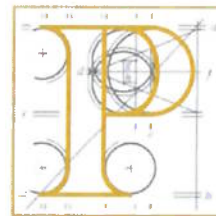


**Our Case Number:** ABP-318446-23

**Planning Authority Reference Number:**



An  
Bord  
Pleanála

Marc O'Connell and Grace O'Meara  
Páirc na Gréine  
Knockaunbrandaun  
The Nire  
Ballymacarbry  
Co. Waterford  
E91XF43

**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. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Hickey  
Executive Officer  
Direct Line: 01-8737145

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

The following is the observation document by Marc Ó Conaill and Grace O'Meara of:

Páirc na Gréine, Knockaunbrandaun, The Nire , Ballymacarbry, Co. Waterford E91XF43.

#### Biodiversity and Ornithology.

In the Coumnagappul Wind Farm (Case no 318446) project's EIAR it states that residual effects as regards habitat loss, disturbance, displacement and collision will have "no greater than a long term slight negative effect".

We have a 21 acre IOA certified Organic farm ( licence no. 5792 ) located at Knockaunbrandaun, Ballymacarbry Co. Waterford, near the proposed site.

We have been involved in government agri schemes such as REPS and are currently participating in the Agri-Climate Rural Environment Scheme (ACRES) for the Comeragh and Knockmealdown Co-operation area. The Comeragh CP Acres area is one of only eight such project areas in the whole country. Our Local Area Plan includes protection of water quality, semi-natural grassland (reservoirs of biodiversity), raptors (birds of prey), red grouse, barn owls, kestrels and archaeology. As part of this scheme we will be erecting more nesting boxes for swifts, owls, kestrels and bats.

Birdwatch Ireland visited and documented our resident owls and their 5 chicks last summer. The adult pair have been returning to our owl box for many years, and we have a large bat population in our outbuildings.

In our view any negative effect on local biodiversity and ornithology needs to be objected to and it is in direct conflict with the aims, requirements and objectives of the ACRES scheme. We and our neighboring farmers are receiving EU funding for this scheme and the proposed windfarm threatens and undermines the future success of the scheme.

We also note that the EIAR references the Royal Society for the Protection of Birds as well other UK based bodies throughout the report. As we are not in the United Kingdom we find this reference troubling. The opinion of Birdwatch Ireland would be more relevant and knowledgeable in this case.

#### Hydrology and Water quality.

We object to any disturbance of local water courses, streams and rivers; including our own private water well, caused by construction materials and related issues.

#### Noise and Vibration.

As regards noise assessments carried out in nearby residential properties. In this extremely quiet area, the impact of noise varies greatly, and the distance noise travels depends on variations in weather and season. Therefore we do have a concern about the impact of the possible noise pollution on our community.

#### Tourism and Recreation.

As mentioned in the EIAR, there are a number of significant walking trails in the Comeraghs. Tourists that come here use all areas of the Comeraghs and we feel that the tourist experience of the area will be greatly damaged by the proposed wind farm. People come here for lots of reasons but the unspoiled landscape is one of the main reasons; and we must take note of recent articles in publications such as the New York Times; which included Waterford in its “52 places to go” list.

Due to climate change and the need for reduction of carbon emissions in the farming sector, the government encourages farmers to diversify. We have considered diversifying into Eco tourism/education on our farm; with the possibility of creating future employment opportunities for our 3 children.

In our view the proposed wind farm would have a negative impact on the success of any future such business opportunities on our farm, for this and future generations.

#### Landscape and Visual Impact.

When we were seeking planning permission to build our house on our farm in 2008, we were asked to move the proposed location of the house to make use of available screening to “minimize the obtrusion of the building on the landscape in the interests of the preservation of the visual amenity of the area”. We were asked to do this with particular regard to those travelling on the East Munster way, directly across the valley from our elevated site. We complied with this and the observation made perfect sense.

The proposed windfarm will forever be seen from most roads in Co. Waterford and adjoining counties, and it will not preserve the visual amenity of the area. If you live here, the visual shape and form of the Comeraghs is engrained in your mind. It has a unique and iconic appearance and to add large wind turbines to that, will destroy it for many people, who enjoy gazing at its silhouette from so many different viewpoints including the much famed Waterford Greenway.

Many artists live in the area and are inspired by the landscape. I am an artist and art educator, and my work is directly influenced by the landscape around me. I am currently working on a large number of paintings directly influenced by the Comeraghs. The proposed windfarm will have a negative effect on my art practice, and that of future generations of local artists and creatives who are inspired by the local landscape.

#### Cultural Heritage, Population and Socio economic.

The Comeraghs are a rich area of cultural heritage and there is a strong tradition of Irish music and dance in the area; kept alive by the Comeragh Comhaltas branch and many local families. There is also a strong history and use of the Irish language in this area, cultivated by our local school.

It is our opinion that the development of the wind farm will have a serious negative impact on this rich and unique culture. We feel that future generations will not stay and live in the area. Our children have a huge pride in where they come from. They have been learning local tunes in Comeragh Comhaltas for years and are all fluent Irish speakers. They do not want to live in the shadow of large wind turbines. The Comeraghs can be a challenging place to live in the Winter months, but the unspoiled natural beauty of the area makes it worthwhile. Since the 2006 census, this area has a "slow growth in population" as described in the EIAR and we can see this in our sports clubs and fluctuating school numbers.

We feel the proposed windfarm could have a negative impact on our community, it will not encourage our children to live here, and new people will not be attracted to a spoiled natural environment.

A decline in population would have an impact on our schools, sports clubs and community facilities.

#### Light Pollution.

On the Dark Sky Ireland website [www.darksky.ie](http://www.darksky.ie) which is funded by The Heritage Council and raises awareness of light pollution in Ireland, you can observe a light pollution map. It shows the area of the proposed windfarm as having some of the least polluted skies in inland areas.

As residents of the area we can concur with that. Dark sky reserves can offer tourism opportunities and we have concerns about light pollution in relation to this project. Light pollution will have an impact on human and animal activity in the area and we do not see much about this topic in the EIAR.

#### Climate Crisis and Wind Energy Guidelines.

Finally, it is our opinion that the current awareness of the climate crisis, and the pressures on government and planners to find alternatives to fossil fuels could create an extra pressure on decision making as regards to such proposals. We must remember that these sites are chosen by commercial entities who are motivated by profit. More input from planners and government must go into the selection of possible sites and it is a worry that the current 2006 Wind Energy guidelines remain in force and have not been updated. The Comeraghs are too important a resource to destroy for future generations.