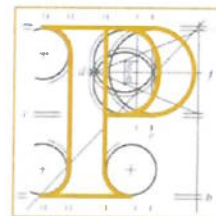


Our Case Number: ABP-318446-23

Planning Authority Reference Number:



An
Bord
Pleanála

Edmond Cullinan
Kilbrien
Ballinamult
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)

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
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1890 275 175
(01) 872 2684
www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

An Bord Pleanála
64 Marlborough Street,
Dublin 1.
V01 V902

AN BORD PLEANÁLA
LDG- 069482-24
ABP- _____
25 JAN 2024
Fee: € 50.00 Type: Cash
Time: 10.15 By: Hand

Kilbrien,
Ballinamult,
Co. Waterford

20th January 2024

Re; Submission of objection to An Bord Pleanála

Planning Application Number: 318446

Proposed Development: For the development of a Wind Farm consisting of 10 turbines (and all associated works)

Prescribed fee of €50 enclosed.

Dear Sir/Madam,

I wish to make a formal objection to the planning application cited above on the following grounds

I am a farmer in a family Farm Partnership whose land borders two of the farms that are part of the Coumnagappul Wind Farm project I have grave concerns about the above development.

I currently live in Kilbrien and have farmland in both Kilbrien and Bleantasour. I was never consulted by the developers at any stage of the project, and I did not receive any newsletters or updates regarding this Wind Farm. I consider this in total breach of EMPowers requirements for Community Consultation. I have always envisioned constructing a residence in Bleantasour, as I frequently commute several times a day to oversee our livestock. The presence of towering 185m wind turbines would discourage this plan.

The river Colligan flows through our land and a portion of this is deemed as a flood plain. I believe the EIAR has not given specific consideration to the mobilisation of silt and changes to the stability of peat. The changes in surface water pattern flow may desiccate the peat allowing pathways to open resulting in subsurface water losses due to the proposed wind farm. In 2020 a number of upland peatland landslides occurred in Ireland Meenbog in Co. Donegal, Shass Mountain in Co. Leitrim and Derrybrien in Co. Galway. As of February 8th 2022 Derrybrien had already cost the state €17 million in European Commission fines, with the total rising by €15,000 every day that its status remains unresolved. Due to these occurrences the climate change predictions like rainfall levels should have been considered in the hazard rating and should have been thoroughly assessed regarding the risk to the change in weather patterns such as more frequent and intense storms and rainfall that increases the likelihood of our rivers flooding, prolonged periods of dry weather could increase the likelihood of peat becoming unstable. An environmental disaster as such would have a detrimental effect on my livelihood, the habitats and the Colligan River that flows into Dungarvan Harbour that is an SPA.

Volume 2 Main EIAR Chapter 17 Material Assets', Telecommunications and Aviation

States: Following the implementation of mitigation measures, no significant residual effects are expected on telecommunications and broadcasting as a result of the proposed Coumnagappul Wind Farm.

C 2 C Broadband Limited is used by many residents in Bleantasour. We have many residents that work from home including farmers whose livelihood depends on Internet connection daily, calving cameras, recording of essential An Bord Bia records.

