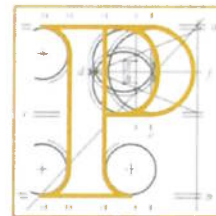


Our Case Number: ABP-318446-23

Planning Authority Reference Number:



An
Bord
Pleanála

James and Martina Cullinan
Kilbrien Lower
Ballinamult
Co. Waterford
E91N8R2

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

Tel
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1890 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Kilbrien lower

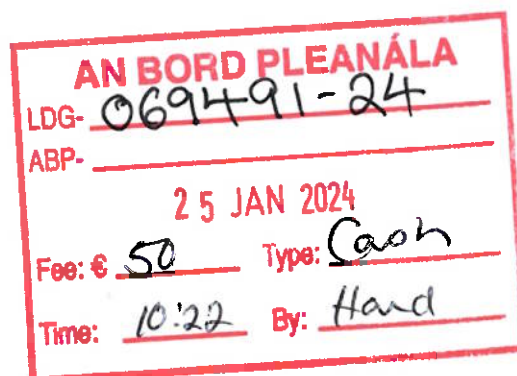
Ballinamult

Co. Waterford

E91 N8R2

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.
DO1 V902.

23rd January 2024



Case Reference:PA93. 318446

Re: Construction of Coumnagappul Wind Farm Comprising of 10 Turbines and associated works.

Prescribed Fee of €50 Enclosed.

Dear Secretary,

We wish to submit a strong objection to the above project.

Our farm is in Bleantasour next to two neighbouring farms that are involved in the proposed wind farm project. We also farm in Kilbrien where our home is. We strongly oppose this development, which is seeking a 10-year planning permission and 40-year operational request. I believe it would have a detrimental impact on our livelihood as we also have an Agricultural Contracting business.

Construction Phase

The impact of the increase of construction traffic on any of our rural road networks would have catastrophic effect on our daily lives. We need to commute daily sometimes on multiple occasions to our farm in Bleantasour to take care of our animals. People need to get to their work place. Farmers need to have their milk collected.

Our Agricultural Contracting Business is extremely weather dependent.

The proposed development threatens to disrupt our ability to reach the farmers in a timely manner. Increased traffic and congestion in the area could make it difficult for us to transport our equipment and machinery to the farms.

If there was a critical incident, emergency services getting to the area has not been addressed, and more importantly the over-all consideration to the residents of the area is not conglomerate to the level of risk.

The L1041 is a local road connecting the R672 at Beary's Cross with Kilbrien and has numerous sharp bends at the best of times two cars will manage to pass each other on this road but nothing larger. The local people use this road to access the R672.

The proposed access for the construction traffic of the Meteorological Mast are travelling down the L1041 turning left at Scart Bridge onto the L1042 that is the Comeragh Drive. On meeting a junction to your left that is a continuation of the Comeragh Drive, you proceed straight ahead onto the L5116 this continues on to the L51162 straight to Coumnagappul where the road ends. Our roads do not have the capacity to take extra traffic. This is also option C for the underground cable grid link.

Scart Bridge which is of Vernacular heritage and is a protected structure RPS Number: WA751041 c1820 described as (A well-proportioned bridge forming an appealing landmark on the river Colligan. The rubble stone work serves to blend the bridge into the surrounding landscape, while the civil engineering heritage significance of the site is identified by the Construction).

The studies have failed to include the fact that Scart Bridge is **Protected**.

The further omission of acknowledging that the L1042 that goes through the bridge is a continuation of the Comeragh Drive referring to it as an unnamed road.

The L51162 is referred to as **An Agricultural Track** that goes through unregistered land. This section of unregistered land is part of Bleantasour Mountain commonage that we hold rights in common with other local farmers. We most definitely will not enter into any agreement that involves Bleantasour Mountain or any part of our property to facilitate this Industrial Development. How can this be part of the planning application without consultation with the other rights in common holders?

Another major omission is the absence of Kilbrien National School from the **Schools Located Near Wind Farm Site** it being a mere 4km from the site.

