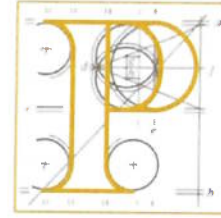


**Our Case Number:** ABP-318446-23



An  
Bord  
Pleanála

Michael O'Donoghue  
Seskin,  
Carrick-On-Suir,  
Co. Waterford  
E32D326

**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, Skeeans, 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

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

**Michael O'Donoghue, Geographer**  
**Seskin, Carrick-on-Suir, Co. Waterford E32D326.**

Strategic Infrastructure Development  
Counmagappul Wind Farm Case No: 318446  
An Bórd Pleanála  
64 Marlborough Street  
Dublin D01V902.

<b>AN BORD PLEANÁLA</b>	
LDG-	<u>069452-24</u>
ABP-	
24 JAN 2024	
Fee: €	<u>50.00</u> Type: <u>chg</u>
Time:	<u>9.00</u> By: <u>Reg Post</u>

### **Profile**

My name is Michael O'Donoghue. I am a retired geography teacher from Carrick-on-Suir. With over thirty years' experience of visiting our local mountains, I believe that I can speak more authoritatively than most about the Comeraghs. I way-marked the first Fáilte Ireland approved looped walks in Waterford over 10 years ago – the Boolas and Lough Mohra Loops, both in the Comeraghs. I was also the geographer involved in the Comeragh Uplands Communities EIP Biodiversity Project which won a national farmers' award in 2023.

In this submission I hope to show An Bórd Pleanála why planning permission for Counmagappul Wind Farm should be refused. I will do so using three main criteria:

Likely Effects of the proposed project on a European Site  
Likely Effects of the proposed project on the Environment  
Implications for proper planning and development in the area

### **Likely Effects of the proposed project on a European Site**

The Comeraghs is an extensive upland area of outstanding natural beauty, dominating central Waterford and stretching from Long Hill and Lachtnafrankiee on the outskirts of Clonmel in the north to Crohaun outside Dungarvan in the south, and from Coumshingaun in the east to Milk Hill and Com na gCapall in the west. It is the standout landscape feature in Waterford and one of the county's premier natural amenities. And now it is under threat. Ten years ago, the threat came from Eirgrid and its huge pylons, now the threat comes from the new holy grail of energy production – wind farms.

**Its outstanding natural beauty has been recognised and it is classified as a European Site**, with one third of its approximate 200 square kilometre area designated a Special Area of Conservation. It is the best example of a high level Old Red Sandstone Plateau in Ireland, most of it above 700 metres in elevation.

**Most importantly perhaps, in relation to this proposed project, it is a unique mountain range of national importance, mainly because of its glacial heritage, especially its amazing coums/corries.** Not just my opinion, here is the site report from the Geological Survey of Ireland:

## **“WATERFORD - COUNTY GEOLOGICAL SITE REPORT**

### **NAME OF SITE Comeragh Mountains (OVERVIEW)**

Other names used for site

IGH THEME IGH7 Quaternary

TOWNLAND(S) Curraheen, Knockanaffrin, Carrigeen, Graigavalla, Ross, Boolacloghagh, Coolnalingaddy, Commons, Kilclooney, Curraghduff, Lyre Mountain, Tooreen Mountain, Comeragh Mountain, Carrigbrack, Ashtown, Barracreemountain Upper, Cutteen North, Coummahon.

### **Outline Site Description**

The Comeragh Mountains site is a mountain plateau heavily ice-sculpted with corries.

### **Geological System/Age and Primary Rock Type**

The mountains have been shaped and moulded during the Quaternary (Ice Age) by glacier ice abrading the mountain tops and flanks. The mountains therefore comprise ice-scoured bedrock, which itself is Devonian Old Red Sandstone.

### **Main Geological or Geomorphological Interest**

The corries comprise deep, wide hollows which include discrete as well as composite corrie features. Many hold tarns (corrie lakes) and also show excellent examples of lateral and corrie-edge recessional moraines.

