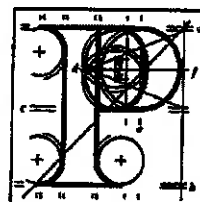


Our Case Number: ABP-317265-23



**An
Bord
Pleanála**

Anne Lebaupain McCarthy
Doon
Ballinamult
Co. Waterford
E91 YD93

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 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,


Ashling Doherty
Executive Officer
Direct Line: 01-8737160

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To: The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1

From:
Anne Lebaupain McCarthy
Brendan McCarthy
Amélie and Joey McCarthy
Doon, Ballinamult,
Via Clonmel, co Waterford
E91 YD93
House H58 in the application

July 30th 2023

Re: Construction of Dyrick Hill Windfarm comprising 12 no. wind turbines and related works:

Application to An Bord Pleanála by Dyrick Hill Wind Farm Limited, in accordance with Section 37E of the Planning and Development Act 2000, as amended, for planning permission for a period of 15 years, for development comprising the construction of a wind farm and related works in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogalle, Colligan More, Colliganwood, Corradoon, Dyrick, Farnane Lower, Farnane Upper, Garryclone, Garryduff, Killadangan, Kilcooney, Knockaunnaglokee Langanoran, Lickoran, Lickoranmountain, Lisleagh, Lisleaghmountain, Lyrattin, Mountaincastle South, Scartmountain, Sleadycastle in County Waterford.

Bord Pleanála Case reference: PA93.317265

Please find below the following documents:

- Cover Letter.....p.2
- Note on autism and wind turbines.....p.6
- Notes on Chapter 13: Heritage.....p.9

To the Board members:

I am writing on behalf of myself and my husband, Brendan (Benny) McCarthy, and our two children Arnélie and Joey. We would all like to strongly object to the planning permission submitted by EMPower Limited and the Dyrick Hill Windfarm project to An Board Pleanála. We ask that An Board Pleanála reject this planning application.

I would like to give you a sense of the place, and the community this development is proposed for.

We live in the "last house on the hill going up to the mountain", as we describe it to delivery people. We bought our house twenty years ago as a young couple.

Our house was a land commission house of the late 50s to 60s. It was standing, but had been uninhabited for more than 7 years and had sustained serious damage from trees and the weather. We wanted a home for good. We wanted to keep the house and make it our own, not pull it down as many suggested. We loved the character and feel of the place, and believed an extension and renovation would make it all that we ever wanted. And it did.

We hired a local experienced builder who was from up Dyrick (right behind the hill of Mweeling) that my musician husband knew from the music. He played accordion, just like my husband. They would often sit and discuss Sliabh gCua polkas and tunes "got" from the player down in Affane, or played at the all Ireland in times gone by. We knew this man would keep all construction in keeping with the feel and character of the house. He had the old skills and a love for the old ways. He renovated our house beautifully with character, and we love the house, and living here.

The setting feels remote to anyone who comes here first, but not so remote once you live here. From our garden we have an awe inspiring view onto Broe Mountain on one side, Mweeling and Dyrick to our South with rolling fields, a sweeping view of the Comeraghs and the valley between the Comeraghs and the Knockmealdowns down to Dungarvan. We never take this for granted and appreciate our house, our views and the community every day.

This was our life project, along with our professional and family plans. We found the right spot to settle and from "blow ins", we became a part of the community.

People of Sliabh gCua and the Tooraneena surroundings are active, quiet, and no-nonsense hard working people. They are welcoming but discreet, the farmers are smart and pragmatic. There is a sense of history and heritage everywhere, who was who and did what in whose field or house in the area, what stories were known and told, what skills the local people had.

The developers' planning application keeps referring to the "robust" character of the landscape, which is shaped by man except for the uplands. It is robust, however I fail to see how this characteristic absolves developers from defacing it with gigantic turbines. The robust character of the area happened over centuries of farming. A single point event of implanting a windfarm on site (and then another on Scart mountain, and then another in the Comeragappul Mountains...) would suddenly undo the gradual shaping of this landscape to what it is now.

I work full time as a teacher in a secondary school in Dungarvan. I love the commute into town, and back home. The road to Clonmel back from Dungarvan is quietly majestic with the Comeraghs first on your right, and then the Knockmealdowns to your left. The weather in this valley seems to travel mostly West to East and North to South, and you never know what to expect where. The weather could be

completely different at home from Dungarvan. I leave with the sunrise over the Comeraghs in the mornings, and return to the sunset over the Knockmealdowns, particularly in the short days of Winter.

This scenic road is at risk of being spoiled with poorly sited turbines to the left, and later on with the Comnagappul project, to the right. I would find it very distracting to drive down that road with turbines whirring on either side rather than the unspoilt scenery and current sense that you are driving through this beautiful valley between two mountain chains, and then for those continuing on to Clonmel, a scenic pass via the Nire to the "inlands".

The developers called to our house in the early days of scoping to tell us about the plans for a windfarm. They did not know where the wind came from, or where the sun set and rose. They were standing in the yard, and had no notion of where they were standing. I asked questions about noise, vibrations, and shadow flicker from that first day, because I know our baseline. I know the contrast that it will be to our quiet environment. I knew that any turbine located anywhere South West of our house would present a looming shadow flicker liability because every year, our family expect the sun to set and the light to come a certain way. They had no definite answer to my questions, but we agreed they could place a sound monitoring device in our backyard, for them to obtain a fair assessment of our baseline noise. Much good it is to us now, since we do not have the expertise to understand or verify the findings of the EIAR report, or the financial means to hire an expert.

There is a great sense of powerlessness when you are in this situation. The developers had all the time to scope and write their reports, with the finances to hire experts. We have to respond to this planning application in a number of weeks. We have to read a huge amount of technical material with no expertise. Even then, we, the residents, do not have the money to hire hydrologists, archaeologists, or engineers to verify any of the data and projections offered by the developers.

As regards the environmental concerns of sound, vibration, and shadow flicker, we just know that from the usual farming sounds and quiet of the countryside, we are likely now be permanently affected with a relentless whooshing and whirring, probably more intense on windy days and nights. A pulsating, never ending sound layer, added to our lives. I know little about infrasound, but I know how annoying it is when a window in the back of the car is left open while driving. I know that infrasound is likely to affect my [redacted] children, who will obsess over things. It's not something they can control, it just happens to them because of their ability to perceive so much of the environment [redacted] (an be both a [redacted] and a set of special abilities). I am attaching a reflection on the potential that this windfarm has to affect my [redacted] children's lives. Our house is the only asset we have to pass on to our children as a couple, but it is unlikely either of them would ever wish to live here if this windfarm goes ahead. They would have a hard time selling the house too, and for a lesser value than we have made it, because of the arrival of this windfarm.

I retrained from a language teacher to teach in the [redacted] class in my school, in light of both my children getting [redacted] these past few years. I am just graduating with a Post-Graduate Diploma in Special Educational Needs, specification [redacted] this year. I love working in the [redacted]. It is intense and exhausting, but so enjoyable and rewarding. If you know an [redacted] child, you will perhaps understand how intense and valuable this job can be. In order to continue giving the best of myself to these young people, I need a "recharging" place. I cannot afford to go home and be irritated by the environment, have my sleep affected by the constant noise, vibration and overwhelming, looming presence of these turbines. I would never get a chance to reset myself so that I can do a good job again the next day if this goes ahead. My work is really important to me as you can probably guess.

Our "new" neighbours, the next house down the road, settled here just a few years ago. They are both teachers too. This is a good spot for teachers. This place is like a Tesla recharging hub for people who work intense, essential jobs in the towns of Clonmel or Dungarvan: nurses, teachers, paramedics, gardai, firemen... It's not just the farmers who live in the community.

My husband is an accordionist, he plays with the band Danú. He goes out to share the culture of Ireland anywhere in the world, and comes home to resource himself. He loves the heritage and the character of the area too. Here at home, he can play until all hours and bother no one. On the contrary, the locals often come up for a cuppa, a chat and a tune in the old cow sheds with him. Sometimes he records them telling old stories of the place, so this "non-tangible heritage" does not get lost. There is an ancient tune and song called Idir Deighric 'gus Broe. We don't know who wrote it, but my husband is very proud of living where the tune was about, and he makes a point of playing it every time he goes abroad, telling the audiences about this tune, written about the beautiful place where he lives.

