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Strategic Infrastructure Development Application by Dyrick Hill Wind Farm Ltd for Planning Permission to Construct a 12-Turbine Wind Farm at Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), and other named Townlands, County Waterford

An Bord Pleanála Reference PA93.317265

SUBMISSION TO AN BORD PLEANÁLA BY THE KNOCKMEALDOWN PROTECTION GROUP

AN BORD PLEANÁLA
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KNOCKMEALDOWN PROTECTION GROUP
PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

02 August 2023

Environmental Management Services
Comhairleoirí Comhshaoil
Environmental and Planning Consultants

An Tinteán Nua, Ballymanus, Castlepollard, County Westmeath
An Tinteán Nua, Baile Mhánais, Baile na gCros, Co. an Iarmhí, N91 PP76.
[redacted]

02 August 2023

Strategic Infrastructure Development Section,
An Bord Pleanála,
64 Marlborough Street,
Dublin,
D01 V902.

Dear Sir / Madam,

Submission to An Bord Pleanála by the Knockmealdown Protection Group in Response to the Strategic Infrastructure Development Application by Dyrick Hill Wind Farm Ltd for Planning Permission to Construct a 12-Turbine Wind Farm at Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), and other named Townlands, County Waterford

An Bord Pleanála Reference PA93.317265

In response to the above-referenced strategic infrastructure development application, the Knockmealdown Protection Group wishes to submit the attached observations to An Bord Pleanála, as permitted by Section 130 of the Planning and Development Act, 2000, as amended.

The Knockmealdown Protection Group (KPG) is a locally-based association, representing the interests of residents, farmers, small business owners and other persons living in and around the area where the proposed wind turbines would be located, if permitted.

Following the establishment of the Group in March this year, members examined carefully the planning application and the applicant's supporting documentation, from which they concluded that the proposed development, if permitted, would result in a number of adverse consequences, including damage to the health of residents living close to the proposed wind farm site. Landscape quality, natural heritage, wildlife and property values would also be adversely affected; and the members of the KPG also discovered a significant number of errors and inconsistencies in the applicant's documentation.

The Knockmealdown Protection Group members' detailed knowledge of the area in which the proposed wind farm site is located, together with consideration of the impacts mentioned above, led to the conclusion that the application site is inappropriate and unsuitable for the proposed development. The local community also concluded that if the wind farm were to be granted planning permission, other alternative and potentially more environmentally suitable and less damaging uses of the subject lands would be ruled out.

The Group therefore decided to submit to the Board their combined observations on the above-referenced planning application by Dyrick Hill Wind Farm Ltd; and the Group has requested Environmental Management Services to prepare the attached document, which, together with this letter, constitute the Group's observations on the planning application.

Additional information about the Knockmealdown Protection Group will be found in section 2 of the attached submission, and the address of the group is:

Knockmealdown Protection Group,
c/o Honorary Secretary Ms Geraldine Lacey,
Coolnacreena,
Cappoquin,
County Waterford,
P51 C6F3..

A payment of € 50.00 is enclosed, in payment of the statutory fee for making an observation on a strategic infrastructure development planning application; and we look forward to your acknowledgement and statutory fee receipt in due course.

Yours sincerely,

Jack O'Sullivan.

Jack O'Sullivan

Environmental Management Services

Environmental Management Services
Comhairleoirí Comhshaoil
Environmental and Planning Consultants

Submission to An Bord Pleanála by the Knockmealdown Protection Group in Response to the Strategic Infrastructure Development Application by Dyrick Hill Wind Farm Limited for Planning Permission to Construct a 12-Turbine Wind Farm at Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), and other named Townlands, County Waterford

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Environmental Management Services
Comhairleoirí Comhshaoil
Environmental and Planning Consultants

An Tinteán Nua, Ballymanus, Castlepollard, County Westmeath
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OBSERVATIONS BY THE KNOCKMEALDOWN PROTECTION GROUP

1. INTRODUCTION

On 01 June 2023, Jennings O'Donovan Consulting Engineers submitted to An Bord Pleanála, on behalf of Dyrick Hill Wind Farm Ltd, a "strategic infrastructure planning application" for the proposed construction of a 12-turbine wind farm and ancillary works in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, Colligan More, Colliganwood, Corradoon, Dyrick, Farnane Lower, Farnane Upper, Garryclone, Garryduff, Killadangan, Kilcooney, Knockaunnaglokee Langanoran, Lickoran, Lickoranmountain, Lisleagh, Lisleaghmountain, Lyrattin, Mountaincastle South, Scartmountain, and Sleadycastle in County Waterford.

The planning application, for a 10-year period, and for a 40-year operational life from the date of commissioning of the entire wind farm, was accompanied by an

Environmental Impact Assessment Report, a Natura Impact Statement, drawings, photomontages and other documents.

Prior to making the planning application, representatives of Dyrick Hill Wind Farm Ltd met with personnel from An Bord Pleanála, as permitted under the Planning and Development Act 2000, as amended by the Planning and Development (Strategic Infrastructure) Act 2006; and during these meetings the Board's personnel provided certain advice to the applicant – an issue to which we will refer later in this submission.

If permitted, the proposed wind farm would consist of:

- Twelve 6.0-7.2 MW wind turbines (the application notes that this is the current output available for turbines of this size; and, given the likelihood of improvements in wind turbine and associated technology, the output of the proposed wind farm may be greater at the time of construction); and the "candidate wind turbines" would have an overall ground tip height of 185m, a 162m rotor diameter and a hub height of 104m;
- Construction of crane hardstand areas and turbine foundations;
- Construction of new internal site access tracks and upgrade of existing site roads, to include passing bays and all associated drainage;
- Construction of a new wind farm site entrance with access onto the R671 regional road in the townland of Lickoran;
- Alteration of existing site entrances with access onto local roads in the townland of Broemountain;
- Alterations and temporary modifications to the existing public roads in order to facilitate delivery of abnormal loads and turbine delivery;
- Construction of one temporary construction compound with associated temporary site offices, parking area and security fencing;
- Development of an on-site borrow pit;
- Installation of one permanent meteorological mast with an overall height of 104m;
- Development of a site drainage network;
- Construction of one permanent 110 kV Substation;
- All associated wind farm internal cabling, connecting the wind turbines to the wind farm substation;
- All works associated with the connection of the wind farm to the national electricity grid, which is intended to be via a 110 kV underground cable connection approximately 16km in length to the existing Dungarvan 110 kV Substation;
- Upgrade works on the turbine delivery route from Waterford Port; and,

- Ancillary forestry felling to facilitate construction and operation of the proposed development.