The features have almost-vertical back walls, with the highest at Coumshingaun up to 400m in height. Coumshingaun and Coumfea-Coumalocha are flanked by fine arête ridges, which are very jagged, sometimes knife-edged, craggy rock walls, which separate two corrie features. Coum Mahon holds one of Ireland's finest waterfalls, which cascades down its backwall (Mahon Falls).

The summit of the Comeragh Mountains is blanketed by several metres depth of blanket peat, which has formed across the summit since the Ice Age. This peat has been cutover in places and displays high peat hags in some localities, particularly between Coumtay and Coumfea-Coumalocha. The Devonian sandstones and conglomerates, which make up the Comeraghs, are also well displayed and include some localised development of paleosols – Devonian soils.

### **Site Importance**

**The mountains provide the best corrie landscape in the country within a relatively restricted (50 square kilometres) extent. They are already a pNHA and SAC (Site 001952, Comeragh Mountains) for biodiversity reasons and the corrie landscape itself is of national importance.”**

From reading that report it is obvious that the GSI recognizes the spectacular glacial heritage of the Comeraghs. Our coums and glaciated valleys are special places and must be protected and preserved in all their natural glory. Coumnagappul and Coumduane, both within the proposed project area, are not the most dramatic of corries, but they are both an integral part of the glacial heritage of the Comeraghs. It took hundreds of thousands of years for this heritage to evolve and it behoves us all to preserve it in its natural state for the next generation.

### **European Site under threat**

Now, the Comeragh Mountains European Site is under threat. The applicant in this project, EMPower, argues that their project is outside the Comeragh SAC and will have no impact on it. Nothing could be further from the truth. It is impossible to compartmentalise upland landscapes. Yes, technically Milk Hill and Coumnagappul are outside the Comeragh SAC, but they blend naturally into nearby Carrigbrack and Lyre Mountain, part of the glorious Comeragh Plateau, which are. **The visual is everything when it comes to scenic mountain zones and the industrial scale of this project will have a very negative impact on the Comeragh European Site.**

### **And make no mistake about it the Coumnagappul Wind Farm Project is of a serious industrial-scale:**

- Turbines 185 metres high – equivalent to 20 two storey houses. Most Comeragh coums have backwall cliffs of about 200 metres, so, if turbines were placed on the floor of each coum, they would almost reach the top of most! There are few places in Ireland, if any, with turbines of this height. The highest man-made structure on the Comeraghs at present is the telecommunications mast on Crohaun at 53 metres.
- Construction Phase of 24 months.
- Substation Compounds measuring 123 metres by 62 metres.
- 92 HGV Trips average per day over 24 months.
- Borrow Pit on Milk Hill 150 metres by 100 metres by 13 metres deep.
- Approx 11.3 km of new internal tracks quoted in Chapter 12 Hydrology; approx. 25.43 km in the planning notice in the newspapers, in a valley less than 3 sq.km in area – which is it?



**The Boolas – Comeragh Landscape par excellence**

## **Likely Effects of the proposed project on the Environment**

In this section of my submission, I first look at landscape and then other environmental elements.

### **Landscape and Landscape Visual Impact Assessment – LVIA**

The developer, EMPower (whose onshore wind energy portfolio was bought in September 2023 by STATKRAFT, the Norwegian state energy company) states on its website that an LVIA will be carried out by a company called Macro Works (acquired in June 2023 by APEM, a British Environmental Consultancy company).

**It should raise a few red flags for An Bórd Pleanála that large European energy companies are circling our mountain areas of outstanding natural beauty with a view to turning them into huge wind farms.** It should also concern An Bórd Pleanála that Macro Works boasts on its website “We excel at challenging projects where our combination of experience and innovation can be brought to bear to give any development its greatest chance of success”. This doesn’t sound conducive to producing an “independent” LVIA.

