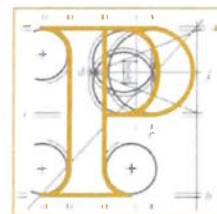


Our Case Number: ABP-318446-23



An
Bord
Pleanála

Rathgormack Ramblers Club Committee
Rathgormack,
Co. Waterford
E32PP94

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

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Rathgormack Ramblers Club Committee

Rathgormack, Co. Waterford E32PP94.

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

AN BORD PLEANÁLA	
LDG-	<u>069448-24</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

We are the committee of Rathgormack Ramblers, a small hill walking club based in the Rathgormack/Carrick-on-Suir area in north Waterford. We object to the proposed Counmagappul Wind Farm, our opposition to the project largely guided by our own experience as hill walkers, Mountaineering Ireland's Built Development Policy, and Waterford County Council's policy on wind energy, as outlined in their County Development Plan 2022-28.

Likely Effects of the proposed wind farm on a European Site

The high Comeraghs was designated a Special Area of Conservation in 1952. It is the largest SAC in Waterford and probably the most scenic one in the south-east of Ireland. It is also a unique mountain range of national importance because of its coums and glacial heritage. Ten of these coums encircle the Comeragh Plateau, the best example of a high level Old Red Sandstone Plateau in the country, and make for dramatic scenery. As a European Site the Comeraghs is legally protected under European law, because of its sensitive and precious landscapes, habitats etc. Technically, the landscape features on which the proposed Counmagappul Wind Farm would be located – Milk Hill, Bleantasour Mountain and Counmagappul – are outside the SAC, but they blend into the nearby Carrigbrack Ridge, which is within the site. No doubt then that the huge turbines of this project would be a visual intrusion and seriously alter the character of this European Site.

Likely Effects of the proposed wind farm on the Environment

David Attenborough once said "No one will protect what they don't care about and no one will care about what they have never experienced."

We, like so many recreational walkers, have very positive experiences of the Comeraghs – trekking across its airy ridges, wild plateau and magical coums. We value the physical and mental benefits its majestic landscapes provide.

We remember the “wellness therapy” it provided many people during the recent Covid 19 Pandemic. We strongly believe that this project will seriously undermine the wild and fragile Comeragh Environment. Below we list some of our main environmental concerns.

1.The industrial scale of the proposed development:

- Borrow Pit measuring 150 metres by 100 metres by 14 metres deep near the top of Milk Hill.
- Construction Phase of 24 months.
- Substation Compound on the banks of the Colligan 123 by 62 metres.
- At least 11.3 kilometres of internal paths criss-crossing the slopes of Bleantasour, Milk Hill and Tooreen Mountain.
- Huge concrete bases for the turbines.
- Turbines reaching 185 metres in height. This is over twice as high as the turbines in Derrybrien in Galway, where the ESB were forced to decommission, and over three times as high as the telecommunications mast on Crohaun, the highest man-made structure on the Comeraghs at present.

2. The location of the proposed development

The wind farm is planned for Coumnagappul, a serene valley under the slopes of Bleantasour Mountain, Milk Hill, Tooreen Mountain and Carrigbrack Ridge. All of the turbines start above 320 metres elevation with three of them starting above 400 metres, two of them on the crest of Milk Hill. The location lies close to the western edge of the Comeragh SAC and is totally inappropriately located. The height of the turbines will guarantee that they will be widely seen across many parts of the Comeragh Plateau.

Here is a quote from Mountaineering Ireland’s Built Development Policy:

“Mountaineering Ireland’s Built Development policy covers all development work in upland and relevant coastal areas requiring planning permission. Development proposals which will erode the remoteness and natural beauty of our landscapes should be critically examined. The extent of wild country in Ireland is rapidly decreasing and Mountaineering Ireland considers itself obliged to assist with its conservation.

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. This itself is an increasingly valuable commercial asset to local communities who can utilise tourism and recreation to replace other declining economic activities. Mountaineering Ireland supports appropriate and sustainable development in or immediately adjoining existing settlement and villages.”

Mountaineering Ireland has specific concerns regarding the location and scale of the proposed Coumnagappul Wind Farm, arguing that the

project would irreversibly change the wild character of the Comeragh landscape –

- “The industrial-scale of the proposed development - it is effectively a wind energy factory, proposed for a location 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.”

3. Negative Visual Impact on the Comeragh SAC

The ridiculous height of the turbines (three of them will reach at least 550 metres elevation) and the closeness of the proposed wind farm to the western boundary of the SAC will mean a high magnitude of visual impact, as the turbines will intrude on a significant proportion of the views across the Comeraghs. It will guarantee for example that:

- The best panoramas from the high points within the Comeraghs will be destroyed e.g. from Milk Hill and Seefin – all ten of the turbines will be visible from both.
- Renowned iconic places in the Comeraghs will be undermined e.g. the Nire Valley, the Gap, the scenic Powers the Pot Road on the Comeragh Drive.
- The western half of the Comeragh Plateau plus its west-snaking ridges of Carrigbrack and Barrachree Mountain, all within the SAC, will have their wild character and glorious views destroyed.

