

Our Case Number: ABP-318446-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Cathriona Walsh
3 Deerpark View
Ballymacarbry via Clonmel
Co. Waterford
E91 WT26

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, Skeeheans, 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,

PP Hickey

Niamh Hickey
Executive Officer
Direct Line: 01-8737145

PA04

Tel	Tel	(01) 858 8100
Glaio Áitliúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Riomhphost	Email	bord@pleanala.ie

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

3 Deerpark View
Ballymacarbry
Via Clonmel
Co. Waterford
E91 WT26

The Secretary
An Bord Pleanála
Strategic Infrastructure Department
64 Marlborough Street
Dublin 01
D01 V902

29JAN2024

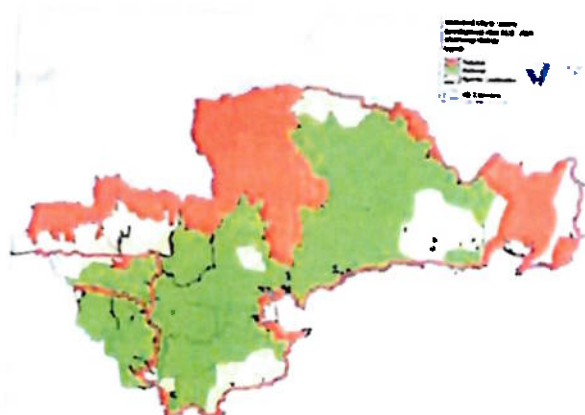
Dear Sirs

Re: Observation in relation to case Bord Pleanála Case reference: PA93.318446

*In the townlands of Coumnagappul, Carrigbrack, Knockavanniamountain,
Barricreemountain Upper and Glennaneanernountain, Skeehans, Lagg, Co. Waterford.
(www.coumnagappulwindfarmSID.ie) Waterford City and County Council*

I write to object to the proposed development on the following basis:

1. The Waterford City and County Development Plan 2022 - 2028 has designated the area as an exclusion zone for Wind Farm Development. The application has been submitted in spite of this exclusion zone designation.



2. Previous proposals to install a windfarm in the Nire area have been refused on the basis as outlined in the screengrab below. The reasons are still valid as the area has not been rezoned.

Decision: Pursuant to the Planning and Development Act 2000 as amended, it is decided to refuse permission for the said development based on the reasons set out below.

Schedule

Reasons:

1. Notwithstanding the site location in a preferred area for wind energy in the Waterford County Development Plan 20011-2017, the proposed development would constitute a visually dominant feature in a vulnerable scenic rural landscape and based on the submitted information the Planning Authority is not satisfied that the development would not significantly compromise the policy to develop the Comeragh Area as a National amenity and would not have significant adverse effects on the environment. The development would contravene the policies of the development plan in this regard and would therefore be contrary to the proper planning and sustainable development of the area.
2. The Nire, characterised by fertile agricultural lands and drained by the Nire River, is flanked by the Monavullagh Mountains to the South and rigid Comeragh Mountains to the East and North. The Nire Valley is renowned for its scenic landscape and supports a thriving tourism product based on hill walking trekking and river fishing and guest accommodation. The proposed wind farm will intrude onto the landscape, becoming a dominant feature and likely impact detrimentally on the environmental quality and scenic landscape of the Nire Valley and contrary to the proper development and sustainability of the area.
3. The location of the Windfarm, on the western flank of the Comeragh Mountain, at elevation above 300m OD will impact on Ballymacarthy Village and nearby settlements and the Nire Valley. Furthermore, the Windfarm location affords panoramic views extending in a wide arc beyond 20km distance, impacting on important and iconic landscapes and features in Counties Waterford and Tipperary, giving rise to general obtrusion, contrary to proper planning and sustainability principles.
3. Reviews of planning applications for domestic dwellings in the greater area over the last number of years have indicated that refusals have been issued based on the potential visual impact of a single /three storey development on the rural landscape. The refused developments would have had a significantly lesser impact on the rural landscape when compared to the proposed windfarm development and again the application appears to contravene the development and sustainability of the area.

Recommendation

Refusal of Planning permission to construct new single-storey dwelling including new entrance, waste water treatment system and all ancillary site for the following reasons:-

1. The site is situated in a Stronger Rural Area as designated in the Waterford County Development Plan 2011 - 2017. Within these areas it is the policy of the Planning Authority to provide for persons with a genuine housing need as defined in the development plan and subject to the site meeting all technical requirements. Based on the submitted information the Planning Authority is not satisfied that the proposal constitutes a Genuine Housing Need as defined in the development plan. It is considered that, in the absence of a substantiated local housing need for a house at this location, the proposed development would conflict with the policy of the planning authority and be contrary to the proper planning and sustainable development of the area.
2. Given the site's designation as a Sensitive Landscape in the Waterford County Development Plan 2011 - 2017 and the exposed nature of the site, it is considered that the proposed development would, due to the ridge height of the proposed dwelling, further erode the rural character of the area and seriously detract from the visual amenity of the area.

On the basis of the above assessment, it is recommended that permission be refused on the following ground:

1. The site is situated in a Stronger Rural Area as designated in the current Waterford County Development Plan 2011 - 2017. Within these areas it is the policy of the Planning Authority to provide for persons with a genuine housing need as defined in the development plan and subject to the site meeting all technical requirements. Based on the submitted information the Planning Authority is not satisfied that the proposal constitutes a Genuine Housing Need as defined in the development plan. It is considered that, in the absence of a substantiated local housing need for a house at this location, the proposed development would conflict with the policy of the planning authority and be contrary to the proper planning and sustainable development of the area.
2. Having regard to the setback of the dwelling from the public road, the absence of road frontage and an established means of access it is considered that the proposed development would erode the rural character of the area, visually scar the landscape and detract from the visual amenity of the area. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.
3. It is considered that the dwelling by reason of its size and scale, particularly the three-storey element would represent an incongruous feature in the rural landscape and as such would constitute an intrusion against the rural and visual amenity of the area. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

Recommendation

On the basis of the above assessment, it is recommended that permission be refused for the following reason:

The proposed development situated in a visually sensitive landscape in the Nire Valley, and its location remote from and elevated over the public road would interfere with the character of the landscape, which is of special amenity value, and which it is necessary to preserve. As such the development would be contrary to Policy ENV 5 as set out in the Waterford County Development Plan 2011-2017, as amended which seeks to restrict development that will have an adverse impact on the landscape in upland areas. The proposed development would, therefore, conflict with the policies of the Development Plan and constitute random, uncoordinated development in an area of high scenic amenity, contrary to the proper planning and sustainable development of the area.

Please note my concerns re the proposed development.

Yours faithfully



Cathriona Walsh

