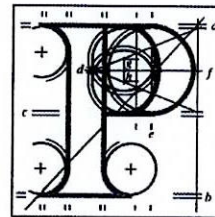


Our Case Number: ABP-317265-23



**An
Bord
Pleanála**

John Cullinan
Dromana
Cappoquin
Co. Waterford
P51 X2D3

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.

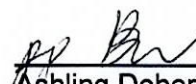
The Board will revert to you in due course with regard to the matter.

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. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Ashling Doherty
Executive Officer
Direct Line: 01-8737160

PA04

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

AN BORD PLEANÁLA	
LDG-	<u>065396-23</u>
ABP-	_____
31 JUL 2023	
Fee: €	<u>50.00</u> Type: <u>CHA</u>
Time: _____	By: <u>Post</u>

Dromana,
Cappoquin,
Co. Waterford.
P51 X2D3
27th July 2023.

The Secretary,
An Bord Pleanála,
64 Marlborough St.
Dublin.
D01 V9O2

Re: Submission to Dyrick Hill Wind Farm, Co. Waterford (PA93.317265)

Dear Sirs,

The draft wind energy development guidelines on wind-take are verbatim copies of sections 5.13 & 7.17 of the 2006 wind guidelines.

4.9.6 Wind-take.

The question of wind-take should be dealt with at scoping stage and/or during pre-application discussions, to ensure that any proposed layout of wind turbines takes into account the development potential of an adjoining site for a similar development. In general, to ensure optimal performance and to account for turbulence and wake effects, the minimum distances between wind turbines will generally be three times the rotor diameter ($=3d$) in the crosswind direction and seven times the rotor diameter ($=7d$) in the prevailing downwind direction. Bearing in mind the requirements for optimal performance, a distance of not less than two rotor blades from adjoining property boundaries will generally be acceptable, unless by written agreement of adjoining landowners to a lesser distance. However, where permission for wind energy development has been granted on an adjacent site, the principle of the minimum separation distances between turbines in crosswind and downwind directions indicated above should be respected.

7.19 WIND-TAKE Conditions with regard to wind-take could be included to ensure that wind turbines are located in a manner that respects the development potential of an adjoining site for a similar development. Where such conditions apply they should generally allow a distance from adjoining site boundaries of not less than two rotor blades having regard to the wind resource at the site, save with the written agreement of the adjoining landowner(s). This issue is more appropriately addressed before an application is made (see paragraph 4.9.6).

The adjacent proposed scart wind farm is not mentioned so no wind take considerations have been taken into account. The same can be said for cumulative effects (6.6 draft guidelines) issues. What else has been missed by the developer?

The receiving landscape character type as defined in section 6.9 Landscape character types as a basis for guidelines of the 2006 guidelines (and 6.10 of the draft guidelines), the receiving landscape with regard to this application is 'hills and flat farmland'. The Table 1. matrix summarising landscape character based recommendations (pg 78 2006 guidelines & pg 127 draft guidelines) states that developments in 'hills and flat farmland' are, spatially generally limited to small developments, have regular spacing, and typically of medium height but tall may be acceptable.

The footnote on page 36 states that for the 2006 guidelines "less than 60m to blade tip are considered short, 75-100m medium and over 100m tall." The draft guidelines are somewhat silent with what constitutes a short, medium or tall turbine, however a meaningful clue exists in Appendix 3 landscape and visual impact assessment of wind energy development

proposal and its Definition of study area and Zone of Theoretical Visibility, where it states that a... Zone of Theoretical Visibility (previously referred to as Zone of Visual Influence) is a computer- aided procedure, which aims to predict from where the turbines might be visible. The following recommendations are made in relation to the preparation of Zone of Theoretical Visibility maps: For blade tips up to 100m in height, a Zone of Theoretical Visibility radius of 15km would be adequate (this is greater than the current standard by some 50% but reflects the technical difficulty of depicting "small and medium" turbines at 20km).

The 2006 and draft guidelines outlooks converge with what constitutes a small, medium, and tall turbine.

Turbine blade tips of up to 100 metre in height are considered to be 'small and medium' for visibility purposes. Regardless of the draft guidelines ambiguity, the 2006 guidelines remain the de facto standard, this application of 12 in number 162 metre tall tip height turbines is a large and not regularly spaced development. They are tall/high wind turbines and are not of typical medium height as indicated in the wind guidelines.

The proposed wind farm is located in a Waterford County Development Plan no-go area for wind development. A SID application however may be overridden by ABP. WCCC have lodged a submission in relation to this application and recommend an ABP refusal. This puts ABP on the horns of a dilemma. WCCC have recommended 17 conditions if ABP is of a mind to overturn the CDP no-go area, these include limiting both the amount and size of the turbines, however these conditions are not in line with the wind guidelines in relation to small developments that are regularly spaced and of medium height, in the receiving environment as outlined above.

This proposed wind-farm fails to mention the proposed adjacent wind-farm and properly and correctly account for it in its design, its proposed location is in a WCCC CDP no-go area, and the proposed development does not adhere to either the 2006 or draft wind guidelines in relation to its receiving environment - small developments that are regularly spaced and of medium height. I would kindly ask that ABP stay within these guidelines in terms of height and regular spacing if they are of a mind to overturn the CDP no-go area.

Thank you for considering this observation.

Yours faithfully,

John Cullinan



€50.00 fee enclosed.