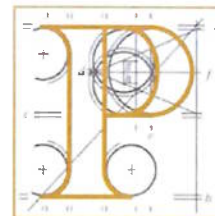


Our Case Number: ABP-318446-23

Planning Authority Reference Number:



An
Bord
Pleanála

Mark Chapman
Scart,
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)

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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OBSERVATION ON INFRASTRUCTURE S.I.D.

CASE REF NO/ PA 93.318446.

SUBMITTED BY MARK CHAPMAN, SCART,

BALLINAMUNT, CO/ WATERFORD.

AN BORD PLEANÁLA	
LDG-	<u>069505-24</u>
ABP-	<u></u>
26 JAN 2024	
Fee: € <u>50.00</u>	Type: <u>P40</u>
Time: <u>9.00am</u>	By: <u>Reg Post</u>

I am a long term resident of Scartnading Mountain, County Waterford, with a special interest in the archaeology and geology of the Comeragh Mountains. This has led to articles on the subject being published in local newspapers, and two contributions to the Waterford Archaeological Society's annual journal "Deiros" in 2005 and 2007, namely "prehistoric drainage diversion in the Comeragh Mountains" and "observations on archaeological features in the Comeragh Mountains".

This observation wishes to draw attention to the presence of archaeological features within the boundaries of the proposed development. Under the Valletta Convention 1992, Article 1, Section 3, the archaeology described here falls under the classification of structures or constructions and is therefore covered by the convention.

In January 2004, a visit by the Head of Geology Dept at Trinity College, Dr John Graham confirmed that a random sample of these structures were not the result of geological process and were therefore anthropomorphic.

It should be stressed that Dr Graham did not visit Comnagappul on this visit, but a nearby location with identical features. A letter from Dr Graham confirming the visit and his opinions are enclosed.

In Autumn 2013, the magazine "Earth Science", journal for geological profession published a two page article on these features, which is also included in this observation.

Having spent many thousands of hours field walking in the Comnagappul, I can report the following. 40 to 50 metres west of the site of turbine two, are a collection of cairns and anomalous stone formations. These are clearly not the result of geological process, are therefore anthropomorphic, and on no account should be disturbed. They fall under the category of unclassified archaeological features and are protected by the Valletta Convention. Other similar collections of stones in the vicinity enjoy the same protection and should also remain undisturbed.

Furthermore the sites of turbines 7, 8, 10 and 11 along with their access roads are seriously compromised by the many structures and

formations to be found to the east of the Conigran River. These increase in frequency the higher up Carrigbrack one proceeds, and once again are clearly not the result of geological process.

In recent years much archaeology has come to light in the Comeragh mountains, with much doubtless remaining to be discovered. In 1991 a highly significant site of "National, and even international importance" was discovered in nearby Connemara, a neighbouring valley only 3 miles from the proposed site. This along with the long recognised sites at Toomeen only a mile away is increasingly linking the Comeragh Mountains archaeologically. It is becoming apparent with time that these sites can no longer be regarded individually, but must be viewed instead as a whole, part of the general prehistoric culture of the Comeraghs.

The Valletta Convention is quite clear on the subject. Even where no material evidence is available, a cautionary approach is urged. It has been suggested that some of the

features described have also linked to funeral practices, which would make their removal even more sensitive.

In conclusion, the destruction of footlands, habitat, danger to birds, in conjunction with loss of archaeological heritage make the site wholly inappropriate for this development.

The applicants claim to have conducted a thorough archaeological survey of the area. It is to be hoped that other claims fare better when exposed to scrutiny.



DEPARTMENT OF GEOLOGY

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Mark Chapman,
Scart,
Ballynamult,
Co. Waterford

23rd February 2004

Dear Mark,

I have been talking with Robbie over the past week and we both agreed that you are really on to something. We found that arrangement of stones in several places that you took us to be quite unnatural and thus indicate the action of man. I'm still not sure how these can be accurately dated but there are one or two recently developed techniques that I will investigate. In the meantime I would strongly encourage you to pursue your investigations and to enlist the help of professional archaeologists if at all possible – I feel sure they will be very pleasantly surprised.

