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The Secretary
An Bord Pleanála
64 Marlborough Street
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29th January 2024

Re: Coumnagappul Wind Farm, Comeragh Mountains – ABP case no. 318446

Dear Sir/Madam

Mountaineering Ireland submits the following observations on the above Strategic Infrastructure Development application.

Mountaineering Ireland is the representative body for hillwalkers and climbers on the island of Ireland. We champion personal responsibility, challenge, adventure and participation, while also caring for the places and environment in which we enjoy our activities and sports.

Mountaineering Ireland recognises the role and need for the development of wind energy as part of the national response to climate change. This though, in all cases, should not compromise or significantly impact upon important sites and areas, such as designated sites, priority species and habitats, high-value landscapes, areas of importance for ecosystem services (such as carbon storage and water quality) and areas of importance to people for health, wellbeing and recreation.

Mountaineering Ireland believes that the siting of the proposed Coumnagappul Wind Farm has the potential to impact upon several of these issues as summarised below:

Designated sites: The wind farm area lies close to the Comeragh Mountains SAC and is likely to affect site integrity by fragmentation of the contiguous and connected peatland habitats which constitute the qualifying interest of the site (see appendix 1a).

Impacts on amenity and recreation: the area to be developed is valued by hillwalkers, including many Mountaineering Ireland members. The visual intrusion and environmental impacts are such that the proposed development would fundamentally alter the experience and enjoyment of the area by people (see appendix 1b).

Impacts on other ecosystem services: Mountaineering Ireland members recognise that there is a high likelihood that other ecosystem services, including carbon sequestration/storage, water quality, biodiversity, and socio-economic value, provided by the area of the proposed wind farm, will be significantly adversely affected by its development (see appendix 1c).

Archaeology: The proposed development site lies between two significant Bronze Age settlement sites, it would affect the setting for these sites and could also result in the loss of archaeological features not yet identified in the area. (see appendix 1d).

Land use: Power generation on the scale proposed for Coumnagappul is an industrial use of land. Mountaineering Ireland challenges the apparent presumption that upland landscapes are appropriate locations for such developments, asking should they not be centred in industrial zones, closer to demand centres? Green energy should not come at the expense of the quality of our green spaces (see appendix 1e).

Landscape and Visual Impact Assessment

Mountaineering Ireland has several concerns in relation to the Landscape and Visual Impact Assessment for the proposed development, as outlined below:

- **Landscape Character Assessment** – Mountaineering Ireland does not agree with the applicants' conclusion that the site sits within a landscape of Medium Sensitivity, using the Assessment Criteria submitted we believe it should be classified as High Sensitivity (see appendix 2a).
- **Landscape Assessment Criteria and Significance of Landscape Effects** - We contend that the applicants' judgement of the significance of landscape effects is flawed. This is a landscape of High Sensitivity, combined with a magnitude of change which is clearly also 'High', so the overall conclusion should naturally have arrived at a Landscape effect which is 'Substantial' (see appendix 2b).
- **Visual Assessment Criteria** - the applicants have in our opinion underplayed the sensitivity of multiple receptors, thus weakening the reliability of the Visual Impact Assessment conclusions (see appendix 2c).

Mountaineering Ireland concludes that the proposed development would be an unacceptable industrial intrusion into a landscape of high scenic quality, that it would be detrimental to the integrity of the Comeragh Mountain landscape and that it would set a damaging precedent. Therefore, we are strongly of the view that this development would be contrary to the proper planning and sustainable development of the area.

Mountaineering Ireland trusts that you will take these views into account when deciding on this application.

