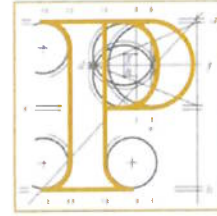


**Our Case Number:** ABP-318446-23

**Planning Authority Reference Number:**



An  
Bord  
Pleanála

Katie Cullinan  
Kilbrien Lower  
Ballinamult  
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](http://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](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned officer of the Board or email [sids@pleanala.ie](mailto: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	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Katie Cullinan  
Kilbrien Lower  
Ballinamult  
Co. Waterford

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1

26<sup>th</sup> January 2024

**Fee of €50 included.**

***An Bord Pleanála Case reference: PA93.318446***

***Proposed construction of Coumnagappul Wind Farm consisting of 10 no. turbines and associated infrastructure.***

Dear Sir/Madam,

I vehemently oppose the above development for the following reasons.

The subject site is on an area classed as an exclusion zone for Wind Farm Development per the Waterford City and County Development Plan 2022-2028. This Development Plan was adopted on Thursday July 7<sup>th</sup>, 2022, by a unanimous decision of the Council and came into effect on July 19<sup>th</sup> 2022. This Plan was made following lengthy periods of consultation, drafting and deliberation. It involved 5 rounds of public consultation. The Plan was then approved by both the Planning Regulator and the Minister for Housing, Local Government and Heritage. This being the relevant statutory development Plan applying to the subject site in question and as such must be central to making a decision.

### Appendix 9.3 Aquatic Survey Reports (page 41)

**Table 3.2** Life Cycle Unit scores for salmonid habitat at the sites surveyed in the vicinity of the proposed Coumnagappul wind farm, September 2020 (lower scores = superior habitat).

Site no.	Salmonid habitat value	Spawning	Nursery	Holding	Total score	Salmonids recorded
A1	Good	3	2	3	8	Yes
A2	Good	2	3	3	8	Yes
A3	Good	2	2	3	7	Yes
A4	Good	2	1	3	6	Yes
A5	Excellent	2	1	2	5	Yes
B1	Moderate	3	3	4	10	Yes
B2	Moderate	3	2	4	9	Yes
B3	Excellent	2	1	2	5	Yes
B4	n/a – site not accessible due to land owner					
B5	n/a – site not accessible due to land owner					
B6	Good	2	1	4	7	Yes

Rivers B4 and B5 were not included in the assessment as the landowner would not grant the assessor access. B4, the Colligan River is located in close proximity to the substation and B5, the Glennaneanmountain River is in close proximity to T11. One would assume participation in environmental assessments must be mandatory for landowners who are participants in this project. This assessment has not been completed in full, therefore this assessment does not comply with the requirements of the EIAR.

## AA Screening and NIS

**Large Scale/ Infrastructure Projects:** The following projects within c. 20km of the proposed site are consented.

### Housing Developments

“An application for completion of 361 no. residential units (207 no. houses and 154 no. apartments), creche and associated site works permitted under planning Case reference: TA93.304423 in Knockboy, Co. Waterford is permitted, located c. 3 km south west from the Site” (page 110 of 147).

In correction to the above I would like to clarify to the Board that case number TA93.304423 page 4 of 97 of the Inspectors Report states:

### 2.0 Site Location and Description

2.1. *The subject site is located situated in the south eastern suburbs of Waterford City. in the area of Knockboy, 5km from the city centre. Knockboy Road/St. Mary's Place (also referred to in the application as Ballygunner Hill) forms the western boundary of the site, and is a linear street, which comprises a church, scouts den, primary school and a number of suburban housing developments as well as individual dwellings. The Knockboy Road takes its access off the Dunmore Road situated to the north and connects into the Williamstown Road to the south. Both the Dunmore Road and Williamstown Road connect to Waterford City Centre.*

Such errors, as the above, are very unsettling for this community. One would question the validity of the contents contained in this application in its entirety.

The application for permission contains various components which may cause sediment to enter the Nire and Colligan Rivers. There is a clear hydrological link via drainage and watercourses between the development site and the rivers Nire and Colligan. The AA Screening and Natura Impact Statement correctly identify the significant adverse impact of soil disturbance leading to mobilisation of sediment and silt. This could result in a negative impact on the downstream aquatic qualifying interests of Dungarvan Harbour SPA and the Lower River Suir SAC, particularly the Freshwater Pearl Mussel.

### 4.4.2 Mitigation Measures

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

#### 14. Surface Water (page 137 of 147)

*“Daily visual inspections of drains, silt ponds, etc on site and weekly inspections of streams will be performed during the construction period. This will ensure suspended solids are not entering the streams and rivers alongside the work area. These inspections will identify any obstructions to channels and allow for appropriate maintenance of the existing roadside*



*drainage regime. If suspended solids in water courses exceed the baseline levels construction work will be stopped, and remediation measures will be put in place immediately".*

We note the mitigation measures proposed in relation to surface water includes weekly monitoring of suspended soils, turbidity etc. This, in my view, is not at all satisfactory. Catastrophic damage could be caused between such long intervals without anybody noticing. Pollution by suspended soils would be most likely after heavy rainfall, and disappears again a short time later. The sporadic nature of this threat is not at all mitigated by such long interval monitoring. A more serious approach would include digital monitors which monitor water turbidity on an ongoing basis and sound alarms when thresholds are breached. The mitigation measures described in the application do not satisfy the requirements set out for the developer.

Under the Aarhus Convention every individual is entitled to

1. Access to information
2. Public participation in decision-making
3. Access to justice

Which are under these three pillars of the Aarhus Convention.

<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32003L0035>

The right of the public to participate in Irelands Planning System encompasses the right to receive adequate consultation. The whole consultation process was inadequate. Many households did not receive newsletters, on one occasion in December 2022 the Applicant failed to deliver any of the consultation newsletters. The webinars held by the company fell short of what is acceptable as regards community consultation. Many questions put forward by the public were not addressed. Listeners were informed that any questions that were not answered would be uploaded on the website, this was never done.

I respectfully request the Board to make the proper decision and refuse this planning application.

Yours Sincerely

Katie Cullinan

Katie Cullinan