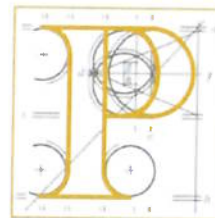


Our Case Number: ABP-318446-23

Planning Authority Reference Number:



An
Bord
Pleanála

Jimmy and Alice Cullinan
Bleantis
Ballinamult
Co. Waterford
E91TW62

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

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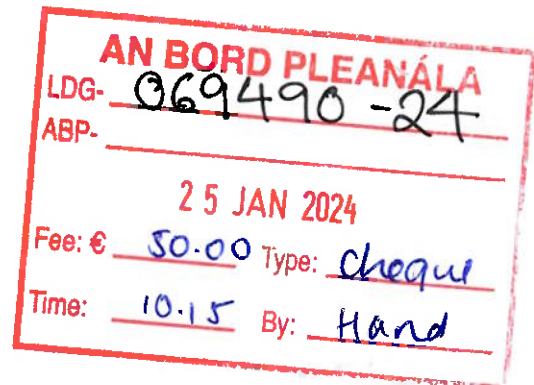
E91 TW62

The Secretary

An Bord Pleanála

64 Marlborough Street

Dublin 1



20th January 2024

€50 fee enclosed

An Bord Pleanála Case reference: PA93.318446

Observation relating to : 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.

To the Members of the Board,

Listed below are the reasons for our strong objection to this development.

Coumnagappulwindfarm.ie states

“Community participation and stakeholder engagement are of the utmost importance to EMPower”.

This company claims to hold the community in high regard, however not one household was consulted before the meteorological mast was erected in June 2019. We bought and renovated a house in Bleantis which was unoccupied for many years, bringing new life to the area with our three young children. We were allowed **two weeks** of living here carefree, before the erection of the mast and the start of this extremely stressful and worrying process.

A number of publications on coumnagappulwindfarm.ie are now outdated and have not been removed, most notably “The Effect of Wind Farms on House Prices 2014” compiled by Renewable UK. This study states *“much media coverage of wind farms presumes that they have a negative impact on house prices but there is no clear evidence to show whether or not this is the case”*. More recent studies show that wind farms do in fact reduce the value of people’s homes. A study published in 2020 by Koster. H and Dries. M. “Wind Turbines and Solar Farms Drive Down House Prices” used detailed housing transactions covering the whole of the Netherlands since 1985. The study proved that tall wind turbines (over 150m) reduce the value of peoples homes within a 2km orbit. Kosten and Dries (2020) also state

“Our study shows that the location of production sites of renewable energy matter”.

This leads to my next reason for objection.

Waterford City and County Development Plan 2022-2026

The Development Plan was established through public consultation and lengthy deliberation amongst the elected councillors, and was approved by the Minister for Housing, Local Government and Heritage and the Planning Regulator. The Development Plan has categorised the area where the proposed wind farm will be situated as an **exclusion zone** for wind energy

“Application form for permission/approval in respect of a strategic infrastructure development

Pg 4 of 15

No 6. Site

Site zoning in current Development Plan for the area

Rural Area, not zoned. Area mapped as 'Exclusion' area under the Renewable Energy Strategy for Waterford City & County 2016-2030."

The applicant noted that this area is in an exclusion zone, one would question the reasoning behind continuing with an application in an area that is deemed unsuitable.

An Bord Pleanála refused planning permission for a wind farm in Ballynagare, Co. Kerry, Case reference: PL08.313007, September 2023 as the proposed development was in an area which is designated as an **exclusion zone** for wind energy. An Bord Pleanála must also refuse permission for Coumnagappul Wind Farm as it is not compatible with the Waterford City and County Development Plan. Wind Energy Developments must be placed in areas that are designated as suitable.

Missing Documents

Addendum B

Application form for permission/approval in respect of a strategic infrastructure development

Pg 4 of 15

No 6. Site

“Where available, please provide the application site boundary, as shown in the submitted plans / drawings, as an ESRI shapefile in the Irish Transverse Mercator (ITM IRENET95) co-ordinate reference system. Alternatively, a CAD file in .dwg format, with all geometry referenced to ITM, may be provided. This has been provided in Addendum B of this application.”

Addendum B is not provided in the application.

Site Notice

A site notice was not erected on the R672, Clooncogaile Cross Roads. Works are proposed at this site. The Applicant is obliged to erect a site notice in all areas where works are proposed.

Schedule 5 : Letters of Consent

It is noted that “Paddy Coffey of Knockavannia, Ballymacarbry, Co. Waterford” has **not** signed the letter of consent.

It is also noted that there is an error of addresses.

“Patrick Power of Coumnagappul, Co. Waterford”

“Thomas Power of Coumnagappul, Co. Waterford”

There are no residents in Coumnagappul. It is concerning that the applicant does not have the correct addresses for their clients, and we are also curious as to why a client would sign a document with such an obvious and important error.

Why has one client not signed the letter of consent? Is the application valid if signatures are missing?

Chapter 14 – Traffic and Transportation - Volume 2 – Main EIAR

Pg15 of 58

“It is expected that full road closures will be put in place to facilitate cabling works in combination with lane closures, partial road closures and stop/go systems.”

Pg 22of58

“The permanent re-routing of overhead utilities will result in a temporary disruption to power and telecommunications services for existing residents and business and will also involve temporary road works to ‘underground’ these services.”

Also pg 22

“Temporary disconnections of overhead utilities will result in a significantly greater impact on local residents and businesses in terms of disruption to services than permanent diversions. It will also result in greater disruptions to traffic flows as the delivery of components through the town on each occasion will take slightly longer due to additional temporary works each time.”

This is going to have a huge impact on all the residents in the area and the huge volume of people who are traveling this route for work and school. Our agricultural contracting business will be hugely impacted, especially during the short window for cutting silage which is weather dependant.

It is inconceivable that we should have to suffer road closures and loss of power to our homes for a development that is not approved by Waterford City and County Council.

Harmony Solar

A google search of coumnagappulwindfarmsid.ie from my phone shows the image below.



I am curious as to why Harmony Solar is named on the Coumnagappul website. I consulted the company who stated they deal specifically with solar energy. Therefore, it could be interpreted that the Applicant intends to place solar panels on this proposed development as there would be no other reason for having Harmony Solar named on their website. It is very presumptuous of the Applicant to make such an obvious connection with solar energy at this early stage.

