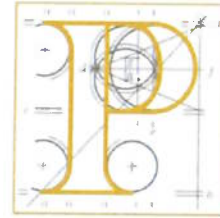


**Our Case Number:** ABP-318446-23

**Planning Authority Reference Number:**



An  
Bord  
Pleanála

Patrick and Denise Cullinan  
Bleantis  
Ballinamult  
Co. Waterford

**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
Glaos 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

**AN BORD PLEANÁLA**  
 LDG- 069489-24  
 ABP- \_\_\_\_\_  
**25 JAN 2024**  
 Fee: € 50.00 Type: cheque  
 Time: 10.15 By: Hand

Patrick and Denise Cullinan  
 Bleantis  
 Ballinamult  
 Co. Waterford  
 22nd January 2024

The Secretary  
 An Bord Pleanála  
 64 Marlborough Street  
 Dublin 1

*An Bord Pleanála Case reference: PA93.318446*  
*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.*  
***Fee of €50 enclosed***

Dear Sir/Madam,

This submission is in relation to the development of Coumnagappul Wind Farm, which we strongly object to.

**Waterford City and County Council Development Plan 2022 – 2028**

The Development Plan was established after a long process of consultation with the people of Waterford and the elected Councillors, which then was signed off by Minister for Housing, Local Government and Heritage and the Planning Regulator. Coumnagappul Wind Farm has applied for planning permission in an area which is classed as an **exclusion zone** for wind energy development. The County Development Plan must be at the centre of the Boards decision.

As the Board is aware, a precedent has been set regarding County Development Plans. An Bord Pleanála refused planning permission for Ballynagare Wind Farm, Co. Kerry, in September 2023. The reason the Board gave for the refusal is as follows:

*"The Board was not satisfied that, notwithstanding the benefits of renewable energy proposals and the support at a national level, the proposed development would in this instance be plan led as it would not be in accordance with the stated objective of the Development Plan. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area".*

We urge the Board to have the same perspective on Coumnagappul Wind Farm and to refuse the development.

**Water Supply**

The mountain where this development is proposed is the source of the water supply to my farm and to my elderly mother who lives in the farmhouse. I have spent nearly 60 years in this area and there has never been a problem with the water supply. From reading the documents submitted by the Applicant in relation to water, it is clear that the assessment has not been completed to a high standard. From my own knowledge of the mountain, and research on the GSI website it is very clear that this development is planned for an area that is unsuitable. The majority of the area is covered in blanket peat which in turn makes the groundwater extremely vulnerable to contamination. The "mitigation measures" in the application are unsatisfactory, particularly silt fencing. We must be allowed to continue living with our clean water supply and not subject my elderly mother and farm animals to contaminated water.

## Photomontages

Assessment of Visual Impacts at Viewshed Reference Points pg 11 of 15

### View Point 21

Receptor Sensitivity Criterion and Analysis at each Viewshed Reference Point (VRP)													
Values associated with the view	V21	V22	V23	V24	V25	V26	V27	V28	V29	V30	V31	V32	V33
Susceptibility of viewers to changes in views													
Recognised scenic value of the view													
Views from within highly sensitive landscape areas													
Primary views from residences													
Intensity of use, popularity (number of viewers)													
Viewer connection with the landscape													
Provision of vast elevated panoramic views													
Sense of remoteness / tranquillity at the viewing location													
Degree of perceived attractiveness													
Presence of striking or noteworthy features													
Sense of historical, cultural and / or spiritual significance													
Rarity or uniqueness of the view													
Integrity of the landscape character within the view													
Sense of place at the viewing location													
Sense of awe													
Overall sensitivity assessment	HM	H	M	M	M	M	HM	HM	H	HM	HM	M	H

The image seen in Viewpoint 21 was taken from the road outside my home. As can be seen from the grid below the box for "Historical, cultural and / or spiritual significance" remains blank. I am disappointed that during the "thorough" assessment of the area the Applicant failed to notice the stone erected at the home I grew up in, which I might add is only 100m from Viewpoint 21.



It is presumed the Applicant purposefully omitted this historical landmark as the photographer would have passed the monument to take photographs at Viewpoint 19. The Applicant also would have driven passed the road sign for the monument located at Scart Bridge, which is a protected structure (RPS number WA751040). This road sign was erected by the Waterford City and County Council as guidance for the many tourists who come to see the monument and visit the place Eamon De Valera took refuge.



In the grid above the space for “Recognised scenic value of the view” is also blank. I would like to point out to the Board that this area is also the route of the Comeragh Drive, as can be seen in the photo attached. It is unacceptable that the Applicant blatantly withheld important information from this assessment and it should not be accepted by the Board.

### **Underground Grid Connection Route C**

#### **110kV Grid Connection Feasibility Study page 17**

*“The second option is to progress UGC Option C [Magenta] as the preferred grid connection option for the project. UGC Option C is the shortest of the three routes options. Option C is required to cross 6 bridges along the route.*

*However, the success of this grid connection option is highly dependent on landowner consent for the off-road UGC sections of the route. Landowners should therefore be engaged at an early outset given the potential resistance to a new UGC outlined above. This route has obvious objections to the wind farm and there could be a potential risk for a cable route.”*

As a farmer who owns land on both sides of the road, I will **not** give permission to the Applicant to use my land for the underground cable route.

This route also passes through Scart Bridge, pictured below.



**Figure 7 - Bridge C6 towards Dungarvan Substation**

As mentioned above Scart Bridge is a protected structure listed in the Waterford City and County Development Plan-RPS number WA751040. Once again the Applicant has shown a very poor level of assessment for this proposed development.

#### **110kV Grid Connection Feasibility Study page 13**

*“It is proposed the UGC would then pass through a private agricultural access track which leads to the windfarm.”*

This “private agricultural access track” is in fact the L51162.

*“The UGC would pass through Folios WD9242, WD5865 & an unregistered folio for approx. 2,270m”.*

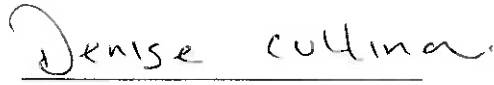
The section of unregistered land is part of Bleantasour Mountain commonage that a number of farmers hold a right in common for. We most definitely will

our property which will facilitate this development.

It is clear that due care has not been given to this application. This is extremely worrying for the residents who will be forced to live underneath this colossal development. We ask the Board to refuse this application and to protect our water, animals and land and to allow the Comeragh Mountains to remain in its current unspoiled state.

A handwritten signature in cursive script, appearing to read 'Pat Cullinan', written over a horizontal line.

Patrick Cullinan

A handwritten signature in cursive script, appearing to read 'Denise Cullinan', written over a horizontal line.

Denise Cullinan