Our Case Number: ABP-318446-23

An Bord Pleanála

Stephen and Martina Mullins
Kilkeany
Knockavannia
Ballymacarbry via Clonmel
Co. Waterford
E91 WR02

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.

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 HCM

Niamh Hickey
Executive Officer
Direct Line: 01-8737145

PA04

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Stephen Mullins
Kilkeany,
Knockavannia
Ballymacarbry,
Via Clonmel,
Co.Waterford.
E91WR02

Phone: [redacted]

11th 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: Stephen & Martina Mullins

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(see attached ABP refusal) 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. One of the main reasons that application 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. So, it now beggars belief that Coumnagappul wind farm ltd are trying to get planning permission for a windfarm in the ACTUAL Nire Valley/Coumnagappul area with wind turbines of 185metres (600 feet) high. ABP refused this application based on its impact on the Nire Valley and it's surroundings, so the current request to build a windfarm in the Coumnaguppul/Nire Valley area is in direct conflict with the decision made by ABP in 2015 regarding the Ecopower application and to grant permission to Coumnagappul Wind farm Ltd would be contrary to ABP's original decision and if granted would more than likely be legally challenged by the Comeragh Wind aware group and the other vested interests, as the precedent already set by the original decision of ABP on the impact of a windfarm in the Nire Valley would be pivotal to the case . I would also assume that the original wind farm applicants Ecopower themselves would also be contemplating a legal challenge to their ruling if Coumnagappul Wind farm Ltd were successful.

So, for the exact reasons that ABP refused this application for Ecopower, in the interests of consistency and fairness the exact same reasons should be applied to the Coumnagappul Wind farm Ltd application and a refusal should also apply as a precedent has already been set for wind farms applying in this area.

It also needs to be mentioned that despite this original refusal it is frustrating to now see another company try to overturn ABP's previous refusal for this area by proposing a much larger windfarm just a few kilometres down the road, in the very area that was deemed a NO GO AREA. It shows a lack of respect for the decisions of An Bord Pleanála and also a total dis-regard for the wishes of the communities in the area.

Waterford County Council 2022/2028 Development plan

The developer has also failed to read the Waterford county Development plan 2022-2028 which 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 one of those sites, it is deemed by the Waterford County Council to be an EXCLUDED ZONE FOR WIND DEVELOPMENT. It is one of the most prominent mountain ranges in County Waterford, in one of the most scenic and biodiverse areas in County Waterford, it must and should be protected from Visual intrusion. The Nire Valley is an area that relies heavily on Hillwalkers, mountain bikers and many other third-party groups who bring tourism to this area. This area

would be considered as visually sensitive and visually vulnerable and has been designated as a **no-go area.**

Burial Site

In 2004 we built our house in the Knockavannia area of the Nire Valley. The Knockavannia area is part of the proposed Coumnagappul windfarm application. When we built our house, we were required by the Waterford County Council to engage the services of an archaeologist before we could begin construction. This was due to information from the County Council that there was a burial ground/Graveyard in the area that might be near our site. It was actually unknown by Waterford County Council where the burial site was located in the area, so the cost of hiring an archaeologist was a necessary requirement as a precaution.
Based on this, how could Coumnagappul Wind farm Ltd be given any planning permission for any large-scale construction if there is a burial ground on the mountain with its location unknown.

Engagement from Coumnagappul Wind Farm Ltd

The engagement from this company regarding this development has been woefully inadequate, we as a household were only notified of one particular community meeting and the invite for the meeting was dropped into our letterbox on the day of the meeting giving us very little time to act. It was fortuitous that I was working from home on the day or I would never have known about it until after the meeting had concluded. A number of our community have also stated that they did not receive any notification of meetings held either online or in person. There was also misleading and misinformation around reports that would be available to the community that were never shared . This was in our opinion a deliberate attempt by Coumnagappul Wind farm Ltd to ensure a lack of engagement and questions from the community. There also appears to be a number of spelling mistakes in the Coumnagappul Wind farm application where they refer to the Nire Valley as the Nier Valley , one such case is under section AA screening and NIS under European site section, when they reference the area of the Nire Valley as the Nier Valley . This could be seen as very misleading to anyone in the Nire Valley area who was reading this application and

may feel that this was not referring to their townlands at all and might not submit an observation based on a poorly presented application.

Impact on Tourism in the Area

Coumnagappul Wind farm limited have also failed to consider 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 hosting events and festivals in the region. This was heavily documented in the CCWFAG report under the Successful Sillaheen/Russeltown objection to the EDL windfarm proposal in 2015. (as quoted above)

These Wind farm companies like Coumnagappul Wind farm Ltd seem to have very little regard of the impact they have on dividing communities, destroying the biodiversity of the area and poisoning the waterways and the drinking water of Waterford along with its tourism.

