Our Case Number: ABP-318446-23

Planning Authority Reference Number:

An Bord Pleanála

Frank Sweeney
Killineen West
Dungarvan
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. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

PP EGM

Niamh Hickey
Executive Officer
Direct Line: 01-8737145

PA04

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An Bord Pleanala

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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, Skeehans, Lagg, Co. Waterford.

Dear Sir/Madam

I wish to object to the proposed Coumnagappul Wind Farm. My first reason for objection is in relation to my family. My daughter, son-in-law and three grandchildren live close to the area where this wind farm is proposed. I have serious concerns over the future of their water supply, which comes from the mountain, if this development is granted planning permission. I have spent a great deal of time reading the documents submitted by the Applicant. The list of contaminants which may enter the watercourses is a lengthy and shocking read. Water is a human right, and their water supply should not be destroyed because of a wind farm which is planned for an area that it should not be in.

Landslide

The Applicant states

"No evidence of slope instability was observed at the Site and there are no historical records of landslide activity within 1km of the Site on the GSI database." (Chapter 11 – Soils, Geology and Hydrogeology page 22 of 69).

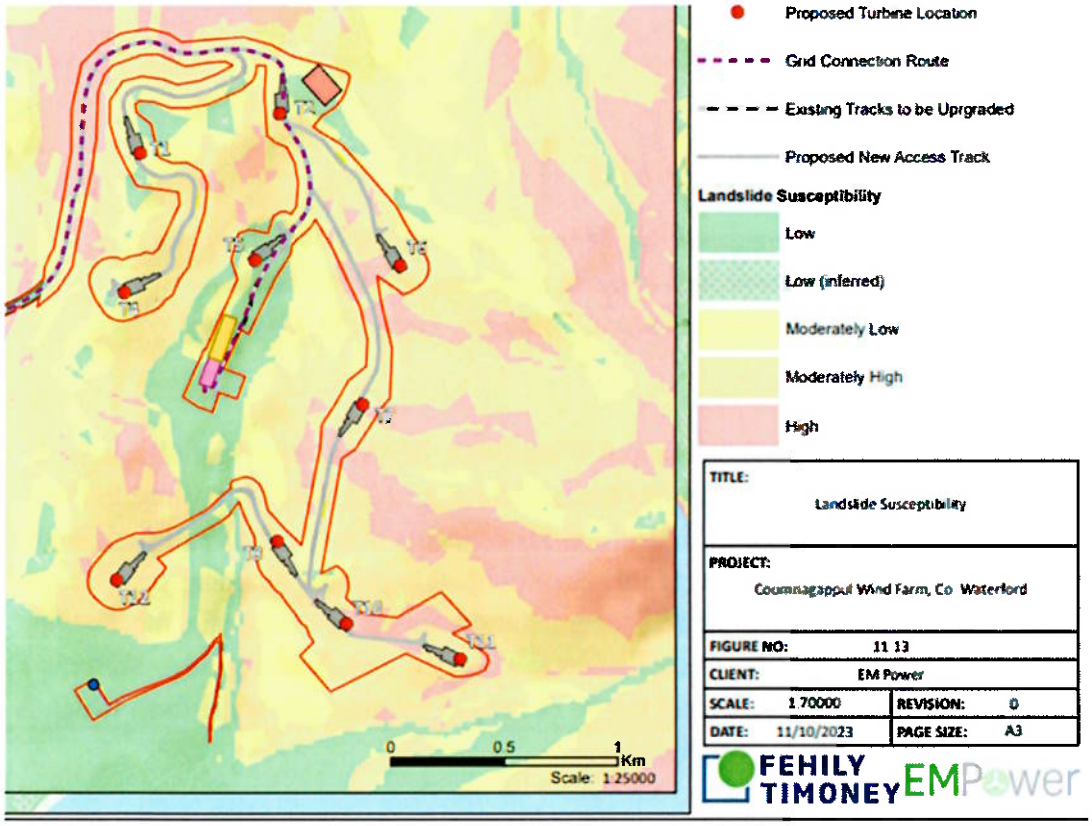
5.1

Scoping Responses

Department of Housing, Local Government and Heritage

"The Department notes that the location map indicates the site may include areas of peatland and areas under coniferous forest cover. The EIAR should give specific consideration to the

