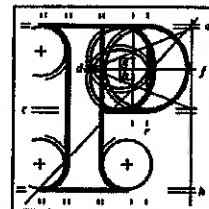


Our Case Number: ABP-317265-23



**An
Bord
Pleanála**

Gerard and Ann Commins
Doon
Ballinamult
Co. Waterford
E91 DK72

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.

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

PA04

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Glao Áitiúil	LoCall	1800 275 175
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Case no: 317265 Dyrick Hill Wind Farm.

Gerard & Ann Commins
Doon,
Ballinamult
Co. Waterford
E91DK72

Dear Sir/ Madam,

We the undersigned wish to make an observation regarding the application for the proposed wind farm project known as Dyrick Hill Wind farm. We wish to **strongly object** to the granting of planning permission for this wind farm on a number of grounds:

1. Development Plan: The proposed development is in direct contravention of the recently adopted Waterford City and County Council Development Plan which came into effect in July 2022. This plan was drawn up and adopted after a long process of consultation and consideration. As you are aware, according to this plan the area of the proposed wind farm is designated as an area not suitable for wind farm development. The site of the proposed development is within 2km of the Tipperary/Waterford border. In the Tipperary Council Development Plan, adopted in July 2022, the area along this border has also been designated as unsuitable for wind farm development, further underlining the unsuitability of the area for such a development.

We feel that a decision by An Bord Pleanála to override the Development Plan of Waterford County Council would set a very dangerous precedent for the country as a whole. It is worth bearing in mind that there are two other wind farms currently being proposed at Coumnaagappul and Scart Mountain, both of which are also in this "No Go" area of the Waterford development plan, and lie on either side of the proposed Dyrick Hill wind farm, potentially leading to our community being encircled with wind farms, despite the aforementioned designation as being unsuitable by Waterford City & County Council.

We also noted that the applicant struggles to differentiate between their proposed projects with numerous errors in their literature and information, referring to projects other than Dyrick Hill. Indeed, on their planning website in the Maps Section, a map referring to the affected eircodes for Dyrick hill wind farm is actually a map of the eircodes affected by their proposed Coumnaagappul project and their map of the proposed haulage route is also that of the proposed Coumnaagappul project! (See: [Dyrick Hill Wind Farm - Virtual Public Exhibition - Innovision](#)). This lack of attention to detail and obvious copying and pasting of work between projects again highlights the disregard the applicant has for those affected. How can anyone make an informed decision on the merits of such a massive project if we cannot rely on the accuracy of information being supplied!

We note that on the 6th March 2023, the Bord refused the granting of planning permission for a wind farm in Co. Carlow (REF: 309937) on the grounds that it directly contravened the Carlow County council development plan. We would hopeful that this precedent would be followed once again in this case.

We built our home here in Doon, in 2009, having been granted planning permission in this area as at the time it was designated as structurally weak, with a declining population. In the intervening years we have noted how the area has begun to thrive, with new businesses and

several young families settling or remaining in the area. We have a vibrant, close-knit community. We live in a very quiet rural setting with beautiful views of both the Comeragh/Moanavullagh and Knockmealdown ranges. The loudest, and most certainly temporary, noise we occasionally encounter is farm machinery. We strongly feel that this way of life will not continue, but in fact will be irreversibly lost if the Councils Development Plan is dismissed by the granting of permission for this development.

It is incumbent on the Bord to uphold the Development plan of Waterford County Council to ensure such proposed developments do go ahead but in a manner, and a location that best supports everyone and not purely in the economic interests of companies who have no connection to the wider area affected. This area is not the right location.

2. Alternatives considered: Waterford County Council have set aside a significant area of the county as suitable for wind farm development in their plan. We are strongly in favour of renewable energy developments moving forward as they are undeniably the key to survival against global warming and climate change. These developments, however, need to be managed in such a way as to work in harmony with the existing infrastructure, amenities and communities.

It is quite clear that the main motivation of the company proposing this development is maximizing profit, which is to be expected. In their section on alternatives considered they detail 3 proposed sites in Kerry.

Derrincullig- in an area in Kerry which was deemed "open to consideration" in the county development plan. There was a previous refusal due to visual impact which EMPower give as their reason for not pursuing it further. We contend that the visual impact, as detailed below, of the proposed Dyrick Hill wind farm will be as significant if not more so than that in Derrincullig.

Killognavreen – also in an area "open to consideration" but was within 5km of various Special Areas of Conservation and tourist areas, and entailed a 34km route to grid, and for these reasons EMPower decided it was unsuitable. We contend that the fact that the proposed wind farm is within 0.2 km of an SAC and involves a significant amount of ground works for connection to grid and transport of infrastructure that again this site is no more suitable than Killognavreen.

Knocknamagh – this alternative is outside the area open for consideration in the Kerry development plan as it is visible from much of the McGillicuddy Reeks range and Killarney National park, two of the most important amenities in Co. Kerry. Using this as a comparison is completely disingenuous on the part of the company. It would be akin to McDonalds applying for planning permission for a restaurant in the middle of Semple Stadium and then justifying it by saying it is more suitable than building in the middle of Croke Park! Why not use a more appropriate alternative for comparison, such as an area in Waterford where wind farms are permitted or open to consideration? Simple answer – profits!