He recorded the tune on location just "up the road" at Dyrick, for a brand of accordions to advertise all over the world on the internet. There is a video with beautiful drone shots of the very spot between Dyrick and Broe and my husband sitting on an accordion box, at a farm gate, where a substation, a borrow pit and several 185 metres high turbines may soon stand if this project goes ahead. That footage (which I cannot include as it is property of this accordion brand now) is part of the heritage now.

I noticed in the planning application that the substation is due to stay even after the project is decommissioned, so the exact viewpoints of the video will be changed forever if this goes ahead.

The developers failed to acknowledge the non-tangible heritage of the place in their EIAR. They did not connect to this place or its people. They just went through the motions of the EIAR and ticked boxes in Chapter 13 on heritage, with the help of a cabinet of archeologists who specialise in "big projects" such as windfarms, roads and the airport strip down in Waterford.

I respect these people's expertise, and there is a need for them. However, they should really have perceived that there was a need for a geophysical survey of the mountains. Obtaining LIDAR data of the uplands and foothills would be an easy way to identify exactly what needs to be preserved, without taking the unnecessary risk of destroying sites and then calling the archaeologist after the fact. The Comeraghs and Coumnagappul areas just 8 kilometres across the way are teeming with archaeological sites, while there is a conspicuous absence of records for Broe and the Knockmealdowns. These "uplands" are relatively low in terms of access and suitability for settlement, and Broe must have been an ideal place to settle in in pre-Celtic, Celtic and pre-Medieval times. Highly visible and status worthy to potential invaders, offering unobstructed views to the valley so you could see the enemy approaching.

I suspect signs of a hillfort on Broe Mountain and a some presence on Dyrick, and they are the perfect locations for such, but I have no expertise, only amateur interest in these things.

Even so, I am including a detailed look into Chapter 13. When I read it I was appalled at how little was made of the monuments which are recorded, and all the heritage that is likely to be here and as-of-yet unrecorded. The developers' archaeologists failed to acknowledge that this place is the heart of Sliabh gCua. They used semantics to brush off the tangible heritage that is on site, and the possibility for more.

The mitigation measures are a 25 metre buffering zone and an archaeologist "on call" for construction.

I spotted many possible archaeological features on aerial photography and satellite images, and I am reporting all to the National Monuments Survey service. My interest in this is not new, simply now there is an urgency in reporting these sites because they stand to be damaged or destroyed with excavations, heavy machinery, and hundreds cubic metres of concrete poured on the mountain.

Ogham stones are a feature of the South, and the area has a significant cluster of Ogham stones between Melleray and Knockboy (well above a dozen), with some still standing in the fields. One stone in Knockboy has the inscription B R O E. There may well have been a Dyrick one too, but according to the man who renovated our house, who grew up in Dyrick, that stone lays buried in a field here. The local farmers did not want archaeologists coming down from town to upset their fields, and he remembered, as a child, standing by when the stone was buried. Unfortunately, he could not remember the exact field or location, and I was unable to find information on this. I wonder would a man in a bulldozer notice the stone before it is irremediably broken or damaged, and how quick the archaeologist would turn up for this, especially in light of the EIAR report and how little they seemed to care. Ogham stones are such a rich source of information on what peoples settled in an area though, surely they should weigh as much as a Viking site out by the N25.

We all wish to preserve the environment. We support renewable forms of producing energy, however, it is not a solution to impact people's quality of life to that extent and to impact the living environment to this magnitude. The project is Gargantuan. It will impact the area negatively for landscape, tourism, the heritage aspect of the environment if it happens. It has the potential to affect people's health, and the impact then of affecting all these working people will be felt on society.

I have not even mentioned the flora and fauna, and how we cherish major murmurations and birds of prey, even the pesky bats which yearly try to roost in our house. The herd of deers grazing peacefully in the back field when the farmer is not around. The stoat and squirrels who visit occasionally, and the foxes and owls we hear every evening. The cuckoo call in April, occasional golden plovers who usually call when the fields are relatively dry. The hares we see nearly every time we walk "up the road" towards Broe. We had a hare living in our half acre for years.

I am aware this is probably an unusual, informally written cover letter, and it is long. Thank you for your time reading this. I would like you to get a sense of how we feel this development would be a major imposition on residents, a blow to the area, and another sizeable portion of national heritage given away because it is more financially viable for developers to exploit land based renewable energy, rather than siting wind turbines offshore. The financial incentives to the area are a source of division in the community, not the asset developers present, not when the financial input comes from external interests at a cost to local concerns.

Please find below a note on autism and wind turbines and our concerns, and a systematic review of Chapter 13 of the EIAR on heritage.

Thank you again for reading this, and please note our serious concerns and our opposition to this proposed Dyrick Hill Windfarm and EMPower endeavour. We ask that you uphold our local Council's designation of this area as a "No go" Red Zone for wind development, and refuse planning permission for this development.

The McCarthy family.

Bord Pleanála Case reference: PA93.317265

Re: Construction of Dyrick Hill Windfarm comprising 12 no. wind turbines and related works:

A note on autism and wind turbines

To the Board members,

My name is Anne Lebaupain McCarthy and I am a post-primary school teacher working in an autism class, in Dungarvan, co Waterford. I have a Higher Diploma in Education and have recently graduated with a Post-Graduate Diploma in Special Educational Needs specification Autism.

I retrained from a mainstream language teacher to work in an autism class [REDACTED]

We live in house 58 on the Appendix 10.3 Soundplan noise outputs map, and H58 on the Figure 1.3 112 Dwellings within a 2 km radius of the proposed turbines EMPOWER lodged with this planning application.

I have serious concerns about how the building of a windfarm within 2 km of our house will impact [REDACTED]

Autism spectrum disorders (ASD) are complex neurodevelopmental disorders, involving social and communication impairments and rigid and repetitive behaviours (American Psychiatric Association).

Autistic persons often present with sensory issues and many are oversensitive to loud noises and particular sounds. This atypical experience of sound is poorly researched; however, some studies have found that a subgroup of autistic individuals may have increased auditory discriminating abilities (Jones et al. 2009, Auditory discrimination and auditory sensory behaviours in autism spectrum disorders), while other studies emphasize that it is not the physical ability to hear sounds that is different in autistic individuals, but the processing of sound information (Howell et al. 2015, Autism and the effect of introducing a new noise source). Autistic individuals process information differently and noises may affect them more than neurotypical individuals even when there is no difference in hearing abilities.

[REDACTED] show signs of hyper-acusis: "an unusual intolerance of ordinary environmental sounds" (Stiegler and Davis, 2010 in Howell et al., 2015). [REDACTED] Loop ear defenders or AirPods on a daily basis when out and about in school, or in public places. Certain noises or loud environments can make them anxious and distressed, unable to function. Our [REDACTED] environment is thankfully very quiet and [REDACTED] rarely ever need to wear ear defenders at home.

I have read the reports on noise from EMPower, and all the technical information on noise tolerance and acceptable levels of noise seem irrelevant to our family situation. Both their father and I worry about how our children will react to the ever-present whoosh of the turbines, the effect on their sleep, their mental health and the possible impact on their future (they are 15 and 17 years old).

The maps on Appendix 10.3 Soundplan Noise Outputs mean nothing to us: we know what way the wind blows onto our house, and we know that when the rally school four and a half kilometres to the South is in operation on a windy day, we can hear it clearly. We expect the turbines to be in motion most days and nights of the year, facing our house, and we expect a constant layer of noise from them, of relative loudness depending on wind.

We worry about infrasound and the lack of research on the impact of infrasound on what EMPower themselves coin as "sensitive receptors", [REDACTED] house H58.