**Before I look at some of my “landscape” concerns about this project and as a geographer give my own landscape visual impact assessment, let me outline some of the inaccurate and sometimes disingenuous and misleading statements in the applicant company’s EIAR, LVIA and NIS documents.**

- In their NIS the company concludes that the project will have very little adverse effects on nearby European sites such as the Lower River Suir SAC, Dungarvan Harbour SPA, Blackwater River SAC and Mid Waterford Coast SPA. Amazingly, they consider the biggest SAC in Waterford and the one closest to Coumnaappul, namely the Comeragh Mountains SAC, to not be within the Zone of Influence of the project!
- In Chapter 16.1.1. of their EIAR the company states “the landform of the study area is complex as it comprises a variety of landscape types and features and is heavily influenced by the Comeragh and Monavullagh Mountains, which occur throughout the southern and eastern extents of the study area.” This is a somewhat disingenuous statement as it infers that the study area is outside the Comeraghs. They downplay the project area, talking of it being a “transitional landscape.” **A geographic and geomorphic clarification here – all the uplands and landscape ripples/buckles from Long Hill on the outskirts of Clonmel in the north to Crohaun above Dungarvan in the south, and from Cruachán Paorach near Clonea-Power in the east to Milk Hill above Ballymacarbry in the west are constituent parts of the Comeraghs.**
- In Chapter 16.6.1.1 a couple of inaccuracies - the applicant states “the site is contained by a horseshoe ridge that comprises Milk Hill to the north and Bleantasour Mountain to the east.” (should read “west”). A little further on it states that “the Coumevane Stream flows ...” Do they mean the Coumduane Stream?
- **The applicant constantly downplays the visual impact of the turbines on the Comeraghs.** In Chapter 16.4.1 they state “the eastern half of the site has a limited potential for turbine visibility.” This is a totally misleading statement. The eastern half of the site abuts Tooreen Mountain and Carrigbrack – most of the turbines will tower abruptly above both. They go on “whilst theoretical turbine visibility will occur along the west facing hills and ridges within the Comeragh Mountains...” They seem to be downplaying these parts of the Comeragh SAC, from where most of the turbines will be visible.
- In Chapter 16.4.2.3 when talking about tourism and recreation, the applicant states “**it is important to note that large sections of the Comeragh Mountains will be entirely screened from the proposed turbines.**” This is a **ridiculous statement** – a high percentage of the Comeraghs SAC will have views of the turbines.
- **More downplaying of the visual impact of the turbines** in Chapter 16.6.2.1 – when talking about Viewpoint 16, the applicant states “the turbines will present as prominent features and at a notable scale. Whilst the turbines will generate a notable increase in the intensity of built development in this transitional landscape context, they will not appear over-scaled nor do they appear out of place”. **In the context of the high Comeraghs, which are a**

**close backdrop to the south and west of the project area, they most certainly will appear over-scaled and are out of place.**

- **The applicant's Photomontage is selective and leaves out** for example: important panorama sites, most Comeragh high points, the important Powers the Pot Road on the Comeragh Drive. See examples below.

**Now let us look at some of my "landscape" concerns about this project.**

### **Height of Turbines:**

Four of the ten turbines here start at an elevation of about 400 metres or above. Add on their 185 metres height and you have a **final height of almost 600 metres** - T1, T2, T4, T6. If we compare the Coumnaagappul project to the controversial Derrybrien one – the turbines in Derrybrien were 75 metres high, less than half that of the Coumnaagappul ones.

