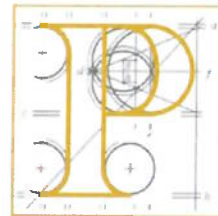


**Our Case Number:** ABP-318446-23

**Planning Authority Reference Number:**



An  
Bord  
Pleanála

Clare Byrne  
Bleantis  
Ballinamult  
Via Clonmel  
Co. Waterford

**Date:** 26 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](http://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](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned officer of the Board or email [sids@pleanala.ie](mailto: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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The Secretary.  
An Bord Pleanála  
Strategic Infrastructure Department  
64 Marlborough Street  
Dublin1 DO1 V902.

Bleantis  
Ballinamult  
Via Clonmel  
Co. Waterford  
20<sup>th</sup> January 2024

**AN BORD PLEANÁLA**  
LDG- 069477-24  
ABP-  
25 JAN 2024  
Fee: € 50 Type: CASAT  
Time: 10:30 By: HAND

Submission to An bord Pleanála  
Reference number: 318446

The construction of 10 wind turbines and related works at  
Counagappul Wind Farm, Co. Waterford

Dear Sir/ Madam,

I wish to make the following observations in response to the proposed development of Counagappul wind farm. The Irish Wildlife Trust states “ we must be cautious about where renewable energy infrastructure is installed”. Short term gains are not mitigating factors against irreversibly destroying our ecosystem and biodiversity. A siloed approach to health, ecological and hydrological factors will only exacerbate the issues regarding the location of this wind farm and will increase vulnerability in an already marginalised community that was afforded little in the way of community consultation.

### Hydrology

Waterford City and County development plan 2022 - 2028 Chapter 9 , introduction immediately addresses Waterford’s vulnerability as a “coastal county at risk from climate change events, climate adaptation measures and nature based solutions are required to be inherent to all future land use planning and development proposals” it further elaborates by stating Waterford city and county council

“will protect floodplains of river catchments in the county and retain them for their flood protection and natural heritage values”.

This project’s proximity to the Colligan River and the Nier River seriously jeopardizes this . Although Fehily Timoney state in their planning statement chapter 12 “The impacts of the construction stage are not significant and there will be no perceivable impact on the Colligan river and the Nier river” this certainly is not a mitigating measure that will ensure the protection of floodplains which are in close proximity to the proposed wind farm. To state that the cable trenches will be excavated in dry weather where possible and infilled and revegetated if required to prevent soil erosion or generation of silt pollution of nearby surface water and that this measure will prevent any increase in the risk of flooding is done so with a clear lack of surety and evidence based theory .

While examining the hydrological impact of this development it is also worth noting the impact of groundwater and the devastating effects that contamination would have on the biodiversity of the area and consequently the SPA that is Dungarvan harbour. The contamination of the groundwater would also have disastrous implications for those who use the this water in their homes, numerous households in the area use a gravity fed water system which uses the natural force of gravity to transport water directly to their homes the risk of pollution of aquifers and surface water cannot be underestimated, it is a real concern for the residents. The infrastructure has been located a minimum set back distance of 75 metres from any mapped surface water but this does not allow for small tributaries and streams that have been omitted from the study for example Glenastackaun and Glounmor Stream. During periods of heavy rainfall water from these mountains will take the path of least resistance all the while producing new streams and tributaries. To minimise the impact to surface water quality, Fehily Timoney state “existing drainage will be maintained outside the immediate site area” this is very ambiguous, where exactly is outside ? At what distance from the site ? this statement is not a sufficient mitigation measure to ensure the protection of surface water quality. The

development in their words “ is not expected to cause interference with domestic wells in the area due to large offset distances to known wells”. This completely ignores the households that use a gravity fed system , a complete study needs to be carried out based on the dewatering of the foundation excavations and it’s impact on gravity fed household systems .

It is also quite logical to assert that grid connection trenches will become preferential flow paths and will be subjected to concrete runoff during periods of heavy rainfall. Where over pumping is proposed the EIAR reports that measures such as screening will be taken, additional measures will be taken to reduce sedimentation caused by pumping e.g. creating of gravel lined sump this is a very ad hoc approach To the over pumping of a watercourse and goes nowhere near the criteria necessary to ensure protection of fishery watercourses.

In summation the hydrological mitigation measures are severely inadequate.

### **Peat**

There is an increased risk of peat slides in wet weather which would become exacerbated with the additional weight of snowpacks which occur in the Comeragh mountains. Places like Derrybrien and Meenbeg were ill- advised wind developments resulting in bog slides . Should this occur in the Comeragh uplands , who is accountable? Are there lessons to be learned . Peatlands and specifically uplands are seen isolated areas with low population density rather than looking at the overwhelming evidence in favour of peatland restoration and its benefit to biodiversity, water and climate . Peatlands ability to restore carbon should not go unrecognised . Peat depths on site is also a serious consideration and needs a full study, in wet weather excavated peat can quickly turned to sludge making it more difficult to excavate, to say that works will occur in dry weather is unrealistic at best and would also affect the seasonal use of water courses as many species are particularly vulnerable to watercourse pollution during certain seasons( October to May) and

as a general rule in stream or near stream activities should be avoided. (The issue as regards Turbary rights also needs to be considered and how these rights preclude the developer from using the land at knockavannia for anything other than Turbary. )

### **Meteorological Mast**

In June 2019 a meteorological mast was erected in Carrigbrack. A second mast was erected on the 14<sup>th</sup> September 2021. Both masts were operational and present at the same wind farm site at the same time. ~~This directly~~ contravenes the planning and development regulations 2008 Class 20A subsection 4- **Not more than one such mast shall be erected within the site .** Thus the data corrected from this unauthorised development should be inadmissible. As a side note : when asked about the presence of the second mast the developer wrote and I quote

“ No, that new mast is not EMPOWER” . While looking for the wind data from the met masts I noticed the apparent lack on information on Carbon and how this application is totally inadequate as regards it's analysis of carbon losses and gains .