See Section: Preliminary Traffic Management Plan: 3.3 Schools. Table 3.2 Schools Located Near Wind Farm Site. Coumnagappul Wind Farm EIAR. Fehily Timoney Consultants

Copy of Table included below for your convenience.

CLIENT: EMP Energy Limited (EMPower)
PROJECT NAME: Coumnagappul Wind Farm EIAR
SECTION: Preliminary Traffic Management Plan



3.3 Schools

Table 3.2 lists the schools within the vicinity of the Proposed Development. The proposed works at the Site are not expected to impact on any school due to their distance from the main site entrance.

Table 3-2: Schools Located near Wind Farm Site

| Name of School | Distance From Wind Farm Site Entrance (km) |
|-------------------------------|--|
| St. Mary's National School | 7.2 |
| Ballymacarbry Pre School | 11 |
| Modeligo National School | 13.3 |
| Ballymacarbry National School | 13.5 |
| Coolnasmear N.S. | 14.7 |
| Scoil Mhuire N.S. | 15.8 |

PHOTOMONTAGE

Two of our children have homes in this area and have young families. They are extremely concerned that the value of their homes will be impacted and fearful as to what negative effects may come from the industrialisation of our beautiful Comeraghs. To be honest the magnitude of this development is frightening. There is no pre existing infrastructure to support it.

We also have deep concerns regarding the photomontage pictures included in the planning application for the proposed Coumnagappul Wind Farm development. Upon careful examination, it has become evident that these pictures were not taken from the most impacted viewpoints, houses to the south of the wind farm will be most

affected as they will see 9 of the turbines. Which raises significant doubts about the accuracy and reliability of the visual representation of the project's potential impacts.