### **Open Landscape:**

Again, referring to Derrybrien – here are a few quotes from the developer: "they feature as a broad low round-topped landform on the horizon with limited visual presence" and "forest cover is one of the defining characteristics. In views from within the uplands the plantations often block lateral views from the roads, generating a high degree of visual enclosure." Now, the high Comeraghs is a very open landscape and there is little forest cover around the turbines in Coumnaagappul. Also, because of the elevation at which they start and their great height, **there will be no "visual enclosure" and they will not appear as "a broad round-topped landform on the horizon with limited visual presence," rather as high metal monstrosities intruding on the natural landscape.**

### **Proximity to Comeragh SAC:**

As you will see from the location map below, three of the turbines are approximately 1 km from the western edge of the SAC - T11 about 800 metres away (spot height 555 or "the Middle Splink"), T6 about 1 km away, and T7 about 1.2 km. Every turbine is less than 2.5 km away. The Bórd Pleanála inspector in her report states that the wind farm site is 1.7 km from the SAC. This is not accurate but may be, I assume, a general statement, and probably refers to the location of the proposed substation.



## ArcGIS Web Map



11/27/2023 4:16:07 PM

LOCATION of Wind Turbines  
B.P. - Borrow Pit marked by X  
▮ Substation

**Wind turbines constitute visual pollution and environmental vandalism in a mountain landscape. I contend that turbines of this scale should not be allowed anywhere near an SAC because they totally compromise the views. See the examples below:**

### **The 60 kilometres-long Comeragh Drive:**

Along with the Copper Coast Drive, the Comeragh Drive is a designated scenic drive in Waterford. Its scenic appeal will be greatly undermined by the intrusive turbines,





especially on the western and southern flanks of the Comeraghs. The applicant downplays this aspect of the project. They do select some viewing points along this section of the Comeragh Drive near the Mauma Road e.g. viewpoints 23, 24, 26, 27, but **don't even mention probably the most scenic stretch of the drive, that along the Powers the Pot Road under Knockanaffrin between Rathgormack and Ballymacarbry, from where turbines T1 and T2 will clearly be seen, inappropriately perched on the summit of Milk Hill.** Yes, they select one viewing point in this area, VP 3, layby at Glendalough, but this is on a road parallel to the Powers the Pot Road, with the view of the turbines largely blocked out by Barr na Buaille Hill. Why didn't they select a viewing point on the Powers the Pot Road, e.g. at Moanyarha Bog S 255 175, where there are splendid views of Knockanaffrin Ridge and the Nire Valley, both macro features of the Comeraghs less than 5 kilometres from the road? Possibly because turbines T1 and T2 will reach 170 metres into the sky from the summit of Milk Hill on the south-western rim of the Nire Valley, almost the same distance as that from the base of Milk Hill at about 250 metres elevation, to its summit at about 450 metres!

### **Visual impact in a “mountain zone” shouldn't just be assessed from roadside views:**

Mountain landscapes have considerable spiritual, mental health and general wellbeing effects and therefore attract many recreational users. If anything, views outward from the mountains are a more important consideration when assessing the possible effects of industrial-scale projects on the character of mountain landscapes.

### **The Nire Valley:**

The applicant does select three viewpoints from the Nire Valley, along with the Mahon Valley, the finest example of a glaciated valley in the south-east of Ireland – viewpoints 9, 10 and 11. They admit that up to 6 of the turbines will be visible from these viewpoints and say they will have “minor negative effects on the scenery of the valley”. **“Minor”? Are they serious?** They neglect to mention the effect that turbines 1 and 2, perched on the top of Milk Hill on the south-western rim of the valley, will have on its scenic appeal.

### **The Gap:**

The Gap, at 466 metres elevation, is the highest pass in Waterford. Sitting at the head of the Nire Valley, and central point of the old Bóithrín na Sochraide (funeral path) from the Nire to Rathgormack, it affords fine views down along its length. These views will be compromised by the turbines on Milk Hill.