Also, in the section on alternatives the applicant compares the alternatives of using two compounds versus one, building new roads versus using existing, various turbine heights and layout, and different grid connection routes. This section is populated by phrases such as "neutral", "slight negative impact" etc. This is the company comparing and deciding between the lesser of two evils in most cases, (and notably seems to come down on the side of the most economically viable decision in most cases). They do not compare any of these aspects

of the project with how life currently exists in this area. We contend that if they were to analyse these aspects while including the alternative of not building a wind farm in this area, then we would see the true potential impact of at least 20 months of construction work, associated noise and traffic volumes, roadworks and traffic disruption along a very busy route which we use every working day, cable laying, and up to 40 years of operation. A minimum of 20 months of such disruption is not "short term" in the context of those of us who will live it every day. Up to 40 years of shadow flicker, noise pollution, impact on bird life, bats, deer and many other species, and then a further period of disruption for decommissioning, is not "short term", "neutral" or "slightly negative". As a community we wish to be fully informed of the factual implications of the proposed development and not a sanitised version. If the proposed development holds no concerns for our community then we would question why the application is littered with examples of a company doing their utmost to mask the true implications of their proposal.

3. Visual impact/ Noise/ Shadow Flicker/ Proximity: We reside at House 60 as detailed in the applicant's submission. The main living area of our home faces south, directly towards the proposed development. All 12 turbines will be visible from our home and 10 of the 12 will be very prominent with the blades being fully visible. 10 of the 12 will be within approximately 1900 metres of our home. Six of these turbines (T6, 8, 10-13) will be clustered together within a 60 degree viewing angle from our main living area, while all 12 will be clustered within 90 degrees.

Our home is located at an elevation of 170 metres above sea level. The two lowest lying turbines will have their bases at an elevation of 165 metres. The highest standing one will have a base level of 415 metre above sea level. Taking the proposed tip height of 185 metres (the tallest wind turbines in Ireland) means that we will be looking directly towards 12 turbines with a range of tip heights of between 350 metres and 600 metres above sea level. The turbines located closest to our home are the highest. T13 will have a tip height of 600 metres above sea level. It is located approximately 1500 metres from our home. This is an actual height difference of 430 metres over quite a short distance from the turbine. These turbines will tower over our home and our community. In winter the sun sets directly behind where T13 is proposed. Given the height difference between our home and T13, the sun will pass directly behind T13 for much of the remainder of the year. For this reason, we would seriously question the data provided by the company on potential shadow flicker.

T5 is named by the company as being the closest to our home. Depending on which part of the documentation we read it is somewhere between 1229 metres (according to the section on shadow flicker), an estimated 950 metres (according to the location of the sound recording devices) and 900 metres according to the location of VP11 (which itself is 40 metres from our home and slightly further away from T5), in the photomontage section. The discrepancy in these distances is significant and would lead us again, to seriously question the viability and accuracy of the data being quoted in this application.

Viewpoint 11 is 30 metres west from our home. We will not benefit from the screening so subtly utilized in the photomontage and all 12 turbines will be clearly visible. The applicant's contention that the turbines will "not appear out of place" and their being of "substantial moderate significance" is laughable. Ten turbines towering over us with a height difference

of up to 430 metres at such close proximity, is nothing short of severely out of place and very significant every time we look out our windows or step outside our property. Would they contend that the Spire in Dublin is not notable, and these turbines will be one and a half times the height.

The photomontage provided by the company highlights, once again, for us the disingenuous nature of the applicants. The photos at most of the locations were taken from strategic locations where trees and poles were used to minimize the visual impact of the development. Many of the photos tried to further limit the visual impact by ensuring that turbines were directly blocking each other from view. By simply moving a matter of metres along the road to where there were open sightlines of the proposed site, many of the images would have given a more realistic and honest impression of the view. The overall visual impact for ourselves and most of the homes in this area will be significant and stark. A tip height of up to 600 metres above sea level makes the proposed turbines unmissable, for a vast area, way beyond the 20km radius used by the company, and in particular for the people of the surrounding townlands and the village of Touraneena.

Also, we have a private well which as mentioned is downhill of the development, leading us to have very serious concerns for the security of our water supply in the future. The scale and proximity of the groundworks pose a very real risk of contamination of this water source.

The site of the proposed wind farm is home to a large population of deer which we encounter on a weekly basis. It is rich in birdlife, including buzzards, hen harriers, kestrels and barn owls all of which I have personally observed. All of this is risked by the proposed development.

We trust that An Bord Pleanála will do the right thing and make the right decision not just for our family and all the families in this area, but for the county and the country in ensuring that the vital development of wind farms does take place, but only in an appropriate manner, in line with the carefully considered county development plans of each region, which have based their decisions and plans on rigorous research, consideration and the welfare of the inhabitants of each area, carried out over a number of years, revised and adapted in line with new recommendations and guidelines, and not on the maximizing of profits for a global company which has scant consideration for those directly impacted by these decisions.

Thank you for your patience and consideration in taking the time to consider our observation.

Signed:

Gerard Commins

Gerard Commins

31/07/2023

Ann Commins

Ann Commins

31/07/2023