PHOTOMONTAGE VP23

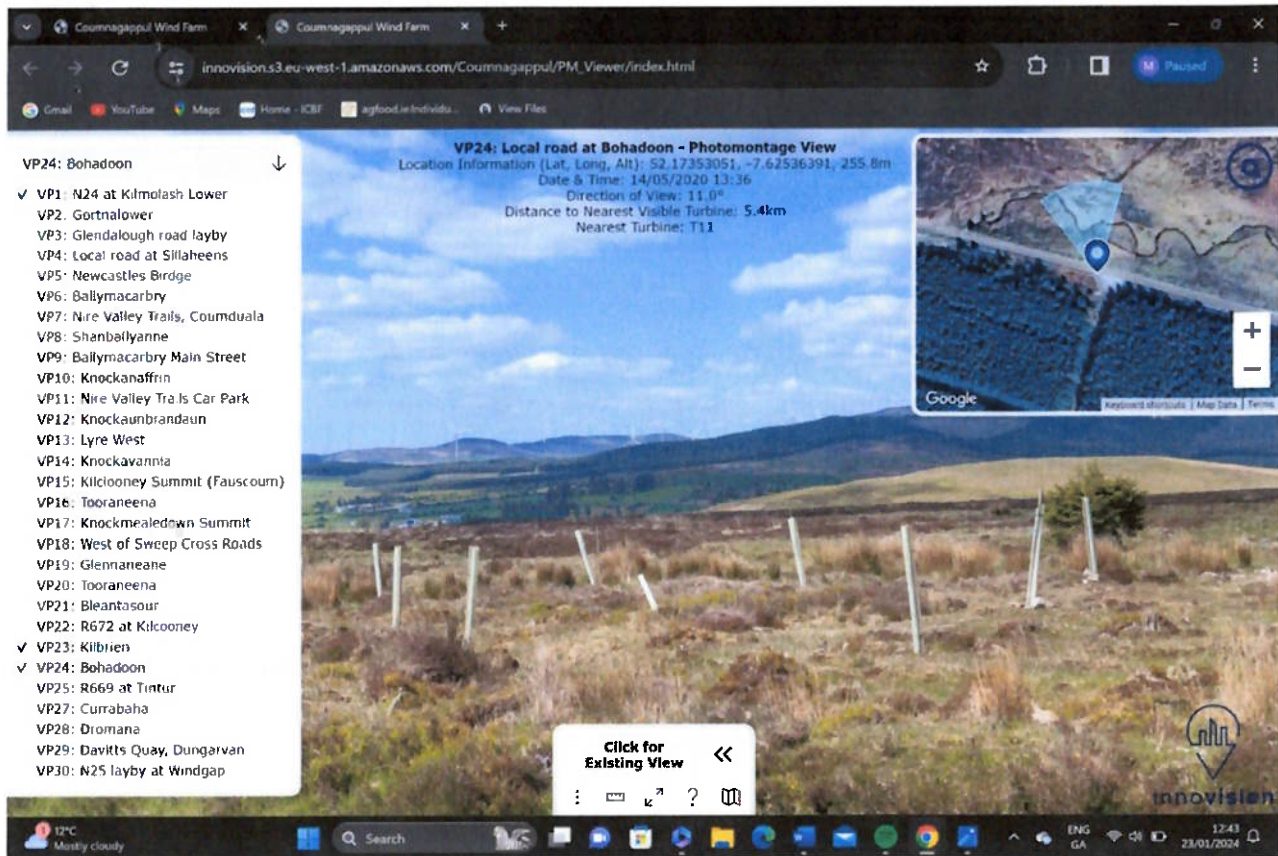


From VP23 Looking directly ahead you can see Kilbrien National School on the L1041 Comeragh Drive. Whoever took this photograph just stepped up the side road to the left.



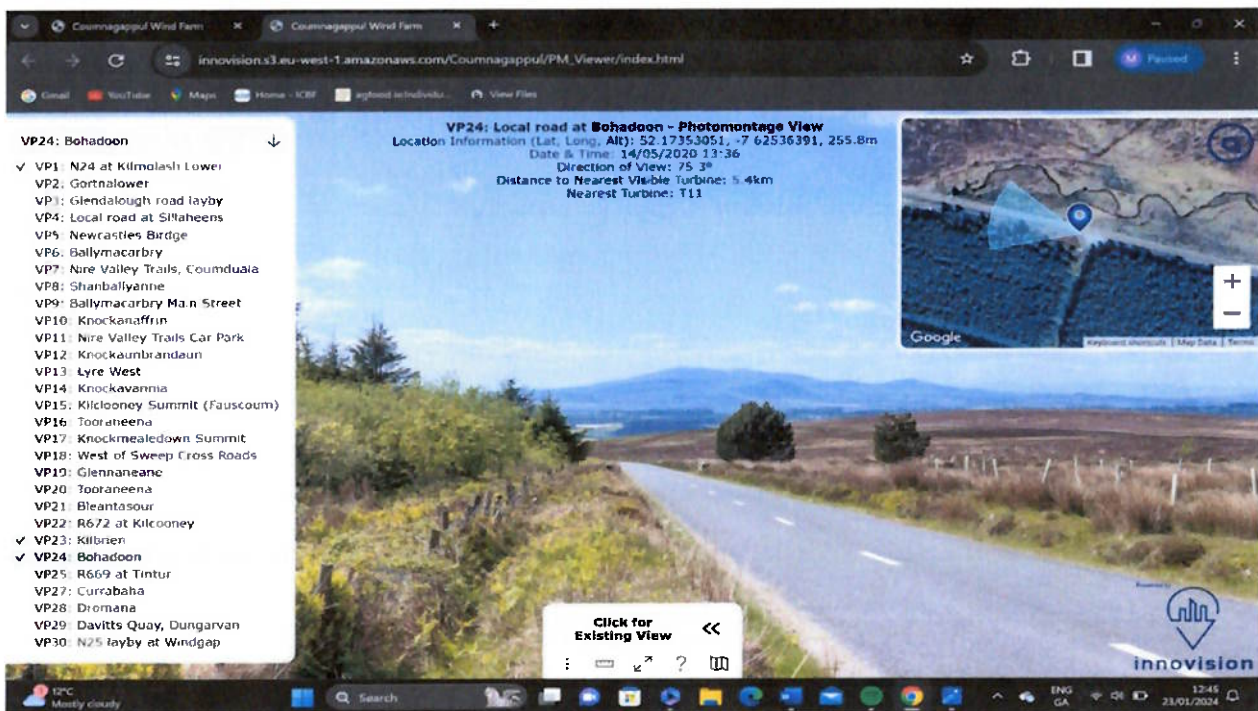
As you can see from the same VP23.