mobilisation of silt and changes to the stability of peat. The proposed windfarm has the potential for significant changes in patterns of surface water flow and may desiccate the peat allowing pathways to open up resulting in subsurface water losses. It should be noted that in 2020 a number of major upland peatland (blanket bog) landslides occurred across Ireland, most notably on Shass Mountain near Drumkeeran in County Leitrim2 and Meenbog, near Ballybofey in County Donegal. The Peat Stability Risk Assessment must be considered in light of these occurrences with consideration of climate change predictions (e.g. rainfall level) in the hazard rating and should thoroughly assess risk with regard to change in weather patterns due to climate change such as more frequent and intense storms and rainfall events, increased likelihood and magnitude of river flooding, prolonged periods of dry conditions which may increase the likelihood of unstable peat."



As can be seen on the map above, turbines are located on areas rated "moderately high" and "high" on the landslide susceptibility map.

It is very unwise for the Applicant to presume there is no risk of landslide, simply because one has not occurred in the past. This site has not experienced construction works of this magnitude, the area is comprised of mostly blanket peat and this combined with rising precipitation levels and storm occurrences could quite possibly result in a landslide. The Applicant simply cannot be sure that a landslide will not occur if aggressive construction works begin.

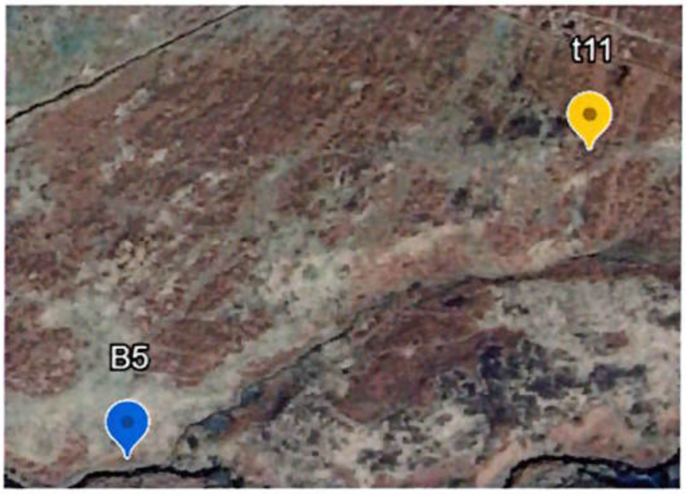
Appendix 9.3 – Aquatic Survey Reports

Table 4.1 Summary of fish species recorded by river survey site in the vicinity of the proposed Coumnagappul wind farm, September 2020

Site no.	Watercourse	Atlantic salmon	Brown trout	Sea trout	European eel	Lampetra sp.	Other species
A1	Shanballyanne River		✓				
A2	Kilbeany River		✓				
A3	Reanadampaun Commons Stream		✓				
A4	Shanballyanne River	✓	✓				
A5	Unnamed stream	✓	✓				
B1	Skeheens Stream		✓				
B2	Unnamed stream		✓				
B3	Skeheens Stream	✓	✓				
B4	Colligan River	Not accessible due to landowner					
B5	[illegible] River	Not accessible due to landowner					
B6	Colligan River	✓	✓				
B7	Knockacaharna Stream						Stickleback
B8	Greenane Stream						
B9	Colligan More Stream				✓		
B10	Colligan River	✓	✓	✓	✓		
B11	Colligan River	✓	✓		✓	✓	Flounder
C1	Unnamed stream						
C2	Ballynagulkee Upper Stream						
C3	Tooraneena Stream		✓				
C4	Clooncogaile Stream		✓				
C5	Clooncogaile Stream		✓		✓	✓	
C6	Tinalira Stream	Dry at time of survey					
C7	Ballynagulkee Lower Stream	✓			✓		

(Coumnagappul wind farm fisheries assessment 2021 page 45)

I would like to point out to the Board that B4 and B5 were not assessed. The coordinates of B4 and B5 are contained in the document. Please see the Google Earth images below



This assessment was carried out in September 2020, the Applicant had ample time to ensure this essential environmental assessment was completed in full. Participation in environmental assessments should be a mandatory condition for landowners who are financially involved in the development.