Yours sincerely

Helen Lawless
Acting Chief Executive Officer

Appendix 1 Additional explanatory notes

a. Impacts on Designated sites

Comeragh Mountains SAC is designated as an SAC on account of qualifying interests which include the following peatland habitats which are likely to be fragmented as a result of the siting of the proposed wind farm:

- Northern Atlantic wet heaths with Erica tetralix [4010]
- European dry heaths [4030]
- Blanket bogs (* if active bog) [7130]

These habitats are present outside the SAC within the area of the wind farm but are contiguous to the same habitats within the SAC. It is unclear as to why these were excluded from the SAC and as such should be treated as integral to the ecological functioning of the designated site and its qualifying interests. Any substantive fragmentation or loss of these habitats, without adequate mitigation, would constitute a significant adverse effect on the SAC. Mountaineering Ireland believes the direct loss through wind farm construction constitutes said fragmentation and loss.

b. Impacts on recreation and amenity

Impacts on the amenity value of the area come in the form of a fundamental alteration of the character of the environment in the area. The quality of the environment and the quality of the recreational user's experience are inextricably linked, with undeveloped natural landscapes providing the highest quality experiences. The relative lack of built artefacts in the upland landscape is a crucial element of the recreation experience. Consultation with Mountaineering Ireland members has identified 'peace and quiet', 'natural beauty', 'wildness' and 'escape' as the main attributes which make mountain experiences special (*see Fig. 1 below).*

The impact that the proposed development would have on the experience of hillwalkers in the Comeragh Mountains has been downplayed by the applicants, as shown in the statement below from the Non-Technical Summary:

> *"Overall, the most significant recreation activity/attractions in proximity to the Coumnagappul Wind Farm site is trail walking, Glamping, Clay Pidgeon Shooting, Mountain Biking, Equestrian Activity and Sports Grounds. There are a number of significant walking routes and trails associated with the Comeragh Mountains, however none of these routes are accessed via the Site and as such the Project will not impede tourist use of the Mountains."*

This shows a very poor understanding of how people engage with the landscape of the Comeragh Mountains, walkers do not have to be on a wind farm site for their experience to be affected. The proposed turbines would be visible from all the main summits and ridges in the Comeraghs. Looking towards a major industrial development will detract from the sense of wildness currently enjoyed in the Comeragh Mountains and irreversibly alter the wild character of the landscape.

Our consultation with Mountaineering Ireland members shows that affiliated clubs do hike within the development site, particularly around Milk Hill. The experience of hillwalkers on the nearby summits of Seefin, and Coumfea, the Knockanaffrin ridge and in the Nire Valley (all popular walking areas) would be diminished by the development of an industrial-scale wind farm on Milk Hill.

The importance hillwalkers place on the wild character, landscape and nature in this part of the Comeragh Mountains is captured in the following statement from a Waterford-based hiking group:

> *"This side of the Comeraghs offers beautiful views, and routes for people of all levels of ability, along with a distinct quietness and untouched beauty in the area that isn't as prevalent in some of the other, more used parts of the Comeragh Mountains."*

Fig 1: Word cloud showing most popular responses from Mountaineering Ireland members to the question of 'What makes Ireland's mountains special?'

c. Impacts on other Ecosystem Services

Water

Due to drainage and exposure of peat arising from construction there is likely to be a persistent risk of peat transfer to sensitive upland streams. This increases the acidity of watercourses, which is detrimental to invertebrates such as mayfly. These invertebrates are in turn the food source for bird species found in upland streams and rivers such as dipper and grey wagtail.

Carbon

In addition to carbon loss to watercourses, there will also be carbon loss to the atmosphere from exposed and drained peatland. The works associated with the proposed development would remove much of the restoration potential of this peatland habitat. The 25-year lifespan of the wind farm is a period when nature restoration, especially in upland and peatland environments will be a necessity and a legal requirement. The carbon cost of wind farm infrastructure including the concrete turbine foundations should also be considered.

Biodiversity

The bird surveys for the proposed development have only considered the impact of the proposed development on the existing bird fauna. What must also be considered is that a wind farm in this location would also make the environment unsuitable for priority species such as hen harrier and curlew which are likely to be targets for nature restoration, but are known to show significant avoidance of wind turbines[1]. This opportunity cost associated with wind farm development should, therefore, be a key consideration in assessing the development. There is also an obligation to consider impacts on birds in the 'wider countryside', and to consider habitat protection in a 'connectivity' context.

Due to the height of the proposed turbines there could be impact on the movement of priority birds for instance upland raptors or wildfowl (geese and swans moving from roosting to feeding sites).