We are also very keen to complete the work on the diverted drainage and submit it for publication. Robbie has made some progress with generating cross profiles from all the measurements we collected. The real delay has been down to myself as I have had a really heavy teaching load this term and have literally been less than a day ahead of the classes at times. However, I should have a little time when I return from the field course to Spain in mid March and this will have my highest priority.

I'll be in touch when I am back in the office and in the meantime keep up the good work.

Best wishes,

Dr. John R. Graham F.T.C.D.

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IN THIS ISSUE:

Exotic places
Rock Camps
Book reviews
Roscommon Rocks
Pillow Walk
Minerals Man
Primary Schools
Unusual fossil
175th Anniversary
More Tellus
And more

NIEA Northern Ireland
Environment
Agency



Department of
Enterprise, Trade
and Investment

**Geological Survey
of Northern Ireland**



In the Eye of the Beholder

Upland Landscape Alteration in Ireland by Mark Chapman

The first hint of what was to unfold appeared in November 1992, on the slopes of Barracree Mountain in County Waterford. It was there during a descent of the Comeraghs that I noticed something odd. An inverted fan shaped patch of rocks ran back up the mountain for around five metres, a patch which had a peculiar structured appearance. Having always had a keen interest in geology, I stood for some time trying to imagine what natural force had left the rocks in this apparently unnatural position, but could think of none.

As time progressed, similar enigmatic patches of rocks were seen on the slopes of the Comeraghs, until eventually a pattern emerged. Among the patches were several distinctive recurrent themes, which also lacked a natural explanation.

Pointers

The most obvious of these themes were pointers. These thin tapering rocks, from between one and three feet long, appeared deliberately fixed within the patches, some vertically, but most at random angles. Others seemed clamped into position upon larger rocks by other substantial stones, and it was their repeated appearance that hinted this was not due to natural process.

Stacks

A second theme was stacking, where rocks could be seen balanced upon each other in extreme ways. These occasionally involved rocks stacked in ascending order of size, with the largest uppermost, but were more often identified by crudely structured piles. Again their frequency suggested more than random geological activity.

Alcoves

Alcoves, the third theme, were chambers or recesses, very similar to examples found in recognized archaeological monuments. The rocks used varied from book to headstone size, and suggested an amalgamation of two fields, archaeology reliant on geology.

Bowls

Perhaps the most significant of the themes were the bowls. These appeared one day on Carrigabuckera, one of the least visited outcrops in the Comeraghs and consequently one of the least disturbed. The only person I ever saw there was a local farmer using it as a vantage point from which to roar obscenities at errant sheepdogs below.

Not far from where he had stood were three nest like arrangements in the rocks, each about a metre wide and one above



Pointer. Comeraghs



Stacking. Comeraghs



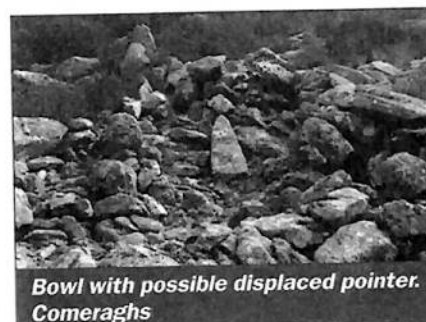
Bowl with backwall. Comeraghs



Pointer. Blackstairs Mountains



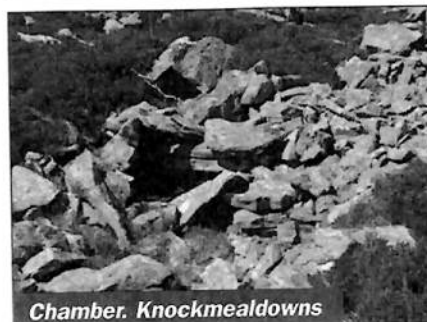
Stacking. Blackstairs Mountains



Bowl with possible displaced pointer. Comeraghs



Pointer. Comeraghs



Chamber. Knockmealdowns



Bowl. Blackstairs Mountains

the other in a terrace like formation. Each of these bowls was distinguishable by a nucleus of small stones surrounded by larger rocks and could not possibly be due to natural causes. As unlikely as it seemed, I was looking at the work of people, and once recognized, the bowls began to appear more frequently. The more elaborate versions had crudely structured backwalls often topped with a boulder or transverse slab, whilst others featured quartz. Recording the features though was problematic, as the one dimensional nature of photography rarely portrayed the true depth of the structures. Most photographs showed flat uninspiring piles of rocks, which was an inaccurate representation.

