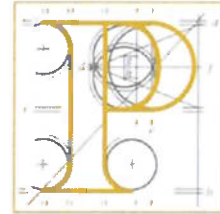


**Our Case Number:** ABP-318446-23

**Planning Authority Reference Number:**



An  
Bord  
Pleanála

Patrick G. Phelan  
Shanballyanne  
Ballymacarbry  
Co. Waterford  
E91H63

**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](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
Glao 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

Patrick. G. Phelan

Shanballyanne

Ballymacarbry

Co. Waterford

E91 H63

The Secretary

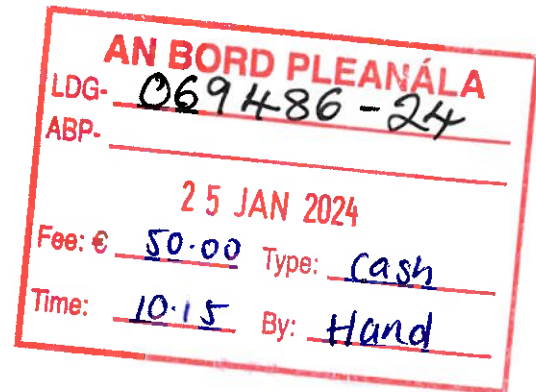
An Bord Pleanála

64 Marlborough Street

Dublin 1

21<sup>st</sup> 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 Glennanecanemountain, Skeehans, Lagg, Co. Waterford.**

To the Members of the Board,

This is an observation of objection to the above mentioned development.

I am against this proposed development for the reasons listed below.

As the Board is aware, the Waterford City and County Development Plan 2022-2028 has designated the area where this development is proposed as “no-go” area for wind energy developments.

Granting of planning permission in a wind energy exclusion zone will contravene the Waterford City and County Development Plan 2022-2028. The above mentioned Plan has been subject to two years of research and five rounds of public consultation. It was then unanimously ratified after being monumentally scrutinised by the elected Members of the

Waterford City and County Council. The Planning Regulator and the Minister for Housing, Local Government and Heritage then signed off on the Plan. The democratic right of the local people living in areas that are designated as “no-go” areas for wind energy developments must be protected.

There are many errors in the documents submitted by the Applicant, which is very concerning for the residents who are living in close proximity to this proposed development.

### **Missing Documents**

#### Site Notice

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

### **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.**

## **Comeragh Mountains SAC**

In the table below the Applicant states that there is “no hydrological connectivity between the site and the SAC”.