We will consider and respond to these proposals in greater detail in subsequent sections of this submission; but we consider that it is important for the Board to note that several of the proposed developments have not been finalised, and are subject to varying degrees of uncertainty.

Our submission includes the following observations on the planning application and the applicant's supporting documents:

1. Introduction, with brief details of the planning application;
2. Brief details of the Knockmealdown Protection Group, including an address by which the Group may be contacted if necessary;
3. Location and description of the subject site, and description of the proposed wind farm development, from the perspective of the local community;
4. Planning context, including relevant policies and objectives of the Waterford County Development Plan, especially policies on energy, and on wind energy in particular; and observations by Waterford City and County Council;
5. Legal context, including the relevance of a recent case and judgment of the High Court;
6. Physical unsuitability of the subject site for the proposed wind farm, including risks of peat slippage and water pollution;
7. Landscape issues, and visual impact of the proposed wind farm;
8. Adverse impacts of the proposed windfarm on habitats and ecosystems, and on protected species and areas;
9. Social and health implications of the proposed wind farm development;
10. In-combination effects of the proposed wind farm with other existing and planned wind farms in the immediate area;
11. Inconsistencies and errors in the applicant's documentation; and,
12. Conclusion of the submission, showing that An Bord Pleanála should refuse permission on a significant number of grounds.

2. THE KNOCKMEALDOWN PROTECTION GROUP

The Knockmealdown Protection Group is a locally and broadly-based community based group, representing the interests of residents, farmers, small business owners and other persons living in and around the Dyrick Hill area where the proposed wind farm would be constructed, if permitted. A committee was established in March 2023, and consists of 17 committee members who represent almost 300 members of the local and wider community. The committee members include an elected chairperson, secretary and treasurer. Committee meetings were held on a monthly basis but more recently on a weekly basis.

The aims of the Knockmealdown Protection Group are:

1. To examine the planning application by Dyrick Hill Wind Farm Limited, and to identify the deficiencies and irregularities in the application and it's supporting documentation, a task undertaken by the committee members;

2. To identify and examine the environmental and social impacts, including potentially serious long-term impacts, of the proposed wind farm on the communities and the environment in the townlands where the wind farm would be located, if permitted, and in the surrounding areas;

2. To engage in the planning process and to make submissions to An Bord Pleanála in response to the strategic infrastructure planning application mentioned above, including the appointment of specialist consultants to assist in this process;

3. To share and communicate (through the Group's website, Facebook page and other social media) to the wider community in the surrounding areas all relevant information about the proposed wind farm, which the members of the Group consider would be detrimental to the health and wellbeing of the community, including effects on the environment, on tourist amenities, residential property prices, other land uses, farming activities, noise, impact on the local amenities, and biodiversity; and,

4. To communicate as widely as possible relevant information about the natural beauty and uniqueness of the Knockmealdown mountain range, and the area's vulnerability to the proposed industrial-scale wind farm.

The Chairperson of the Knockmealdown Protection Group is Mr Richard Gorodecky and the Honorary Secretary is **Ms Geraldine Lacey, Coolnacreena, Cappoquin, Co. Waterford, P51 C6F3**.

The Honorary Secretary 's address may be used by An Bord Pleanála to contact the Knockmealdown Protection Group, in addition to the address of Environmental Management Services, as agent for the group.

3. Location And Description Of The Subject Site, And Description Of The Proposed Wind Farm Development

3.1 Site Location and Description

The proposed wind farm site is located in a rural area of considerable natural beauty, in which the principal land types and uses are farmland, forestry and upland heath, with some areas of blanket bog. Forestry and agricultural land uses, including dairy and sheep farming are the predominant land uses within the area in which the proposed wind farm would be located, if permitted.

The site is located approximately 6.0 km north-east of the town of Cappoquin (the nearest town to the site), between 12.9 and 13.3km north-west of the town of Dungarvan, and the north-west corner of the Site is adjacent to the County Waterford boundary with County Tipperary. The small settlements of Ballynamult, Tooraneena and Mountain Castle Bridge are located approximately 3km to the northeast, east and south of the site.

The proposed site is located at the south-eastern extent of the Knockmealdown Mountains, and is surrounded by the three main peaks of Knocknasheega (428m), west of the site boundary, Broemountain (429m) in the northern extent of the site and Dyrick Hill (286m) within the southern central portion of the site. The western, northern and southern extents of the site are typically more elevated than the central and eastern extents of the Site. Land elevations range from 180m above ordnance datum (AOD) in the east side of the site to 400m AOD towards the north-west side of the site.

The Farnane River, which is a tributary of the Finisk River, rises near the north-western extent of the site and flows along its western boundary. The Lisleagh Stream, which is also a tributary of the Finisk River, rises in the central portion of the site and flows in a south-easterly direction until it merges with the Finisk River, north of the townland of Woodhouse. The Aughkilladoon Stream, another tributary of the Finisk River, rises at the south-eastern extent of the Site and flows in a south-easterly direction until it merges with the Finisk River, east of the townland of Woodhouse.

The site of the proposed wind farm is 463 hectares, consisting of a mixture of privately owned land and shared land (commonage). Forestry plantations border the western extent of the proposed site on an area of commonage land, while additional areas of forestry exist within the central, north-eastern and southern areas of the site.

Housing density in the area is considered to be "medium", but there are 112 dwellings within a 2km radius of the proposed turbines, predominantly comprising one-off houses and farm holdings. The locations of these houses are shown in

Figure 1.3 in the applicant's Environmental Impact Assessment Report (EIAR), from which it can be clearly seen that these houses are located on lower ground to the east and south-east of the proposed wind farm location.

The site includes approximately 66.7 ha of commercial forestry; and, in order to facilitate turbine construction and to provide access roads, the applicant states that 8.1 ha of forestry will need to be clear-felled (EIAR, chapter 2, section 2.3.2). Clear felling of this area of forestry will require a licence from the Forest Service of the Department of Agriculture, Food & the Marine.

3.2 The Proposed Wind Farm

A brief description of the proposed wind farm, listing the primary components of the development, is provides in section 1, Introduction, above. The application states that the proposed wind turbines, if permitted, would be a typical modern design and would consist of a three-bladed, variable speed rotor up-wind of the turbine support tower which would measure 104 metres from the foundation to the top of the tower.