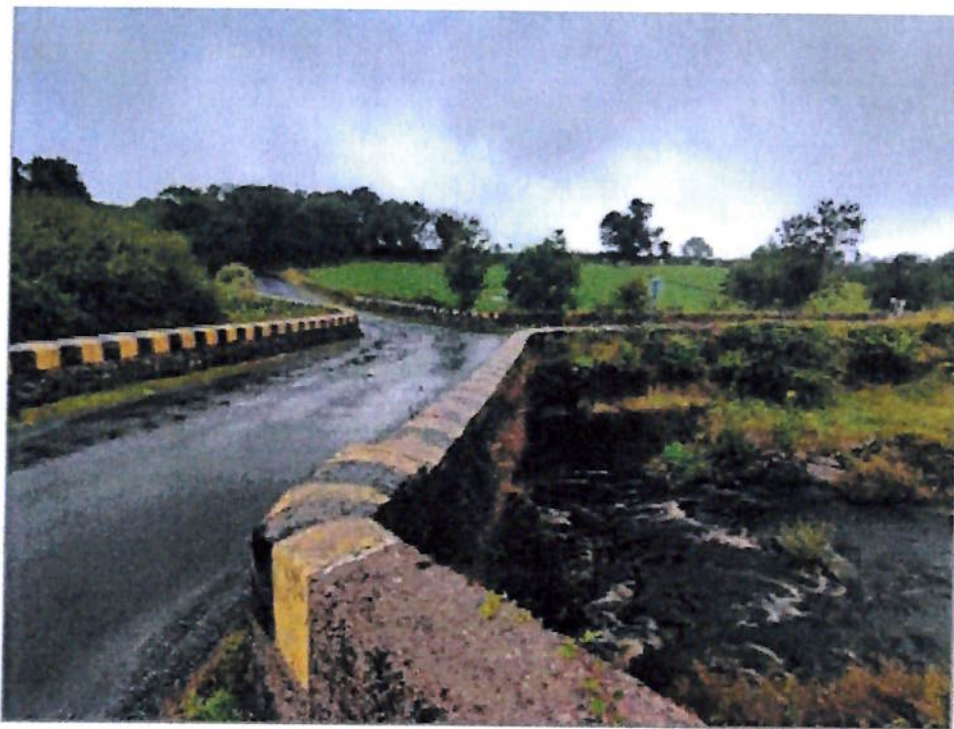
However, the Consultation Response report does not consider this Wireless (Satellite) Broadband telecommunication signals that the residents living near this Proposed Development depend on for rural Internet broadband services. Rural communities in the area between the Comeragh Mountains and the Knockmealdown Mountains are dependent on the use of wireless broadband devices and its technology for both personal and business purposes. This service is dependent on direct line of sight signal broadcasting from transmitters in mountain areas to local resident receivers, i.e., mini satellite dishes. The cumulative affect of all the wind farms will no doubt impact this network.

The study has failed to include Scart Mountain Wind Farm, which is a 16- turbine proposal by Future Energy Ireland that is currently in Pre-Application Consultation with An Bord Pleanála (Case ref.: PC93.315920).

APPENDIX 3.1

110 KV Grid Connection Feasibility Study states:

After the 10,981m, the UGC diverts northeast at Beary's Cross onto the L1041 local road. The UGC follows the L1041 for approx. 2,707m, until it meets the Colligan River. Over the course of this section the UGC encounters one large drain and 1 No Bridge crossing & passing 2 No. OHL crossings. The drain would require an undercrossing. There is a series of sharp bends with a large gradient difference on this section that could pose a risk at the cable pulling stage. The Bridge crossing is a double bridge where the River Colligan and the Skeheens Stream meet. The cable route is only required to cross the bridge over the Skeheens stream, however on the day of the survey there was a substantial volume of water flowing in this stream, which would indicate this water body could be more of a river than a stream. Figure 7 below, shows Bridge C5 overlooking the Colligan River, with the Skeheens stream running parallel, from right to left, on the opposite side of the local and the green field in the background. Preliminary measurements would indicate that there is sufficient cover, of greater than 640mm, with approx. 1000mm available to allow the cable to be located within in the road in flat formation. Figure 7 - Bridge C6 towards Dungarvan Substation



This is Scart Bridge and it is a Protected Structure RPS Number WA751040

The granting of the proposed Coumnagappul Wind Farm would contravene the Waterford City and County Development Plan 2022-2028 that has deemed the proposed location as an exclusion zone for Wind Farm Development.

October 2023

GROUP

After crossing Bridge C5, the UGC route diverges north to follow an unnamed local road for approx. 3,212m. This section of the route has numerous OHL crossings, 2 No. drain crossings C6 & C7 and must share the road with Irish Water infrastructure. This road has numerous residential and agricultural properties that would appear to be opposed to wind farms in the area, see Figure 8 below. Similar posters could be seen at entrances to several properties along this section of the route. As there is a visual presence of objectors to wind farms in the area, this could also pose a risk to a cable route in this area.



Figure 8 - Local Objectors to Wind Farms

It is proposed the UGC would then pass through a private agricultural access track which leads to the windfarm. The UGC would pass through Folios WD9242, WD5865 & an unregistered folio for approx. 2,270m



Figure 9 - Agricultural Access track which leads to the wind farm

UGC Option C Constraints:

- Existing ESB UGCs installed at the entrance of Dungarvan Substation.
- Road opening Licences required.
- A general high amount of traffic using the route (N72 & R672).
- At least 2 No. Bridge crossings with HDD required.
- 6 No. Watercourse crossings total.

I respectfully request An Bord Pleanála to carefully consider my concerns, and ensure that The Waterford City and County Development Plan is upheld.

Yours Sincerely,

Edmond Cullinan
EDMOND CULLINAN