4.1.3 European eel

"On both a global and Irish scale, the European eel is listed as 'critically endangered' (Pike et al., 2020; King et al., 2011). European eel were recorded from a total of four sites; B9 (Colligan More Stream), B11 (Colligan River), C5 (Clooncogaile Stream) and C7 (Ballynaguilkee Lower Stream)" (Taken from Coumnagappul wind farm fisheries assessment 2021 page 44).

This critically endangered species may also be located in B4 and B5.

4.1.1 Salmonids

"The majority of the survey sites provided good or better salmonid habitat based on Life Cycle Unit scores (Table 3.2) although, of the n=20 sites assessed, only three offered excellent quality salmonid habitat, i.e. sites B3 (Skeheens Stream) and B10 and B11 (Colligan River). The Colligan River at site B10 (Colligan Bridge) also supported adult sea trout, where excellent quality holding habitat for migrating fish was present". (Taken from Coumnagappul wind farm fisheries assessment 2021 page 44).

3.2.2 Lamprey habitat

"Lamprey ammocoetes (Lampetra sp.) were only recorded at a single site (i.e. site B11 on the Colligan River at Kildangan Bridge)" (Taken from Coumnagappul wind farm fisheries assessment 2021 page 42).

The Lamprey is listed under Annex 11 of the Habitats Directive. There is a strong hydrological connection between the proposed wind farm site and the Colligan River which will result in contaminated waters for this protected species.

"Good quality lamprey habitat was present at sites B9 (Colligan More Stream) and B11 (Colligan River). Sites B10 (Colligan River) and C4 (Clooncogaile Stream) offered some moderate quality lamprey habitat overall but none were recorded via electro-fishing." (Taken from Coumnagappul wind farm fisheries assessment 2021 page 42).

It states above "none were recorded". This does not mean they are not present, they were simply not there when this short assessment was carried out. Good quality habitats must be protected. An endangered species will not have the ability to rejuvenate if its habitat is destroyed.

"Site C6 (Tinalira Stream) was 100% dry at the time of survey and thus a LHQI score was not applicable (i.e. no fisheries habitat present). Sites B4 (Colligan River) and B5 (Glennaneanemountain River) were not accessible during the survey period". (Taken from Coumnagappul wind farm fisheries assessment 2021 page 42).

This is unacceptable.

Appendix 5.1 Scoping Responses

<u>Waterford City and County Council</u>

"Hydrology- direct and indirect impacts on water quality from excavation and soil stability in an area of cut away peat shall be given particular attention as the upper reaches of the River Colligan are within a Blue Dot Catchment. The EIAR needs to demonstrate how the proposed development will impact on the objectives for protection of Blue Dot Catchments under the Water Framework Directive."

Waterford City and County Council are not in favour of this development as it is located in an area designated as a no-go zone for wind energy. The Colligan River must be protected, but this is impossible if environmental assessments are not complete.

As I have previously mentioned the Waterford City and County Development Plan 2022-2028 makes it very clear that the area where the wind farm is proposed is a no-go area for wind energy. Ballynagare Wind Farm in Co. Kerry was recently refused planning permission by An Board Pleanala as the wind farm was proposed in a no-go area for wind energy, set out by the Kerry County Development Plan. I ask the Board to hold the conditions of the Waterford City and County Development Plan in the same regard and refuse this application.

Yours sincerely,

Frank Sweeney.