### **The Waterford City and County Development Plan**

The Waterford City and county development plan designated this area as an exclusion zone for wind farm development this area was given thorough consideration and rightfully designated as such. Fundamentally this is due to incapacity of the landscape to accommodate the development of this large infrastructure. This plan was two years in the making and was the result of an exhaustive process which included multiple opportunities for public consultation it was signed off by the planning regulator and the minister. This plan should be adhered to without any hesitation.

### **Flora and Fauna**

The environmental effects and the threat to biodiversity and Ornithology of the Comeragh mountains and the unsatisfactory mitigation prescribed in this EIAR need to be given serious

consideration by An bord Pleanála . It is apparent that the approach to protecting biodiversity at Coumnagappul wind farm is basically where possible we will do XY&Z but if this is unavoidable which i believe it will be, then a disturbance licence will excuse the developer from protecting the habitat and essentially give them free reign in this sensitive landscape which is home to the red squirrel, pine marten and many more diverse creatures who are increasingly under threat in the hedgerows and trees of the Comeragh mountains.

When examining the fatality monitoring in the Ornithology measures section, it reads as follows the primary components are EFG&H components ABC and D appeared to be missing from the schedule of commitments this seems a worrying trend in this application.

Furthermore the monitoring measures refer to recommendations on Swans on wind farms , surely the hen Harrier the golden plover and the peregrine and all other rare and protected species that inhabit Comeragh mountains require a full commitment and report on the mitigating factors that will ensure their survival in the Comeragh mountains. As a resident living within the two kilometre zone of the proposed wind farm and as someone who has had the experience of seeing the hen Harrier in full flight and the occasional joyous sighting of the peregrine, aswell as the Merlin and golden plovers that have found sanctuary in these mountains, I feel the onus is on An bord Pleanála to protect These birds of international importance.

It is extremely alarming to suggest that the loss of wintering and / or foraging habitat will be a long term slight effect, this is more than a slight effect .

7 sightings of the hen Harrier during this survey also begs the question as to why there was such a lack of sightings was it due to COVID restrictions limiting the surveyor's ability to track the bird sufficiently ? As hen harriers are frequent flyers in the locality . Table 10.6 chapter 10 in the EIAR Under the sun heading -golden plover; it states that the magnitude was high, with a high number of sightings, large flock size , turbines to be erected in habitat , flocks are flighty and often spend prolonged periods of time in the air after

being spooked!! This alone should set a precedence that Coumnagappul wind farm cannot be constructed in the Comeragh mountains . An SSE report 2016 by RSPB Scotland stated that numbers of the golden plover (which are protected under European birds directive) dropped by 80% at the GordonBush wind farm during its first two years of operation this decline was markedly greater than areas surrounding the wind farm that were studied over the same period .

The habitats directive does not a priori, exclude wind farm developments in or adjacent to a Natura 2000 site. I was heartened to read that the boards representatives highlighted the importance of considering additional European sites which fall outside the 15 kilometre buffer zone that would have the potential to be impacted by the proposed development this in essence , recognises the connectivity between the wind farm site the Colligan river and the Dungarvan SPA -an indepth study of this connectivity is now required looking at the risk to the freshwater Pearl mussel which is identified as being present , the dissemination of species that have a very high significance at European level, a detailed response from the Raptor study group and an investigation into why are we allowing the undermining of the birds directive ( European law) with regards to the qualifying interest that is dungarvan harbour.

### **Visual impact**

According to the schedule of commitments, section on mitigation by avoidance and design a final layout of 10 turbines was generated from the iterative design process, this process identified that there “is a notable degree of local scenic amenity” and that” the turbines will be dominant features in the local landscape” it continues to say “the turbines will be one of the most distinctive features of the view for these residents”.This is totally at odds with the Waterford City and County Council who have committed to a policy to develop the commeragh area as a national amenity , this can be evidenced by events like the Comeragh wilds festival , the Comeragh crossing

challenge and the ecotourism that has sprung up in the locality for example, the Comeragh pods, Comeragh mountain farm, Comeragh lamb and the getaway eco cottages.

This development will totally distort the aesthetic from all over the dungarvan area but most unconscionable will be its devastating effect on the scenic route known as the Comeragh drive. ( this road is given so little consideration by the developers That they refer to it as an unnamed Rd appendix 3.1 -110KV grid connection feasibility study.

In conclusion this development would contravene the objectives of the county development plan this highly intrusive and visually domineering industrial farm would destroy this unique landscape. As previously stated one of the most worrying things in this application is the lack of any commitment to the safeguarding of the biodiversity of the site and surrounding area which encompasses the Comeragh mountains SAC and its disregard for the EU birds and habitat directives.

" The potential cumulative impact from Dyrick Hill Wind Farm, has been considered" according to Empower . The same company that has lodged both planning applications! Is the board completely satisfied that this isn't project splitting? The hydrological effects in this area could very possibly have catastrophic results for the residents and the natural habitat not least due to its positioning on peatland. However I was heartened to read the transcript from the boards consultation meetings with the developer and the boards obvious regard for the welfare of the Comeragh mountains habitat. Leading on from this I spoke to the Raptur study group who were seemingly unaware of any scoping letter or consultations that have been sought by the developer .

In view of all of these facts I respectfully ask the board to consider the potential consequences and to reject this planning permission.

The integrity of our environment should be prioritised over this proposed development.

Is Mise le Meas,  
Clare Byrne