Here we wish to express our dissatisfaction with the applicant’s LVIA – in Chapter 16. A few frankly ridiculous statements:

- “It is important to note that large sections of the Comeragh Mountains will be entirely screened from the proposed turbines.”
- “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.”
- Talking about the Nire Valley, one of Waterford’s scenic gems – where 5/6 turbines will be visible with turbines 1 and 2 towering above the entrance to the valley – they claim that they will have “minor negative effects on the scenery of the valley.”

The applicant constantly downplays the visual impact of the wind turbines on the Comeraghs. They also seem to be fairly selective in their choice of viewing points e.g. no viewing point selected from the western part of the Comeragh Plateau, none selected from the best panoramic locations e.g. Seefin, Milk Hill, Knockanaffrin Peak, Lachtnafrankie, none from the Powers the Pot Road on the Comeragh Drive.

The applicant's LVIA is at best disingenuous and should not be taken seriously by an Bórd Pleanála. Field trips to the Comeraghs need to be undertaken to investigate some of the ridiculous statements re visual impact of the proposed wind farm on the Comeraghs.

4. Environmental and Ecological Damage

It is inevitable, we believe, that some significant environmental and ecological damage will be done by a project of this scale. We have concerns about:

- The impact that the transporting of materials from the borrow pit to the turbine sites will have on the slopes and sensitive blanket bog and wet heath habitats. The removal of huge quantities of peat from the hillsides may lead to peat instability and the possibility of a peat slide similar to that in Derrybrien in Galway some years ago.
- The potential polluting of the Colligan and Nire catchment streams.
- The construction of the sub station compound close to the banks of the Colligan and its possible impact on water quality.
- The scars that will be left on Milk Hill by the borrow pit.
- The impact of the turbines on the birds of the Comeraghs re Natura 2000.
- The 2 year-long construction phase and its impact on the minor roads and traffic, and especially its impact on the daily life of the local community and their local unspoilt environment.

Another disingenuous and ridiculous statement from the applicant:

"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".

Implications for proper planning and development in the area

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."

The Council believes that proper planning and development in the area should focus on developing green tourism, not develop huge wind farms. Only a few years ago they refused planning permission for an 8-turbine wind farm on Curraheenavoher Hill near Ballymacarbry for this reason.

The Council knows that the Comeraghs is an area of outstanding natural beauty and is Waterford's most important natural amenity. **Proper planning in such areas, they believe, should prioritise the preservation of the natural features that help to bestow these areas with their great beauty.**

Proper planning should recognise that not all projects are suitable for all locations. This is the thinking of Waterford County Council. In their County Development Plan 2022-28 they outline their Wind Energy Strategy for the county. **They classify the Comeraghs as a no-go area for wind energy.**

In Appendix 8 of the Plan – “Landscape and Seascape Character Assessment, Scenic Routes and Protected Views” – they divide the county into seven landscape categories. **All of the Comeraghs, including the Milk Hill and Coumnagappul area, are included in the “most sensitive” landscape category**, which have “very distinctive features with a very low capacity to absorb new development without significant alterations of existing character over an extended area.”

Landscape Policy Objective LO2 of the County Development plan states: “We will protect the landscape and natural assets of the County by ensuring that proposed developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area and ensuring that such proposals are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the uplands, along river corridors, coastal or other distinctive landscape character units.”

So, it is the Council’s aim to protect the most sensitive areas of the county from inappropriate development. They obviously believe that the proposed Coumnagappul Wind Farm would contravene policy LO2 and would therefore be contrary to proper planning and sustainable development in the area. If the proposed development was not a SID i.e. if it had fewer and lower turbines and created less energy, it would be refused planning permission by Waterford County Council. So more and bigger turbines in a timeless, scenic landscape =? **Big business interests and Ireland’s energy strategy must not be allowed to destroy a national landscape treasure. It is a question of values. Short term economic thinking must not be prioritised over the preservation of special landscapes for future generations.**

To conclude:

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 its existing character. It would be totally inappropriate to allow an industrial-scale development such as the Coumnagappul Wind Farm to go ahead in such a precious mountain area. Waterford City and County Council believes this to be the case. We trust that An Bórd Pleanála has the wisdom to concur and therefore deny permission for the proposed Coumnagappul Wind Farm.

Signed on behalf of Rathgormack Ramblers Committee:

Gea Kuwan Chairperson
Michael O'Donoghue Environmental Officer