I am not sure how statistics can reliably inform EMPower of the presence or absence of (indeed) "sensitive receptors" in the area, and it is likely that there are other sound sensitive receptors within the range of this planned development that they do not know about, and who do not fit their criteria : undiagnosed neurodiverse populations, people suffering from migraines, depression or anxiety, or hyper-acusis and other impairments. As we improve our services to diagnose such ailments or conditions, so should guidelines to developments of major infrastructure.

In "Infrasound from wind turbines: An overlooked health hazard" (2013) H. and I.M. Enbom, both Ear/Nose/Throat specialists in otoneurology and specialists in dizziness disorders, and allergy and hypersensitivity reactions respectively, explain that "Children and adults with ADHD and autism are at risk and could have their symptoms worsened" with constant exposure to infrasound.

In the quote below, the authors mention flickering lights, which may also be an issue for our children with the risk of shadow flicker acknowledged in EMPower planning documents. From our house, wind turbines T03, T04, T05, T06, T08, T13, and the tips of T10, T11, T12 are all located within our sunset spectrum depending on the time of year. The sun sets behind Broe Mountain for us all year long, closer to Mweeling and Dyrick in January and towards the townland of Monatouk at the height of summer. On winter days when the sun is low, it spans our Southern horizon and if this windfarm is allowed to go ahead, turbines T04, T05, and T06 are highly likely to cast flickering shadows towards us.

"The issue is not noise damage in the traditional sense, but the effect of a constant pulsating sound pressure that constantly changes the pressure in the inner ear and excites sensory organs there. One can liken it to pulsating or flickering lights—many people are not bothered noticeably, while people with sensory hypersensitivity may experience discomfort. Flickering light can even trigger epilepsy. Likewise, constantly pulsating, non-audible infrasound from wind turbines triggers major problems in people with central sensory hypersensitivity. These problems can become chronic, debilitating and lead to anxiety and depression and increase the risk of heart attack." (Enbom, 2013)

Autistic individuals can fixate or hyperfocus on things, and although there is no way of knowing right now, if [REDACTED] hyperfocus on the sound and movement of the turbines, their lives will be seriously affected by this development.

Both [REDACTED]
[REDACTED] Autistic young adults tend to remain dependent on their parents or carers longer than their peers, [REDACTED]

It is a real concern that the relentless sound and movement of the turbines within a mere 2 kilometres of the house will interfere with their ability to study for college or school, and function at home, let alone sleep.

Anxiety and depression are well known comorbidities of [REDACTED] Both [REDACTED] suffer from anxiety, and it is not an exaggeration to state that the major industrial development proposed by EMPower in the area for the next 40 years or so has the potential to make our [REDACTED] home unlivable [REDACTED] now and in the future.

We agree with the authors quoted above that the "current regulatory framework for wind turbines has not taken into account the potential risk to people with central sensory hypersensitivity" (Enbom, 2013).

We ask that An Bord Pleanála please consider the sensitive "sensitive receptors" in the area of the proposed Dyrick Hill windfarm, and how mitigations are unlikely to address the issues these turbines may cause for our children.

Anne Lebaupain McCarthy

Notes on Chapter 13: Cultural Heritage

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C. Appendix 1: email to the National Monuments Survey website and first report.

Please note there will be a subsequent report for other archaeological features shortly after this submission is lodged.

- A. The developer failed to establish a “comprehensive cultural heritage baseline” for the area: significant archaeological, historical, and cultural aspects of the area were missed or overlooked. The EIAR is incomplete and of insufficient quality.

The term ‘Cultural Heritage’ encompasses heritage assets relevant to both the tangible resource (including archaeology and architecture heritage); and non-tangible resources (including history, folklore, tradition and placenames). The recorded and potential cultural heritage resource within lands encompassing the proposed wind farm site (the Site), grid connection route and work areas required to facilitate the delivery of turbines to the Site as well as surrounding lands was reviewed in order to compile a comprehensive cultural heritage baseline for the assessment.

Chapter 13, EIAR.

‘Data and information included by the developer in the environmental impact assessment report, in accordance with Annex IV to Directive 2011/92/EU, should be complete and of sufficiently high quality’. EIAR Guidelines, 2022, Environmental Protection Agency.

The present notes are compiled by a concerned citizen interested in archaeology and history, with no further relevant qualifications than living in the area.

The developers’ EIAR’s assessment and report have unfortunately missed a lot of information that was otherwise available to them with access to ordinary resources online or in the local library, or in the oral tradition, from consulting with locals.

The archaeologists involved did not consult with locals, overlooked precious local resources (such as the Waterford County Museum website, the Decies Journals or the Rev. P. Canon Power “The Place-names of Decies”, both available on the Waterford City and County Council website), and failed to grasp the strong sense of community and the attachment to the local heritage of this community that is clearly evident online, particularly after the Covid lockdown.

On the matter of resources consulted, the archaeologists used the basic required resources mentioned in the *Guidelines for Information to be Contained in EIAR (2022)*:

- Sites and Monuments Record
- Record of Monuments and Places
- Record of Protected Structures
- National Inventory of Architectural Heritage
- *Archaeological Inventory of County Waterford*
- National Monuments Service’s Historical Environment Viewer
- *Heritage Council of Ireland Map Viewer* (www.heritagemaps.ie)
- *Topographical Files of the National Museum of Ireland*
- *Database of Irish Excavation Reports*: www.excavations.ie
- *Literary Sources*: “Various published sources were consulted in order to assess the archaeological, historical, architectural heritage and folklore record of the study area.”

- *Cartographic Sources*
- *Aerial and Satellite imagery:* Ordnance Survey of Ireland (OSI), Google Earth and Bing Maps.
- *Irish National Folklore Collection:* www.duchas.ie
- *UNESCO designated World Heritage Sites and Tentative List*

Of these resources, only the unspecified "literary sources" and the Duchas website had the potential to inform the developers of **non-tangible cultural heritage resources** of this area. As will be shown below, these resources were not used adequately for the EIAR report.

1. The developers missed the significance of the location of proposed Dyrick Hill Windfarm in terms of potential pre-historic finds and heritage.

N.B. there are two Dyrick hills. One lies to the West of the proposed windfarm, North of Melleray and towers over R669. The Dyrick Hill windfarm encompasses the other hill of Dyrick, also known as Dyrick Crow Hill. The two hills are 8.10km distant.

The Dyrick and Broe area may be significant on a geological and paleontological level.

EIAR 13.3.2 The Wind Farm Site: Archaeological and Historical Background

There are no known archaeological sites dating to the Mesolithic or Neolithic periods located within the Site or external lands extending for 1km in all directions.

When considering geological and paleontological matters, the 1 km perimeter of reference seems inadequate. This is similar to assessing the health of an average size garden on a 50x50 cm square patch of bedding plants.

Tertiary:

The Knockmealdowns and specifically Dyrick hill have been mentioned in a paper by G.F. Mitchell, 1980, published in the Journal of Earth Sciences, entitled *The Search for Tertiary Ireland* in relation to sea level and erosion. It is surmised that sea level once reached the base of the Knockmealdowns, and etched some distinct features to the base of Dyrick (it is not established which Dyrick is referred to).

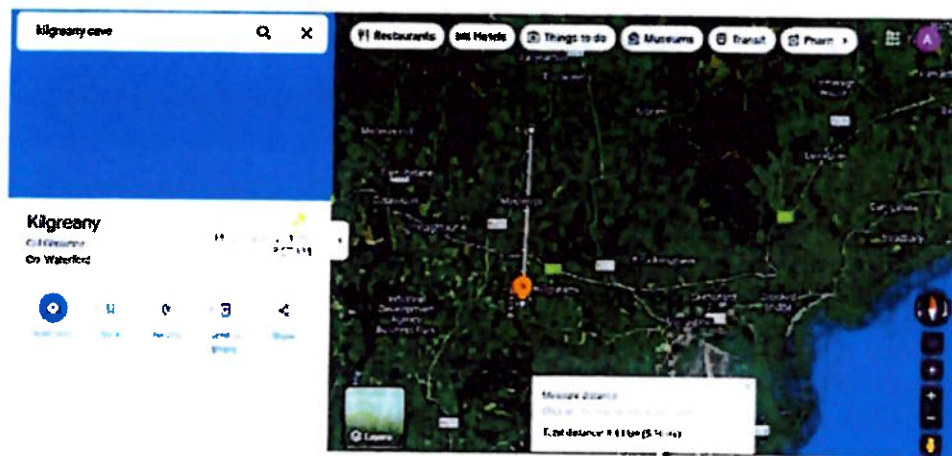
Quaternary:

The Knockmealdowns mark the edge of glacial sheets in the quaternary or ice age, according to Frank Mitchell & Michael Ryan's *"Reading the Irish Landscape"*, 1997 edition. While Europe and Ireland were in the grip of glaciation, the very Southern edge of these ice sheets was located exactly where this windfarm is planning heavy excavations & industrial scale development.

