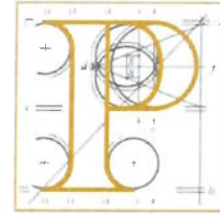


Our Case Number: ABP-318446-23

Planning Authority Reference Number:



An
Bord
Pleanála

Doris Reinisch
Kilkeany
Ballymacarbry
Co. Waterford
E91 KF88

Date: 29 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,

PP HCM

Niamh Hickey
Executive Officer
Direct Line: 01-8737145

PA04

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Doris Reinisch
Kilkeany,
Ballymacarbry,
County Waterford,
E91KF88.

To An Board Pleanála, Dublin

Subject: Case 318446

Dear Sir/Madam,

I am writing to object to the proposed wind turbine project in Coumnagappul, Co. Waterford. I have several concerns regarding the project, which I would like to bring to your attention.

Since 20 years I am resident in Kilkeany, county Waterford. The location of my home is in the Nire Valley based on the foothills of the Comeragh Mountains and about 1.5 km away from the proposed wind turbine project. The 185 m Wind turbines are proposed to be build on the side of the Comeragh mountains, which will have an enourmous impact on our environment.

The Comeragh mountains are well known as an unspoiled and rural landscape full of beauty with a wide range of natural habitats, breeding grounds and unique flora and fauna.

It is hard to believe that the exact area of Coumnagappul, with the ten proposed 185 m tall wind turbines, was recently part of a large biodiversity project funded by the European Union as.

The values of biodiversity, Flora and Fauna in the exact location were the reason why the Biodiversity project was funded for this area.

It is very disappointing that the report about biodiversity in the planing application stated that the area has no values in biodiversity and habitats. The wordings of their findings were 'an overgrazed

landscape' and no biodiversity, as the area was burned in most places.

Basically, it is poor research and a lack of interest in finding the biodiversity in the exact same landscape of a recent successful and award winning biodiversity project.

The misleading report done by the wind turbine company is not at all considerate about the environment. It is very frustrating when such a big company tries to destroy such an important area full of natural habitats and rich in biodiversity to turn the area into an industrial park for sustainable energy. Sustainable energy is important, but more so important is the unspoiled biodiversity in the area to be left undisturbed, as there is very little of it left on our planet.

Such nature and biodiversity cannot be rebuild in any way. It is very contradicting how the wind turbine company stated in their planning application that they will get some land of the landowners to turn fields into habitat grounds to compensate the loss of biodiversity in Coumnagappul.

There is no possibility in recreating the same biodiversity from Coumnagappul in a field anywhere else. The negative impact that the whole project from start to finish will cause to Coumnagappul's and the bordering Comeragh mountain SAC's biodiversity can never be compensated in such a way.

It completely underlines the wind turbine company's ignorance of our environment.

I had previously expected that such companies would be more concerned about the environment, as they sell their project to us as such, providing the solution to save our planet earth.


I am for sustainable energy, but I do not believe that destroying our unspoiled nature should be the cost of it.

