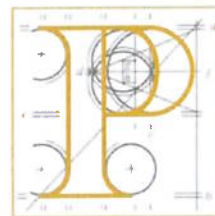


**Our Case Number:** ABP-318446-23

**Planning Authority Reference Number:**



An  
Bord  
Pleanála

Patrick and Alice Coffey  
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](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

Tell  
Glaó Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel  
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Fax  
Website  
Email

(01) 858 8100  
1890 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
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64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

Patrick and Alice Coffey

Scart

Ballinamult

Co. Waterford

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1

25<sup>th</sup> January 2024

€50 fee included

*An Bord Pleanála Case reference: PA93.318446*

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

Dear Sir/ Madam,

We are strongly opposed to the proposed development of Coumnagappul Wind Farm. (and all associated works)

Our home and farm are located a mere 3.2km from this proposed development we are very concerned about the impact this Industrial sized Wind Farm will have on our tranquil and unspoilt surroundings.

I would like to remind the Board that the Waterford City and County Development Plan 2022-2028 has designated the area where this development is proposed as an exclusion zone for Wind Farm Development.

On The Report To Inform The Appropriate Assessment Process (Screening And Natura Impact Statement) Table 2.2 Wind Energy Developments within 20km of the proposed Development, see table below.



Table 2-2: Wind Energy Developments within 20km of the Proposed Development

Wind Farm Name	Number of turbines	Distance and Direction from proposed site	Status
Tierney Single Turbine	1	5.1km west of Site	Operational  Privately owned operational (since 2015) single 150 kW turbine (hub height 30 m, tip height 44 m)
Kilnagranee Single Turbine	1	14km east of Site	Operational  Privately owned (KWT Energy Ltd) operational (since 2016) single turbine with a 60 m tip height
Woodhouse Wind Farm	8	17.2km west of Site	Operational  Woodhouse Wind Farm (ESB) is an operational wind farm (since 2015) and was constructed in 2 phases comprising a total of 8 no. wind turbines with a 126 m tip height (45m blade length).
Knocknamona Wind Farm	8	17.6 km west of Site	Permitted  Was granted permission in September 2022 (PL93.309412) and is located immediately south of the existing Woodhouse Wind Farm. The Knocknamona Wind Farm will comprise 8 no. wind turbines with a 146.3 m tip height.
Dyrick Hill Wind Farm	12	7.9 km southwest of Site	Proposed (at planning)  Proposed private development (EMPower) submitted for planning in June 2020 (Case reference: PA93 317265) comprising a 12-turbine array with a 185m tip height.

The proposed Scart Mountain Wind Farm is omitted from the above table. When the planning application for Coumnagappul Wind Farm was lodged to An Bord Pleanála the Scart Mountain Wind farm was at pre consultation phase with An Bord Pleanála. Case Ref No; PC93 317824. This is a very serious omission as the cumulative affect is not accurate and very misleading to the Board.

Below is the image that appears when coumnagappulwindfarmsid.ie is entered into Google search on a mobile device the Harmony Solar logo appears on their website. The company Harmony Solar, specialises exclusively in Solar Energy.



## SILT FENCING

The Developers can not guarantee that the Colligan, Nire Rivers and their tributaries will remain unaffected

14.2 Mitigation Measures

Table 4-6: Details of Mitigation Measures to be implemented for Proposed Development

No.	Mitigation Measure	How Measure Will Avoid/Reduce Adverse Effects	Implementation of Mitigation Measure and Level of Success	Monitoring scheme to prevent mitigation failure
Mitigation Measures to be implemented Prior to Construction				
6	Silt traps and silt fencing The main purpose of the silt traps and silt fencing is to slow water flow, increase residence time, and allow settling of silt in a controlled manner.	Silt traps and silt fencing measures for the proposed wind farm site will be provided at outfalls from roads or drains to silt ponds, at the end of the drainage channels, to the outside of the tree-felling buffer zone and silt traps will be placed down-gradient within forestry and agricultural drains near streams.  The traps and fences will be maintained regularly ensuring that they are clear of sediment, debris and are not severely eroded.  Additional silt fencing will be kept on site in case of an emergency break out of silt water run-off.  This measure will reduce the risk of sediment runoff reaching waterways within the catchment of the proposed wind farm site. This in turn will avoid adverse effects on the surrounding water courses and aforementioned designated sites.	Mitigation measures will be implemented in full by the Client through the Contractor awarded the contract to construct the wind farm.  All required mitigation measures will be included as a contractual obligation on the contractor.  - probability of success	The Environmental Vantage will monitor the implementation of the mitigation measures as detailed and in accordance with the relevant management plans within the CEMP.  Regular reporting to client and contractor as per cash management plan.



*"To prevent offsite movement of soil particles, many environmental regulatory agencies mandate the use of perimeter silt fences. However, research regarding the efficiency of these devices in applied settings is lacking, and fences are often ineffective. The damage is almost instantaneous when silt fences fail."*

(Journal of Environmental Management Volume, 164 December 2015, Pages 67-73)

"Additional silt fencing will be kept on site in case of an emergency break out of silt laden run-off". In this instance the water course is already polluted, and will continue to be polluted while the Applicant attempts to remove the damaged fencing and replace it with a new one. This reiterates what is contained in the quote above, "damage is almost instantaneous when silt fences fail".

Silt fencing is certainly not effective in preventing sediment run off down-stream, as mentioned in the table above.

"The traps and fences will be maintained regularly ensuring that they are clear of sediment build up and are not severely eroded". The Applicant must specify how often they will be maintained, "regularly" is not sufficient. I have huge concern that the regular checks on the silt fences are to ensure they are not "severely eroded". Must the fences be severely eroded before they will be maintained? This is entirely unacceptable.



**Fig 1.** Common problems with silt fence installation and maintenance observed in Ottawa, Ontario, Canada. All of these problems can lead to unnecessary silt deposition into aquatic ecosystems. a) Fencing that has fallen over with broken wooden support poles, b) Sediment piled upon and over silt fencing, c) Wooden support poles removed causing fence to collapse, d) Insufficient fencing, e and f) Loose and ripped fencing.

(Journal of Environmental Management Volume, 164 December 2015, Pages 67-73)

The use of silt fencing is not effective and the Applicant cannot state it will result in a high probability of success when research proves otherwise.

In the event of An Bord Pleanála granting permission for this Development, there is significant likelihood that we would potentially encounter a severe environmental disaster like that in Derrybrien.

I respectfully request that An Bord Pleanála will make the correct decision and refuse this application.

Yours Sincerely,

Patrick Coffey  
H. H. Coffey