The valley from Cappoquin to Dungarvan has already produced some important archaeological finds of ice-age fauna and has great potential for ancient human finds and fossiliferous finds or information in relation to both fauna and flora.

The Kilgreany cave, a mere 8.63 km from the entrance to the windfarm site, has not yet been fully explored. In it were found bones from reindeer, bear, arctic lemming and Irish Elk, as well as a female skeleton dated to the Neolithic. It has great potential for finds of the Mesolithic, and could yet harbour the very first human specimen of that era to be found in Ireland. In Dungarvan, the Shandon Cave harboured Mammoth, bear, and reindeer bones.

Besides the potential for glacial and alluvial deposits in the vicinity of Broe mountain and Dyrick, there is the potential for fossils or traces and remains of species which survived in this unfrozen Southern wedge of Ireland during the ice-age.



The Waterford County Museum website provides excellent information on the Kilgreany and Shandon Caves. [Introduction - Waterford Geology and Prehistoric Dungarvan - Waterford County Museum \(waterfordmuseum.ie\)](http://www.waterfordmuseum.ie)

Ireland during the ice age: [ice_age.gif \(466x599\) \(wesleyjohnston.com\)](http://www.wesleyjohnston.com)

2. The EIAR report fails to mention Ogham stones.

EIAR Chapter 13, 13.3.3 Record of Monuments and Places

There are four recorded archaeological monuments located within the Redline Boundary and these comprise a ringfort (WA013-022---), a levelled hut site (WA013-020001-) and two standing stones (WA013-020001- and WA013-021----), the former of which was re-erected in recent years. There are also an additional fifteen recorded archaeological sites located within the lands extending for 1km outside the Redline Boundary (Figure 13.1 and Table 13.5). Of the overall nineteen archaeological sites within the study area, the Archaeological Survey of Ireland have recorded that thirteen either retain no surface expression or are levelled with only slight surface traces surviving. None of the sites within the study area are designated as National Monuments in State Ownership or Guardianship or have been assigned Preservation Orders but they are afforded legal protection by their inclusion in the Record of Monuments and Places. All of these archaeological sites are located within private farmlands which are inaccessible to the public.

The EIAR report acknowledges surrounding monuments as standing stones only. It considers potential alignments, and dismisses visual alignments on the basis that forestry, other vegetation or terrain interfere with the visual aspects. Of the monuments quoted in the report, two are Ogham stones (TS091-004 and TS091-005).

The developers fail to consider that Co Waterford has a high concentration of Ogham stones compared to other counties. This area of the county, within the 10 km perimeter, presents a significant cluster of Ogham stones.

The developers also missed out on local knowledge and lore: an Ogham stone is said to be buried in Dyrick lands. I have informed the National Archaeological Survey of this lore and I am attaching my email to same in Appendix 1.

According to the Sites and Monuments record, there are 56 Ogham stones in co Waterford, of which 11 are on location in Waterford.

The ecclesiastical sites of Melleray and Knockboy shelter 5 Ogham stones and a further 9 Ogham stones respectively, in addition to the pair of Ogham stones located across the windfarm site, in Priestown. Of the 56 co Waterford Ogham stones, 16 are located within a c.7 km perimeter of the proposed development site.

The website Seskinan parish church « Pilgrimage In Medieval Ireland (pilgrimagemedievalireland.com) has a detailed description of stones gathered at the Knockboy site. It is likely that the stones were collected from various places around the parish, brought to Knockboy, and subsequently incorporated into the building. In fact, one of the Ogham stones in Knockboy reads B R O E.

These Ogham stones are the subject of several papers by Richard R. Brash and more recently, Dr Harbison.

It is worthy of note that several of these stones are inscribed with the family prefix M U C which is said to be that of an important family, possibly of Milesian origins, i.e. pre-celtic. This pre-celtic presence is the topic of the next paragraph.

Paper: On the Seskinan Ogham Inscriptions, County of Waterford, Richard R.Brash, The Journal of the Historical and Archaeological Association of Ireland, 1968.

8. Placenames: the report fails to record the significance of placenames.

EIAR Chapter 13

The available translations of names of the townlands within the Site were reviewed on the Placenames Database¹⁴ and one example (Corradoon) may be associated with a ringfort monument. It is noted that the majority of this townland is located outside the Site and it shares a placename element with the adjoining townland of Doon which does contain a known ringfort.

...The online database of the Irish National Folklore Schools Collection¹⁵ was reviewed to ascertain if it contains any records for the townlands in the study area. The only entry in the database relates to Lisleagh townland which notes that the placename derives from the recorded ringforts in this area (WA013-022--- and WA022-003001-).

There are no cultural heritage institutions, such as local museums or other heritage centres, associated with the intangible cultural heritage of the area located within the Site or surrounding study area. In addition, the Site is not located within, or in the close environs of the County Waterford Gaeltacht area.

N.B. ¹⁴ www.logainn.ie ¹⁵ www.duchas.ie

In addition to the extract above, the report lists placenames in **Table 13.7 Translations of Townland Names with Site**

Table 13.7 Translations of Townland Names with Site

Townland	Irish Origin	Translation and notes	Archaeological Indicator?
Dynick	De ghnc	'Meaning unclear'	No
Broemountain	Cnoc Breó	No translation	No
Lisleagh	An Lios Liath	The Grey Ringfort	There are two known ringforts within this townland, including one example within the Site (WA013-022---)
Townland	Irish Origin	Translation and notes	Archaeological Indicator?
Lisleaghmountain	Sliabh an Leasa Léith	Mountain of the Grey Ringfort	Relates to known ringforts in this townland
Corradoon	Corrdhún	Round Fort	There are no recorded ringforts within this townland, though there is an example in the adjacent townland of Doon, which has a shared placename root as Corradoon and may have formerly formed part of the same land division.
Ballynaguilkee Upper	Baile na Giolcaí Uachtarach	Broom town	No
Lickoranmountain	Sliabh Leic Dhobhráin	Mountain of the flat stone	No
Scartmountain	Sliabh na Scairte	Mountain of the thickets	No

The information I am providing below was sourced from Reverend Power Placenames of the Decies (available online as a pdf from the Waterford Co Co. website) .

Evidently, the authors failed to consult this resource.

- The place names Dyrick and Broe are said to be mysterious and may well be pre-celtic names, which is significant. This would indicate the presence of pre-celtic individuals in the area, possibly Milesian according to Rev. P. Canon Power. In combination with an abundance of Ogham stones, this places the areas of Dyrick and Broe as a possible hub for pre-celtic habitation.
- Broe, if originated from Irish, may signify "flame", suggesting that there may at one time have been a beacon on its summit. (Rev Power)
- Another interesting take on the name Broe in this podcast could indicate a parallel to a location near Newgrange.

https://soundcloud.com/mythicalireland/newgrange-and-the-place-name?utm_source=clipboard&utm_medium=text&utm_campaign=social_sharing

- The EIAR authors indicate that they consulted the place names database Duchas and this informed their table 13.7. The authors evidently failed to thoroughly investigate the placenames of the townlands listed for the windfarm since I was able to collect the stories below and more by searching for townlands with English or Irish spellings.