We are in both a climate crisis and a biodiversity crisis. We need to move away from fossil fuel-generated electricity, however, we can't have a situation where a solution to one crisis, makes the other one worse, by further degrading and destroying upland habitats.

Socioeconomic value of landscape

Waterford City & County Council has put huge effort and investment into marketing Waterford as an outdoor activity destination, with one of the key attractions in the county being the landscape of Comeragh Mountains. The Council has recently secured funding to develop an Outdoor Recreation Management Plan with a focus on core environmental, conservation, landscape, and socio-economic factors.

d. Archaeology

The site of the proposed development is within one kilometre of a cluster of national monuments that make up a Bronze Age settlement site in Tooreen. In the opposite direction, less than five kilometres to the south is Coumaraglin, a site of national importance due to its extensive remains of a settlement and ritual landscape dating from the early Bronze Age (2,500 BC on). Coumaraglin has the highest concentration of national monuments in Co. Waterford, with most of these identified in recent decades.

The proposed development site is part of a landscape that has held significance to people for thousands of years. In addition to diminishing the setting for the monuments that are already recorded, there is a risk that development could result in the loss of archaeological features not yet identified. Mountaineering Ireland believes that the potential impact of the Coumnagappul wind farm on archaeology and heritage has not been fully addressed in the developers' Environmental Impact Assessment Report.

e. **Land use**

Mountaineering Ireland challenges the apparent presumption that upland landscapes are appropriate locations for such developments. Historically upland sites were better for wind energy generation, however with improvements in turbine technology and blade design, lowland sites are now equally viable and more efficient as turbines on blustery upland sites are prone to mechanical faults.

[1] Pearce-Higgins, J. W., Stephen, L., Langston, R. H. W., Bainbridge, I. P. & Bullman, R. 2009. The distribution of breeding birds around upland wind farms. *Journal of Applied Ecology* 46: 1323-1331.

Why not locate wind farms in industrial estates or business parks on the outskirts of cities and towns, on farmland, or in proximity to existing large-scale infrastructure such as outer ring-roads and motorways? Siting wind farms closer to demand centres also reduces losses in electricity transmission and distribution.

Selecting upland sites for wind farm development because they have a low population density is disingenuous and exploits the fact that the landscape itself does not have a voice. Green energy should not come at the expense of the quality of our green spaces.

Power generation on the scale proposed for Coumnagappul is an industrial use of land. Had the wind industry not long since adopted the benign term *'farm'* it would be far more fitting to describe this as a wind energy factory. Would this site be considered a suitable location for the construction of any other factory?

Offshore wind energy development, a greater diversity in renewable sources, improvements in grid capacity, better energy storage solutions and smaller-scale, community-owned windfarms can all assist in achieving Ireland's goal of carbon neutrality by 2050, without the further loss of important scenic landscapes.

Appendix 2 – Landscape and Visual Impact Assessment

2a Landscape Character Assessment

Waterford City and County Council commissioned a Landscape and Seascape Character Assessment in 2019. This study identified 7 Landscape Character Types with the subject site being located in Type 6 – Uplands (Namely 6A Comeragh Mountains).

The County Character Assessment also assigned indicators of sensitivity, which indicates the extent to which particular landscape types will be vulnerable to change in their character.

The subject site is fully located in Type 6A Comeragh Mountains which has been designated with the highest level of sensitivity set by the County Landscape Character Assessment – 'Most Sensitive'.

This is defined within the Character Assessment as:

Most Sensitive - Very distinctive features with a very low capacity to absorb new development without significant alterations of existing character over an extended area.

In addition, the sensitivity guidance are provided (extract below).

4. Landscape Sensitivity Guidelines

4.1(a) Most Sensitive Areas

Landscape Character Areas and features designated as Most Sensitive represent the principal features which create and sustain the character and distinctiveness of the surrounding landscape. To be considered for permission, development in or in the environs of these areas must be shown not to impinge in any significant way upon its character, integrity or uniformity when viewed from the surroundings. Particular attention should be given to the preservation of the character and distinctiveness of these areas as viewed from scenic routes and the environs of archaeological and historic sites.

