

Our Case Number: ABP-318446-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

PJ O'Meara
Newtownadam
Cahir
Co. Tipperary
E21 W998

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. 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

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Newtownadam,
Cahir,
Co. Tipperary,
E21 W998.

28th January 2024

Dear Sir/Madam,

Re Case 318446 (Counnagappul Wind turbine project in the Comeragh Mountains, Co. Waterford), I wish to make a submission because a) I am a frequent visitor to relatives in the Kilkeany/Knockavania area and b) I have done quite a lot of walking in the Comeragh Mountains over the last 20 years.

While I am a supporter of renewable energy projects, I also agree with the practice in several local authority development plans of identifying areas in which wind turbines should be prohibited. In this regard, the current County Waterford Development Plan 2022-28 would seem to explicitly forbid the proposed development under consideration.

The proximity of this project to the largest Special Area of Conservation in County Waterford is another ground for the rejection of this application. The protections conferred on this upland area by the Habitats Directive 92/43/EEC cannot be blithely dismissed in a Scoping Report for the applicants.

Furthermore, the Scoping Report proceeds to challenge the designation of "blanket bog" status given by Geological Survey Ireland (G.S.I.) to a significant area of the proposed development site. Presumably, Bord Pleanála has sought a response from G.S.I. in relation to this claim? The approach of the applicants begs the question, "When is a blanket bog not a blanket bog?"

Additional recognition of the high biodiversity value of this area comes from its inclusion in a "Cooperation Zone" within the new ACRES environmental scheme established by the Department of Agriculture, Food and the Marine (DAFM). The aims of this project are to ensure that the work of local farmers and public investment combine to achieve optimum benefit for our shared environment.

It is disappointing that several shareholders of the local commonage have given their consent to this ill-advised project. As custodians of this landscape, they are obliged to keep their parcels of the commonage in good agricultural and environmental condition. From a public interest perspective, should they not be obliged to declare if they have received any financial consideration from the applicants for this support? If they have been remunerated for this, surely a "manufactured consent" carries less weight with the relevant planning authority?

Finally, there are serious concerns that this proposed development does not represent the full extent of the applicants plans for this area. I would draw your attention to an internal road to be constructed that takes a very scenic route from the local road to the Counnagapul Valley. Aside from my objection to avoidable environmental damage, one can only assume that this circuitous, internal road is being built with future expansion in mind?

Thank you for taking the time to read my submission.

Kind regards,

PJ O'Meara

[REDACTED]
[REDACTED]