

Tipperary County Council
Civic Offices
Nenagh
Co. Tipperary

Date: 02 August 2023

Re: Construction of Dyrick Hill Windfarm comprising 12 no. wind turbines and related works.
Townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee
Upper, Broemountain, Carrigaun (Mansfield) and others, Co. Waterford.

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.


The Board will revert to you in due course in respect of this 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,



Ashling Doherty
Executive Officer
Direct Line: 01-8737160

PA09

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Evan McGuigan

From: Kiely, Teresa <teresa.kiely@tipperarycoco.ie>
Sent: Monday 31 July 2023 18:39
To: SIDS
Subject: 317265 Prescribed body submission
Attachments: sid 317265 waterford.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it concerns

Please find attached our submission on the above referenced file

Kind regards
Teresa

Teresa Kiely
Administrative Officer, Planning Section,
Tipperary County Council, Civic Offices, Nenagh, Co Tipperary
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It may suit me to send emails outside of my normal workings hours, I do not expect a response or action from you outside your own working hours.

E: teresa.kiely@tipperarycoco.ie
W: www.tipperarycoco.ie



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Our Reference

Your Reference
PA 93.317265

Date
31st July 2023

The Secretary
An Bord Pleanála
64 Marlborough St.
Dublin 1

**Strategic Infrastructure Development under Section 37E of The
Planning and Development Act 2000 (As Amended)**
**Proposed Dyrick Hill Wind Farm, County Waterford (Ref. No. PA
93.317265)**

Dear Sir/Madam,

The Planning Authority refers to the proposed Dyrick Hill Wind Farm, County Waterford (Ref. No. PA 93.317265) which is a Strategic Infrastructure Development (SID) under Section 37E of The Planning and Development Act 2000 (As Amended).

The Planning Authority has examined the documentation associated with the above proposal and wishes to make the following points:

Introduction

The subject Strategic Infrastructure Development comprises of, inter alia, the erection of 12 no. 6.0-7.2 MW wind turbines with an overall ground tip height of up to 185m. The candidate wind turbines will have a rotor diameter of circa 162m and a hub height of 104m.

While the subject site is located entirely within the administrative area of Waterford County Council, it adjoins the boundary of Tipperary County Council. Given the nature of the proposal, the overall tip height of the turbines proposed and the proximity to the administrative boundary of Tipperary County Council, this Local Authority have identified a number of issues which have the potential to impact upon the functional area of Tipperary County Council and merit consideration by An Bord Pleanála in their assessment of the subject proposal.

The Tipperary County Development Plan 2022
Landscape Character

The Tipperary County Development Plan 2022 came into effect in August 2022. Volume 2 Appendix 3 set out the landscape character assessment for the county. The subject site, as noted above while not within the



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administrative area of Tipperary County Council, adjoins The Uplands Generalised Landscape Character Area.

