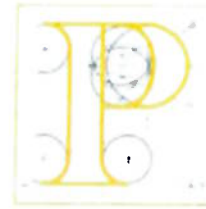


Our Case Number: ABP-318446-23



An
Bord
Pleanála

Mary Fenton
Sillaheen
Ballymacarbry via Clonmel
Co. Waterford
E91 D684

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)

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.

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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

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64 Sráid Maoilbhríde	64 Marlborough Street
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D01 V902	D01 V902

Mary Fenton
Sillaheen
Ballymacarbry,
Via Clonmel,
Co. Waterford.
E91 D684

Phone: [REDACTED]

15th January 2024

An Bord Pleanala
64 Marlborough Street
Dublin 1

RE: Coumnagappul Wind Farm Ltd
Planning ref: 318446

To whom it may concern.

Subject: **OBJECTION to planning application -Coumnagappul Wind Farm Ltd**

Objector: Mary Fenton

I refer to the above subject matter and herewith, wish to lodge a formal objection to the Planning application ref PA93.318446 filed by Fehily Timoney and company consultants on behalf of the Wind farm developer Coumnagappul Wind farm Ltd consisting of a proposed Wind Farm of 10 wind turbines, electrical substation and associated works at various locations.

I am opposed to the developments on the following grounds:

Previous Planning Submission Refusals in the area

In File ref No: 15/51 Ecopower Developments Ltd (EDL) were refused an application for a windfarm in 2015 in Baunfune/Sillaheens/Russeltown/Boolabrien Upper (Planning application ref no 1551) area of our community. I live in the Sillaheen area, which is close to the Coumnagappul area and I honestly cannot believe we are having to fight as a community again to stop another Wind farm application in this area. ABP refused the EDL application on a number of grounds in 2015 but one of the main

reasons it was refused was on the basis of its impact on the Nire Valley in the Coumnagappul area and its surrounding areas even though the proposed windfarm was several kilometres away from Coumnagappul itself. So, it now it is very surprising to see another wind farm apply for planning in the actual Nire Valley/Coumnagappul area itself. We as a community were grateful that ABP saw through this previous applications significant flaws in 2015 and I would now ask that the same logic is applied here to this new application from Coumnagappul Wind farm Ltd. The application for a wind farm in the Coumnagappul/Nire Valley area is in direct conflict with the decision made by ABP in 2015 regarding the Ecopower application. To grant permission to Coumnagappul wind farm application while refusing the EDL application previously would be a contradictory approach that would make no sense and I would ask that ABP as they have always done show consistency in their decisions and give members of the public like myself and my community confidence that these decisions are handled consistently.

Waterford County Council 2022/2028 Development plan

The Waterford county Development plan 2022-2028 clearly states that there are areas within a “preferred” zone which will not be suitable for wind energy development due to the specific aspects of those sites. The Coumnagappul area is deemed by Waterford County council to be one of those sites, it is deemed by the Waterford County Council to be an EXCLUDED ZONE for Wind Development . Based on previous refusals and given that the Coumnagappul/Nire area is one of the most prominent mountain ranges in County Waterford, it is also in one of the most scenic and biodiverse areas in County Waterford and should be protected from Visual intrusion. This area would be considered as visually sensitive and visually vulnerable and has been designated as a no-go area.

The Nire Valley itself relies heavily on Hillwalkers, mountain bikers and many other third-party groups who bring tourism to this area.

Impact on Tourism in the Area

Coumnagappul Wind farm limited have also failed to reflect on the effect the proposed development will have on the Comeragh area from a tourism point of view. This area is a thriving and growing tourism area constantly hosting events and festivals in the area. This point was repeatedly referenced in the CCWFAG report under the Successful Sillaheen/Russeltown objection to the EDL windfarm proposal in 2015. (as referenced above)

Engagement from Coumnagappul Wind Farm Ltd

The engagement from this company regarding this development has been poor. There was only one meeting in the Ballymacarbry community hall regarding this Wind farm and I never received any notification of this meeting by post/email etc . I would have actually never known about it only for a neighbour informed me of the meeting taking place. After that meeting there were no further meetings in the village, which is very poor engagement when you consider that this company are trying to secure planning to build 10 turbines of 185 metres in height, which will be some of the biggest in Ireland, and they want to do it in a biodiverse, environmentally sensitive, no go area in Waterford .

I also need to point out during my reading of the Coumnagappul Wind farm application to ABP I noticed some spelling mistakes where they referred to the Nire as the Nier. This could be seen as very misleading and an attempt to confuse some objectors as to the actual proposed area. It is important with significant issues like this that the applicant given all their financial and people resources should at least have the application fully correct when asking people to make vital decisions on what is proposed in their areas.

Scale:

The proposal for 10 Turbines 606ft/ 185m tall is a very concerning proposal and it will have a huge impact in the middle of a rural community with a significant number of homes. A development of this scale should not even be proposed never mind considered in the middle of a community.

Wind farms are the only industrial installations allowed to run nights and weekends.

The impact on property devaluation is estimated at 30%+.