SECTION: Chapter 14 – Traffic and Transportation - Volume 2 – Main EIAR

Pg 11 of 58

14.4.2.1 Site Access Coumnagappul Wind Farm will have one main site entrance which will be used for both construction and operation as an access point from the public road. **The meteorological (met) mast will be accessed**

from the main site entrance via the internal access track leading to turbine 12 to construct, service and maintain the met mast.

Pg 13 of 58

14.4.2.3 Permanent Met Mast 1 no. permanent meteorological (Met) mast will be erected approximately 1km south of the site. The permanent met mast will be of the following configuration: • 100m high free standing lattice steel mast with a shallow concrete foundation fixed to ground anchors by 3no. guy-wires to measure local meteorological conditions. The mast will include a concrete base measuring 10m by 10m and will be up to 1.5m in depth. **The met mast will be accessed from the proposed wind farm internal access road network** and existing agricultural track which will be upgraded as shown on layout plans. A section of new track will lead from the existing agricultural track to the met mast location. The met mast access track will be 3.5m in width and will include drainage.

Another contradiction by the Applicant. Will the permanent met mast be accessed by the main entrance or the internal access road?

Chapter 2 – Description of the Proposed Development pg3of50

“The proposed grid connection cable works will include 6 no. existing watercourse and drain crossings”.

“Chapter 2 – Description of the Proposed Development pg 24 of 50

24	Grid Connection Route (GCR)	There will be a requirement for 3 no. riverine watercourse crossings along the GCR in total, outside the site. These are on an unnamed tributary of the Saeheens Stream, the Ballynagallace Lower and Colligan River. The crossing of the unnamed tributary of the Saeheens Stream will be via horizontal directional drilling (HDD). Although no-instream works are proposed, the drilling works will only be completed during a dry period between July and September (as required by Inland Fisheries Ireland for in stream works) to avoid the salmonid spawning season and sensitive life stage period. Mitigation measure 38 will be implemented. A pre construction confirmatory meter survey to reconfirm the findings of the FT surveys undertaken in 2021 will be undertaken to ensure that no breeding or resting areas are located within 150m of the drilling locations. Should an otter breeding (nursery) or resting area (couch) be detected, a derogation licence will need to be obtained from the NPWS to facilitate drilling works, and measures will be implemented to ensure no significant effects on the otters.	Mitigation measures will be implemented by the Client through the Contractor awarded the contract to construct the GCR. All required mitigation measures will be included as a contractual obligation on the contractor and will be implemented in full. High probability of success.	The Environmental Manager and/or Ecologist will monitor the implementation of the mitigation measures in accordance with permitted licence and in accordance with the relevant management plans detailed in the CLMP. Regular reporting to client and contractor as per licence requirement.
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The Applicant refers to 6 watercourse crossings, and also 3 watercourse crossings, misinformation and a lack of care given to the application.

4.4.1 Construction Programme

he construction of the project in its entirety is expected to take 24 months. Given the topographical conditions of the site, it is anticipated that the earthworks and the construction of both access tracks and turbine foundations would extend the development programme by up to 6 months longer than a typical 12 turbine farm development. A 24 month construction programme was assumed for the purposes of assessing worst traffic volumes in the traffic impact assessment.

The Applicant has applied for the erection of 10 wind turbines, not 12.

2.4.1.7 Biodiversity Management / Enhancement pg 24 of 50

The measures set out in the BEMP include those designed to protect and enhance existing habitats. Higher value habitats will be actively managed to maintain and improve their value and lower value habitats will see specific interventions designed to improve their attractiveness for a range of species. The BEMP measures will be employed for the lifetime of the windfarm."

It is outrageous that the applicant has made such a statement. The biodiversity of the area will be destroyed by the applicant if this development is approved. The applicant cannot state that they will "*protect and enhance existing habitats*" while simultaneously destroying them. I also query what is a "*higher value habitat*?" All habitats are essential.

Bats

"Habitat and Species Management Plan pg2 of 17

1.1.3 Species Field survey indicated a range of species using the Site. These are detailed within EIAR Chapter 9: Biodiversity and include:

- Bats – three bat species were commonly recorded within the Site: common pipistrelle, soprano pipistrelle, Leisler's bat.
- Mammals - feeding signs (stripped spruce cones) indicating the presence Wood Mouse were observed within conifer plantation at the western side of the study area on 07th September 2022.
- Birds – Raptors, Small Passerines and ground nesting birds, such as the red-listed Meadow Pipit utilise the Site All of these species will benefit from tree planting and grassland enhancement and management proposed as part of this BEMP. These area of enhancement are located **away from** proposed turbine locations so as not to increase collision risk to species"

Bat boxes, marked as green dots on the map below, are not a sufficient distance from the turbine.



Volume 1 - Non-Technical Summary pg 53 of 56

"An aeronautical obstacle lighting scheme will be agreed with IAA in line with IAA's consultation response and applied to the proposed turbines."

This will deter bats from using the bat boxes. *“Bats are nocturnal and adapted to low light conditions. Bat species find artificial lighting very disturbing.” (Bat Conservation Trust)*

The artificial light that will be placed in the area was not taken into account. This is a substandard level of assessment, on a species that is protected in Ireland.

Chapter 9 – Biodiversity pg 14 of 178

“It should be noted that, due to the ongoing development of the project, the location for the proposed turbines changed since the 2020 static detector surveys. It was considered that the updated proposed turbine locations represented similar habitat types and landscape features, and therefore the 2020 static data was still applicable.”

This is completely unacceptable. Bats are protected by law under the Wildlife Act 1976. The bat survey should have been repeated taking into account the new location for proposed turbines.

The table below states there will be “likely significant effects” on the Peregrine Falcon.