4.1(b) Areas Designated as Most Sensitive

The coastline, all headlands and promontories.
The banks of the rivers;
The shoreline of all lakes;
The skylines of upland areas;

Whilst the submitted Landscape and Visual Impact Assessment (LVIA) has referenced the County Landscape Character Assessment, acknowledging that all proposed turbines are fully located within a landscape recognised within the County LCA as 'Most Sensitive', the authors have focused attention on the proximity of the site to the adjoining Landscape Type which is designated as Low Sensitivity.

The LVIA author argues that the site sits within a transitional landscape between Most Sensitive and Low Sensitivity landscapes, and therefore regardless of the County's highest sensitivity classification, the sensitivity should be dropped to Medium Sensitivity.

Whilst we agree that there is often a grey area at the transition boundaries between one character area and another, we would strongly contend that the quality and sensitivity of the surrounding foothill landscapes in this case have been somewhat underplayed by the LVIA author.

If there is a weakness in the County Landscape Character Assessment it is that the sensitivity classification of the surrounding foothill landscape should in fact be increased to High Sensitivity.

High Sensitivity - Distinctive character with some capacity to absorb a limited range of appropriate new developments while sustaining its existing character.

The authors argue that the site sits within a transitional landscape, however we would contend that the surrounding foothills are in fact the transitional landscape, which merit a higher sensitivity classification.

We simply do not agree with a conclusion that the subject site sits with a landscape considered of **Medium Sensitivity**, but with reference to the author's submitted Assessment Criteria tables would settle on a classification of **High Sensitivity.**

2b Landscape Assessment Criteria and Significance of Landscape Effects

In order for Landscape and Visual Assessments to be of value to the decision-making process it is essential that the terminology used is consistent and balanced.

Whilst the Guidelines for Landscape and Visual Impact Assessment', (3rd Edition) 2013[2] place greater emphasis on terminology, proportionality and professional judgment, while encouraging less reliance on tables and matrices, these continue to provide strong and valuable support for landscape professionals within the assessment process.

Although there is general guidance on the structure of matrices and tables, there is no agreed industry template or standard in terms of the terminology used. It is therefore the responsibility of experienced LVIA authors to compile appropriate and fairly weighted descriptions that reach robust and defensible conclusions regarding predicted landscape and visual effects.

In this case the authors appear to have followed practice guidelines for the methodology and structure of Landscape and Visual Assessment, however we believe there are a number of discrepancies within the submitted material which have resulted in conclusions we believe to be imbalanced.

[2] IEMA (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*, published by the Landscape Institute, LI, and Institute of Environmental Management and Assessment, IEMA, Routledge, UK

Mountaineering Ireland

Firstly, in relation to Landscape sensitivity, the authors have submitted the following tables:

Table 16-1: Landscape Value and Sensitivity

Sensitivity	Description
Very High	Areas where the landscape character exhibits a very low capacity for change in the form of development. Examples of which are high value landscapes, protected at an international or national level (World Heritage Site/National Park), where the principal management objectives are likely to be protection of the existing character.
High	Areas where the landscape character exhibits a low capacity for change in the form of development. Examples of which are high value landscapes, protected at a national or regional level (Area of Outstanding Natural Beauty), where the principal management objectives are likely to be considered conservation of the existing character.
Medium	Areas where the landscape character exhibits some capacity and scope for development. Examples of which are landscapes, which have a designation of protection at a county level or at non-designated local level where there is evidence of local value and use.
Low	Areas where the landscape character exhibits a higher capacity for change from development. Typically this would include lower value, non-designated landscapes that may also have some elements or features of recognisable quality, where landscape management objectives include, enhancement, repair and restoration.
Negligible	Areas of landscape character that include derelict, mining, industrial land or are part of the urban fringe where there would be a reasonable capacity to embrace change or the capacity to include the development proposals. Management objectives in such areas could be focused on change, creation of landscape improvements and/or restoration to realise a higher landscape value.

