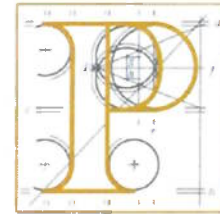


Our Case Number: ABP-318446-23

Planning Authority Reference Number:



An
Bord
Pleanála

Vicky Heslop
Tooracurragh
Ballymacarbry
Co. Waterford

Date: 29 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	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Observation on **Bord Pleanala Case: PA 93.318446**

Which is Planning application **Coumnagappul wind farm, Co. Waterford**

My name : Vicky Heslop

My address : Tooracurragh

Ballymacarbry

Co. Waterford

22/1/24

I hereby submit an observation to the proposed windfarm development by EMP Energy Limited (EM Power) at Coumnagappul. My objection is based on the following points

1. The Comeragh mountains are a unique landscape and environment in Ireland, and within Europe, so should be protected from invasive industrial style development.
2. Ireland has a very high level of wind resource. However, even in upland areas wind turbines produce only about 30% of the built capacity. Whereas, deep offshore wind turbines can produce over 60% of the built capacity. Deep offshore wind generation is now viable and being planned for and therefore developers should be directed to focus their interest and investment to deep sea wind development, as this is more efficient and is a much greater resource.
3. The proposed area for the wind farm at Coumnagappul incorporates an area of bogland, that is a water source for rivers and water supply in the area.
4. The submitted report is unclear and 'wooley' and does not meet 'Plain English' requirements

Further explanation of the four points of observation.

1. The Comeragh mountains are an extensive unique upland area (as recognised in the County Development Plan)

These mountains cover an extensive area and are crossed by only one road. They exhibit many different types of terrain, features and wildlife. They attract many visitors that come to enjoy and explore this landscape and local communities have developed businesses reliant on these visitors.

The Regional Spatial and Economic Strategy for the Southern Regional Assembly (RSES) vision statement the RSES seeks to:

- Nurture all our places to realise their full potential.
- Protect, and enhance our environment.
- Work to achieve economic prosperity and improved quality of life for all our citizens.
- Accommodate expanded growth and development in suitable locations; and
- Promote the region's international reputation as one of Europe's most creative, innovative, greenest and liveable regions.

The proposed development at Coumnagappul would not be in keeping with these core visions of RSES

The Waterford County Development Plan 2022 has as a strategic objective in Chapter 10 on landscape to 'Protect our sensitive landscapes and seascapes which contribute to the distinctiveness of Waterford as a place.'

Also in Chapter 10 'Protecting our Landscape and Seascape' it 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.'

If the proposed wind farm development was permitted at Coumnagappul these strategic objectives would not be met.

Also BGI 12 Integrated Management of our Uplands says 'We will commission an integrated management plan and management structure addressing recreation, conservation, landscape and socio-economic development issues in Waterford's uplands.'

The proposed windfarm development should not even be considered for planning until such time as this integrated management plan is publicly available

In the previous Waterford County Development Plan it excluded any development above 600 foot above sea level, in the area of the Comeraghs.

The site of the proposed wind development at Coumnagappul is below 600'. Due to the height of the proposed turbines, the blades of the turbines will be operating at a height well above the level that development is not permitted. The maps produced by the developers that identify the areas that will have visibility of the proposed turbines show that the 100% of the blades will be visible from a very extensive area in Waterford, including other areas people go to enjoy the landscape from those locations.

It is important therefore that, the compliance with the planning regulations, of this proposed development is considered in three dimensions not just at ground level.

It is now well recognised that it is important for mental wellbeing and social health that there are natural landscapes, for people to relax in. This is because nature's shapes and rhythms have a soothing effect on our nervous system. Whereas, within man-made structures our stress levels rise. Increased stress levels are known to be the cause of poor physical and mental health and contribute to societal breakdown.

It is therefore, really important for future wellbeing of people, that we retain the last few remaining areas, in Ireland, that do not exhibit man-made development, such as the Comeraghs.

2. Ireland has a very high level of wind resource.

It is imperative that fossil fuel use is reduced. Renewable energy resources, such as electricity generated from wind provide one way to do this. There are other ways that fossil fuel use can be reduced too – such as reducing the overall requirement for energy. Such strategic choices are not issues for Planning Authorities to decide though! However, the way land is utilised is in the remit of the Planning Authorities. Land is a limited resource, and as the population of Ireland continues to grow rapidly, the pressure on this limited resource will grow. All

Regulations tend to lag behind what is happening in reality, because a problem has to arise before a regulation is developed, and has to be based on research.

Wind development in Ireland followed the least cost approach. To some extent this was necessary as the technology was in early development stages and overheads to construction were high, so sites with the best wind resource and lowest infrastructure cost were developed first. Today the wind energy industry is well established and can attract finance relatively easily. Although it is important from an electricity consumers' point of view that electricity costs are kept as low as possible, there is now the real technology potential for developing wind generation in deep sea areas. The increased output from deep sea generation that can be gained, compared to land based generation, helps to balance out the added development costs.

Therefore, wind energy development on land should be considered in the context that the limited land resource may be required for other purposes, now or in the future.

3. The proposed area for the wind farm at Coumnagappul incorporates an area of bogland, that is a water source for rivers and water supply in the area.

The developer has proposed measures to ensure the turbines will be stable in the bog. However, it is known that there are many unforeseeable issues that can and do arise when undertaking extensive excavations in bogland. **Therefore, given that any changes in the condition and stability of this bog could significantly affect water supply, it is considered that their proposed measures are insufficient.**

4. The submitted report is unclear and 'wooley' and does not meet 'Plain English' requirements

The Environmental Impact Assessment Report (EIAR) for the proposed Coumnagappul Wind Farm, Co. Waterford that was compiled by Fehily Timoney Consultations for EMP Energy Limited (EM Power) is difficult to read and much of the information is convoluted, acting as a barrier to citizens to interpret and understand. The document is not available in Irish or other any other language.

Therefore, in my view, the EIAR does not meet with the Adult Literacy for Life Strategy (2021) 3.1 Pillar Two.