Source	Pathway	Receptor	Potential for Significant Effects
Site and GCR			
Physical Changes to the Environment			
<p>The Site will comprise the construction of the foundations for the 10 no. turbines and 1 no. permanent met mast along crane areas, new/upgrading of site tracks and associated drainage infrastructure, re use or upgrading of existing and installation of new watercourse or drain crossings, and the construction of the electrical substation and associated compounds</p> <p>The proposed Site will result in the long term removal of wet heath (7.1 ha or 3.4%), dry siltaceous heath (6.8 ha or 4.9%), conifer plantation (1.4 ha or 1.1%), improved agricultural land (0.43 ha or 1.2%), dense bracken (1.6 ha or 1.6%), dense bracken/ scrub mosaic (0.11 ha or 0.9%) and exposed siltaceous rocks (0.6 ha or 2.1%). Additionally, installation of drainage channels may alter surface water flow on the site. Therefore, changes to the environment are a potential impact resulting from the proposed Site.</p> <p>Potential for bird collision with turbine towers, blades (moving or stationary) and/or associated infrastructure, and barrier to dispersal, regular movements or migration for migratory bird species.</p> <p>The associated GCR will consist entirely of underground 110kV cable which will be laid within the existing road corridor or within private lands. There will be one new watercourse crossing of an unnamed tributary of Skeheens Stream, which will be crossed by HDD.</p>	<p>There is no hydrological connectivity between the Site and the Mid Waterford Coast SPA.</p> <p>The SPA is designated for cormorant, peregrine, herring gull and chough.</p> <p>Peregrine and herring gull have been recorded within the Site.</p>	<p>Mobile SCIs at the site will be receptors. Given peregrine and herring gull were recorded during surveys at the site, and that the site is within the maximum foraging range for peregrine falcon, changes to the habitats on site would likely cause indirect effects on SCI species.</p>	<p>Likely Significant Effects</p>

The Applicant also states “*It is not possible to determine with certainty, the proposed Dyrick Hill Wind Farm will likely have a cumulative impact on peregrine in terms of land-take and displacement/disturbance*”. (AA Screening and NIS page 131 of 147)

[illegible]

The table above shows that “829 seconds were logged in the flight activity survey area, of which 110 seconds were in the potential collision”. For the Applicant to then state that there is “no potential for the project to affect the target of conservation” is illogical. The Peregrine Falcon has flown through the collision zone , while being observed by bird watchers. How many times has this protected bird flown through the collision zone when bird watchers have not been present? The Board should not accept the Applicants conclusion that the Peregrine Falcon will not be affected.

Water

Chapter 11 – Soils, Geology and Hydrogeology

Page 3 of 69

*“Table 11-1: Consultation Responses Consultee Response Date Responses / Issues Raised
Geological Survey Ireland (GSI) September 2020*

*Replied with comments related to Geo-heritage, Groundwater, mapping and resources,
Geohazards and the use of Natural Resources (Minerals/Aggregates).*

Geological Survey Ireland August 2021

The Geological Survey Ireland had no specific comment or observations to make since last response. Recommended using Geological Survey Ireland's Publicly Available data sets, when conducting the ELAR, SEA, planning and scoping processes.”

EIA Scoping and consultation

Volume 2 Chapter 5, Page 4 of 9

“Geological Survey Ireland (GSI) 23/08/2021

The Geological Survey had no specific comment or observations to make since the last response. Recommended using Geological Survey Ireland's Publicly Available data sets, when conducting the ELAR, SEA, planning and scoping processes. Chapter 9 - Land, Soils & Geology Chapter 10 – Hydrology & Water Quality Chapter 11 – Material Assets”

The comments made by GSI are not available in this application. The comments from all other consultees are available. The fact that the applicant has omitted the comments from GSI , it is presumed that they are not in favour of this development.

Groundwater Vulnerability

“Groundwater Vulnerability is a term used to represent the natural ground characteristics that determine the ease with which groundwater may be contaminated by human activities. The vulnerability category assigned to a site or an area is thus based on the relative ease with which infiltrating water and potential contaminants may reach groundwater in a vertical or sub-vertical direction.” (www.gsi.ie)

Turbine and substation coordinates provided in the application were input into the groundwater vulnerability map on the GSI website. These are the findings.

T1 – Extreme vulnerability

T2 – High vulnerability and is 25 metres from extreme

T4 – X : which is a subdivision of extreme

T5 – High vulnerability

T6 – Extreme vulnerability

T7 – Extreme and is 26 metres from X – a subdivision of extreme

T8 – High vulnerability

T10 – High vulnerability

T11 – High vulnerability

T12 – High vulnerability

Substation – High vulnerability

Four turbines are located in areas classed as “extreme” or “X” which is a subdivision of extreme.

I contacted a geologist in GSI regarding “category X”, below is the response.

“In your email below, category X refers to extreme vulnerability, this is where we think groundwater is the most vulnerable to potential contamination. This is because there is rock very close to or at the surface, with less than 1 m of soil cover. This means that water and contaminants can directly enter the bedrock and there is no protection from subsoils and soils. In practical terms, this means that we should be very careful about what land use activities go on in areas of high vulnerability to try and protect the groundwater.”

Subsoil Permeability

Turbine coordinates that were provided in the application were input into the map on the GSI website. These are the findings.

T1 – Blanket peat, permeability not mapped

T2 – Blanket peat moderate permeability

T4 – Bedrock, permeability not mapped

T5 – Till – moderate permeability

T6 – Blanket peat – permeability not mapped

T7 – Blanket peat – permeability not mapped

T8 – Blanket peat – moderate permeability

T9 – Blanket peat – moderate permeability

T10 – Blanket peat - moderate permeability

T11 – Blanket peat – moderate permeability

I contacted a geologist working for GSI in relation to the subsoil permeability levels that are classed as “not mapped” on the website. Below is the response.

“Where subsoil is thin, subsoil permeability can be variable because it can be influenced by, for example, cracking, root development, interaction with the weathered top of the bedrock, etc. As such, for the areas that we map as less than 3 m, we don’t define subsoil permeability on the maps.”

The Applicant states in Chapter 11 – Soils, Geology and Hydrogeology pg 12 of 69

“The expected permeability for the subsoil is ‘Moderate’, but it may be locally ‘High’ within ‘X’ areas, due to the possible presence of shallow or outcropping weathered bedrock”.

This is extremely concerning. The Applicant states “expected permeability”, is it not part of the EIAR process that subsoil permeability is established? The Applicant states that the subsoil permeability “may be locally High within X areas”. The subsoil permeability within X areas IS high. Four turbines are located on areas with a groundwater vulnerability rating of Extreme, with less than 1m of subsoil. This is clearly a substandard level of assessment of groundwater vulnerability and should not be accepted by the Board.

My Water Supply

“The European Union (Drinking Water) Regulations 2023, come into effect through the transposition of EU Directive 2020/2184 into Irish Legislation. The regulations enhance existing requirements to protect human health by laying down detailed and clear directions regarding the management of water intended for human consumption and access to water, in particular for marginalised groups.” (www.gov.ie)

The water supply to my home comes from the mountain. The mountain naturally filters the water however this will no longer be the case if this application is approved. The possible contaminants and damage that the applicant says “*potentially may happen*” the water courses in the area is frightening to read. The ground water in this area is extremely vulnerable to contamination, therefore for the applicant to say that contamination *potentially* may happen is absurd. The emails I received from GSI, shown above, reinforces just how vulnerable the water in this area is. It is unacceptable that we should have to live with the fear of giving our three young children contaminated water. Water is a human right and our water supply must be protected.

