

Our Case Number: ABP-318446-23



An  
Bord  
Pleanála

Richard and Julia Gorodecky  
The Quiet Farm  
Coolagurtboy  
Cappoquin  
Co. Waterford  
P51 W921

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](http://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](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned officer of the Board or email [sids@pleanala.ie](mailto: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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23 January 2024

An Bord Pleanála Case Reference: 318446 (also listed on [pleanalae.ie](http://pleanalae.ie) as PA93.318446)

**Re: Proposed construction of Coumnagappul Wind Farm consisting of 10 no. turbines and associated infrastructure.**

Dear Sir/Madam,

We are submitting an observation online in respect of the above Proposed Development and have paid the appropriate fee for this of €50.

EMPower is wanting to develop the Coumnagappul Wind Farm (of 10 turbines) in an area that has been classified as a **Wind Exclusion Zone** by Waterford City & County Council in its Development Plan 2022-2028. This Development Plan took years in the making and is the work of multiple experts taking a holistic view of the county. As a result, Waterford County has been divided into three Wind Energy Designation areas when it comes to locations for wind farm developments: 'Preferred'; 'Open for Consideration'; and 'Exclusion'.

The Waterford City & County Council Wind Energy Designation Map states: "*The Wind Energy Designation Map and the Landscape and Seascape Character Assessment Map identify different landscape character areas and associated landscape sensitivities. These designations encompass the concept of buffers between areas of sensitivity which vary across the different landscape character types and their different locations. These buffers allow for a gradual change between contrasting landscape sensitivities and associated wind energy designations to be considered, as necessary, when determining any development proposal.*"

The Wind Exclusion Zones are not random areas, and have been deemed unsuitable for a number of reasons. These zones have been put in place to protect biodiversity, vulnerable landscapes and habitats, and to protect the natural beauty and attractiveness of certain areas. To attempt to develop within such an area shows a blatant disregard for the expertise and understanding of the area by the experts employed by Waterford County Council. And the fact that by building at a certain scale – as a Strategic Infrastructure Development (SID)

- means that a developer can attempt to ignore such expertise and can circumnavigate Waterford City & County Council itself in the application process.

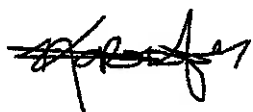
It is understandable that certain developments need to be considered at a higher level of planning, but this process should be under exceptional circumstances rather than a loophole that developers are abusing. For example: if all of the areas deemed suitable for wind farms had been taken and there was still a need for land-based turbines, the application for a SID would seem reasonable and understandable at this point, but this is not the case in the slightest. There is a far greater area marked Preferred for wind farm development and Open to Consideration, than Wind Exclusion Zones. And very little of these areas have been developed on. The truth is, many of the protected areas are higher and could theoretically be exposed to greater and or more consistent wind, but these higher areas are often much more environmentally vulnerable. As is the case with the area proposed for Coumnagappul Wind Farm. There is more than one aspect when it comes to the environment crisis – the loss of biodiversity is as critical and as much a threat to the environment as climate change and needs just as much protection.

As much as we recognise the need for alternatives to fossil fuels as one of the key components of fighting climate change, we are thoroughly unconvinced by the motives of EMPower / Coumnagappul Wind Farm and other wind farms that are planned in Waterford County's Wind Exclusion Zones. And we do not believe that the developer has sufficient grounds (if any at all) to place their development in such a zone or has shown sufficient evidence that their proposed location is of more advantage than anywhere else within the county that is deemed 'Preferred' or 'Open for consideration'.

We therefore ask that An Bord Pleanála uphold the Waterford City & County Council Development Plan and refuse planning permission for Coumnagappul Wind Farm. And by doing, so send out a clear message to developers that prioritising profit over environmental impact is not a credible solution to tackling climate change.

We thank you for your time and consideration and look forward to receiving your acknowledgement.

Yours faithfully,



Richard Gorodecky

Julia Gorodecky