

Our Case Number: ABP-318446-23



An
Bord
Pleanála

Alice Hickey
Shanballyanne
The Nire Valley
Co. Waterford

Date: 31 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, Skeeans, 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

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Alice Hickey,
Shanballyanne,
The Nire Valley,
[REDACTED]
[REDACTED]

My Name is Alice Hickey and I have lived and raised my family in Shanballyanne, The Nire Valley for the past 45 years. I walk this beautiful area on a daily basis and also take my grandchildren on walks on the weekend. I have major concerns regarding the safety of the roads due to HGV's travelling these narrow roads, they will no longer be safe to walk cycle or possibly drive due to heavy construction traffic. Also, this will have a major impact on environment and habitat of the local area. I feel there has been little to no community consultation regarding this proposed project. I did not have any knowledge of this project until recently and I live within the 2.5 km zone.

Please see some of my concerns below

Waterford County Development Plan 2022-2028

The proposed project is in a designated "No Go Area " for wind turbines according to the most recent Waterford County development plan 2022-2028.

The many reasons for this area to be protected as such include the high value Annex 1 and Annex 2 habitats, including Blanket bog. The blue dot catchment water areas, which feed into the Colligian and Nire rivers. The protected Viewing areas and road such as the Comeragh Drive and the Nire valley car park as an example.

The Comeraghs SAC.

The development is located alongside the largest SAC in Waterford, This fact has been completely downplayed by EMPower, the Applicant. In their scoping report they managed to eliminate it from their EIAR by just using two lines;

No Annex I habitats within the Site, no hydrological connectivity between the Site and the SAC.

Upstream from any hydrological/ hydrogeological connectivity to TDR and GCR.

This is completely disingenuous and fails to take into account the guidelines for a development in or alongside a Nature 2000 site, which this is.

the Habitats Directive 92/43/EEC, states that in identifying European sites (Natura 2000 sites) which may be affected by the project, the following should be identified:

- 1 any European sites geographically overlapping with any of the actions or aspects of the plan or project in any of its phases, or adjacent to them;**
- 2 any European sites within the likely zone of influence of the plan or project. European sites located in the surroundings of the plan or project (or at some distance) that could still be indirectly affected by aspects of the project, including as regards the use of natural resources (e.g., water) and various types of waste, discharge or emissions of substances or energy;**

3 European sites in the surroundings of the plan or project (or at some distance) which host fauna that can move to the project area and then suffer mortality or other impacts (e.g., loss of feeding areas, reduction of home range)

4 European sites whose connectivity or ecological continuity can be affected by the plan or project.

Habitats.

The Applicant claims the project will have little impact on Habitat, especially on Annex 1 Habitat which is protected. Where do admit to affecting Habitat, their claim is that it is in poor condition and therefore of little value. This contradicts the Habitat Directive which says any loss is unacceptable and that Restoration and protection is key.

The claim that little Habitat will be affected is not in line with other professionals, Notably, Geology Survey Ireland which has categorised a substantial area of the proposed project as Blanket Bog. This is a Carbon Sink and one of the most important Habitats we have in Ireland and the World. It is only now we are realising its significance and the need to preserve it, not destroy it in the name energy.

Despite this, EMPower have decided that the GSI are incorrect in their findings and dispute the depth and level of Bog affected, claiming their brief research and survey supersedes the that of the GSI. Interesting that they can ignore 170 plus years of experience. Geological Survey Ireland is Ireland's public earth science knowledge centre and is a division of the Department of the Environment, Climate and Communications.

Another reason this project seems completely unsuited to this area is the fact that all of the area concerned and the surrounding lands are part of the new ACRES environmental scheme opened recently by the Department of Agriculture and backed by European CAP money.

They are in fact part of the Cooperation Zone, there are only eight of these areas around Ireland, chosen for their high Biodiversity value and the project aims to help farmers preserve and improve the habitats involved. These co-operative project zones include areas dominated by semi natural vegetation (Both privately owned and in Commonage), Nature 2000 lands, and priority water catchments.

These zones are recognised as having high-nature value; holding significant carbon stores; and as the location of "some of the most pristine waters in the country" according to the Dept of Agriculture, food and the Marine.

There was also a recent award winning European Innovation Project(EIP),

The Comeragh Upland Community project which included nine areas of the Comeragh Mountains, including Coumnaagappul and was exploring the rich habitats and history of the lands and worked with the landowners in education and improvement of the valuable habitat found there.

The Coumnaagappul report from this also classified a lot of the land as Annex 1 Habitat. This report can be forwarded to you for confirmation.

Commonage

Part of the proposed project lies on Commonage land, Knockavania mountain.

I would like clarification that the shareholders are all agreed on this as one signature is missing on the Letters of Consent, Paddy Coffey. There is no Commonage plan or list of active, inactive or deceased Shareholders.

I they are in fact the Shareholders the rights they have are very specific.

They pertain to the right to graze the land and act as custodian of it.

No where is it mentioned that Commonage includes the right to develop or destroy the land and habitat. This goes against everything that Commonage is about. You cannot buy or sell commonage as it belongs to the state.

Each commonage parcel is meant to be maintained in good Agricultural and environmental condition.

Project Splitting

The proposed project is only the start as EMPower have already signed up landowners involved in this project and other landowners in the Coumnagappul Extension Project, Ornithology studies are ongoing at present and this would more than double the size of the project.

If you look at the plans you will notice the internal road of the project as it comes off the local road onto Knockavania it turns left and continues along the side of the mountain and all the way around into Coumnagappul valley. There is a simpler more direct route straight into the valley but they add 3km of destruction to get there instead. They mention this is to preserve habitat, how 3km extra preserves anything I don't know, but this is also the same habitat later on they say it is of poor quality and little value.

I would conjecture the real reason for this will be the connecting corridor for the Extension Plan route.

There are many more reasons why this project should not go ahead in a no go area and I would really appreciate if you could do your best for us to help protect our valuable environment from an industrial development that has no place being there.

Thank you for your time and patience and please feel free to contact me for further information and literature regarding the project.

Community consultation was absent at the beginning and throughout the project. News letters were not delivered within the limited 2km zone, Only 44 households and still a lot of them received no letter or received it late.

Information events held in Touraneena and not in the accepted, closer population centre of Ballymacarbry.

Traffic plan

The planned traffic for the route is unacceptable on the small country roads. This has been downplayed by the applicant and practically ignored in places. There will be a 2400 % increase on one of the roads which is used by a lot of the residents within the 3km zone for travel to Dungarvan. They say that despite the increase, up to 190 trucks a day and an average of 16, there will be little impact on travel times. This is simply untrue and impossible. Anyone knows how slow things go in harvest time and that is only a fraction of the proposed traffic and for a short time. They did not do an Air Quality impact assessment as they said travel speeds will not drop by an average of 10km, this is simply untrue, as if that volume of traffic is on this small roads we will be lucky to even travel at 10km.

Kind Regards,

Alice Hickey,

Shanballyanne,

The Nire Valley,
[REDACTED]
[REDACTED]