“Water is essential for life. A catchment that has healthy water helps a community to have a better quality of life. Ensuring that these waters are clean and well protected is critically important to our well-being”. (www.catchments.ie)

The Board must be satisfied beyond any reasonable doubt that the proposed development would not have significant effects on the water quality, however it is clear this development will have a serious detrimental effect on water quality. This development is planned for an area that is completely unsuitable for works of this magnitude and therefore must be refused.

Volume 2 – Main EIAR – Chapter 12 – Hydrology and Water Quality pg 9of55

“The surface hydrological environment of the Proposed Development and its downstream catchments are considered to be of High sensitivity given that both the Coligan and Nier catchments have a High WFD status Objective / are part of the Blue Dot Programme.”

As the Board is aware, the purpose of the Water Framework Directive is to prevent further deterioration of surface waters and to protect and enhance the status of aquatic ecosystems. The Blue Dot Catchment Programme was established to achieve the objectives of the EU Water Framework Directive. The programme specifically targets the maintenance and restoration of high-status water bodies and aims to address their decline.

The objectives of the WFD will not be achieved if this development is approved.

AA Screening and NIS

Table 3-1: European Sites Within the Potential ZoI

Lower River Suir SAC (002137)	<p>Atlantic salt meadows (Glaucopuccinellietalia maritima) [1330]</p> <p>Mediterranean salt meadows (Juncetalia maritimi) [1410]</p> <p>Water courses of plain to montane levels with the <i>Ranuncion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation [3260]</p> <p>Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430]</p> <p>Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]</p> <p>Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0]</p> <p><i>Taxus baccata</i> woods of the British Isles [91I0]</p> <p>Freshwater Pearl Mussel (<i>Margaritifera margaritifera</i>) [1029]</p>	<p>4.29km to closest turbine</p> <p>2km in-stream distance from TDR Node 5 (0.3km distance from works to stream across grassland)</p> <p>3.3km in-stream distance from TDR Node 25</p>	<p>Freshwater aquatic QI habitats and species are highly susceptible to potential changes in water quality as a result of potential emissions to air, water and waste emissions. Otter are also susceptible to disturbance during works.</p> <p>The internal access tracks, turbine hardstandings and GCR are within the same sub-catchment and are hydrologically linked to the SAC.</p> <p>The closest proposed works along the TDR will be non-invasive, being limited to some minor vegetation trimming/ removal and laying of load bearing surfaces.</p> <p>Therefore, it is determined that there is potential for emissions released to the drainage network to ultimately enter the SAC, and disturbance to mobile QIs. Therefore, the SAC is within the ZoI.</p>	Y
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Note in the table above the Applicant states that there is 0.3km distance from works to stream, which is connected to the Lower River Suir SAC.

Table 3-2: Potential for Significant Effects on the Lower River Suir SAC

CLIENT: EMP Energy Limited (EMPower)
PROJECT NAME: Environmental Impact Assessment Report (EIA) for the Proposed Coumragappul Wind Farm, Co. Waterford
SECTION: AA Screening and NIS



Source	Pathway	Receptor	Potential for Significant Effects
Duration of construction, operation, decommissioning/Temporal Aspects There is potential for displacement of GI species (i.e., otter) due to disturbance during key seasonal stages of the life cycle during construction. Disturbance to otter can occur up to 150m from the proposed works area (National Roads Authority, 2008).	In addition to the hydrological pathway, there is also an indirect physical pathway via mobile freshwater species using the watercourses on site.	Mobile freshwater species are the receptor for temporal aspects of construction. Key seasonal stages of the life cycles of salmon, sea lamprey, brook lamprey and river lamprey, may be impacted by construction.	Likely Significant Effects
In-combination with other plans and projects Cumulative effects could occur if felling and construction activities at the Site are undertaken in parallel with other plans and projects, as well as off-site forestry activities (particularly harvesting) and agricultural activities (particularly manure spreading) within the same catchment, ultimately adding potential nutrients to the Blackwater River (Cork/Waterford) cSAC and further impacting the aquatic qualifying interests.	The identified pathway is the streams on site which enter the Shanballyane and Nier Rivers. These streams enter the River Suir respectively, which form part of the Lower River Suir SAC. In addition to the hydrological pathway, there is also an indirect physical pathway via mobile freshwater species utilising the rivers.	Given that the impact pathway is a hydrological and physical one, GIs of Lower River Shannon SAC which may be vulnerable to such impacts are the aquatic habitats and species. The release of sediment and pollutants to the watercourse network could potentially impact the attributes needed to support the qualifying interests.	Likely Significant Effects
TDR			
No connectivity between the TDR Nodes and the SAC	N/A	N/A	No Potential Significant Effects

The Applicant states above that there is “no connectivity between the TDR Nodes and the SAC”, blatantly contradicting the information in table 3:1. It seems the Applicant has tried to make light of the effect this development will have on the protected Freshwater Pearl Mussel.

CLIENT: EMP Energy Limited (EMPower)
PROJECT NAME: Environmental Impact Assessment Report (EIA) for the Proposed Coumragappul Wind Farm, Co. Waterford
SECTION: AA Screening and NIS



Table 4-2: Summary of the potential occurrence of qualifying interests of the Lower River Suir SAC within the ZOI of the Proposed Development

Natura Code	Item Description	Occurrence
1029	Freshwater pearl mussel (<i>Margaritifera margaritifera</i>)	The conservation objective applies to the Clodiagh freshwater pearl mussel population, which is listed on The European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009. (S.I. 296 of 2009). The Clodiagh catchment is upstream of the main channel of the River Suir, with a direct path distance of 17.5km between the Clodiagh/Suir confluence and the closest hydrologically linked node. As such there is no direct hydrological connectivity.

On page 93 of 147, the table above states that there is no hydrological connectivity between the proposed development and the River Clodiagh. This is another example of the Applicant trying to brush passed the fact that this development is hydrologically linked to Lower River Suir SAC, and therefore requires protection from contamination.

Freshwater Pearl Mussel

“The Freshwater Pearl Mussel is protected under Annex II and V of the Habitats Directive and legally protected in Ireland under Schedule 1 of the Wildlife Act.