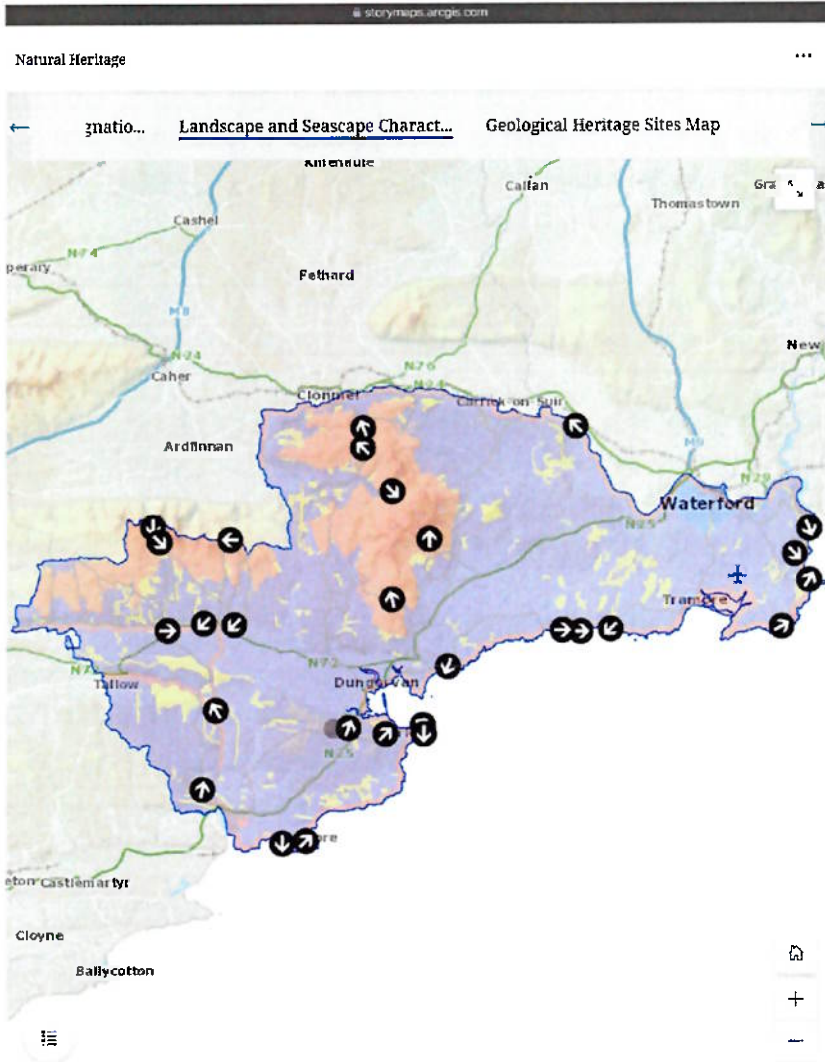
My objection of this proposed project is also backed up by our County Waterford Development Plan from 2022. Coumnagappul was declared by the Council Waterford as an Exclusion zone for renewable energy. The maps state it clearly that the proposed 185 m tall wind turbines are in the exclusion zone.

Here we show the Landscape and Seascape Character Assessment (LSCA) Map for Waterford. The LSCA is the process of understanding and documenting the range of factors that contribute to the unique physical identity of a particular geographical area.

The LSCA acknowledges that distinct areas have different capacities to accommodate change that can impact on that particular landscape character and this is understood as landscape sensitivity.

The following provides an overview of the various sensitivity classifications displayed on the LSCA Map.

 Very distinctive features with a very low capacity to absorb new development without significant alterations of existing character over an extended area.



By right these Wind turbines should be nowhere near the Comeragh mountains.

The report of the Geological Surveys Ireland about the Comeraghs is highlighting how well the area should be preserved with its unique landscape, habitats, flora and fauna.

The protected blanket peat is found on a wider area on the Comeragh mountains and Coumnagappul also has blanket bog in the area where the Winturbine construction is meant to take place.

The below Page is part of the report from the Comeragh Upland Communities European Innovation Project (EIP) carried out in 2022.

Further on page 69 of the Comeragh Upland Communities EIP Project report they mention as part of the conclusion how to enhance the preservation of the uplands, as follows:

A high-water table is essential to the formation of new peat. Blocking ditches and drains can restore the peatland function where bogs have been drained in the past.

I believe the project could have a negative impact on the peat erosion in the area. The turbines could cause soil erosion and have long-lasting effects on the local ecosystem.

Next on page 71 of the Comeragh Upland Communities EIP Project report, recommendations about vehicle use to avoid damage in this area of preservation, as follows:

Vehicle use

Using vehicles on existing tracks causes little or no damage to moorland habitats. You can avoid damage to habitats on moorland by using low-ground pressure vehicles and varying routes.

Soft, wet ground and areas of fragile soils are the most sensitive, where the habitat could be damaged and expose.