The height of each turbine is given as 185 metres from foundation to blade tip, based on a rotor diameter of 162 metres.

The precise dimensions and power of the electrical generator, to which the blades would be connected, is not given in the planning application. Instead, the application states that each turbine will have an installed generator with a maximum capacity of 6.0-7.2 MW, and the final turbine will be chosen in a competitive tendering process as part of the project financing process, after all necessary consents have been secured (applicant's EIAR, chapter 2, section 2.5.2).

While stating that "*the final turbine will be chosen in a competitive tendering process … after all necessary consents have been secured*", the application also states, with some degree of inconsistency, that "*the final choice of turbine model will be Vestas V162 6.0 – 7.2MW model wind turbine*". The application includes only an "*indicative schematic drawing of the candidate turbines*", while stating that "*this turbine model has been included for the purposes of EIA and planning approval*".

The application correctly notes that all turbine suppliers have a requirement for a turbine hardstand area to be constructed beside each turbine, but the EIAR provides only a generalised or indicative layout of the turbine hardstands, leaving a further area of uncertainty.

However, the application also states that the main turbine hardstands will be 3,395m^2 in area and will be 2.25m in depth, depending on the local bedrock profile and the varying soil depth. In total, this would equate to a surface area of

40,740m² for the 12 turbines proposed, and their construction would require the excavation and displacement of approximately 12,222m³ of material. The material to be excavated would consist of soil, subsoil and rock.

As stated in the applicant's EIAR, the volume of concrete and steel required for each turbine foundation would be 814m³ and 90 tonnes respectively.

Other components and requirements of the overall wind farm development are listed in section 1, Introduction, above; but the following additional information is provided below.

3.2.1 Site Access Tracks

The application states (EIAR, chapter 2, section 2.5.5) that approximately 1,780m of existing site access tracks will be used, but these would have to be upgraded, requiring approximately 2,937m³ of stone. The proposed wind farm would also include approximately 10,684m of new site access tracks; the construction of these tracks would cover an area of 53,800m² and would require approximately 3,526m³ of rock.

These figures clearly indicate the very large scale of the project, and demonstrate its significant impact on the land surface of the proposed development site.

3.2.2 Electricity Supply, Transformers, On-site Cable Connections and Electrical Power Management

The planning application states that "*a rural/local supply will be required as a back-up power supply to the substation for light, heat and power purposes*", but no details of this supply are given. If the supply if intended for back-up purposes, then it would appear that a stand-alone generator would be necessary in the event of a local power failure. Such back-up generators are quite common in large industrial installations, and are generally powered by diesel engines.

However, the application also states that the rural/local supply "*will be designed and constructed by ESB Networks*" (EIAR, chapter 2, section 2.5.6), but no details are given. If this is a necessary component of the overall wind farm development, accurate details must be provided in the planning application and in the EIAR. The on-site substation building is also shown as including a battery room, but no details are given of any planned battery energy storage system. If battery electrical energy storage is a component of the proposed development, full details of this facility should have been given in the application.

The application also states that the proposed wind farm development would include a 110kV electricity substation (EIAR, chapter 2, section 2.5.7; with an approximate location shown on Figure 2.1 in the EIAR), to provide a connection point between the wind farm and the grid connection route between the wind farm and the existing Dungarvan 110kV substation on the national grid. The on-site

substation is intended to serve the functions of providing housing for a battery system, switchgear, control equipment, metering and monitoring equipment, and storage; and the building would provide housing for a central computer system, electrical control panels, spare parts store, workshop, staff canteen, meeting room and toilets (water supplied by rainwater harvesting on roof).

The application also states that each turbine would be connected to the on-site substation via underground MV cables, and there would be 10,997m of internal cabling, i.e., approximately 11km.

3.2.3 Connection to the National Grid

A connection to the National Grid is a significant and essential feature of any wind farm, and the High Court has judged that full details of this connection must be provided in the planning application.[1]

The planning application states that a grid connection will be sought from EirGrid, the national grid system operator, with the overall length of the grid connection between the on-site substation and the existing Dungarvan 110kV substation being given as 16.013km (EIAR, chapter 2, section 2.5.9; with the route of the grid connection shown on Figure 2.6 in the EIAR), along the public road corridor.

The grid connection would be constructed to the requirements and specifications of EirGrid, and three optional routes are described in Appendix 12.1, *110kV Grid Connection Feasibility Study*, dated May 2022. This appendix refers to significant constraints associated with the grid route options; it states that the positions of proposed underground cable connections (UGCs) are indicative only, and that site surveys and consultation with ESB would need to be completed as part of the design process in determining the actual position of these UGCs which would in turn determine the position of the proposed route for the new grid connection (Appendix 12.1, section 4).

A further uncertainty is caused by the number of drainage crossings along the grid connection route, and Appendix 12.1 states that additional survey works would need to be completed on the preferred route to confirm the proposed crossing methods. Furthermore, the preferred grid connection option is dependent on landowner consent for the off-road UGC sections, and around the Horizontal Directional Drilling locations along the route; and no details are provided of service ducts (e.g. water, electricity, telephone) between the public road and adjacent roadside properties, where these may be affected by trenching or burial of the proposed underground grid connection cable.

It is our submission that the proposed grid connection is not sufficiently detailed and contains too many uncertainties.

[1] O'Grianna -v- An Bord Pleanála (IEHC 632, 12 December 2014).

3.2.4 Requirement for Borrow Pits and Spoil Storage Areas, and the Impacts of Transporting Large Quantities of Soil, Subsoil, Stone and Rock

The planning application states that a borrow pit would be required, to provide fill (principally crushed stone produced from excavated rock) for the site access tracks, turbine hardstands, turbine foundations and temporary compound area; the borrow pit would be located on commonage land and would be excavated as required (EIAR, chapter 2, section 2.5.10). The approximate location of the borrow pit is shown in the applicant's Figure 2.1, close to a standing stone, west of Dyrick Hill; and our observations on the applicant's lack of a legal right to excavate the commonage land are in section 3.4 below.

The application also states that when the borrow pit is no longer required, it will be reinstated using any surplus inert material from the site. The Construction Environmental Management Plan (CEMP) (EIAR, Appendix 2.1) refers to several borrow pits, stating that "most of the crushed stone fill material for site track and hardstand areas will be sourced from the permitted borrow pits", and "rock will be extracted from the proposed borrow pits". In addition to the borrow pits, a number of temporary spoil storage areas will be located around the site.