FPM are particularly sensitive to changes in water quality, such as increased nutrient inputs and changes in suspended solids/ sediment loads. This can cause severe damage as the FPM closes its shells in response to the sediment pressure, impacting feeding behaviour or causing suffocation. In 2009, legislation was enacted to support the achievement of favourable conservation status for FPMs (S.I. 291 of 2009) and the NPWS developed 27 FPM Sub-Basin Management Plans as designated under the regulations to address measures to halt the decline in the species.” (Third Cycle River Basin Management Plan 2022-2027 SEA Environmental Report)

The Board has a legal obligation to protect the Freshwater Pearl Mussel, and it is clear that this development will pose a threat to this protected species.

Dungarvan Harbour SPA – Colligan River

Table 3-1: European Sites Within the Potential ZoI

CLIENT: LMP Energy Limited (LMPower)
PROJECT NAME: Environmental Impact Assessment Report (EIA) for the Proposed Coumragappul Wind Farm, Co. Waterford
SECTION: AA Screening and NIS



European Site (code)	List of Qualifying Interest/Special Conservation Interest	Distance from Proposed Development (km)	Pathway	Considered further in screening Y/N
Dungarvan Harbour SPA (004032)	Great Crested Grebe (<i>Podiceps cristatus</i>) [A005] Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Red-breasted Merganser (<i>Mergus serrator</i>) [A069] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Lapwing (<i>Vanellus vanellus</i>) [A142] Knot (<i>Calidris canutus</i>) [A143] Dunlin (<i>Calidris alpina</i>) [A149] Black-tailed Godwit (<i>Limosa limosa</i>) [A156] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Curlew (<i>Numenius arquata</i>) [A160] Redshank (<i>Tringa totanus</i>) [A162] Turnstone (<i>Arenaria interpres</i>) [A169]	12.74 km to closest turbine 0.36 km in-stream distance from TDR Node 6 (0.08 km distance from works to stream across road/ grassland) 0.67 km to Grid Connection, downstream distance of 1.7 m from closest water crossing	The SCI bird species are susceptible to habitat loss, noise and human presence during the construction and decommissioning stage. During the operational stage the SCI bird species are highly susceptible to collision risk with turbine towers, blades (moving or stationary) and/or associated infrastructure and the barrier effect to regular movements. The proposed site is outside the core and maximum foraging range (a defined range according to SNH 2016 and Johnson et al 2014) of the Dungarvan SPA SCIs, with Golden plover having the largest foraging ranges (core: 3km and maximum: 11km).	Y

Above it mentions that this distance from construction works to the Colligan River is 0.08km however

“Here the access road between turbines T08 and T12 crosses over the Colligan River, requiring a bridge structure and approach earthworks.” (Chapter 11 – Soils, Geology and Hydrogeology pg 10 of 69).

The applicant failed to mention that there will be construction works **passing over** the Colligan River in the SAC section of the application. Another instance of the Applicant attempting to make light of the construction works that will be done on top of the rivers and streams in this area.

The site plan for Colummagappul Windfarm Eir shows the layout of the windfarm, including the access road, the windfarm itself, and the surrounding land. The plan includes a legend, a key plan, and a scale bar.

Legend:

- Access Road
- Access Road - 10m wide
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- Access Road - 995m wide
- Access Road - 1000m wide

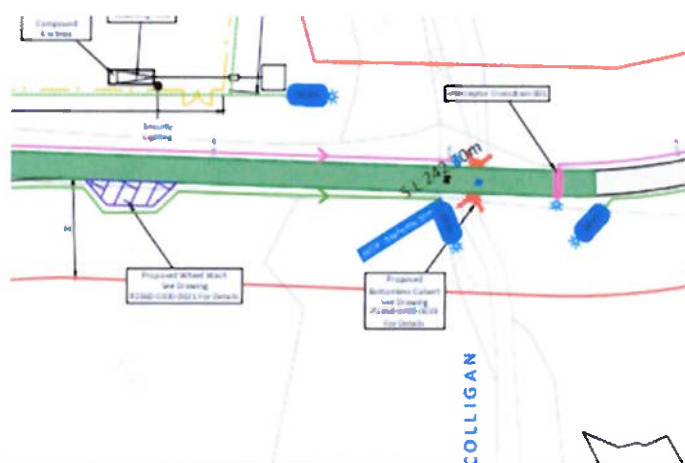
KEY PLAN
Scale 1:50000

Scale 1:5000

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COLUMMAGAPUL WINDFARM EIR

EMPOWER



“The upper reaches of this spate river are fast and furious and are very popular with white water rafters. It is reputed to be one of the fastest flowing rivers in Europe. The last 2 miles before the sea slow down and there are some great pools for the Salmon and Sea Trout angler. The Sea Trout fishing in the Colligan is excellent, perhaps some of the best in the country.” <https://salmonireland.com/rivers/southern-rivers/river-colligan/>

Comeragh Mountains SAC

AA Screening and NIS pg 107 of 147

“Waterford City & County Development Plan 2022-2028

The Cork City Development plan includes a series of objectives, which include:

BD04 BD 04: Appropriate Assessment

All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and subsequent Appropriate Assessment where necessary, that:

1. The plan or project will not give rise to significant direct, indirect or secondary effects on the conservation objectives of any European site (either individually or in combination with other plans or projects)”

As can be seen above the Applicant references the Cork City Development Plan, how can the Applicant be trusted to construct and operate a development of this magnitude when the documents that have been submitted are full of errors. It is extremely concerning for the residents who will be living underneath this huge development.

In reference to the above mentioned Appropriate Assessment, the Comeragh Mountains SAC was not considered by the Applicant for further screening.