### **No viewpoints from some of the highest peaks in the Comeraghs:**

Lachtnafrankie, Knockanaffrin, Seefin and Milk Hill all have grand panoramas and all will be adversely affected by views of the turbines. None were selected by the applicant as viewpoints. They select only one viewpoint, VP 15, from the Comeragh Plateau at Fáscom in the far east. **They don't select any viewpoints from the western parts of the Comeragh Plateau and SAC e.g. Carrigbrack Ridge, Lyre Mountain, top of the Nire Lakes Horseshoe at Coumfea. Why is this? Because their height and scale, their very presence, will destroy the views outward from the Comeraghs.**



### **Milk Hill`s Panorama will be destroyed:**

(see photo above, looking north along Tooreen Mountain towards the low plateau of Milk Hill in centre background). Although it reaches just 450 metres elevation, Milk Hill has one of the finest panoramas in west Waterford – Knockmealdowns and Galtees to the west, Boolabrien Ridge, Lachtnafranke and Slievenamon to the north, Knockanaffrin Ridge, the Gap, the Nire Valley and its coums to the north-east and east, the Comeragh Plateau, the high Monavullagh ridges, Seefin and Crohaun to the south. Two turbines, **T1 and T2**, will stand on its summit at over 400 metres elevation. As mentioned already, these **will tower above the picturesque Nire Valley** to the north-east. All the other turbines will rise high into the sky above any hillwalker who looks south across Coumnagappul Valley towards the Comeragh Plateau and high Monavullaghs. **Absolute landscape vandalism.**



### **Seefin`s Panorama will also be seriously affected:**

**Without any doubt, one of the best scenic panoramas in the south-east of Ireland is to be had from Seefin, the highest point on the Monavullagh Ridge in the southern Comeraghs – seascapes to the south along the Waterford Coast, SAC features of national importance such as the Comeragh Plateau to the north. These will be undermined – see the photo above, taken from near the top of Seefin, looking north across the edge of Carrigbrack Ridge towards Coumnagappul and Milk Hill and on towards the Galtees and Knockmealdowns. All the 10 turbines, I believe, will be visible from here at a distance of just 2 to 5 kilometres – this means that the magnitude of the visual impact will be high here as the turbines intrude into a significant proportion of the view. They will constitute one of the most noticeable elements of the panorama, thus greatly reducing the visual amenity of Seefin and the Comeragh Plateau.**

## **Environment and Ecology**

**Waterford City and County Council`s environment policy** states its aim “to develop the Comeragh area into a national amenity and to promote the heritage and recreational features of the area for all users while conserving its natural habitats, protected species, flora, fauna, archaeology and landscape, and as a sustainable area for the local community.” It points out that the Comeraghs is a vulnerable landscape and as such has “**very distinct features with a very low capacity to absorb new development without significant alterations of existing character over an extended area.**”

**Despite the evidence of the industrial-scale of this project mentioned earlier, the applicant incredibly states in Chapter 16.6.1.2.1 that the project will have little impact on this character and that “the topography and land cover of the site will remain largely unaltered, with construction being limited to tracks, hard standing areas for the turbines, on-site substation compound, met mast borrow pit, felling of forestry.”**

I accept that it is difficult to predict the extent of the environmental and ecological damage that this industrial-scale project will inflict on the Coumnaagappul area – on the hillsides of Bleantasour, Milk Hill, Tooreen Mountain, Carrigbrack, on their soils and water courses. But if the recent happenings in Derrybrien and Meenbog, areas with similar wet heath and some blanket bog terrain, are anything to go by, it may be considerable.

**My main environmental concerns, apart from landscape, relate to:**

**Hydrology:**

Coumnaagappul is the catchment area of the headwater streams of the Colligan River, Waterford's longest within-county river. There is every chance that the Carrigbrack and Coumduane streams will be adversely affected during the construction stage of the project. Ecological continuity will be affected by the project e.g. there is hydrological connectivity between the project area and Dungarvan Harbour SPA because of the Colligan River. The Nire catchment area to the north may also be affected. Cement may enter the streams and be blown into the Nire Valley and onto the Comeragh SAC by the prevailing south-westerlies. The removal of peat from the hill slopes will lead to sediments and silt being deposited in the fledgling streams. Water quality will be affected and there will be an increase in surface flow and flood runoff rate. The aquifer under the site is classified by the Geological Survey of Ireland as having a high vulnerability. **Turbine 8 is located less than 150 metres east of the fledgling Colligan. Turbine 7 looks particularly precariously located – just 150 metres south of Carrickbrack stream, on sloping ground in a marshy hollow between Tooreen Mountain and Carrigbrack Mountain – photo below shows this marshy hollow, known as An Ciseán Buí.**