CLIENT: EMP Energy Limited (EMPower)
PROJECT NAME: Environmental Impact Assessment Report (EIAR) For The Proposed Coumnagappul Wind Farm, Co. Waterford
SECTION: Volume 2 - Main EIAR-Chapter 16: Landscape and Visual Impact

Table 16-2: Magnitude of Landscape Impacts

Magnitude of Impact	Description
Very High	Change that would be large in extent and scale with the loss of critically important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an overall change of the landscape in terms of character, value and quality.
High	Change that would be more limited in extent and scale with the loss of important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an overall change of the landscape in terms of character, value and quality.
Medium	Changes that are modest in extent and scale involving the loss of landscape characteristics or elements that may also involve the introduction of new uncharacteristic elements or features that would lead to changes in landscape character, and quality.
Low	Changes affecting small areas of landscape character and quality, together with the loss of some less characteristic landscape elements or the addition of new features or elements.
Negligible	Changes affecting small or very restricted areas of landscape character. This may include the limited loss of some elements or the addition of some new features or elements that are characteristic of the existing landscape or are hardly perceivable.

Table 16-3: Landscape Impact Significance Matrix

	Sensitivity of Receptor				
Magnitude	**Very High**	**High**	**Medium**	**Low**	**Negligible**
Very High	Profound	Profound-substantial	Substantial	Moderate	Slight
High	Profound-substantial	Substantial	Substantial - moderate	Moderate-slight	Slight-imperceptible
Medium	Substantial	Substantial - moderate	Moderate	Slight	Imperceptible
Low	Moderate	Moderate-slight	Slight	Slight-imperceptible	Imperceptible
Negligible	Slight	Slight-imperceptible	Imperceptible	Imperceptible	Imperceptible

* Note: Judgements deemed 'substantial' and above are considered to be 'significant impacts' in EIA terms.

The author utilising the descriptions and classifications above, has concluded with the Significance of Landscape Effects below:

16.6.1.3 Significance of Landscape Effects

The significance of landscape effects is a function of landscape sensitivity weighed against the magnitude of the landscape impact. This is derived from the significance matrix (Table 16.3) used in combination with professional judgement.

Based on a Medium sensitivity judgement and a High-medium magnitude of construction stage landscape impact, the significance of impact is considered to be **Substantial-moderate / Negative / Short-term** within and immediately around the site during construction, but reducing quickly with distance and broader context.

Based on a Medium sensitivity judgement and a High-medium / Medium magnitude of operational stage landscape impact, the localised significance of impact is considered to be **Substantial-moderate / Negative / Long-term** within and immediately around the Site. Thereafter, significance will reduce to Moderate and Slight at increasing distances as the development becomes a progressively smaller component of the wider landscape fabric even in the context of higher sensitivity landscape units / features such as the Uplands to the east and west and the coastline in the southeast quadrant of the Study Area.

Firstly, as set out previously we believe the author has completely overreached the judgement of landscape sensitivity to arrive at a classification of Medium Sensitivity when it is clearly a landscape which should be considered High to Very High Sensitivity.

Secondly, within the Significance of Landscape Effects above they appear to have introduced a magnitude of change classification which is not defined within the submitted criteria table - namely **High-Medium**.

Notwithstanding the introduction of High-Medium, we would contend that the magnitude of landscape change in this case is at last **High** - with reference to the author's submitted criteria defined as:

High - Change that would be more limited in extent and scale with the loss of important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an overall change of the landscape in terms of character, value and quality.

In short, we contend that with a landscape which is without question of 'High Sensitivity ' combined with a magnitude of change which is clearly also 'High' the overall conclusion should naturally have arrived at a Landscape effect which is **'Substantial'**.

We must highlight that Landscape Effects which are **'Substantial'** do not necessarily mean that a development should not proceed, as Landscape and Visual matters are only one consideration. There may be overriding planning, environmental and economic considerations which deem that a development should be permitted.

2c Visual Assessment Criteria

We have reviewed the findings of the Visual Assessment and have identified numerous discrepancies relating to sensitivity classification at particular visual receptors.