The landowner of Coumnagapul who benefits financially the most by the wind turbines, was also heavily

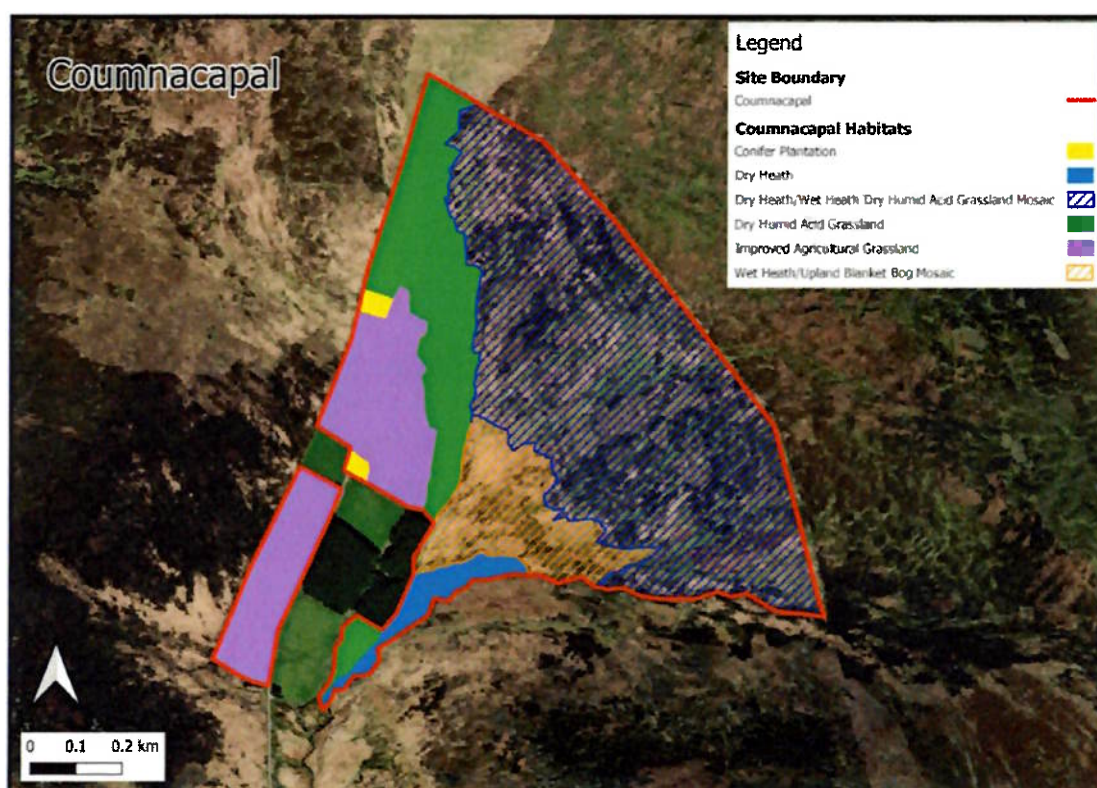
involved in the Comeragh Upland Communities EIP Project with their land.

10. Habitats Survey Results and Potential Actions

A field survey of the upland was undertaken in September 2021. An overall description of each habitat was recorded, including common botanical species and other habitat characteristics, *e.g.*, *shrub height, grazing signs, signs of burning etc.*

The Comeragh Mountains SAC is approximately 650 m east of the Coumnacappul mountain (Map 1.2).

The habitat types recorded across the mountain and their location are shown in Map 10.1. The percentage of each habitat within the upland is outlined in Table 10.1.



Map 10.1. The locations of the habitat types recorded across the Coumnacappul upland

Habitat	Area (ha)	Area (%)
Dry Heath/Wet Heath/Dry Humid Acid Grassland mosaic	44.67	55.8
Improved Agricultural Grassland	12.32	15.4
Dry Humid Acid Grassland	11.84	14.8
Wet Heath/Upland Blanket Bog mosaic	8.38	10.5
Dry Heath	2.35	2.9
Conifer plantation	0.53	0.6
Total	80.09	100%

Controlled land burning was included in the Comeragh Upland Communities EIP Project, and it must be a coincidence that the land was burned in the area exactly where turbines are planned to go. Even there was no Wind turbines addressed within the report, but somehow the burning is an indicator that the whole area will be disturbed by a large construction site to erect wind turbines.