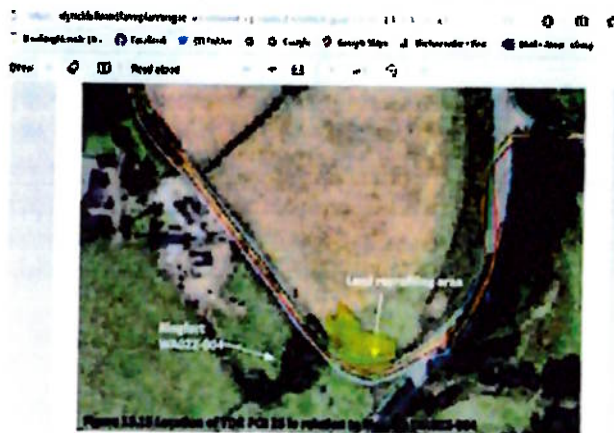
There may be more links to be found, but here are some of the beautiful stories associated with our townlands I have found.

- **Stories about Broe/Breo mountain**
- **A Crock of Gold · Currach Chluana (Croughclooney) · The Schools' Collection | duchas.ie (duchas.ie)**
- **Raths, Llosses etc. · Currach Chluana (Croughclooney) · The Schools' Collection | duchas.ie (duchas.ie)**
- **Giants, Wiches, etc. · Currach Chluana (Croughclooney) · The Schools' Collection | duchas.ie (duchas.ie)**
- **Multiple pages on Idir Deighric 'gus Breo: a song that bears the two names Dyrick and Broe, and was written about the area. This song and tune are well known the world over by musicians. A YouTube search returned more than 20 results for the title of this tune from musicians in Scotland, America, Australia, etc.**
[Items · The Main Manuscript Collection | \[duchas.ie\]\(http://duchas.ie\) \(\[duchas.ie\]\(http://duchas.ie\)\)](#)
- **A page on Ballynaguilkee Baile na Giolcaí**
[Stories · The Schools' Collection | \[duchas.ie\]\(http://duchas.ie\) \(\[duchas.ie\]\(http://duchas.ie\)\)](#)

This search relates to a story on the school in Ballynaguilkee. **Donnchadh Rua Mac Connmara**, a poet of renown, taught in this school. Many poets and bards frequented the area.

The footprint of this school is located at crossroad on Fig 13.13. The school is recorded on 6 inch maps of the area and I have highlighted the location in yellow. The road works for haulage are due to excavate the very site of the school.

This school may also have been at various points in time a hedge school, and the bardic school mentioned in several ecclesiastical works about the area.



Quotes from Rev. Power "Place-names of Decies":

LICKORAN PARISH

THIS is a small and unimportant division. Two of its townland (mountain) names, Deighric and Breo, defy analysis, and are evidently, like many mountain and most river names, of great antiquity. The names quoted designate two remarkable dome-shaped hills, which because of their resemblance and contiguity are grouped together in local reference. For a description of the ruined parish church of Lickoran see Journal of Waterford Archaeological Society, Vol. III., p.77.

...

... it may be noted that it is still an open question whether all the river, and some other geographical, names of Decies be Celtic at all. Be the solution of the question what it may the majority of river names of the region have so far defied analysis. It is just possible - and perhaps something more - that these names, together with some mountain names (Broe, Dyrick &c.) and the names of some more important territorial divisions (Decies, Iffa, Femhin &c.) are pre-Celtic and pre-Aryan. In this connection a list-perhaps not quite complete-of our river-names may be of interest:- Suir, Tar, Dwag, Thonog, Nire, Countaish, Buading, Ligan, Clodagh, Ire, Mahon, Tay, Nemh, Araglinn. Bualack, Funcheon, Colligan, Brickly, Licky, Bride, Anner, Mile, Dalligan, Nittle, &c. For sake of completeness it will be necessary here to briefly recapitulate the stereotyped account of the Milesian conquest of Decies by the three sons of Fiacha Súi.

Screenshot of the tune Idir Deighric 'gus Breo being discussed on an online forum 16 years ago.

Title

Idir Deighric 'gus Breo
aka Idir Deighric agus Breo
aka Idir Deighric is Breo

translates as "Between Dyrick and Breo" which are two hills (and two townlands named after the hills) in Leir Dhoibhrain (Lickoran) parish in Co. Waterford

You can hear the song from which the air comes on Padraig O Coarbhaill's Anabair na Seod (on Cfa Iar-Chormachta)

Amazing how titles can get mangled. I once saw this listed as "Cao Breo's"

1. Posted by breo123 16 years ago

There are no cultural heritage institutions, such as local museums or other heritage centres, associated with the intangible cultural heritage of the area located within the Site or surrounding study area. In addition, the Site is not located within, or in the close environs of the County Waterford Gaeltacht area.

The Waterford County Museum website (and its brick & mortar premises in Dungarvan Museum) is a plentiful resource on the area, as well as the Waterford & Wexford co Councils' website. The Dungarvan Museum also holds some interesting artefacts. Although the site is not located near a Gaeltacht area, the locals will tell you proudly that it was indeed its own Gaeltacht with Irish being spoken in the area well into the recent past. Had the developers paid attention to the monuments in Millstreet and Tooraneena on the way to the site, they would have noticed both are written in Irish.

4. Cultural heritage: the report fails to mention Sliabh gCua.

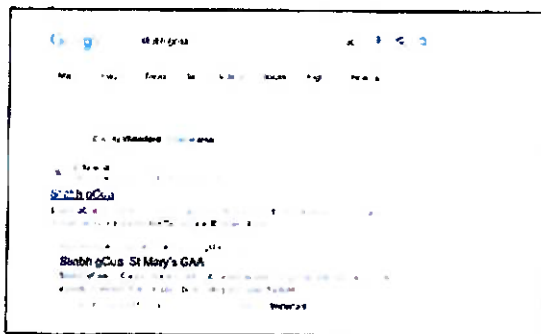
The cultural area of Sliabh gCua is of major importance, it is a non-tangible cultural asset, and the proposed windfarm site is in this area.

There is no mention of Sliabh gCua in the 53 pages of Chapter 13: Cultural Heritage. It demonstrates well the utter failure on the part of the developers to connect with the community and to comprehend the historical and cultural character of the area they are planning to affect with an industrial development of this magnitude.

Sliabh gCua's original importance seems to have emerged mostly from pre-medieval and ecclesiastical times, and its identity is so strong that to this day, the community in the area of Sliabh gCua publishes a Sliabh gCua annual, attends music and dance competitions under the banner of Sliabh gCua, and during Covid, formed a Facebook group to deliver the Sliabh gCua sessions online.

Sliabh gCua has been discussed in many books and publications.

A Google search for Sliabh gCua returned 36 400 results.



Sliabh gCua Facebook page.



There is a Wikipedia page for Sliabh gCua



The Sliabh gCua annual is sold in Beary's cross shop



The Decies Journal of the Old Waterford Society, in its No. 46 publication, has an item titled "Where was Sliabh gCua?".

The answer to this according to this article is that the area was originally considered to be encompassing the foothills of the Knockmealdowns, specifically in the area where the proposed windfarm would be located: from Affane and Modelligo, to the Lickoran, Ballynamult and Tooraneena areas, stretching towards Clonmel. The article ponders that in later times, the appellation Sliabh gCua seemed to have been extended to include parts of the Comeraghs and even coastal areas such as Stradbally, only to be again narrowed to this specific area in the understanding of the locals.

Waterford City & County Council : DECIES - No.46 (waterfordcouncil.ie)

5. The developers' desktop study failed to identify a possible ringfort at the summit of Dyrick Hill:

The archaeologists working for the developers conducted surveying and a desktop study. They claim to have checked historical maps of the area, and found no other historical sites than were recorded on the National Monuments Survey or Archaeological Survey. They also state that they reviewed aerial and satellite images and found no unrecorded potential archaeological sites.

EIAR Chapter 13, 13.3.10 Ordnance Survey Maps

A review of historic Ordnance Survey (OS) maps surveyed in the 19th and 20th centuries was carried out as part of the desktop study ... There are no potential unrecorded archaeological sites, large country houses, landscaped gardens or demesne lands indicated within the Site

And

13.3.5 Aerial and Satellite Images

A review of Ordnance Survey of Ireland, Google Earth and Bing Maps online aerial/satellite images of the Site revealed that the much of the internal lands have remained relatively unchanged from 1995 to present... No potential unrecorded archaeological sites were noted within the Site during the review of the aerial and satellite imagery.