Whilst the authors have included a table outlining Magnitude of Visual Impact, they have not submitted a table outlining Visual Sensitivity, opting instead to supply a list of visual receptor types considered the most susceptible to changes in views and visual amenity, namely:

- Residents at home;
- People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;
- Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;
- Communities where views contribute to the landscape setting enjoyed by residents in the area; and
- Travellers on road rail or other transport routes where such travel involves recognised scenic routes and awareness of views is likely to be heightened.

An important example we believe requires clarity relates to visual receptors the author classes as LCV – Local Community Views, which are defined as:

Local Community Views (LCV)

This type of VRP represents those people who live and/or work in the locality of the proposed EIA Development, usually within a 5 km radius of the site. Although the VRPs are generally located on local level roads, they also represent similar views that may be available from adjacent houses. The precise location of this VRP type is not critical; however, clear elevated views are preferred, particularly when closely associated with a cluster of houses and representing their primary views. Coverage of a range of viewing angles using several VRPs is necessary in order to sample the spectrum of views that would be available from surrounding dwellings.

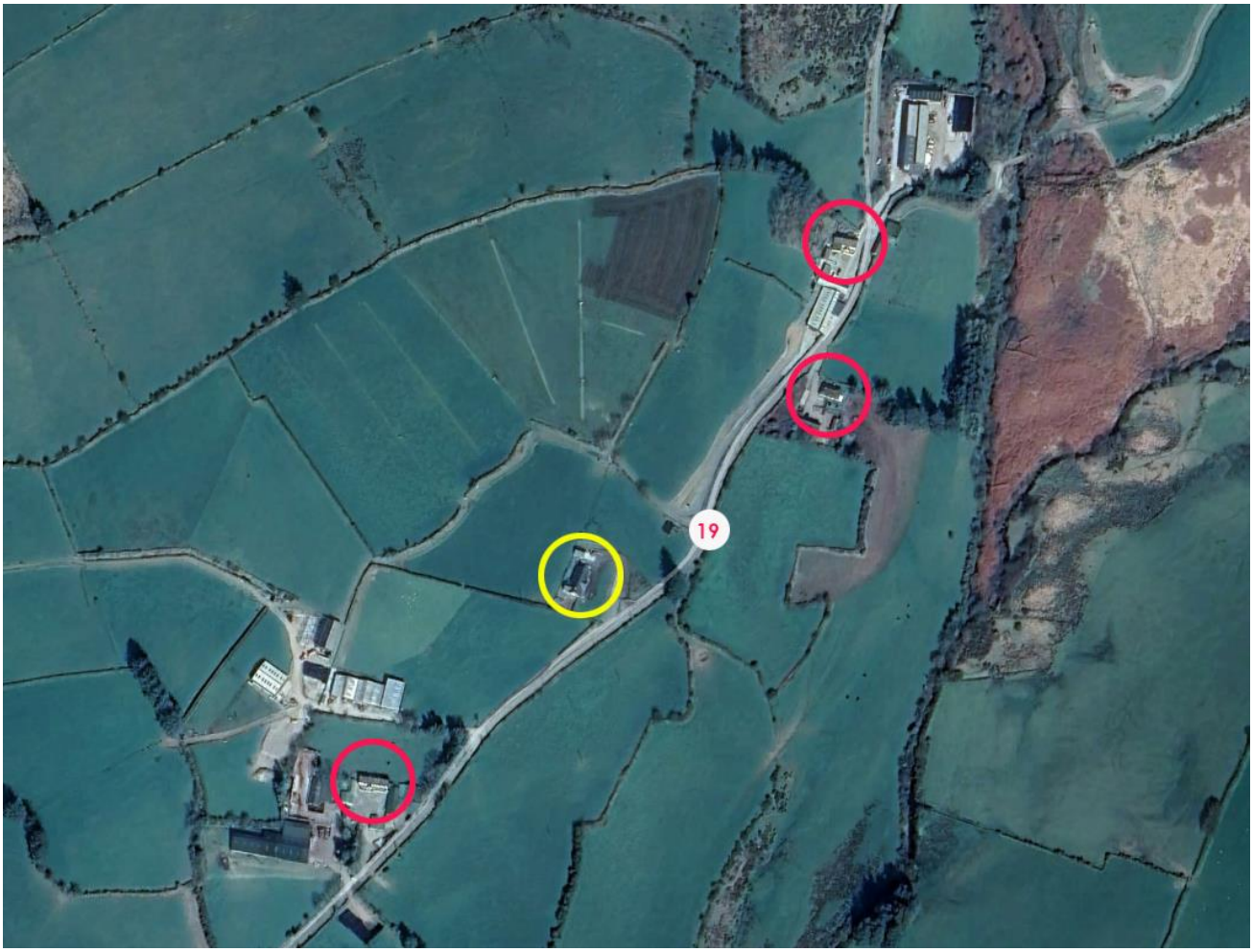
Direct views from residential properties are universally accepted within Landscape and Visual Impact Assessment as being of the Highest sensitivity.