The volumes of soil, subsoil and rock to be excavated for the construction of the wind farm are very large by any industrial standards; the applicant's **Spoil Management Plan** provides estimates of these amounts, and we have added all the amounts in Table 3.2.4 below. The amount of internal traffic required to move all this material has not been calculated, and has not been shown in the EIAR as one of the very significant impacts of the proposed development.

Construction activity	Volume of soil, to be excavated (m^3)	Volume of subsoil and rock to be excavated (m^3)
Wind turbine foundations	613	14,708
Wind turbine hardstands	4,074	8,148
Electrical sub-station and site compound	862	16,386
Road construction	6,390	12,780
Cut and fill & junction areas	33,707	303,367
Totals	45,646	355,389
Overall total of soil, subsoil, stone and rock to be excavated		**401,035**

Table 3.2.4 Volumes of soil, subsoil, stone and rock to be excavated during construction of the proposed wind farm

A calculation of the volumes of material to be excavated and transported within the site is provided in Chapter 2, Table 2.5, which shows a total of 456,604m^3, substantially higher the total in Table 3.2.4 above.

It is therefore our submission that the applicant's EIAR is deficient in not showing the impact of this very large amount of construction activity, particularly the amount of vehicle movements required to transport soil, subsoil stone and rock within the site.

3.2.5 Drainage and Surface Water Control

The planning application states that drainage measures will be provided to attenuate surface water runoff, guard against soil erosion and/or soil compaction, and safeguard local water quality. A list and brief descriptions of surface water controls and treatment systems for surface water are provided in the EIAR, chapter 2, section 2.5.11, and in a Surface Water Management Plan attached as Appendix 2.1 to the EIAR.

The adoption of the precautionary principles described in the EIAR, and the implementation of mitigation measures also listed and described, would ensure that the risk of elevated suspended solids discharging to surface waters is low, and therefore the potential risks to sensitive receptors are also low. However, the Surface Water Management Plan does not state that such risks would be eliminated, especially given the increasingly heavy rainfall events predicted as a consequence of climate change.

3.2.6 Risk Assessment, Prevention and Control of Oil Spillages

The applicant's EIAR states that *"vehicles will be refuelled off-site where possible"*, and the Surface Water Management Plan (SWMP) describes proposed mitigation measures to reduce potential impacts from the release of hydrocarbons and other harmful chemicals to surface waters. Even with mitigation measures at the designated refuelling area, which address the management of refuelling and fuel storage, the SWMP states that there is a remaining potential risk of hydrocarbon spills from plant and equipment or other general chemical spills at other areas of the site.

Standard mitigation measures will be implemented in these other areas, but it is our submission that oil spillages cannot be completely prevented, given that such spillages are frequently due to human error or to equipment failure, neither of which can be eliminated. Transporting and using large quantities of hydrocarbon oils in such a vulnerable and sensitive environment is therefore an activity which we suggest should not be permitted.

It is also our understanding that an average 1.5MW turbine contains 900 litres of lubricating and cooling oils, with the result that the 12 turbines proposed will contain approximately 10,800 litres of oil. Yet there is no mention of any

mitigation measures that would be taken to reduce or eliminate the risks presented by draining, flushing and filling the turbines with oil during construction, operation (approximately every 36 months), and during decommissioning.[2]

And lastly, the Applicant's NIS fails to describe any mitigation measures for oil leaks resulting from the catastrophic failure of a turbine, and / or damage from a lightning strike or fire. These are not unknown events, and the Board will be aware of a very recent lightning strike (last month) which caused the destruction and fire on a wind turbine located off the Wicklow coast.

3.2.7 Construction Traffic; Suitability of the Proposed Haulage Route for Turbine Components; Works Required on the Haulage Route; Impacts on Other Road users, and Inconsistencies and Gaps in the Information Provided

The applicant has estimated that during the civil engineering components of the overall construction activity, approximately 5,944 loads will be delivered to site, and this number equates to approximately 297 loads per month or an average of 83 per day raging between 3 to 141 loads (per day) excluding Sundays and bank holidays (EIAR, Chapter 2, section 2.6.10). However, the EIAR states that a realistic estimation of peak deliveries is approximately 141 deliveries per day (for at least 20 separate days in the construction programme when the concrete for the turbine foundations will be poured).

3.2.7.1 Incomplete or conflicting Information about the Proposed Haulage Route for Large or Abnormal Loads

One of the most significant impacts of windfarm construction is a requirement to transport not only large amounts of construction materials (as noted immediately above), but also the transportation of abnormal or very large loads consisting of portions of the wind turbine towers, the nacelle, turbine hubs and the turbine blades.

The applicant is proposing that these turbine components will be landed by ship and stored for transportation at Belview Port (Waterford Port), and they will be transported to the site using specialised vehicles capable of carrying abnormal loads. A survey of the turbine delivery route between Belview Port and the wind farm site was undertaken in October 2022 by Pell Frishmann Ltd; and the report by Pell Frishmann states in section 3.1 (page 6) that:

> "*due to travel restrictions associated with the Covid 19 outbreak, all results described below are based upon a desk top assessment of the access*

[2] The Applicant's NIS, Section 5.2.1.2 Release of Hydrocarbons (page 25)

route as agreed with EMPower", and "*A full site visit will be required to confirm that all constraints have been noted on the route".*

It is therefore our observation that, in the absence of the proposed full site visit, including a more detailed examination of the haulage route, the transportation impact report by Pell Frishmann must be considered incomplete and significantly inadequate. A further uncertainty arises from the absence of any indication in the planning application that the management of Bellview Port has been contacted, and that an agreement has been reached that the port is suitable for the landing and onward transportation of the wind turbine components. For example, the Pell Frishmann report strongly recommends that early discussions should be "*held with the port authority to ensure that they are content with the proposed mitigation measures".*

Furthermore, if Bellview port is unavailable for any reason, or if the port authority is unhappy with the proposed traffic and mitigation measures, would it be necessary, or even possible, to transport these large components from the Ports of Cork or Waterford? It is our submission that these are key questions which have not been addressed.

It also appears from the Pell Frishmann report that extensive site works would be required at Belview Port, necessitating a load-bearing surface to be laid to allow heavy vehicle movement over the railway sidings and the crane running line. These changes to the operations of the Port would detrimentally affect other users for the period of time needed for all the wind turbine components to be brought ashore.