- I conducted a similar desktop search and soon came across the **William Larkin Grand Jury Maps** on the website **Loganm.ie** (also mentioned by the developers in the report in relation to placenames).
- The William Larkin Grand Jury maps precede all maps consulted by the developers.
- The Waterford Grand Jury Map Sheet 2 on the above website seems to show a **ringfort on top of Dyrick Hill**. The legend on these Grand Jury Maps seems to call all circular forts "Danish forts".

- I checked aerial and satellite imagery of Dyrick on the Historical Environment Viewer. The 1995 imagery mentioned by the developers in the above quote seemed to indicate a circular enclosure or a possible ringfort at its summit.
- I reported this possible ringfort to the nationalmonuments@housing.gov.ie email address provided on the website with a report form and the relevant supporting information. I informed the National Monuments website that there were plans for a proposed windfarm at this site and that I was concerned that their archaeological surveying had not mentioned this possible ringfort, which is in close proximity to both turbines and a substation, due to be built at the foot of Dyrick.
- I also mentioned the local knowledge or lore about an Ogham stone buried in land at Dyrick.
- A hillfort at the summit of Dyrick would present a significant visual landmark in the landscape of the Knockmealdowns as observed from a North East to South West span.

William Larkin Grand Jury Map which caught my eye.



Satellite imagery 1995, GeoHive environmental viewer showing a circular feature on Dyrick.



I have since spotted further possible archaeological sites and reported them to the NMS.

There is no reasonable explanation why the EIAR archaeologists would not consider to use further resources or apply more scrutiny to their survey of the area when the nearby Monavulagh and Comeragh uplands are teeming with archaeological sites, for such an extensive development.

6. the EIAR report fails to acknowledge the non-tangible cultural significance of monuments WA013-023002- High Cross and WA013-023003- Ecclesiastical enclosure.

A High Cross base was found at the monuments' site listed above.

The developers' report mentions it as follows:

EIAR 13.3.2 p. 15

The recorded site of an early ecclesiastical church (WA013-023001-), with an associated graveyard (WA013-023003-) is located 990m outside the east end of the Site. The only remains of this ecclesiastical site are very slight surface traces of an oval enclosure within a green field location. A fragment of a high cross (WA013-023002-) was recorded within the enclosure during the 19th century but this is no longer present.

- The site at Ballynaguilkee where the high cross base was found (and subsequently lost) is stamped as ecclesiastical. There is an oval outline which is identified as a prior church.
- This site is significant because it may be evidence of the passage of Máelsechnaill in Ballynaguilkee. There was, according to historians, a "Knockmealdowns highway" via the Vee, the St Declan's Way.
- However, Peter Harbison writes that Máel Sechnaill cut through the mountains East of the St Declan's way, from the Suir river at Knocklofty via the Ballynaguilkee area, which could explain the high cross base being found in at this site.

Peter Harbison: A High Cross Base from the Rock of Cashel and a Historical Reconsideration of the 'Ahenny Group' of Crosses

(Proceedings of the Royal Irish Academy: Archaeology, Culture, History, Literature, 1993, Vol. 93C, No. 1 (1993), pp. 1-20)
Also: *A Descriptive List of the Early Irish Crosses* Author(s): Henry S. Crawford, 1907, and *List of Early Irish Crosses* Author(s): Henry S. Crawford, 2018, and many more lists of High Crosses.

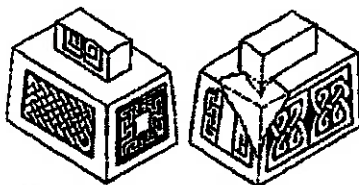


Fig. 1. Reconstructed representation of the site of the cross and base from Ballynaguilkee. (Drawing by G. Du Noyer)

Left: The High Cross Base found in Ballynaguilkee, illustration from G. Du Noyer

¹ Harbison, op. cit., p. 22.
² Peter H. Harbison, 'A Descriptive List of the Early Irish Crosses', *J. R. Soc. Arch.* 12 (1993).
³ P. Harbison, 'The High Crosses of Ireland', 1992, vol. 2, p. 10-11.

- Máel Sechnaill mac Domnaill was a high king. When he passed by, he redefined Osraige borders and in 983, he conquered Ímar of Waterford.
- The High Cross and its link to Máel Sechnaill indicate that the site of the windfarm was a passage way of sorts in Medieval times, thereby suggesting that medieval artefacts and other habitation or ecclesiastical items may remain to be found.

7. The report fails to mention the peculiarity of the Dyrick standing stone
WA013-021:

This standing stone is described by the author of the now defunct website megalithomania.com in 2007 in the following terms:

I don't think I've seen a more unusual stone. It looks like a 2 m high model of an old New York skyscraper. It is difficult to describe, but it is made up different height rectangular blocks. The trees around it block all the view, but at one time nearby Dyrick Hill would have featured very prominently.

The author of Monu-Mental about Prehistoric Waterford, 2007, Tom Fourwinds, provides the image below and describes it thus:

This is the most interesting standing stone in a group concentrated around Dyrick Hill, a prominent, but small, round hill at the Eastern edge of the Knockmealdown Mountains. It has the most unusual form, looking like an Art-Nouveau skyscraper. Sadly, the pine plantation that surrounds it on three sides obscures its views of Dyrick Hill. At 2 metres tall it would be quite imposing if it was left to stand in an open field.



14. A standing stone

Table 13.10 of the EIAR report, p.46, describes the magnitude of impact of this development on the stone as "Negligible", and the significance of the impact as "Slight".

It will be protected by a 25m radius concentric buffer zone.

The stone will be located 60 m North of T09 access road (c. 50 m according to Table 13.09), 410 m East of turbine T09, 860 m from turbine T03, 490 m to the South East of turbine T10, 170 m South East of the Borrow Pit, 180 m West of the Substation.

This "Negligible", "Slight" impact is said to be "reversible" (Table 13.10), however, as per the Dyrick Hill Windfarm Planning Statement:

A permanent planning permission is being sought for the Grid Connection and the 110kV substation as these will become an asset of the national grid under the management of EirGrid and will remain in place upon decommissioning of the wind farm.

This implies that, were this remarkable stone to survive being surrounded by gigantic vibrating turbines, the rumble of heavy and oversized loads 50 metres away, and the heavy machinery vibrations and ground destabilisation of the Borrow Pit, and were it to be once more restored to its visual grandeur once the forestry is harvested, it would still be obscured from sight on the Eastern side, incidentally the side that is more than likely behind its very function as a Dyrick Hill landmark.

B. Other issues with Chapter 13 and the developers' approach to heritage:

1. The developers failed to conduct a geophysical survey:

As per the Heritage Council Archaeology and Development: Guidelines for Good Practice, Section 2.2.10:

It is Dúchas policy that archaeological assessment in the form of visual inspection, geophysical survey and test excavation be carried out in developments affecting extensive tracts of land even where no recorded or known monuments are involved. Each case is judged on its merits depending on the proximity of known sites and the potential for new discoveries. As a rule of thumb this requirement for assessment would apply to all linear developments over one kilometre in length (see section 3.6.2 of DAHGI Principles and Framework) and all other developments involving ground clearance of one hectare or more.

https://www.heritagecouncil.ie/content/files/archaeology_development_guidelines_good_practices_for_developers_2000_1mb.pdf

The developers did not follow good practices and did not conduct a geophysical survey of the area. The data in the EIAR cannot be complete.

LIDAR data is required to determine what possible subsurface archaeological sites may populate the area, particularly since the area is extensive and uplands tend to be rich in heritage, for example the Monavulagh Mountains and Comeraghs, within 10 km East of the site, abound with monuments. LIDAR is a safe, non-intrusive process for surveying large areas.