Scale:

The proposal for 10 Turbines 606ft/ 185m tall is a wholly unrealistic proposal and has no place in the middle of a rural community with a significant number of homes. The reality is that a development of this scale is far too big and noisy to be in the middle of a community. It also makes a mockery of the planning laws , rules and regulations that apply to the ordinary citizens in this area, as we were not allowed by the planning authorities in Waterford to build anything larger than a bungalow, yet large companies like Coumnagappul Wind farm limited seem to think they are above the planning laws and are suggesting that 185m wind turbines, which would be some of the **biggest** in the country be allowed to be erected in this area. Wind farms are the only industrial installations allowed to run nights and weekends. The reality of Property devaluation is estimated at 30%+. The reality of health and mental

devaluation of the residents is immeasurable and could result in many class actions into the future.

A single wind turbine requires.

45 tonnes of plastic

900 tonnes of steel

2500 tons of concrete

To build enough wind turbines to make a difference you would have to do some serious environmental damage to rural and biodiverse communities.

A windfarm of this scale and size would be detrimental to the community and to the wildlife in the area. The fact that Coumnagappul Wind farm Ltd has not even discussed a potential smaller scale proposal shows this is all about profits and not the environment.

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.

The building of wind turbines is profit driven only and is at the expense of rural communities.

Water:

The developer cannot guarantee that the water table will be unaffected and in turn our private water supply will not be poisoned or destroyed. In the planning application our private wells are not located or mentioned in the Environmental impact study or geological survey. It should also be noted that according to a recent EPA report, Waterford is a red listed water area and this is even before the potential destruction to the waterways that a wind farm would bring.

It also needs to be noted that "In 2000 WCC refused a Super Dump as the planned Substation (the battery bank of the wind farm) due to concerns about contamination of drinking water supplies for Youghal (population 8000)".

Drilling into the ground in the areas concerned may damage the underground waterways and potentially contaminate the private wells and natural springs in the area.

Shadow Flicker / Repetitive sunlight reflections/ Glinting:

Turbines create pulsating-strobing effect inside homes and across gardens, affects areas near turbines and farther away, more so when the proposal is for 9 Turbines 606ft/185m tall, which will be some of the largest in Ireland. Homes affected will lose their right to enjoy their own garden and home as it is intended, with turbines spinning 24/7. Developer's shadow flicker survey is inadequate, incomplete, is written to suit the developers narrative and is not fit for purpose.

Noise Pollution:

Vibrations of spinning turbine blades produce infrasound noise – this affects the body like the beat of a bass drum, 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 . 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.

The developer has also failed to identify and address the dust and noise that will be generated as part of the road openings works and wind turbine construction works on the people and communities in the area.

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.

Infrastructure:

The current network of roads surrounding the site are in a poor state of repair and currently over work the suspension of any vehicle which travels them. The increase in heavy traffic will only make these roads worse.

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.

Setback:

Should this development go ahead, any future dwelling which I or any other members of my family wish to construct in the future will not be able to be built, as any new home would be too close to the turbines. My daughters may wish to be able to build a home in this scenic area, my picturesque home area, in their later years and because of the placement of these turbines may be unable to do so. I do not want such a development to decide that my other family members or I cannot build a home where they grew up.

Potential financial penalties for people in the area:

Should the proposed development go ahead, the value of property in the surrounding area will be badly affected and any ability to acquire finance secured on these properties will be severely diminished.

Further Historical Precedents and Quotes

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.

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."

While we do not object to the generation of 'green' power, this development is not suitable for this location. So I would suggest the following, Co. Waterford has a coastline in which a great deal of wave energy could be harnessed, maybe this is something that the County council and/or Coumnagappul Wind farm Ltd could consider on the grounds of green energy generation and the prospect of employment through engineering of and construction of such wave energy capture apparatus and also the running of such an operation.

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

Thank you for your time,

Stephen & Martina Mullins

11/01/2024

[illegible] Act 2000 as amended

File Ref No: 15/51

RE: Permission sought by Ecopower Developments Limited to erect 8 No. wind turbines, overall height of up to 127 meters, crane hardstands, 1 No. meteorological mast up to 80 meters in height with wind measuring equipment attached, access roads, electrical cabling, electrical substation compound, substation equipment and control building, visitor car park, borrow pits, ancillary drainage system and ancillary site works at Bawnfune/Sillaheens/Curraheenavoher/Russellstown/Boolabrien Upper/Russellstown New, Ballymacarbry, Co. Waterford.

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 Ballymacarbry Village and nearby settlements and the Nire Valley. Futhermore, 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.

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.
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Yours faithfully,

PP EGTM

Niamh Hickey
Executive Officer
Direct Line: 01-8737145

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