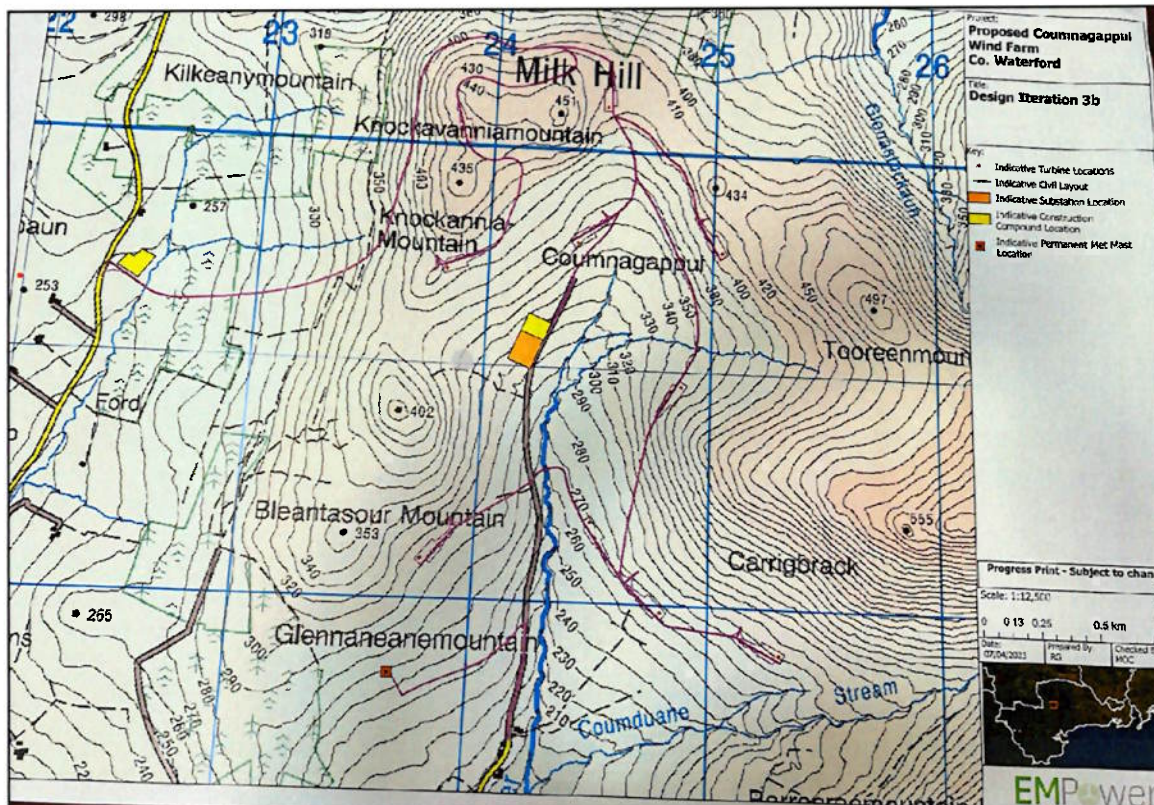
The Colligan river's spring rising in Coumnagappul and it is a blue dot water area in the region. The construction and the turbines could affect the water quality which could have a long-lasting effect on our local ecosystem. The Nire river will also be affected by this development, and despite mitigation efforts there really is no guarantee they the purity of the waters will not be damaged.

The European funded Comeragh Upland Communities Project is contradicting with the future plans for these uplands. It is very disappointing that the landowner does not take the conclusion from the report serious and is planning to cause a major destruction to this area.

When I look on the following map provided by EMPower the Project is affecting a larger area and environment, not just Coumnagappul.