CLIENT: EMP Energy Limited (EMPowr)
PROJECT NAME: Environmental Impact Assessment Report (EIA) for the Proposed Cooonagapah Wind Farm, Co. Waterford
SECTION: AA Screening and NIS

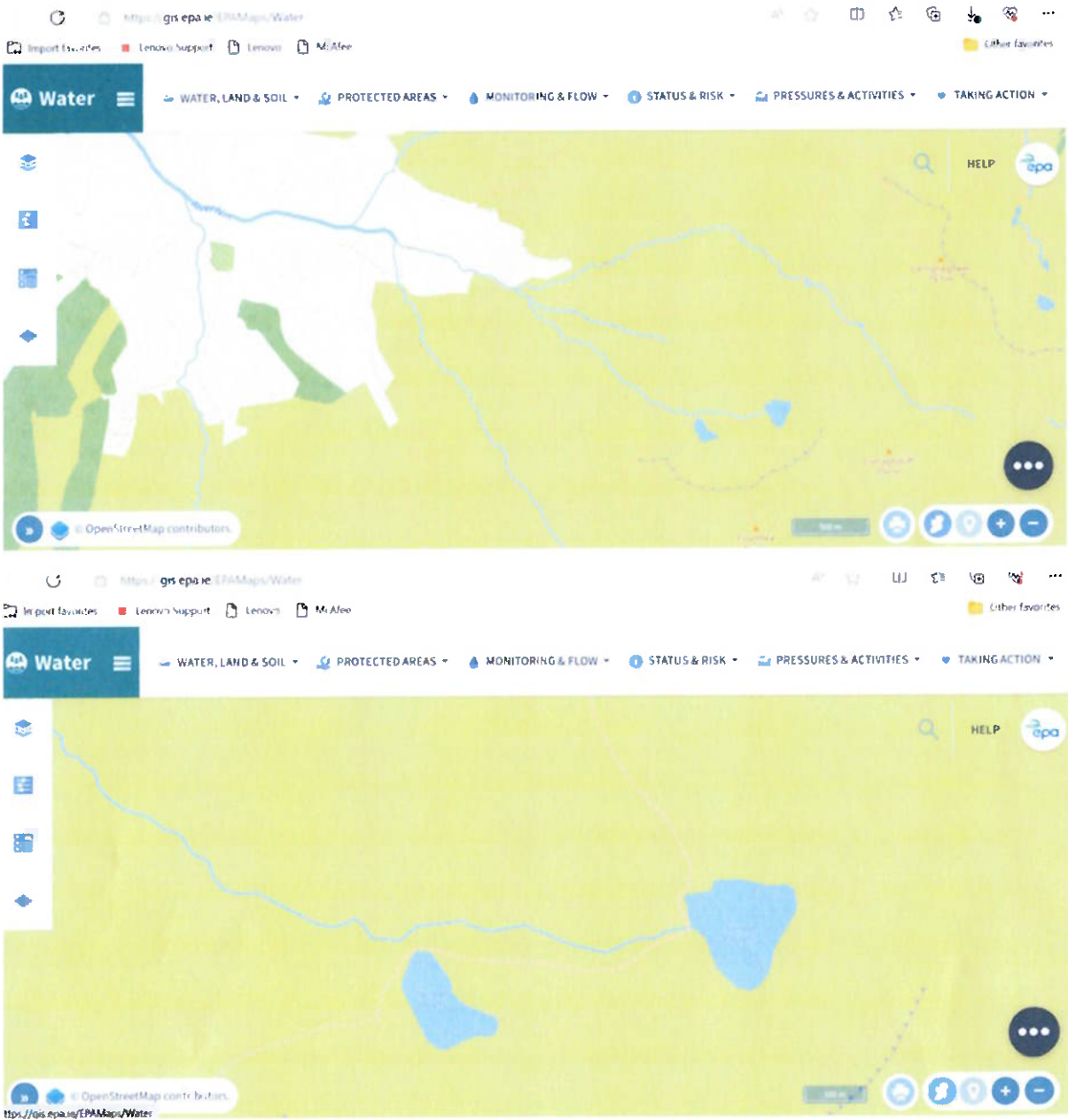


Table 3-1: European Sites Within the Potential ZOI

European Site (code)	List of Qualifying Interest/Special Conservation Interest	Distance from Proposed Development (km)	Pathway	Considered further in screening Y/N
Comeragh Mountains SAC (001952)	<p>Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110]</p> <p>Water courses of plain to montane levels with the Ranunculus fluitans and Callitriche-Batrachion vegetation [3260]</p> <p>Northern Atlantic wet heaths with Erica tetralix [4010]</p> <p>European dry heaths [4030]</p> <p>Alpine and Boreal heaths [4060]</p> <p>Blanket bogs (* if active bog) [7130]</p> <p>Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) [8110]</p> <p>Calcareous rocky slopes with chasmophytic vegetation [8210]</p> <p>Siliceous rocky slopes with chasmophytic vegetation [8220]</p> <p>Slender Green Feather-moss (Hamatocaulis vernicosus) [8216]</p> <p>https://www.npws.ie/sites/default/files/protected_sites/conservation_objectives/CO001952.pdf</p>	0.74 km to closest turbine	<p>No Annex I habitats within the Site, no hydrological connectivity between the Site and the SAC.</p> <p>Upstream from any hydrological/ hydrogeological connectivity to TDR and GCR</p>	N

As can be seen above the Applicant states there is “no hydrological connectivity between the Site and the SAC”.

This is untrue. The River Nire flows from Sgilloge Lough in the Comeragh Mountains, see map below.



The River Shannon SAC

The table below, pg 91 of 147 AA Screening and NIS, shows the “threats pressures and activities with impacts on the Lower River Shannon SAC”. The Board should not accept this application as this clearly shows that the documents have been compiled with very little care or professionalism.



Table 4-1: Threats, Pressures and Activities with Impacts on the Lower River Shannon SAC

High Level (inside site)	High Level (inside site)	High Level (both inside and outside site)	Medium Level (both inside and outside site)	Low Level (inside site)	Low Level (outside site)	Low Level (both inside and outside site)
J02.12.02 Dykes and flooding defence in inland water systems	A08 Fertilisation in agriculture	H01 Pollution to surface waters (limnic, terrestrial, marine & brackish)	J02.01 Landfill, land reclamation and drying out, general	A01 Agricultural cultivation	B Forestry	D03.01 Port areas
		E01 Urbanisation and human habitation		I01 Invasive non-native species		
		E03 Discharges (household/industrial)		J02.01.02 Reclamation of land from sea, estuary or marsh		

Source: Lower River Suir SAC (002137) Natura 2000 Data Form, <https://www.npws.ie/sites/default/files/protected-sites/natura2000/NF002137.pdf> (Accessed 12th July 2023)

Silt Fencing



14.2 Mitigation Measures

Table 4-11: Details of Mitigation Measures to be Implemented for Proposed Development