3.2.7.2 Inadequate Information about Affected Third Party Lands

Photographs of the two possible transportation routes in the Pell Frishmann report (sections 3.3.2 and 3.3.3) show typical narrow rural roads along a significant portion of the route, with many locations described and illustrated where loads will "oversail" into third party lands on both sides of the road, requiring trees and vegetation to be cleared and cut throughout these sections. At some locations, walls, gates, fences and posts would have to be removed; while traffic islands would have to be cleared and replaced by load-bearing surfaces. At other locations, additional load-bearing surfaces will be required along the edges of the roads and on bends to allow the load-carrying vehicles to manoeuvre safely.

We wish to point out that both the applicant's Screening Report for Appropriate Assessment and Appendix 14.1 of the EIAR (the Pell Frischmann Report) state that "*There are ten areas on the haul route that will require works in third party lands".* However Table 2.2 of the Screening Assessment for Appropriate Assessment shows only three places where works in or on third party lands would be needed, not ten places.

The Board should note that the landowners of these Third Party lands have not been listed in the applicant's list of contracted landowners, and the precise areas of land required were not specified.

3.2.7.3 Specific Problems with Bridges over the Finisk River

In addition, where bridges are encountered, the road surface may have to be temporarily raised on the approaches to these bridges.

A particular example given is the bridge carrying the L5071 over the Finisk river, is a tributary of the River Blackwater, which is a Special Area of Conservation (SAC). Another bridge, south-east of Touraneena, which also carries the L5071 over the Finisk River, is not mentioned in the applicant's Screening Report for Appropriate Assessment, and it is not stated or known whether this bridge can carry the volume and weight of wind farm component haulage traffic. Near this bridge, a large amount of trees would need to be removed to create the height required; and the report makes no reference to the power lines supplying the village of Touraneena along this road.

Another bridge carrying the L5071 over the River Finisk (Mullinacoorka Bridge) has not been the subject of the necessary feasibility study to determine its suitability or load-bearing strength. This deficiency is noted on page 16 of the Screening Report for Appropriate Assessment, where it is stated that "*Discussions with the council should be held to ensure that the bridge has suitable bearing capacity for the proposed loads".*

This is an old bridge, constructed to take traffic no heavier than horses and carts, and at this point the River Finisk is part of the River Blackwater SAC where any tree felling would likely require a specific license addition to the normal tree-felling license. This bridge, though not protected, is hugely important to local history, with many stories including an ambush here during the War of Independence in 1922. Bats and otters have been reported at this bridge, as mentioned elsewhere in our submission.

3.2.7.4 Lack of Clarity About the Last Section of the Haulage Route

A further problem which we have noted is the lack of clarity about the last section of the haulage route to the site entrance. After crossing Mullinacoorka Bridge, the application documentation is unclear about the exact route – the Pell Frischmann report shows it proceeding up Ballynaguilkee Lower, although the gradient would be far too steep and the road too narrow to cater for the proposed heavy and lengthy specialised vehicles. It is also important to note that surface water runoff from the side of this road may flow directly down to the Finisk river, with the consequence that any major work to widen this road (as suggested in the application) could directly affect the River Blackwater SAC

On the other hand, the applicant's EIAR (section 14.3.3 'Road Access to the Site') shows the transportation route turning left onto the R671 to a gate into a field, where a new site access road will be built, crossing the public road, leading to Lickoran through lands owned by Mrs. Rita Hickey. This section of the EIAR states that:

> *"Access to the wind farm site will be from a new priority T-junction constructed on the R671. The junction will be constructed to accommodate the swept path of abnormal load vehicles accessing the site during the delivery of turbine components. The junction will be a stop-controlled junction with priority for* ***N59 traffic****".*

However, the N59 does not exist at this point – the road in question is the R671. A glance at any road map will show that the N59 goes from Sligo to Galway; and this error has left us with the impression that portions of this chapter of the EIAR may have been copied & pasted from another document. The N59 is also referenced on page 35, where it is stated that:

> *"During the wind farm construction and decommissioning phases, road works signs in accordance with the requirements of Chapter 8 of the Traffic Signs Manual will be erected at the wind farm site entrance on the N59 and at all locations on the haul route which are being modified to facilitate turbine delivery."*

There is also a further conflict between two different versions of the haulage route after the junction and bridge which carries the R671 over the River Finisk; the description of the route in Chapter 14 of the EIAR differs from the route described in Appendix 14.1, the Pell Frischmann report.

3.2.7.5 Insufficient Sight Lines and Dangerous Junctions on the Haulage Route

According to the road safety guidelines produced by Transport Infrastructure Ireland (TII), the sight lines are not sufficient at the proposed Site Entrance 1 on the R671. The sight line is less than the required 160m from 4m setback for Commercial Developments on a Regional Road. This road will have to cross further local roads to access the site, but there are no details or accurate drawings of how or where this will be done. Similarly, the upper section of the track road within the site will have to cross the public local road at Lickoran at proposed site entrance number 2.

This unnamed local road at Lickoran is a busy route and is used by many vehicles, including HGVs travelling to and from Cappoquin. This is a safety concern for local residents. The Board should also be aware that the applicant's traffic studies were carried out during COVID-19 restrictions, and therefore

cannot be considered an accurate representation of the normal day-to-day traffic in the area.

It is also our submission that three proposed junctions with the public road between Dyrick Hill and Broemountain, as shown on the site layout plan (EIAR, Chapter 14, Figure 14.1 on page 5), and one on the R671 in very close proximity to a dangerous bend, must be considered as dangerous junctions. These proposed road junctions are matters of considerable concern to the local community who use these roads.

3.2.7.6 Errors in the Applicant's Construction Environmental Management Plan (CEMP)

The applicant's Construction Environmental Management Plan (CEMP) contains a number of significant errors in the descriptions of the haulage route and road works associated with the transportation of materials and equipment. For example:

> "*During the wind farm construction and decommissioning phases, road works signs in accordance with the requirements of Chapter 8 of the Traffic Signs Manual will be erected at the wind farm site entrance on the* ***N59*** [our emphasis] *and at all locations on the haul route which are being modified to facilitate turbine delivery*" (EIAR Appendix 2.1 Construction Environmental Management Plan (CEMP), page 48, Section 3.8 Traffic.
>
> "*Works required at the site entrance; - Extending the entrance to allow HGVs turn right into the site from the* ***N22***" [our emphasis] (EIAR Appendix 2.1, CEMP, page 55, Section 3.10.3.4 Site Preparation)
>
> "*....all access to the Site will require passage through a controlled safety barrier/gate or hut. The exact location(s) shall be decided by the Contractors with primary responsibility for safety on the site. It is proposed that the barrier(s) be located at the entrance to the north of the site, on a private road and to the east of the site at the junction of* ***R662*** *....."* [our emphasis] (EIAR Appendix 2.1 CEMP, page 60, Site Security).