Figure 1 Landscape Character Area

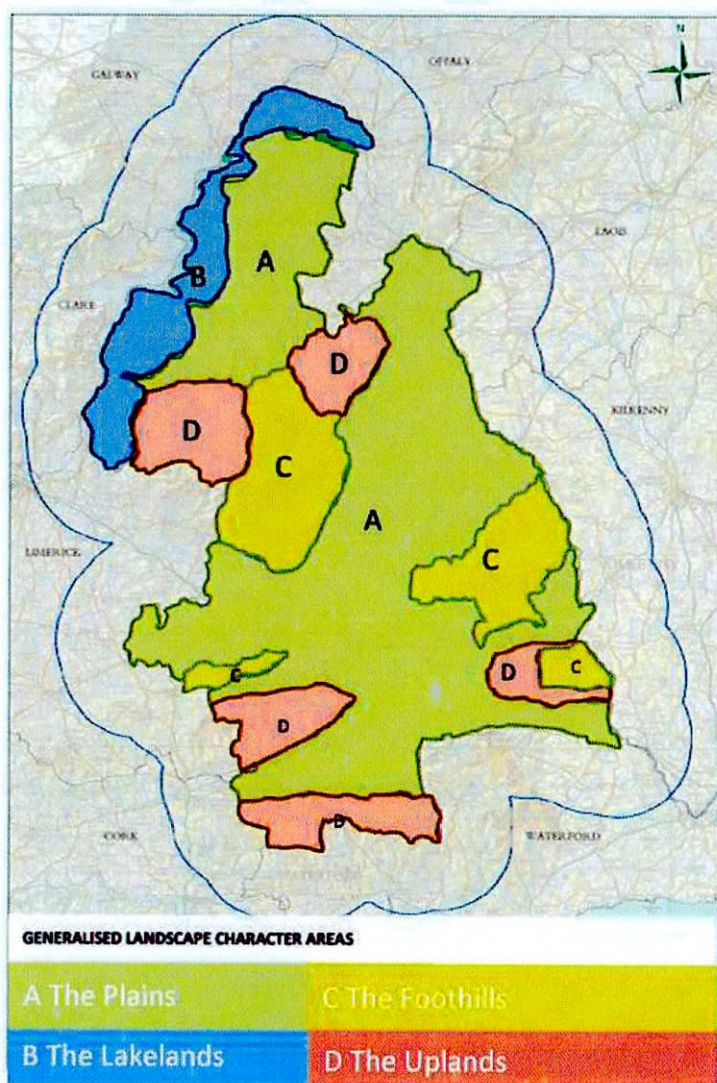


Figure 3.2 Generalised Landscape Character Areas

There are 5 areas within the County defined as an Upland Character area. The Tipperary County Development Plan 2022 notes that these landscapes are being increasingly used for amenities as well as energy and telecoms infrastructure.

The southern most Upland Character area is the Knockmealdown Mountain Mosaic. This character area is defined as an area of solitude, dominated by



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natural vegetation, and harsh climate overlooking the busy, fertile plains and settlements of Tipperary. Though seldom visited, these areas viewed across wide expanses of lowlands form the backdrop to almost all of the most scenic areas of the county. As such, the Plan considers the Knockmealdown Mountain Mosaic to be a sensitive area. The Plan has also identified the area to be a Primary Amenity Area.

Figure 2 Landscape sensitivity

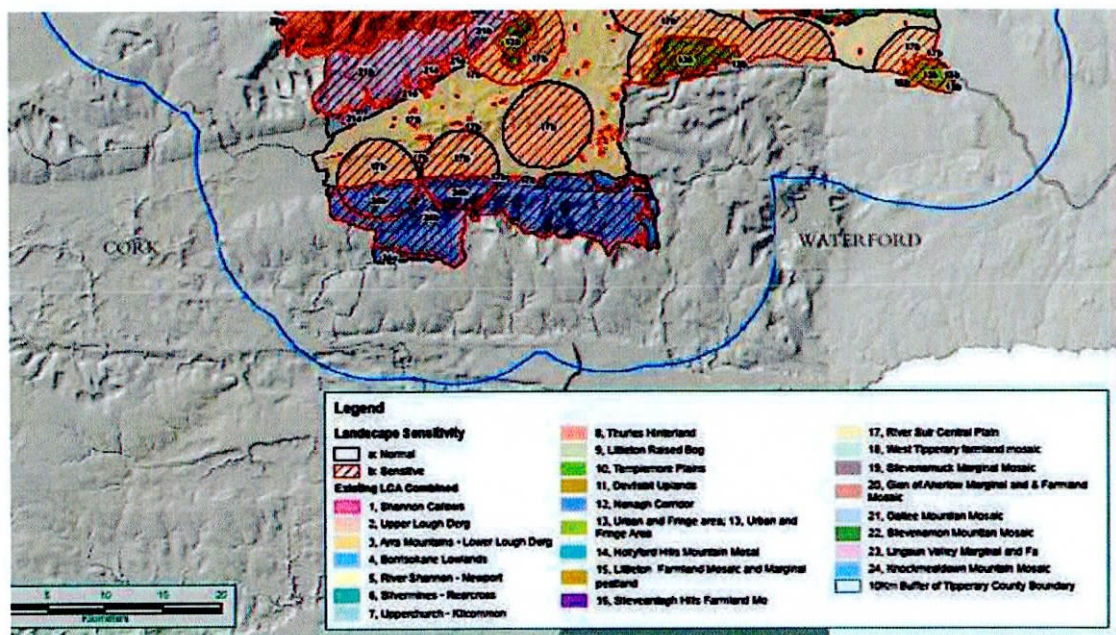


Table 5.2 of Volume 3 considers the Knockmealdown Mountain Mosaic to be vulnerable landscape.

Table 6.1 of Volume 3 sets out the controls for managing development in this area. It aims to control unavoidable new developments unless they can demonstrate capacity to sustain existing appearance and character. Table 6.2 notes that the Knockmealdown Mountain Mosaic area has low compatibility with multiple turbine scheme.