No.	Mitigation Measure	How Measure Will Avoid/Reduce Adverse Effects	Implementation of Mitigation Measure and Level of Success	Monitoring scheme to prevent mitigation failure
Mitigation Measures to be Implemented Prior to Construction				
6	Silt traps and silt fencing The main purpose of the silt traps and drain blocking is to slow water flow, increase residence time, and allow settling of silt in a controlled manner.	Silt traps and silt fencing measures for the proposed wind farm site will be provided at outfalls from roadside swales to silting ponds, at the end of the drainage channels, to the outside of the tree felling buffer zone and strategically placed down-gradient within forestry and agricultural drains near streams. The traps and fences will be maintained regularly ensuring that they are clear of sediment build-up and are not severely eroded. Additional silt fencing will be kept on site in case of an emergency break out of silt laden run-off. This measure will reduce the risk of sediment runoff reaching waterways within the catchment of the main wind farm site. This in turn will avoid adverse effects on the surrounding water courses and aforementioned designated sites.	Mitigation measures will be implemented in full by the Client through the Contractor awarded the contract to construct the wind farm. All required mitigation measures will be included as a contractual obligation on the contractor. High probability of success.	The Environmental Manager will monitor the implementation of the mitigation measures as detailed and in accordance with the relevant management plans within the CEMP. Regular reporting to client and contractor as per each management plan.

Note in the above table it states *“this measure will reduce the risk of sediment runoff reaching waterways”*. Should the Applicant not ensure that there is **no** risk of sediment runoff? From my research on silt fencing it is apparent that the Applicant cannot guarantee that there will be no risk of sediment runoff as silt fences are not effective.

“To prevent offsite movement of soil particles, many environmental regulatory agencies mandate the use of perimeter silt fences. However, research regarding the efficiency of these devices in applied settings is lacking, and fences are often ineffective. The damage is almost instantaneous when silt fences fail.” (Journal of Environmental Management Volume 164, 1 December 2015, Pages 67-73)

The Applicant cannot guarantee a *“High probability of success”* and this should not be accepted by the Board.



No.	Mitigation Measure	How Measure Will Avoid/Reduce Adverse Effects	Implementation of Mitigation Measure and Level of Success	Monitoring scheme to prevent mitigation failure
Construction Phase Mitigation Measures				
8	Habitats or flora	<p>The area of the proposed works will be kept to the minimum necessary, including all site clearance works, to minimise disturbance to habitats and flora. In this case, the footprint of the proposed development has been kept to the minimum necessary, including the use of layout design methods (e.g. existing roads and stream crossings) to minimise excavation works.</p> <p>No disturbance to habitats or flora outside the Proposed Development area will occur.</p> <p>All works will be restricted to the immediate footprint of the development, which will be wholly within the development site boundary and kept separate from any key areas for biodiversity.</p> <p>Machinery, and equipment will be stored within the site compound.</p> <p>Designated access points will be established within the site and all construction traffic will be restricted to these locations.</p>	<p>A Project Ecologist/Ecological Clerk of Works (ECOW) will be employed by the Client through the Contractor awarded the contract to construct the wind farm. All mitigation will be implemented in full.</p> <p>High probability of success.</p>	<p>The Project Ecologist/ECOW will monitor the implementation of the mitigation measures detailed and in accordance with the relevant management plans within the CEMP.</p> <p>Regular reporting to client and contractor as per each management plan.</p>

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“All works will be restricted to the immediate footprint of the development, which will be wholly within the development site boundary and kept separate from any key areas for biodiversity” It is unacceptable that the Applicant can make such a statement. The Board should not accept that works will be kept separate from key areas for biodiversity, when the Applicant has listed the many habitats, flora, fauna and watercourses that will be affected by this project.

“Local Road at Bohadoon”

The image below can be found in Photomontages Book 2 and is titled “*Local Road at Bohadoon*”. Another instance of false information.



The images below are taken from the Waterford City and County Development Plan 2022-2028, Landscape and Seascape Character Assessment Map.

The blue arrow points to the spot the above photograph was taken by the Applicant. It can clearly be seen on the map that this is the Mauma/Maum Road.





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



Distinctive character with some capacity to absorb a limited range of appropriate



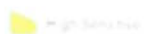
Very distinctive features with a very low capacity to absorb new development without significant alterations of existing character over an extended area.



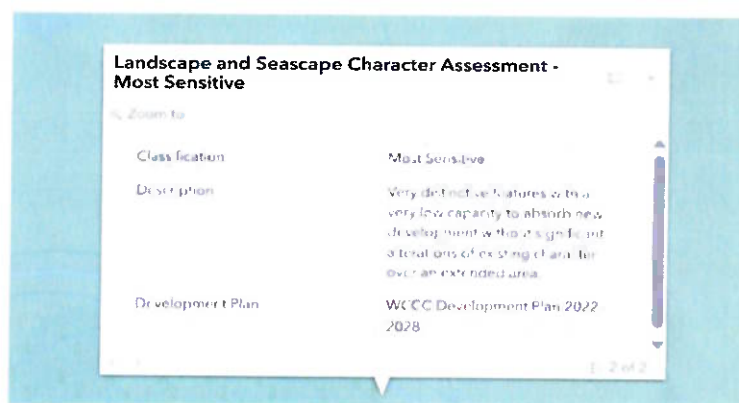
Distinctive character with some capacity to absorb a limited range of appropriate new developments while sustaining its existing character.



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



Distinctive character with some capacity to absorb a limited range of appropriate new developments while sustaining its existing character.



This area is a scenic route, protected view and is “most sensitive” to new development. It most certainly not just a “*local road at Bohadoon*”.

Assessment of Visual Impacts at Viewshed Reference Points pg 11 of 15

View Point 21

Receptor Sensitivity Criterion and Analysis at each Viewshed Reference Point (VRP)

Values associated with the view	VP16	VP17	VP18	VP19	VP20	VP21	VP22	VP23	VP24	VP25	VP26	VP27	VP28	VP29	VP30
Susceptibility of viewers to changes in views															
Recognised scenic value of the view															
Views from within highly sensitive landscape areas															
Primary views from residences															
Intensity of use, popularity (number of viewers)															
Viewer connection with the landscape															
Provision of vast, elevated panoramic views															
Sense of remoteness / tranquillity at the viewing location															
Degree of perceived naturalness															
Presence of striking or noteworthy features															
Sense of historical, cultural and / or spiritual significance															
Rarity or uniqueness of the view															
Integrity of the landscape character within the view															
Sense of place at the viewing location															
Sense of awe															
Overall sensitivity assessment	HM	H	M	M	M	M	HM	HM	H	HM	HM	HM	HM	M	H

N = Negligible, L = low sensitivity, ML = medium-low sensitivity, M = medium sensitivity, HM = High-medium sensitivity, H = high sensitivity, VH = very high sensitivity

