterford City and County Renewable Energy Strategy 2016-2030 and is aligned with the vision of the strategy” (page 22 of 31).

The above two paragraphs are entirely untrue. Waterford City and County Council have expressed a strong opinion on this development, they are not in favour as it is located in an area that is designated a no-go zone for wind energy.

Appendix 5.1 Scoping Responses

Waterford City and County Council

Please find below Coumnagappul Wind Farm SID EIAR Scoping Comments from WCCC

Draft Waterford City and County Development Plan 2022-2028

“Regard should be had to the proposed designation of the subject site which appears to be in an exclusion zone for windfarm development in the Draft Waterford City and County Development Plan 2022-2028. Therefore, the draft zoning would not support a windfarm development at this location.”

It is clear that this proposed development is located in an area that is unsuitable and unwanted by the people of Waterford and the Waterford City and County Council. I ask the Board to refuse this development and allow my grandchildren to continue to have access to an uncontaminated water supply to their home, which is surrounded by the peace and tranquility of the unspoiled Comeragh Mountains.

Yours sincerely

Anne Sweeney