The Board should note that none of these roads are near the proposed site.

The applicant's Construction Environmental Management Plan also states that:

> "*The haul route of quarry materials, i.e. readymix concrete, will be established after the appointment of the contractors, but it is envisaged that material will be sourced from quarries local to the site to minimize disruption on the public road network as per EIAR Figure 15.3.*"
>
> "*From Keim, trucks would follow the R582 in a south-easterly direction to the New Macroom By Pass (N22) and then follow the L-3402 to the site.*"

"For the quarries to the south, trucks would use the R587, then the R584 to the new Macroom By Pass (N22) and then follow the L-3402 to the site".

"The L-3402 between the existing N22 and the existing forestry entrance…."

The Board should note that Keim is located approximately 114km from Dyrick Hill, in a direction almost due west of the site, and north-north-west of Cork City. If there is a quarry at Keim, it is certainly not a *"local quarry"*, and the above statements leave the reader in very little doubt that this section of the CEMP contains significant errors.

3.2.7.7 Delivery Vehicle Specification

The type of delivery vehicles to be used for transportation of large turbine components should be specified precisely, as the characteristics of the vehicles would determine to a great extent the works needed to permit their journeys along extensive sections of the haulage route (examples of these works are given in sections 3.2.7.2 and 3.2.7.3 above).

However, the Pell Frischmann report states that:

"To provide a robust assessment scenario based upon the known issues along the access route, it has been ***assumed*** [our emphasis] *that all blades would be carried on a Superwing Carrier trailer to reduce the need for mitigation in constrained sections of the route".* (Pell Frischmann report, section 2.3, page 5).

"Delivery of turbine components will be carried out using specialist abnormal load vehicles. ***Turbine blades measuring 79m in length*** [our emphasis] *will be delivered on an extendable semi-trailer, one per trailer. Approximately 15.0m of the blade will over- hang the rear of the trailer. Following delivery to the site, the trailer will be retracted for the return trip"*

We would point out that the turbine blades are in fact 81m in length, and not 79m as stated above. This discrepancy should alert the Board to the strong likelihood that the applicant's assessment of road transportation problems and proposed mitigation measures cannot be relied upon, and the reported constraints and problems may be more serious than indicated in the Pell Frischmann report.

3.2.7.8 Traffic and Transport Assessment (TTA)

The response by Transport Infrastructure Ireland (TII) to the applicant's scoping report (email dated 22 April 2022) stated:

"In relation to the general project scoping/pre-planning, the recommendations indicated below provide general guidance: It would be important that, where appropriate, subject to meeting the appropriate

thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads".

Instead of a detailed and comprehensive TTA been carried out as requested, only three places were assessed. Classified traffic counts were carried out by Jennings O'Donovan on 18 October 2022 at three locations in the vicinity of the wind farm site to determine baseline traffic volumes for junction capacity analysis. These traffic counts were carried out at the following locations:

- R671 Regional Road Junction / R672 Regional Road Junction (Junction 1)
- N72 National Secondary Road / R671 Regional Road Junction (Junction 2)
- N72 National Secondary Road / R672 Regional Road Junction (Junction 3)

It is our observation that these three locations are not indicative of the whole route, and cannot show the impact on the roads being used/having work carried out on them. Furthermore, the counters marked 'Junction 2', 'Junction 3' and TII Traffic Counter on Figure 14.1 are all outside of the haul route and grid connection route.

Jennings O'Donovan & Partners stated that they carried out "*classified traffic counts at three locations in the vicinity of the proposed wind farm to determine baseline traffic volumes and junction capacity on the public road network at locations which will be directly affected by construction traffic during the wind farm construction period. The traffic count periods were selected using information from the TII automatic traffic counter at Drumroe which is located on the N72 between Dungarvan and Cappoquin to the west of R671 / N72 junction".*

We would point out to the Board that three of these locations are outside of the haul and grid connection route, and so have no relevance, as they are not locations that will be directly affected by construction traffic.

No other assessments were made on any of the public roads where all construction will take place so the information provided is incomplete and also inaccurate because there are many major junctions between the traffic counter locations and the haul and grid connection route where traffic may leave/join.

Table 14.12, Chapter 14, on page 26 of the applicant's EIAR shows what is described as a schedule of maximum predicted daily traffic movements to site over 20 month construction period. It is our observation that the information in the table is rather misleading, a schedule of 'daily traffic movements' in the table yet shows it in months, and then continues with a detailed analysis of movement based on weeks. (e.g.: Weeks 1 to 8 will involve deliveries of materials for site

access works, site access tracks, site compound, site offices, site security, and drainage and Weeks 8 to 56 will involve deliveries of materials for site access works, turbine hardstand, turbine foundations, site access tracks, substation building and cable / ducting works, turbine component delivery and 110kV grid connection works.

Therefore the table provides ambiguous data, and does not give a definitive overview. Furthermore, looking at the detailed information provided in weeks against the Table overview of 'daily' activity provided in months, and using a 'five-week per month' basis, that follows Month 1= Weeks 1-5; Month 2=Weeks 5-10; Month 3 = Weeks 10 -15) for an approximate and generous overlap; the timing does not align between the table and the text, which states that:

> *"Weeks 8 to 56 will involve deliveries of materials for site access works, turbine hardstand, turbine foundations, site access tracks, substation building and cable / ducting works, turbine component delivery and 110kV grid connection works. This period will include deliveries of fencing materials for site boundaries, road construction materials for access tracks, site entrances and turbine hardstands, ready mix concrete and steel reinforcement for turbine foundations. It is anticipated that a maximum of 39 HGV vehicles (78 HGV movements) will visit the site on a daily basis during the period of weeks 8 to 56 with an additional 102 HGV vehicles (204 HGV movements) delivering concrete for turbine foundations on twelve separate days during the forty-eight week period between weeks 8 to 56".*

Based on the above "Month = Week" allocation, weeks 8 to 56 would be equivalent to months 2 to 11, yet any work connected to cable/ducting works, turbine foundations, site access tracks, grid connection works, fencing materials, ready mix concrete for turbine foundations continues right through to month 14 (up to week 70). And the 'anticipated maximum of 39 HGV vehicles' that will visit the site on a daily basis during the period of weeks 8 to 56 is incorrect, as the table states 134, 133, 135 throughout those months.