I live along the yellow access road on the left shown above on the map. The road is a narrow country road and joins further down the road with the scenic route of the Comeragh Drive.

It does sound horrifying when I read in the planing application, that EMPower proposed a 2500% increase of heavy vehicle traffic on our small road. The road has a speed limit of 80km/h and this will change down to 10-20km/h. I live in Kilkeany and my main route towards the main road to Dungarvan will be massively busy, where with heavy slow moving industrial



vehicles will be impossible to pass these out. Not ideal as an access route for the construction site of these giant wind turbines.

Further I want to point out that the access route past the indicated Construction Compound location is planned to go in front of Knockavannia mountain and past Milk Hill before it heads towards the turbine locations. The building of that extra long stretch in the access route is disturbing further nature habitats and disrupts the environment. Why can't they go straight across from the compound to turbine near Knockannia mountain.

This extra bit of access route seems part of their next project of the Coumna Gapul Extension, as the EMPower is already signing up landowners for the next group of wind turbines to be continued on our side. This extension project is nowhere outlined in this project's planning application and therefore I would like to address that there is some project splitting going on.

The visual and scenic impact would be huge and it would spoil our environment and local area. The Comeragh drive is a scenic route, popular by locals and tourists. The giant 185 m wind turbines will be seen from afar in every direction.

The wind turbine project could have a negative impact on the protected scenery of the area. The turbines could obstruct the views and affect the natural beauty of the area.

This could have a detrimental effect on the tourism industry, which is a significant source of income for the local community.

We have sightings of rare breeds of birds and important breeding grounds within the area of the proposed project.

One of the rare breeds sighted is the hen-harrier in the area. There were sightings of the Golden Eagle and in general the surrounding areas of the Comeragh mountains are well-known for habitats, which attracts birdwatchers and nature lovers from near and far. The destruction of their habitats could have long-lasting effects on the local ecosystem.

From the beginning when EMPower turned up here with this project, they were not engaging very well with our community.

There first public informal meeting was held not locally, but in Dungarvan. None of the concerned community knew about it, due to the lack of contact with the community and the surrounding area.

The second public meeting was held in Tourneena, and many households in the near affected area did not received a brochure about the project beforehand.

During the meeting I was told by the EmPower Manager that the wind turbines would be 160 m tall. Which changed now to 185 m, which makes a huge difference

in size. This did not help my trust in the wind turbine project, as facts seem to change along the way.

The last meeting was in Ballymacarbry during business hours on a weekday and we only received a letter about the meeting a day before the meeting. It did not make it easy for working people to make time in the last moment to get to the meeting and get informed about the project.

I made it to their information day in Ballymacarby. The information displayed was cluttered, maps were very unclear and hard to read. EMPower received feedback about the poor quality of provided visuals and exhibited material after the previous meeting, but none of the feedback was taken on board.

In general, I found a lack of respect towards the concerned community, as EMPower did not provide clear information from the beginning.

I live very close to the proposed project area and I only became aware of it about 2 years ago. Their surveys about noise and flicker, impact on the environment are absolutely irrelevant, as they are planning already to continue with the Coumnaagappul Extension plan, which means more wind turbines.

I believe it is not fair to our community and to our environment that EMPower is proposing little pockets of small amounts of wind turbines here and there. Even when the projects end up beside each other and the consequences of the larger impact are not acknowledged and investigated by any authorities. Such large scale sustainable energy developments need to be better legislated and regulated, to avoid regretful damage of our nature through greed and false manifestations about sustainability.

As such, this projects is proposed on a 'no go area' declared by the development plan 2022-2028 of the local Waterford County Council.

This is a strong point and should not be ignored, because our local council has numerous reasons to keep this area as a 'no go area' for such developments.

In light of these concerns, I urge you to reconsider the proposed wind turbine project. I believe that the negative impacts of the project far outweigh any potential benefits.

Thank you for your time and consideration.

Sincerely,

Doris Reinisch

Doris Reinisch