The Geological Survey Ireland (GSI) Open Data query service was contacted, who confirmed that an airborne survey was conducted over co Waterford in 2016 collecting geophysics data (magnetic, radiometric and electromagnetic). The developers may have been and may still be able to obtain data from this survey, or from Tailte Éireann (Ordnance Survey section) who, according to the GIS, may have surveyed the area but do not make their data freely available. (LIDAR data for the Cappoquin area is uploaded to the free data viewer online, unfortunately it does not extend to the proposed site).

Unfortunately these resources are not within reach of the budgets of ordinary citizens who happen to reside in these upland and foothills areas, but a conscientious developer who stands to profit from exploiting the site could afford it.

Agriculture and forestry on this site may have indeed "levelled" many monuments but subsurface archaeological sites retain all their value as per the Heritage Council guidelines.

2. The mitigation measure of a 25 metres buffer zone is inadequate and insufficient.

Proximity to T13:

The cairn near T13 may be a burial site. In the event that the cairn covers a tomb, the structure itself may span over 20 to 25 metres sub-surface showing how inadequate a 25 metre buffer zone may be. Court tombs, wedge tombs, and passage tombs can have a large, sub-surface inprint.

Proximity to T06: hut site and standing stone (WA013-020001- WA013-020002-). Access road to the wind turbine is within less than 50 metres judging from figure 13.3. The sheer disruption to the site from vehicles building the access road and turbine stand is highly likely to result in damage to the above archaeological items. Hut sites were lived in places, and a narrower buffer zone assumes that the inhabitants kept all daily activities and ancillaries such as drainage systems confined to a 25 metres distance of their house, which is problematic.

Hut Sites | Prehistoric Feature | Irish Archaeology

Proximity to T10 and Borrow Pit: the peculiar Dyrick standing stone WA013-021---- is situated c. 50 m from the T10 turbine access road, and 180 m West of the Borrow Pit. Assuming both activities of building a road and extracting the materials for construction require heavy machinery manoeuvring back and forth, and drilling or digging activities, this is likely to affect the stone with dust, vibrations, or place it at risk of being knocked or displaced.

3. The wording of EIAR Chapter 13 attempts to minimize the importance of archaeological heritage on site and surroundings and the impact of the development.

The dismissive tone of this EIAR chapter has already been noted, nevertheless, it deserves its own section since it precisely goes against the ethics of a fair and accurate EIAR.

The Framework and Principles for the Protection of the Archaeological Heritage of the Department of Arts, Heritage, Gaeltacht and the Islands, 1999, defines a monument as per the National Monument Act of 1930 as follows (emphasis added):

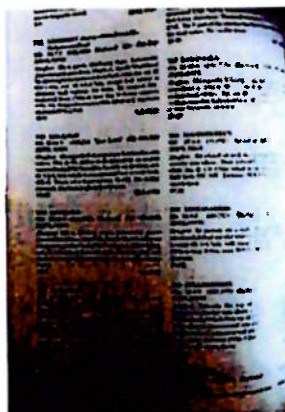
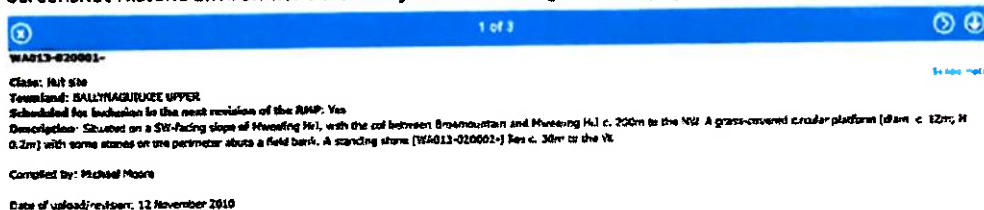
4.3 Protection of archaeological monuments and areas 4.3.1 Definitions
(a) Summary of provisions
Section 2 of the 1930 Act (as amended) provides that 'monument' includes the following (whether above or below the surface of the ground or the water and whether affixed or not affixed to the ground):
'(a) any artificial or partly artificial building, structure or erection or group of such buildings, structures or erections,
(b) any cave, stone or other natural product, whether or not forming part of the ground, that has been artificially carved, sculptured or worked upon or which (where it does not form part of the place where it is) appears to have been purposely put or arranged in position,
(c) any, or any part of any, prehistoric or ancient-
(i) tomb, grave or burial deposit, or
(ii) ritual, industrial or habitation site, and
(d) any place comprising the remains or traces of any such building, structure or erection, any such cave, stone or natural product or any such tomb, grave, burial deposit or ritual, industrial or habitation site, situated on land or in the territorial waters of the State', but excludes 'any building or part of any building, that is habitually used for ecclesiastical purposes'.

The specification that monuments, “whether above or below the surface of the ground or the water and whether affixed or not affixed to the ground”, makes it clear that monuments, whether “levelled” or sub-surface, are of equal value and require the same care in preserving our heritage.

- In Chapter 13 of the EIAR, the developer uses the word “levelled” in relation to archaeological items in 26 instances.

A copy of the Archaeological Inventory of County Waterford from 1999, and a screenshot of the National Monuments Survey record note demonstrate how the word “levelled” is not used in relation to these types of monuments. A note is sometimes added to let the reader know that the monument is not visible at ground level. Most of these monuments, albeit low to the ground, also retain some surface elements, such as stones in the case of the hut site or earth works.

Screenshot Historic Environment Viewer of the Archaeological Survey of Ireland website.



1999 copy of the Archaeological Inventory of County Waterford, Lisleagh ringforts.

In the same chapter, much is made of the fact that (again), the hut is “levelled” and “No surface trace of the platform feature described in the inventory entry for this site (Table 13.5) were observed and it was noted that root action from the nearby trees has likely resulted in disturbance of any sub-surface remains of this site” (p.31, 32). The intention is to devalue this archaeological site and lessen the perceived impact of building a turbine base within metres of it.

Right: Screenshot of figure 13.3, showing proximity of the turbine, its base, associated building works, and the access road.



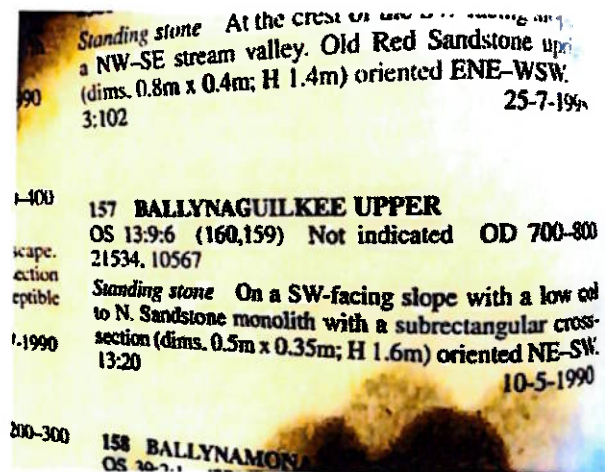
- Use of incorrect information on Standing stone (WA013-020002-):

The 13.3.14 Field Work section p. 31 states:

The standing stone (WA013-020002-), which was recorded as collapsed in the Archaeological Survey of Ireland inventory description dating to 2010, was re-erected in an upright position at some point during the past decade. The base of the reset stone has been bolstered with field stones, presumably intended to act as supports to prevent another collapse. Its current position is within the same general area indicated on the National Monument Service's Historic Environment Viewer. However, as previously noted there is no record that any advance archaeological excavations, which are typically carried out to ensure that such re-erection works are carried out accurately, were undertaken to ensure that the monument was reset in the correct location and without impacting on any associated sub-surface archaeological remains.

Again, this report is intended to minimize the impact of construction of a turbine and access road within 50 metres or less of this monument.

The Archaeological Inventory of County Waterford from 1999 dates a report on this stone from 1990. The stone was standing then, and its location recorded on the Ordnance Survey sheet, allowing anyone who wishes to do so to record whether the stone has subsequently been moved.



The stone is depicted standing in the book *Monu-Mental* about Prehistoric Waterford, Tom Fourwinds, published in 2007. The photograph (shown below) clearly shows “packing stones” at the base of this stone, as it stood. The “field stones” used to bolster the stone according to the EIAR report were already in place prior to its collapse.