A windfarm of this scale and size would be detrimental to the community and to the wildlife in the area.

Smaller and fewer turbines reduce visual impact, reduce noise risk, reduce traffic impacts, reduce footprint size, reduce risk to watercourse, reduce risks to birds and other wildlife. But none of this seems to be even considered by Coumnagappul wind farm ltd, they have not even offered an alternative plan with less and smaller turbines.

Water:

When asked, the developer cannot guarantee that the water table would be unaffected and the private water supply of the community will not be poisoned or destroyed. In the planning application peoples private wells do not seem to be located or accurately mentioned in the Environmental impact study or geological survey. It should also be noted that according to a recent EPA report, Waterford is currently a red listed water area.

The impact on this after a 10 turbine Wind farm being built would be catastrophic to the water table in the area.

Noise Pollution:

Vibrations of spinning turbine blades produce infrasound noise, this can cause disturbed sleep, raised stress levels, heart palpitations, and tinnitus and can affect/cause those with pre-existing medical conditions. The WHO published guidelines report on noise which can be found at [www.euro.who.int/ data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf](http://www.euro.who.int/data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf) . This report highlights the adverse health effects of infrasound and low frequency noise emitted from Wind Turbines. The developer's noise survey is inadequate, incomplete, and not fit for purpose.

The Coumnagappul area is downwind of the proposed development and incorporates complex and difficult to judge terrain making computer analysis virtually impossible to predict with any real confidence. The winds in this area are more than likely going to exacerbate the sound propagation and the developer cannot give any assurances that this will not happen and that they would not commit to immediate dismantling of the turbines if it does happen, which gives the community no confidence in their bona fides.

It should also be noted there have been a number of other cases of residents taking legal action against windfarms for noise and nuisance. I will quote one for reference; Webster and Rollo versus Ballyduff Windfarm at Kilcomb, Enniscorthy, Wexford.

Shadow Flicker / Repetitive sunlight reflections/ Glinting:

Households affected will lose their right to enjoy their own garden and home as they previously enjoyed and intended with turbines spinning 24/7.

Ecology:

Run off into protected SAC (Special Area of Conservation). Loss/reduction of local rural scenic amenity. Aquatic, avian, and terrestrial habitats of the SPAs compromised. (Special Protection Areas). Also, it is known that hen harriers reside in the Knockavannia area, what would happen to this protected species under the EU Directive and under the Wildlife Act 1976 if the Coumnagappul wind farm was given the go ahead? It is a criminal offence to kill or injure such a protected species.

All of the below facts and quotes further back up the argument that this application should be refused in order to follow precedents already in place and to ensure fairness and consistency in the planning decisions made by the bodies such as An Bord Pleanala, a body in which the Irish public rely on to be fair and consistent in all of its decisions and Judgements.

**AN BORD PLEANALA REFUSED PERMISSION FOR
BAUNFUNE/SILLAHEENS/CURRAHEENAVOHER/RUSSELLSTOWN/
BOOLABRIEN WIND FARM: (See attached)**

Erection of 8 Turbines, overall height of 127 metres was refused planning permission on a number of grounds. This proposed windfarm is only a few kilometres from the proposed Coumnagappul wind farm. With the Coumnagappul proposal being much larger in scale and height proposing 10 Turbines 606ft/185mtrs high with all associated works. The sheer scale of this application from Coumnagappul wind farm is far greater than the Baunfune/Sillaheens/Curraheenavoher/russellstown/Boolabrien wind farm which was refused by ABP.

AN BORD PLEANALA REFUSED PERMISSION FOR ARDGLASS WIND FARM:

Eight turbines were refused at the Ardglass wind farm because it would be situated on 'vulnerable rural elevated upland plateau, in an open and exposed landscape, with no land cover or significant features to absorb the scale of the development', 'injuring visual amenities of the area and Scenic Route'. Ardglass site is less 11km due west from Lyrenacarriga and therefore further away from the Blackwater Valley and situated on the same elevated upland plateau. So, the points raised by the ABP inspector in 2017 for Ardglass are totally relevant in the instance of Lyrenacarriga wind farm. There needs to be consistency in planning decisions. Visit the link here to read the full report & decision:

<http://www.pleanala.ie/casenum/246824.htm>

QUOTE FROM INSPECTORS REPORT ON ARDGLASS-

"The pattern of development (One off housing) in the vicinity and the planning history (DUMP REFUSAL) of the subject site. It is considered that the proposed development would seriously injure the visual amenities of the area."

QUOTE FROM RWE TEC DOC IN EIAR-

The Planning Authority shall have regard to the possible visual impact of a wind farm development on towns and villages, protected views, and amenity areas outside of the administrative area of Waterford County Council in the assessment of wind energy applications."

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I ask An Board Pleanála to not grant this application, based on the facts and precedents outlined above.

Thank you for your time,

Mary Fenton

15/01/2024

Our Case Number: ABP-318446-23

Planning Authority Reference Number:



An
Bord
Pleanála

Nicholas and Kitty Quealy
Barracree
Ballinamult
Co. Waterford

Date: 26 January 2024

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