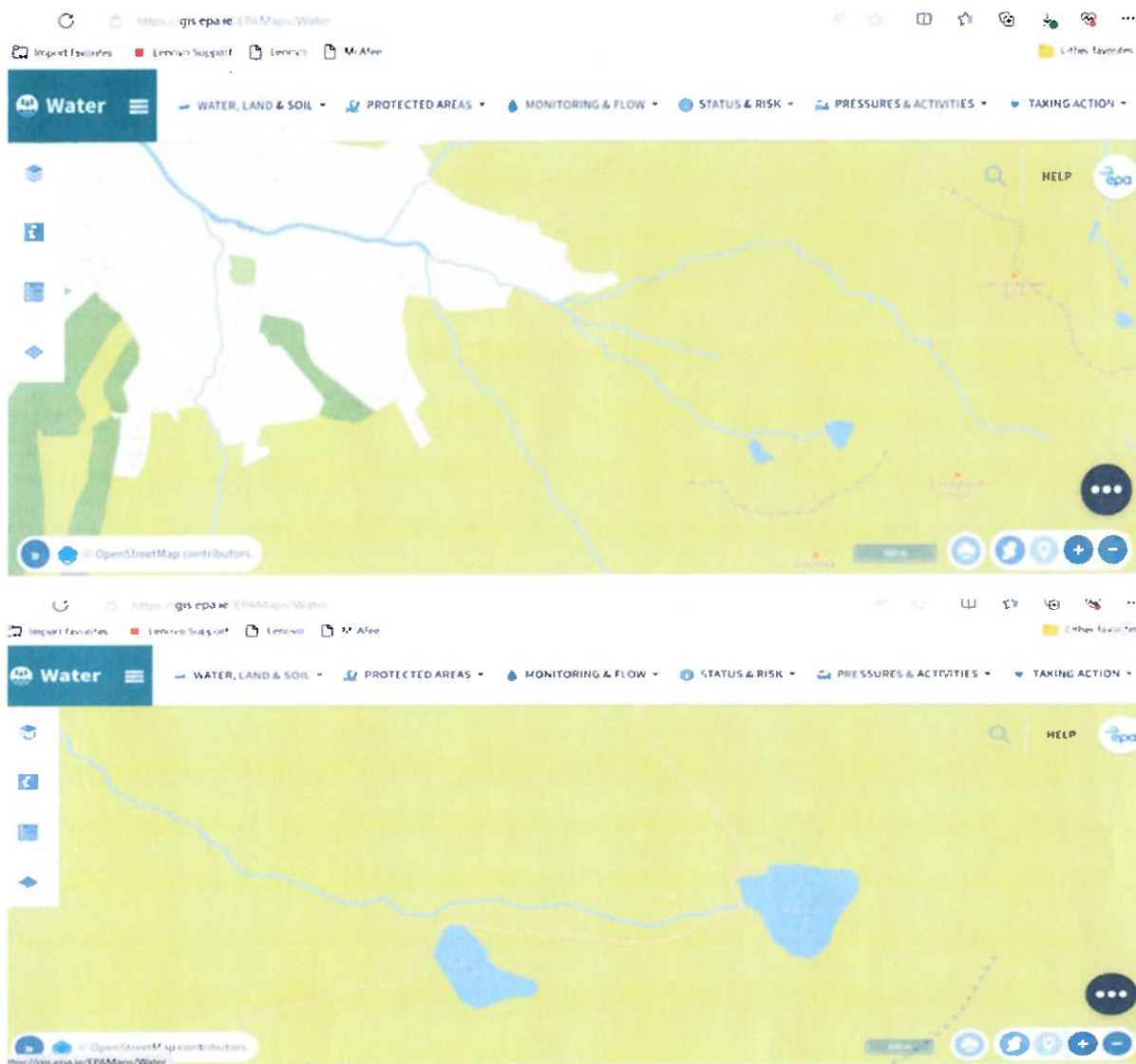


Table 3-1: European Sites Within the Potential ZOI

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 fluitantis 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) [6216]</p> <p><a href="https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001952.pdf">https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001952.pdf</a></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

If this assessment had been completed with due care the Applicant would have seen there is, in fact, a very obvious hydrological connection between the proposed development and the Comeragh Mountains SAC.

The River Nire flows from Sgilloque Lough in the Comeragh Mountains SAC.



The Applicant cannot guarantee that the proposed works, especially deep excavation works and the pouring of concrete, will not affect the Comeragh Mountains SAC through underground streams. The omission of the Comeragh Mountains SAC from further assessment cannot be justified.

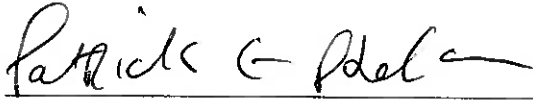
The area where this development is proposed is completely unsuitable for works of this magnitude. The groundwater is extremely vulnerable to contamination due to widespread blanket peat. The Applicant cannot guarantee that this development will not result in a landslide. This is very concerning for the residents living in this area.

There are many conservation objectives for the Comeragh Mountains SAC which can be found on

“Comeragh Mountains SAC (site code 001952) Conservation objectives supporting document - upland habitats NPWS”

This development will contravene the above conservation objectives as the closest turbines is located less than 800meters from the SAC.

I ask the Board to put the Waterford City and County Development Plan 2022-2028 at forefront of the decision making process and the concerns submitted by the local residents.

A handwritten signature in black ink, reading "Patrick G. Phelan", written over a horizontal line.

Patrick. G. Phelan