### **Hillside Erosion:**

The sheer size, length, and weight of the turbines (much larger than those at Derrybrien) would suggest that there will be significant damage inflicted on the fragile wet and dry heath and blanket bog hillsides surrounding Coumnagappul. The construction of access tracks alone (11 or 25 kilometres of them?!) and huge concrete bases for the turbines pose a serious **peat stability risk** on the sloping ground. There will be significant excavation on slopes of 10 to 15 degrees in places e.g. at turbine 7 and turbine 11 on the slopes of Carrigbrack and on Barr na hUidhre on the western flanks of Milk Hill.

### **Borrow Pit:**

A borrow pit measuring 150 metres by 100 metres by 14 metres deep is to be dug out at over 400 metres elevation at approx. S 246 103, on the eastern slopes of Milk Hill near the col between it and Tooreen Mountain. This will be located less than 1.5 kilometres away from the important Bronze Age monuments of Tooreen East.

Obviously, **a huge unsightly scar will be inflicted on the eastern slopes of Milk Hill** because of the removal of building materials from the pit.

Of greater concern perhaps, will be the damage done to the heath and peat cover on the hillsides by the constant **ferrying of building materials** from the borrow pit to the various turbine sites. This, and the digging out of foundations for the turbines, may undermine the stability of the peat slopes and perhaps **lead to a disastrous peat slide like that which occurred in Derrybrien in 2003.**

## **Recreation and Mountaineering Ireland Policy**

This project is against Mountaineering Ireland's Built Development Policy.

Mountaineering Ireland considers certain man-made projects such as large wind farms to be potentially damaging to the essential landscape qualities of our uplands. They believe that Ireland has an extremely limited stock of undeveloped mountain land, which is irreplaceable and is being depleted. They point out that **The Citizens Assembly on Biodiversity Loss has shown that Ireland is facing an enormous problem of biodiversity loss.** A relevant quote from their policy document:

"Mountaineering Ireland does not oppose all development in upland areas, rather it argues that development should be located where it does not destroy the essential character of the undeveloped landscape of the upland and coast." **They argue that upland landscapes are not appropriate locations for such developments, asking should they not be centred in industrial zones on the outskirts of cities and towns, closer to demand centres? Green energy should not come at the expense of the quality of our green spaces.**

## **Mountaineering Ireland is particularly concerned about the proposed Coumnaagappul project for reasons such as:**

- The industrial scale of the project. They argue that it is essentially a wind energy factory proposed for an area where no other factory would be considered.
- The height of the turbines and the fact that they would be visible from all the main ridges and summits in the Comeraghs. Looking down on a major industrial development will detract from the sense of wildness currently enjoyed in the Comeragh Mountains and irreversibly alter the wild character of the landscape.

## **Implications for proper planning and development in the area**

As I have mentioned already, the Comeraghs is an area of outstanding natural beauty and is Waterford's most important natural amenity. It is a touchstone for many people from the Déise. As Declan McGrath points out in his book "A Guide to the Comeragh Mountains": "the Comeraghs encourage the inculcation of a distinct sense of identity and attachment to the county."

**Waterford City and County Council recognises this and wishes to develop the area as an outdoor activity hub.** They realize that there is great potential here in Waterford to develop green outdoor tourism in our magnificent landscape. The Copper Coast was Ireland's first Global Geopark and the Comeraghs is the most scenic mountain zone and SAC in the south-east. With these brands we have every chance of promoting County Waterford as a green destination for outdoor activities.