What if?

One day, while searching for more, a thought occurred. In the distance stood the Knockmealdown Mountains, where unusual patches of scree could also be seen. It was only five miles between the two mountain ranges, and I began to wonder "what if?"

Over the next few months attention was focussed entirely on the Knockmealdown Mountains, during which time an entire prehistoric settlement was found in the townland of Middlequarter, although my primary interest was the patches.

Recurring themes.

I had been aware for several years of the extraordinary profiles of some of these scree patches, but only now realized it was not scree in the recognized sense. There was seldom any rock source upslope to source such material, with much occupying hollows. None had the loosely structured appearance of conventional scree, but were chaotic, irregular jumbles. A further anomaly was the presence of raised scree patches in close proximity to those in the hollows, suggesting two contradictory processes



had been at work. Despite an extensive search, no definitive explanation for their cause in an Irish context has been found.

It was among these increasingly unnatural looking patches of stone that identical restructuring was found. All themes were recurrent and by this stage easily recognizable. Pointers, bowls and stacking were all present, although there were patches in both the Comeraghs and Knockmealdowns where no restructuring was visible. These tended to be patches of smaller stones which may have been disturbed beyond recognition. Considering the greater population of previous centuries and a far greater dependence on the uplands, this is possible. It was among patches of larger and more difficult to disturb rocks that evidence of alteration was most apparent. There were some particularly good examples on the northern slopes of Knockshanahullion, from where there was an excellent view of the Galtys.

Moving on

The Galtys proved irresistible and on the first visit displayed all the hallmarks of the Comeraghs and Knockmealdowns, although it appeared the Galtys had been subjected to much heavier traffic. The once great cairn on top of Temple Hill had been severely damaged, with much of it forming visitors' initials on the surrounding plateau.

Monacloghana, the bog of the rocks, and the slopes leading up to it had been spared such destruction, with the approach from the north proving particularly rewarding. The rocks there were of angular Old Red Sandstone, with the landscape leading to the summit heaped with it. Some of these mounds had hollows in their sides, described by archaeologists as "wind shelters". Trying one in a heightening gale, I established its shelter potential was zero and concluded the hollows must have served some other function.

Landscape alteration or restructuring – natural or human activity?

The presence of so much apparent landscape alteration raises serious questions. I think it was human

activity. Its extent suggests it played an important role in the lives of those responsible, and occurred over a period of many centuries. To date, and after much research, no reference to it has been found in any record, ancient or modern. This absence of historical reference suggests considerable antiquity, although dating can only be vague at best. Taking all factors into consideration, most of the restructuring appears too well preserved to be due to pure chance. I have considered the possibility it might be due to extreme frost/thaw conditions at the end of the last ice age but this seems unlikely. Also, evidence of burnt stone has been found in some of the bowls, suggesting fires were once lit inside them.

Found nationwide

More restructuring has now been found on other hills and mountains in Co Limerick, Co Wexford, Co Wicklow, Co Donegal, and on Achill Island. Now I plan to look further afield to Britain.

The question remains

It has been a fascinating journey, which thus far has led to some of the most remote parts of Ireland. My conclusion is that this might be an entirely new avenue for archaeology. The structures have the potential to shed more light on the lives of our distant ancestors. Questions remain and it is hoped others with more relevant skills will now help solve this most enigmatic of riddles. ■

Editor

I take responsibility for the title on top of this article. Reading the landscape is a special skill geologists and geographers develop. It has been suggested many of the features talked about above are due to entirely natural erosion. Or are they? Has ancient Man had a hand? The article will make you think, so is worth reading. It represents careful observation by someone who really appreciates the countryside. Is the interpretation one step too far or just the first of more to come? – Editor]