Local residents and other road users, including farmers, can expect to see 102 loads of ready mix concrete each day for 12 months, equivalent to some 204 traffic movements congesting local and regional roads. In addition to these daily deliveries, a further 33 daily deliveries of other materials on site, or a further 66 traffic movements can be expected; and this further traffic would bring the daily average number of deliveries to 135 vehicle movements each day for 12 months, giving a total of 170 daily traffic movements.

The report by Jennings O'Donovan & Partners states that:

> *"A maximum of 141 HGV trips (282 HGV movements) and 60 LGV (120 traffic movements) at the R671 site entrance. Outside these times, construction traffic will typically consist of 39 HGV trips (78 HGV*

movements) and 60 LGV (120 traffic movements) at the R671 site entrance".

This equates to 198 traffic movements per day at the R671 site entrance, and does not include the movement of 60 staff vehicles on and off site each day. If these are included, the daily number of traffic movements would rise to 318 during peak construction. This congestion of our local and regional roads would lead to considerable lengthening of daily commute times for residents, in addition to road safety concerns and the increased likelihood of accidents.

It is therefore our submission that the applicant has not undertaken a Traffic and Transport Assessment (TTA) as advised by Transport Infrastructure Ireland, that the assessments undertaken were inadequate and were not carried out in accordance with relevant guidelines; and the Board should therefore consider that this part of the planning application documentation has not fulfilled the requirement to assess road traffic impacts.

3.2.7.9 Advice in the Pell Frischmann Report not Followed by the Applicant

The Pell Frishmann report strongly recommends that Dyrick Hill Wind Farm Limited should undertake a significant amount of further work before delivery of the first abnormal loads, in order to ensure load and road user safety, and this work should include:

- Topographical surveys and swept path results completed and checked;
- A review of axle loading on structures along the entire access route ;
- A review of clear heights with utility providers to ensure that there is sufficient space to allow for loads plus sufficient flashover protection (to electrical installations);
- Verge vegetation and tree canopies which may foul loads must be trimmed back;
- A review of potential roadworks and or closures should be undertaken;
- A test run should be completed to confirm the route and review any vertical clearance issues; and
- A condition survey should be undertaken to ascertain the extents of road defects prior to loads commencing.

The Pell Frischmann report also recommended that "*a detailed operational Transport Management Plan*" should be developed to assist in transporting the proposed loads. However, this operational plan has not been included in the application documentation, we must therefore draw the conclusion that it has not been prepared.

Given this extensive amount of additional work required, it is our submission that the full environmental and social impact of transportation has not been assessed to the extent required by the EIA directive. A further omission which we have noted is that there appears to be no assessment of the effects of these heavy loads on underground services, both under the road surface and under roadside verges, where these services supply roadside properties.

A table showing the impacts of transporting the materials for the proposed wind farm is provided in chapter 14 of the applicant's EIAR, including the impacts on sensitive receptors such as schools, hospitals, medical centres, nursing homes, churches, hotels and B&Bs, businesses and shops, and private dwellings located along the haul routes. Impacts listed include increased noise, vibration, parking restrictions, and increased journey times. While some mitigation measures are suggested, it is clear that these would not eliminate the adverse impacts of transportation; and the EIAR does not specify the residual impacts which would remain following implementation of the proposed mitigation measures.

It is therefore our submission that transportation impacts have not been addressed to the necessary degree, and that these impacts will adversely affect other road users during the construction period of the windfarm. It therefore appears that the applicant simply requires people living along the transportation route to put up with noise, vibration, traffic delays, and general disruption.

3.2.8 Operation, Maintenance and Decommissioning

The applicant's EIAR states that "*during the operation of the wind farm, the turbine manufacturer, the Transmission System Operator (TSO) (EirGrid), the operator, or a service company will carry out regular maintenance of the turbines*" (EIAR, Chapter 2, section 2.8). While it is normal for the operator or a service company to carry out regular maintenance of the turbines, or the turbine manufacturer to visit a wind turbine if there is an urgent or significant problem, we understand that Eirgrid would not be involved in any way with maintenance of the proposed windfarm. Including Eirgrid as a participant in the maintenance of the windfarm therefore appears to be an error.

The statement that "*the financial costs of decommissioning, at current material values, will be more than met by the recycling value of the turbine components*" is not based on any figures or costs provided by the applicant, and must therefore be considered as no more than guesswork. Because decommissioning is such an important part in the total life of the wind farm, it is our submission that this aspect of the development should have been dealt with much more comprehensively in the applicant's EIAR, and the applicant should have stated that a financially secure cumulative fund would be provided as an independent guarantee for decommissioning of the windfarm in the event of any problems arising with the financial state of the operator. If such a fund is not provided, it is possible that the cost of decommissioning would fall on the state.

It is our further submission that the Environmental Liability Directive (ELD)[3] requires the owner or operator of an industrial facility to establish a liability regime for subsequent environmental damage, based on the 'polluter-pays' principle. Even though wind farms are not mentioned in the Directive, we believe that the principle should apply, and that the operator should remain liable for any subsequent cost of environmental damage.

3.3 Other Wind Farms in the Immediate Vicinity, and In-Combination Effects with the proposed Dyrick Hill Wind Farm

One of the areas of significant concern to the Knockmealdown Protection Group is the number of operating and planned wind farms in the immediate vicinity of the proposed Dyrick Hill wind farm. The other wind farms have been listed by the applicant in Table 2.1, in section 2.3.3 of the EIAR, and we have reproduced that table (as Table 3.3 below) to show the Board that the number of wind turbines in this area is already significant, and would be considered excessive if the Dyrick Hill wind farm were to be granted planning permission.

Wind farm name	Number of turbines	Distance and direction from the Dyrick Hill wind farm site boundary	Status
Coumnagappul Wind Farm	11	7.1km east of site	Pre-planning
Tierney Single Turbine	1	3.5km northeast of site	Operational
Woodhouse Wind Farm	8	10.8km south of site	Operational
Knocknamona Wind Farm	8	11.6km south of site	Consented
Barranafaddock Wind Farm	9	19.3km west of site	Operational
Ballycurreen Wind Farm	2	20km southeast of site	Operational
Total number of turbines	39		

Table 3.3 Existing Wind Farms within 20km of the Proposed Dyrick Hill Wind Farm

[3] Directive 2004/35/CE of the European Parliament and of the Council of 21 April 2004 on environmental liability with regard to the prevention and remedying of environmental damage

As noted in the first paragraph of our section 1, Introduction, above, one of the townlands in which the proposed windfarm would be located is Scartmountain, immediately west of the Dyrick Hill application site.