The Comeragh Drive



VP24

This road L1040 is the Mauma Road on the Comeragh Drive it takes you all the way down to the Mahon Falls. It is the renowned Scenic Drive. This photograph was taken from Bohadon forestry entrance. Under the Waterford City and County Development Plan 2022-2028 this is a protected view (VP14). Views are protected for good reasons. Please do not allow our scenic view to be littered with wind turbines



Also, from VP24. This shows the breathtaking unspoilt views.

Environmental Impact Assessment Report for The Proposed Coumnagappul Wind Farm Planning Statement 2.2 The Site 2.2.1 Existing Land Use

The Proposed Development Site is located along the transitional Western Foothills of the Comeragh Mountains

Environmental Impact Assessment Report (EIAR) for the proposed Coumnagappul Wind Farm AA Screening and NIS

2.1.1 Existing Land Use

The Site is Located within the Upland topography of a horse shoe shaped area formed by the Comeragh Mountains.

As you can see above one report states in the Foothills and the other states in the Upland?

I would like to enquire as to why there is no Addendum B?

It is a requirement of the Applicant to erect a site notice in all areas where works are proposed. A site notice was not erected on the R672, Clooncogaile Cross Roads.

I would like to point out to the Board there is an omission of a signature on the letters of consent. "Paddy Coffey of Knockavannia, Ballymacarbry, Co. Waterford" has not signed the letter of consent.

TWO METROLOGICAL MASTS?

Probe location 001 (view east) – at Turbine T11



Probe location 004 (view east) – at Turbine T10

P2360

www.fehilytimoney.ie

Page 1 of 26



Probe location 029 (view east) – at Turbine T02 and view of existing met mast

P2360

www.fehilytimoney.ie

Page 7 of 26

The 1st Meteorological mast was in situ on the 15th June 2019 in Carrigbrack. A retention planning application was lodged with Waterford City and County Council on the 17th June 2021. Ref no: 21565. The decision date was 11th August 2021. It was withdrawn on 10th August 2021.

The 2nd Meteorological mast was in situ on the 14th September 2021 in Coumnagappul erected by Met Com. There were two masts without planning.

I refer to case Referral No.PL05E.RL.3419 Planning Authority Reference: PS5/15/01

Details of Reference: Whether the erection of 2 no. Wind monitoring masts is or is not exempted development. The inspectors report: States An Bord Pleanála, in exercise of the powers conferred on it by section 5 (3) (a) of the 2000 Act, hereby decides that the said erection of multiple masts for mapping meteorological conditions in a site is not exempted development.

On the 5th November 2021. Ref no:211029 The 1st Meteorological mast was in for retention once again with Waterford City and County Council. The application was finalised on the 8th January 2022. EMPower said the Mast was not theirs.

While looking through the planning document Appendix 11.2 General Geotechnical site photos I came to page 7 above and as you can see from the picture above they refer to "at turbine T02 view existing met mast" this is the 2nd mast in question in the col to the east of Milk Hill.

The first mast that was in Carrigbrack was dismantled and removed by Met Com in late January 2023 and the second mast followed subsequently in 2023.

Both masts were subject to Unauthorised Developments.

Waterford City and County Development Plan 2022-2028 has deemed the area of the proposed Coumnagappul Wind Farm as an Exclusion Zone for Wind Farm Development.

The Elected Members of Waterford City and County Council adopted the Waterford City and County Development Plan 2022-2028 at the full Council Meeting held on Tuesday 7th June 2022 and it came into effect on Tuesday 19th July 2022.

Planning applications are expected to provide a comprehensive and accurate assessment of the potential impacts of a proposed development. However, when significant omissions are discovered in a planning application, it raises serious doubts about the credibility and reliability of the combined studies.

A lot of this application is based on assumptions so how are An Bord Pleanála supposed to make a decision without precise information.

We respectfully request you take our grave concerns into account and protect our democracy by upholding The Waterford City and County Development Plan.

Yours Sincerely,

James Cullinan JAMES CULLINAN
Martina Cullinan MARTINA CULLINAN