In recent times the council has done great work to promote the area with their Waterford Food Festival, Seán Kelly Tour and Comeragh Wild initiatives.

**The Council recognises the dangers that inappropriate industrial-scale projects pose to the character of the spectacular landscape and the fragile environment of the Comeraghs. That is why they have classified the vast majority of the Comeraghs, including Milk Hill and Coumnaagappul, as no go areas for wind energy development.** A few years ago, the council refused planning permission for a proposed 8 turbine wind farm (smaller turbines at a lower height of 300 metres) on Curraheenavoher Hill about 5 km north of Ballymacarbry for these reasons.

**Landscape Policy Objective LO2 of the 2022-28 County Development Plan** states “protection of the landscape and natural assets of the county shall be a priority having regard to the character, integrity, distinctiveness, or scenic value of specific areas”. The Council considers that the proposed development “would materially contravene policy LO2 and would, therefore, be contrary to the proper planning and sustainable development of the area”. I suggest that Waterford City and County Council know what’s best for the development of the Comeraghs and that An Bórd Pleanála pay heed to their considered view and long-term vision.

I would also remind An Bórd Pleanála of what happened in Derrybrien in Galway. In November 2019 the European Court of Justice ruled that Ireland had failed in its obligations to assess environmental effects in accordance with European Directives prior to granting planning permission. We don’t want the Comeraghs destroyed because of poor planning decisions. When talking about developments affecting a European Site, **the European Commission states “If there is a lack of certainty as to whether there will be negative effects, then the plan or project cannot be approved.”**

I would also remind the Board of an email I sent them on Friday December 15<sup>th</sup> 2023. It outlines my dissatisfaction with the way the Board seems to be treating the public regarding the provision of information in regard to this SID and their apparent acceptance that it is okay for the applicant’s website, rather than the Board’s website, to provide the information in regard to a change in the deadline date for submissions.

**Finally, I refer the Board to An Bórd Pleanála Inspector’s Report dating 21-12-2022 regarding the proposed Coumnaagappul Wind Farm – ABP-309259-21:**

Writing (in 6.7) about Designated Sites in proximity to the site she states:

“The nearest Natura 2000 Sites are as follows:

- Comeragh Mountains SAC 1.7 km”

**This is a mistake and is very relevant under “Implications for Proper Planning”. Comeragh Mountains SAC is located just 800 metres from the Coumnaagappul site (Turbine 11 at 2525 0786 on the slopes of Carrigbrack). The Inspector must have**

been talking about the Sub Station on the banks of the Colligan, which is located 1.7 km from the boundary of Comeragh Mountain SAC. Still, a serious mistake.

### **To summarize:**

The Comeraghs is an area of outstanding natural beauty, is classified as a European site, and possesses a unique landscape of national importance because of its glacial heritage. The main management objective of such a landscape should be the conservation of the existing character. It would be totally inappropriate to allow an industrial-scale development such as the Coumnagappul Wind Farm to go ahead on such a precious mountain area. Yes, this project supports national targets of climate change and reduction of greenhouse gas emissions but at what cost to a national landscape treasure? **It would drive "a coach and four" through Waterford City and County Council's Development Plan if planning permission is granted for this project.** It would be an act of wilful blindness or conscious avoidance of the facts regarding the effects of this project on the Comeraghs. And remember, if this industrial-scale wind farm proposal is approved, it may open the flood gates for more of the same.

**An Bórd Pleanála is tasked with making a very important decision here, one that may have serious implications for some of Ireland's most scenic mountains down the road. Surely, there are some precious mountain zones/wild places that do so much for the human spirit – such as the Wicklow Mountains around Glendalough and Glenmalur, The Twelve Bens and Maumturks in Galway, The Mountains around Killary Harbour, The McGillicuddy's Reeks, The Comeraghs – that should be sacrosanct and worth protecting from intrusive industrial developments such as wind farms, worth protecting in their natural state for future generations?**

Michael O'Donoghue