Renewable Energy Strategy

The sensitivity of this area is acknowledged in the Renewable Energy Strategy for Tipperary as set out in Volume 3 Appendix 2 of the County Development Plan. The Uplands area to the south of the County was deemed to be unsuitable for new wind energy developments. A review of the Waterford City and County Council Development Plan 2022 – 2028 shows that the part of the



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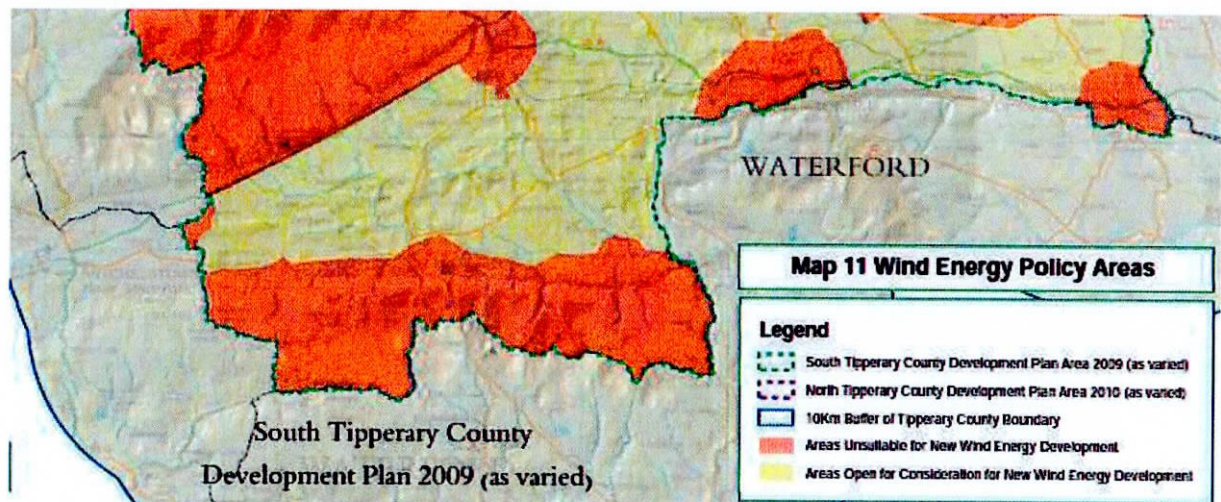
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Knockmealdown Mountains within Waterford County Councils administrative area is also unsuitable for wind energy proposals.

Figure 3 Wind energy Policy Area Tipperary County Development Plan 2022



It is a policy of the Tipperary County Development Plan 2022 (11-16) to

Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported.

While not within the administrative area of Tipperary, the Local Authority has a concern, by reason of the nature of the proposal and its proximity to sensitive landscapes that are protected from inappropriate development, with the visual impact of the works proposed on the setting and character of sensitive landscapes in Tipperary.

Roads

The Planning Authority notes that the route of the grid connection is shown to be to Dungarvan and that primary haul routes are from Belview to the site. There are a number of aggregate suppliers shown to be located in County Tipperary and the Planning Authority requests that the impact of same on the road network of County Tipperary is considered in the assessment of the application.



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Procedural issues

Tipperary County Council would like to draw An Bord Pleanála's attention to the correspondence issued in respect of this proposal to the Council. It is noted that the correspondence issued by Jennings O'Donovan was not specifically addressed to Tipperary County Council, but rather to the Civic Offices in Clonmel whereas the correspondence issued to Waterford City and County Council was specifically addressed to the Planning section of that local authority. The adequacy of this notification is a concern.

Principle Concerns

As set out above, the Knockmealdown Mountain Area has been identified as a sensitive landscape that is vulnerable to change arising from new development. The area has been identified as a Primary Amenity Area in the Tipperary County Development Plan 2022. The wider area has also been identified as being unsuitable for wind energy developments in both the Tipperary County Development Plan 2022 and in the Waterford City and County Council Development Plan 2022 – 2028.

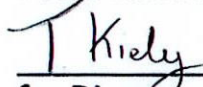
It is a policy of Tipperary County Development Plan 2022 to facilitate new development which integrates and respects the character, sensitivity and value of these sensitive landscapes

While not within the administrative area of Tipperary County Council, the subject proposal has the potential to have a significant visual impact on areas of Tipperary that are deemed to be vulnerable landscapes and areas of primary amenity value.

The Planning Authority requests An Bord Pleanála give serious consideration to the concerns noted above in arriving at its decision.

If you have any queries, please do not hesitate to contact me.

Yours faithfully,


for Director of Services