Tom Fourwinds records the stone as follows:

“The view to the south of this 1.2 metre tall stone looks towards Dyrick Hill, which has several standing stones around it (see *Dyrick* above). This craggy, scruffy stone culminates in a rough, jagged point. At the base of the stone there are several exposed packing stones.

Between the stone and Dyrick Hill, the land drops from the boggy plateau that it stands on to a small valley, which rises up to the base of the hill. To the north and west, rocky slopes obscure the views, but the vista remains open to the east towards the Monavullagh Mountains.”



The field survey and desktop study do acknowledge that this stone is evidently prone to falling, and yet the developer’s intention is to conduct heavy construction work in close proximity.

As per the Framework and Principles for the Protection of the Archaeological Heritage of the Department of Arts, Heritage, Gaeltacht and the Islands, 1999, "There should always be a presumption in favour of avoidance of developmental impacts on the archaeological heritage and preservation in-situ of archaeological sites and monuments must be presumed to be the preferred option." T06 and the construction thereof should not place these archaeological sites at risk. The stone may not be moved or removed, but the turbine can.

EIAR Chapter 13, Section 13.3.3.

Of the overall nineteen archaeological sites within the study area, the Archaeological Survey of Ireland have recorded that thirteen either retain no surface expression or are levelled with only slight surface traces surviving. None of the sites within the study area are designated as National Monuments in State Ownership or Guardianship or have been assigned Preservation Orders but they are afforded legal protection by their inclusion in the Record of Monuments and Places. All of these archaeological sites are located within private farmlands which are inaccessible to the public.

That archaeological sites may be "levelled" due to agricultural exploitation is not a valid archaeological reason to overlook a potential wealth of information from archaeological sites. Incidentally, and to counterbalance the bemusing dismissive tone of the quote above, the Framework and Principles for the Protection of the Archaeological Heritage by the Department of Arts, Heritage, Gaeltacht and the Islands, 1999 clearly states in its opening pages the importance of all archaeological sites, be they standing or sub-surface, common or unique, yet to be discovered or previously recorded.

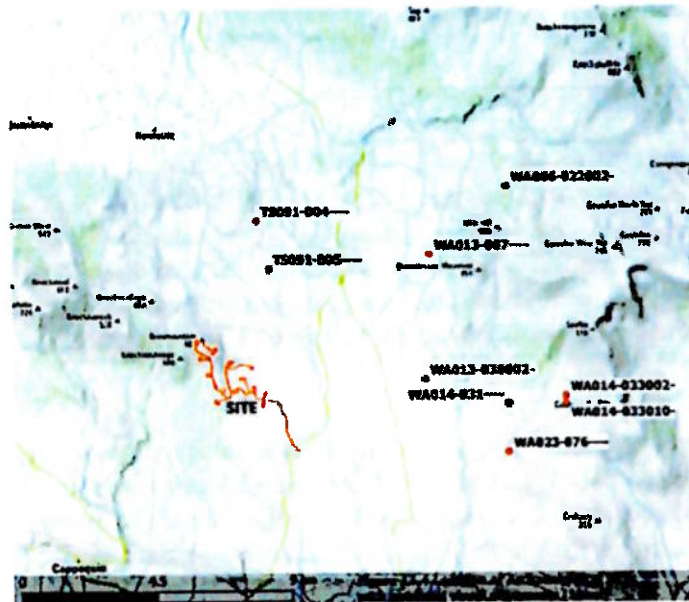
1.1.1 Nature of the archaeological heritage

Archaeological sites may have no visible surface features; the surface features of an archaeological site may have decayed completely or been deliberately removed but archaeological deposits and features may survive beneath the surface. Such sites may sometimes be detected as crop-marks visible from the air or have their presence indicated by the occurrence of artefact scatters in ploughed land, but in other cases may remain invisible unless uncovered through ground disturbance.

1.1.2 Significance of the archaeological heritage

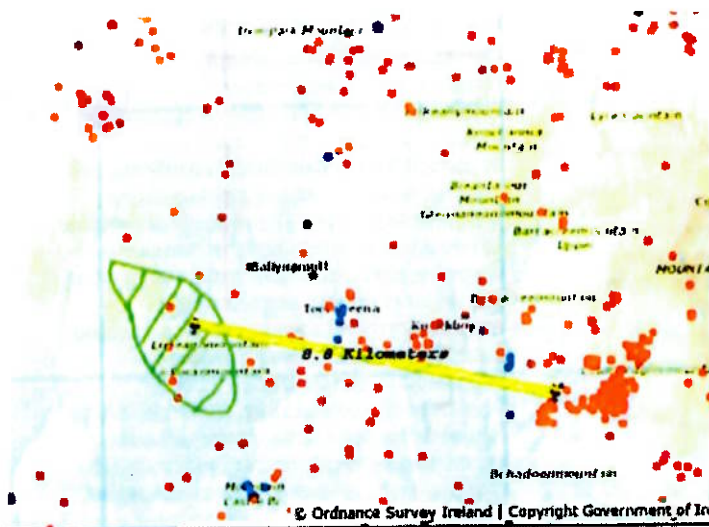
Unique sites, monuments or artefacts, or ones belonging to categories which only occur rarely, may be very important but archaeological significance or interest is not necessarily dependent on uniqueness or rarity. The analysis of patterns of occurrence and variation of frequently occurring site, monument and artefact types is a major element of archaeology. Examination of a broad range of evidence is necessary so as to have a reasonable expectation that the concepts being developed are valid. Only a proportion of the material remains of past societies have survived and this is another reason why all the available evidence is of archaeological significance.

Screenshot of Figure 13.4 from the developer, illustrating what archaeological points they considered to present a possible visual alignment to the archaeological heritage on the Dyrick Hill Windfarm proposed site. We do not know the criteria used to establish whether a site has a direct visual alignment to sites on the proposed area.



This is what the developer shows.

For contrast and information, the screenshot below shows ALL National Monuments Records within c. 10 km. The Comeragh and Monavulagh Mts have a high density of archaeological heritage. There is no particular reason why the Knockmealdowns may not have the same concentration of archaeological sites.



This is what the National Monuments Record shows.

C. Appendix 1: email to the National Monuments Survey website to report a possible fort on Dyrick Hill and Ogham stone in the Dyrick area.

Re: Reporting a possible monument

Anne McCarthy

087272023 1421

Tellhousing National Monuments <nationalmonuments@housing.gov.ie>

Hello Aillean and thank you for the quick reply.

I fully agree to the National Monuments Service recording and retaining my details plus publication of my name in association with the monument/s reported.

Thanks and regards,

Anne Latsupain McCarthy

From: Housing National Monuments <nationalmonuments@housing.gov.ie>

Sent: Monday 3 July 2023 11:54

To:

Subject: FW: Reporting a possible monument

Dear Anne,

The National Monuments Service acknowledge receipt of your referral of a potentially newly identified monument. On receipt of such referrals the Archaeological Survey of Ireland (ASI) needs to verify whether the feature represents a monument under the definition of the National Monuments Act or not and whether it comes within the scope of the ASI. This process may require a field visit and will happen as resources permit. Upon verification the monument will be included in the Sites and Monuments Record in due course to appear on the Historic Environment Viewer (HEV) available at www.archaeology.ie.

Please send an email GDPR declaration if you fully agree to the National Monuments Service recording and retaining your details plus publication of your name in association with the monument/s reported.

Please note there may be a delay in getting referrals onto the HEV. Your patience is appreciated.

Kind regards,

Aillean Farrell

National Monuments Service

An Eilean Tibhachta, Nicholas Ástall agus Ollsheachtas

Department of Housing, Local Government and Heritage

Yeeb an Chaisleán, Baile Átha Cliath 1, D08YF80

Custom House, Dublin 1, D01W5X1

www.archaeology.ie

From: Anne McCarthy

Sent: Sunday 2 July 2023 21:45

To: Housing National Monuments <nationalmonuments@housing.gov.ie>

Subject: Reporting a possible monument