Six of the selected visual receptors categorised solely as Local Community Views (LCV), namely VPs 12, 13, 14, 18, 19, 21, have been assigned Medium sensitivity.

Whilst it is reasonable to assume that a number of properties will have oblique or obscured views in the direction of the proposal, it is also the case that many properties within the visual catchment have direct views in the direction of the site.

For example, VP19 has been selected as an example of LCV.

However, as the image below illustrates, this selected visual receptor is located at a field gate a relatively short distance from a number of properties which would achieve direct views of the development (Direct Views - Red, Oblique Views - Yellow).



Although this view is supposed to be representative of views typical of residential properties with the LCV, the author has in our opinion underplayed the sensitivity when opting for a Medium Sensitivity classification.
In addition whilst the photomontage for VP19 has required 3 images to illustrate the extent of the view, the author has selected a Magnitude of Change they consider High (rather than the Very High – see submitted table below).

Table 16-4: Magnitude of Visual Impact

Criteria	Description
Very High	The proposal intrudes into a large proportion or critical part of the available vista and is without question the most noticeable element. A high degree of visual clutter or disharmony is also generated, strongly reducing the visual amenity of the scene
High	The proposal intrudes into a significant proportion or important part of the available vista and is one of the most noticeable elements. A considerable degree of visual clutter or disharmony is also likely to be generated, appreciably reducing the visual amenity of the scene
Medium	The proposal represents a moderate intrusion into the available vista, is a readily noticeable element and/or it may generate a degree of visual clutter or disharmony, thereby reducing the visual amenity of the scene. Alternatively, it may represent a balance of higher and lower order estimates in relation to visual presence and visual amenity
Low	The proposal intrudes to a minor extent into the available vista and may not be noticed by a casual observer and/or the proposal would not have a marked effect on the visual amenity of the scene
Negligible	The proposal would be barely discernible within the available vista and/or it would not detract from, and may even enhance, the visual amenity of the scene

With a sensitivity of Medium and a Magnitude of High the authors have arrived at a visual effect for VP19 of Substantial –Moderate.

VRP No.	Distance to nearest turbine km	Visual receptor Sensitivity (see appendix 16.1)	Visual Impact Magnitude	Significance of Visual effect
VP17	17.9km (T12)	High	Low-negligible	**Slight / Negative / Long Term**
VP18	1.8km (T12)	Medium	Medium	**Moderate / Negative / Long Term**
VP19	967m (T12)	Medium	High	**Substantial-moderate / Negative / Long Term**
VP20	4.9km (T12)	Medium	Low	**Slight / Negative / Long Term**
VP21	2.2km (T12)	Medium	Medium	**Moderate / Negative / Long Term**

We strongly disagree that residential properties with direct views could be considered of Medium Sensitivity and believe that the LCV system used by the author is therefore inadequate to reflect the likely experience for many of the properties within the study area.

In addition, the extent of potential change as illustrated is clearly Very High (based on the author's own descriptions).

Therefore, with a visual sensitivity set as High or Very High, combined with a Magnitude of Change which is Very High the predicted visual effect at VP19 would be Profound - Profound/substantial.

We believe the reduction of residential receptors within LCVs to Medium Sensitivity is one clear example where the potential visual effect has been dampened within the LVIA thus weakening the reliability of the conclusions.