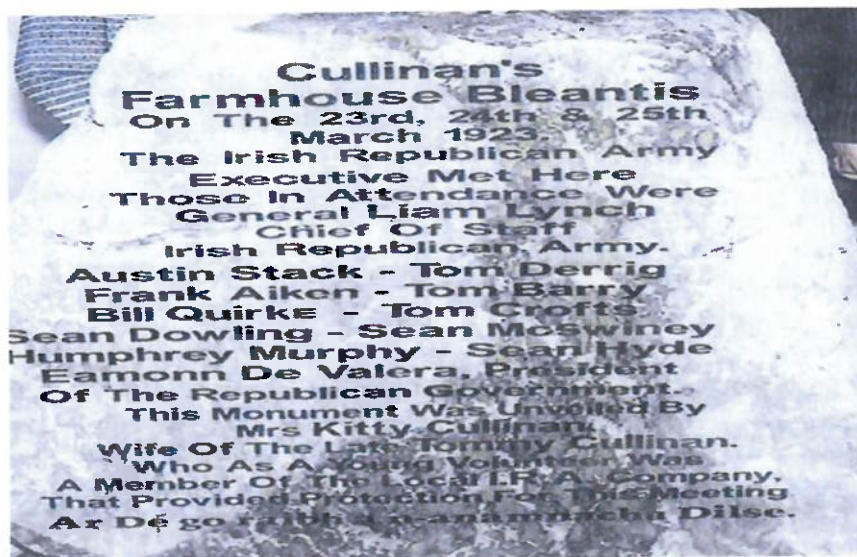
My home is 150m below VP21. This grid states there is no “recognised scenic value of the view” which is laughable, we are surrounded by the Comeragh Mountains.

How would the Applicant possibly have a “*sense of place*” here when they are not from the area, it is ridiculous that is even a category on the graph.

The Applicant states they did not have a “*sense of awe*” from VP21. I refuse to believe the Applicant did not have a sense of awe while taking in the view here.

If this assessment had been done correctly the space for “*sense of historical, cultural and or spiritual significance*” would not have been left blank.

Cullinan’s farmhouse is located 100m from viewpoint 21. The meeting of the Anti-Treaty I.R.A. Executive was held here on March 23 - 25 1923. They were there to discuss the military position of the IRA and peace proposals brought to the Executive by Éamon de Valera. Once again this shows an extremely poor standard of assessment by the Applicant.



Viewpoint 21

VP No.	Existing View	VP Sensitivity	Visual Impact Magnitude	Significance / Quality / Duration of Impact
VP21	<p>Local road at Bleantasour – This is a pleasant view from the Comeragh Mountains' foothills in the townland of Bleantasour. The depicted view is oriented to the north and is partially contained by near intervening mature vegetation located in the immediate surrounds of the adjacent residential dwelling. Further to the east, a view is afforded towards the broad Comeragh Mountain uplands, which are cloaked in extensive areas of mountain moorland. It is also important to note that a broad view is afforded to the south across the low rolling foothill landscape in the direction of Dungarvan and the coastline.</p>	Medium	<p>The eastern extent of the array will be clearly visible here, whilst the turbines further to the west are heavily veiled by dense mature vegetation in the near foreground. The rotating turbine components will be a distinctive feature of this view to the north and are considered to have a dominant visual presence. Nonetheless, the turbines are not considered to generate any sense of overbearing from this distance of 2.5km.</p> <p>Whilst some sense of visual clutter and visual ambiguity will be generated by the stacked views of the central turbines in the array, and the partial view of turbines rotating beyond the dense winter vegetation, the highly legible view of the eastern turbines in the array will slightly offset these negative aesthetic effects. Despite their relatively prominent visual presence, the turbines appear well accommodated in this transitional landscape context in scale and function. They will notably increase the intensity of built development in this view and will slightly detract from the visual amenity afforded here.</p> <p>However, the turbines are notably offset from the more upland parts of the Comeragh Mountains, viewed further to the east. Overall, the magnitude of visual impact is deemed Medium.</p>	Moderate / Negative / Long term

I would like to point out to the Board that the Applicant states above “*this is a pleasant view from the Comeragh Mountains foothills*”, acknowledging that this is in fact the Comeragh Mountains. A different opinion from the public consultation meetings where the Applicant refused to acknowledge this.

I entirely disagree with the language used above, such as “*the turbines further to the west are heavily veiled by dense mature vegetation*”, it is an outrageous statement, vegetation will not conceal industrial sized wind turbines which are 185m high.

“The turbines are not considered to generate any sense of overbearing from this distance of 2.5km”. This is another attempt by the Applicant to make it seem like this monstrous development will fit in well in the area.

Also T12 is located 2.16km from VP21, not 2.5km see map below. Once again misinformation by the Applicant and an assessment that has not been done to an acceptable standard.



“Whilst some sense of visual clutter and visual ambiguity will be generated by the stacked views of the central turbines in the array, and the partial view of turbines rotating beyond the dense winter vegetation, the highly legible view of the eastern turbines in the array will slightly offset these negative aesthetic effects.” This sentence is illogical. Also to say that 185m wind turbines are “visual clutter” is ridiculous.

Chapter 4 – Policy pg 27 of 31

*“The Landscape and Seascape Character Assessment subdivides the counties landscape into 7 landscape character types (LCTs) and a subsequent 28 landscape character units. The Proposed Development is located across three sensitivity classifications which are ‘Most Sensitive,’ ‘High Sensitivity’ and ‘Low Sensitivity.’ The development is located in an area with varying landscape sensitivities; Most Sensitive, High Sensitivity and Low Sensitivity. **The Proposed Development as a whole is not located in an area designated as the most sensitive from a landscape and visual perspective according to the County Development Plan.**”*

Character Assessment Map

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



Once again the Applicant has produced false information. As can be seen on the Waterford City and County Development Plan 2022-2028, Landscape and Seascape Character Assessment Map, the project is located in an area designated as most sensitive.

If this development is approved the damage that will be done to this unspoiled area of the Comeragh Mountains will be irreversible.

We urge the Board to refuse this application and allow us to continue living without the fear of a contaminated water supply, a reduction in the value of our home, ill health effects and noise disturbance.

Please respect the decision of the people of Waterford and the Waterford City and County Development Plan 2022-2028 which has designated this area as a “no-go zone” for wind energy.

Alice Cullinan

Jimmy Cullinan