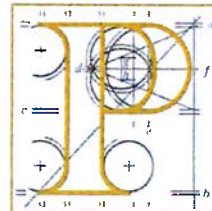


**Our Case Number:** ABP-318446-23

**Planning Authority Reference Number:**



An  
Bord  
Pleanála

Thomas Cullinan  
Bleantis  
Ballinamult  
Via Clonmel  
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. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact 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

The secretary.  
An Bord Pleanála.  
Strategic Infrastructure Dept.  
64 Marlborough St.  
Dublin 1. DO1 V902.

Bleantis  
Ballinamult  
Via Clonmel  
Co. Waterford  
27<sup>th</sup> January 2024

Submission to An bord Pleanála Reference number: 318446

The construction of 10 wind turbines and related works at  
Counagappul Wind Farm, Co. Waterford

Dear Sir/ Madam,

I wish to make the following submission with regards to the Counagappul Wind Farm . I am one of the property owners living within the 2km zone from the wind farm . Our aesthetic will be utterly changed which has been identified by the developers as they state "the turbines will be one of the most distinctive features of the view for these residents". As a result of this and the measurements e.g tip height and blade measurements that we have gleaned from the application we asked a local Estate agent and auctioneer to value our property pre and post construction of the industrial wind farm. The esteemed Auctioneer and Valuer stated that we would have a 50% reduction in the value of our property. It is incredulous that a house and land that my wife and I worked hard for can be destroyed not true a natural occurrence but through an industrial installation that will not be able to replenish the carbon footprint and losses it accrues from its destruction of the local habitat and watercourse ( Colligan and Nier rivers).

The total lack of clarity around the grid connection is also another factor as to why I felt it necessary to enter this submission.

The proposed digging of the roads to install underground cabling will cause major disruption and the excavation process could have huge implications for the water quality and the habitat that rely on it for

their existence. Unfathomably local land owners who will be affected by this have not been consulted.

The proposed grid connection is 22.47 kilometres in length running from the source of the river Colligan to Dungarvan 110KV substation. I emphasise the word proposed as this is not a definite route. In the AA screening and NIS report the developer admits that this project involves watercourse

crossings and a bridge crossing, this crossing requires drilling the waterbed yet they haven't supplied a detailed construction method statement to accompany the application.

The fact that an EIA has not been done to accompany the grid connection is beyond belief so essentially 17,339 metres of public road and 5031 metres of tracks and private lands over a length of 22.47 kilometres will be disturbed but its effect on the environment is unnecessarily surveyed!!! To assert that the habitat in Colligan wood, Ballymacmague (which is near the town of Dungarvan) has the same habitat and ecosystem as that of the Comeragh mountains is unacceptable. A one size fits all approach will not suffice here.

O'Grianna & Ors v An Bord

Pleanála [2014] IEHC 632, the High Court held that grid connection works formed part of an overall wind farm project where EIA was required to be carried out in order to avoid 'project splitting'.

Therefore, the cumulative impact of the wind farm and grid connection needed to be considered in order to comply with the EIA Directive.

In Daly v Kilronan Windfarm Ltd [2017] IEHC 308 it was held that "...as grid connection works are part of an overall project, and an ABP-301310-18, Inspector's Report Page 20 of 24.

EIA is required for the overall project, an environmental assessment must be carried out of the entire project, and, therefore, no part of the project, and ipso facto no individual part treated as a standalone element, can be exempt from planning." It would appear, therefore,

that grid connections for windfarms that are subject to EIA cannot be exempted.

The area identified for the Grid connection route is very close in proximity to the nesting grounds of the brent goose, any disturbance to this site has to be evaluated, the dunlin, the redshank and turnstone are all visible in the ballymacmague area and most importantly the black tailed godwit and the bar tailed godwit have been identified in this area.

The county Waterford and biodiversity action plan referenced the 2007 study of the extent and conservation status of springs, fens and flushes in Ireland, this study identifies Ballymacmague Fen. "This site was surveyed as part of the Waterford wetlands study. These habitats are sensitive to damage From groundwater abstraction, drainage, infilling and pollution". This Fen was also named in the Waterford city and county development plan Appendix 11 – Natural heritage Assets, Waterford wetlands of biodiversity importance. This surely is sufficient grounds for the board to seek an EIA for the grid connection plan in order to avoid project splitting. Without even highlighting the presence of flounder, Eels and pearl mussle in the lower Colligan woods river water.

It is my understanding that there should be sufficient detail in a windfarm EIS relating to the grid connection to allow for a cumulative and comprehensive assessment of environmental impacts. In the absence of such information as is evident in Coumnagappul wind farms application, the EIS is defective and permission cannot be granted.

Yours Sincerely,

MR. THOMAS Cullen