The Board will be aware that Future Energy Ireland is currently in a pre-application consultation phase for Scartmountain wind farm, and has engaged in a pre-application consultation (An Bord Pleanála Case Reference No. PC93.315920). The wind farm plans are for sixteen 185-metre wind turbines on Scart Mountain, Knocknanask and Knocknasheega.

It is very important that the Board should take into account this forthcoming application for another wind farm on Scartmountain, which is currently at the pre-planning stage; this wind farm is mentioned in the applicant's EIAR, Chapter 2, section 1.10.4.2, Cumulative Effects, as follows:

> "*The closest proposed wind farm development is Scart Mountain Wind Farm. This project is currently in pre-planning stage and in the public domain. In accordance with the European Commission Guidelines: 'on the Assessment of Indirect and Cumulative Impacts as well as Impact interactions',*[4] *the following criteria are required to assess wind farms cumulatively:*
>
> - *nature of the project;*
> - *project phasing;*
> - *the scale of the project;*
> - *the site layout;*
> - *emissions to land, air and water;*
> - *ancillary development; and,*
> - *proposed mitigation measures."*

Section 1.10.4.2 of the EIAR states that:

> "*The criteria outlined above is not available in the public domain to date for Scart Mountain Wind Farm. Therefore, this project cannot be cumulatively assessed and has not been in not been included in any other EIAR Chapters."*

It is our submission that the applicant for the Dyrick Hill wind farm has made a number of significant errors in stating that the Scartmountain wind farm cannot be cumulatively assessed with the Dyrick Hill wind farm.

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[4] Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions, May 1999. European Communities, 1999; Luxembourg: Office for Official Publications of the European Communities, ISBN 92-894-1337-9.

Firstly, the applicant should have quoted from Annex III of the EIA Directive[5], which lists the criteria to determine whether the projects listed in Annex II should be subject to an environmental impact assessment. The Directive states that the characteristics of projects must be considered, with particular regard to:

> *"(a) the size and design of the whole project; and,*
>
> *(b) the cumulation with other existing and/or approved projects".*

Even though the Scartmountain wind farm has not yet received planning consent, it would be inappropriate, and against the aims and objectives of the Directive, if the in-combination effects of this wind farm were not considered.

Secondly, the European Commission's guidelines for the assessment of indirect and cumulative impacts as well as impact interactions, quoted by the applicant, defines cumulative impacts as:

> *"Impacts that result from incremental changes caused by other past, present or reasonably **foreseeable** actions together with the project".*

The important word here is "foreseeable", which definitely applies to the planned Scartmountain wind farm; and therefore if the guidelines are to be followed, the in-combination effects of this wind farm must be considered and evaluated.

Thirdly, the European Commission's guidelines for the assessment of indirect and cumulative impacts as well as impact interactions, quoted by the applicant, states that:

> *"Before the assessment of environmental impacts can be carried out certain basic information about the project will need to be established. **Some of this information*** [our emphasis] *will be of particular relevance in the consideration of indirect and cumulative impacts and interactions. This Chapter identifies the type and detail of information about the development proposals that should be obtained, **where possible and practical*** [our emphasis], *to enable the assessment to reflect the potential impacts more fully.*
>
> *The key factors to be considered concerning a project are:*
>
> - *the nature of the project;*
> - *project phasing;*
> - *the scale of the project;*

[5] Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 26, 28.1.2012, p. 1), as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014.

- *the site layout;*
- *emissions to land, air and water;*
- *ancillary development;*
- *proposed mitigation measures".*

We have emphasised above the phrases: *'...certain basic information ...*", and "*some of this information...*" and "*... should be obtained, where possible and practical*" to clearly indicate that there is no stipulation for ALL of the listed criteria above to be available. The applicant is therefore incorrect to state that:

> *"the following criteria* ***are required*** [our emphasis] *to assess wind farms cumulatively".*

The applicant's statement incorrectly suggests that if all of the relevant criteria are not available, possible cumulative impacts cannot be assessed.

A further point on which we wish to comment is the applicant's statement in Section 1.10.4.2 of the EIAR, quoted above:

> "*The criteria outlined above is not available in the public domain to date for Scart Mountain Wind Farm. Therefore, this project cannot be cumulatively assessed and has not been in not been included in any other EIAR Chapters."*

We must therefore point out to the Board that there was a very significant amount of relevant information already available in the public domain about Scart Mountain wind farm at the time when the applicant was preparing the EIAR. Relevant details of this information include:

1. Information about the nature of the project was already publicised in Scart Mountain Wind Farm's newsletter and on the company's website in February 2023 (note that the applicant states '[Accessed: 9th March 2023]' on page 29 of the Screening Report for Appropriate Assessment as the date when Scart Mountain wind farm's website was accessed in support of the applicant's statement that: '*The criteria outlined above was not available when they accessed the public domain to date'*.)

2. Information about project phasing was available, as both of the Scart Mountain Wind Farm's newsletters, dated 14 October 2022 and 27 February 2023 (which were also available online) include a Development Timeline for the project.

3. Information about the scale of the project was available, as published in the Scart Mountain Wind Farm's newsletters and website in February 2023; these stated that the proposed Scart Mountain Wind Farm would have 17 turbines (subsequently changed to 16); the newsletter and

website included a 'draft design layout', a map illustrating site boundary and estimated turbine layout, and general overview of the wind farm's capacity, for the SID application (above the threshold of 50MW).

4. Information about the site layout was available; it was published in the Scart Mountain Wind Farm's newsletters and website in February 2023, stating that the proposed Scart Mountain Wind Farm would have 17 turbines (subsequently changed to 16); the newsletter and website included a 'draft design layout' and a map illustrating site boundary and estimated turbine layout.

5. emissions to land, air and water: not available yet.

6. ancillary development: not available yet.

7. proposed mitigation measures: not available yet.

Furthermore, in order to emphasise the point which we have made, we request the Board to examine the following maps: the proposed turbine layout of Dyrick Hill wind farm, **Figure 3.3.1** on this page; the proposed turbine layout of Scartmountain wind farm, **Figure 3.3.2** on the following page, and both wind farms together, shown in **Figure 3.3.3** below.

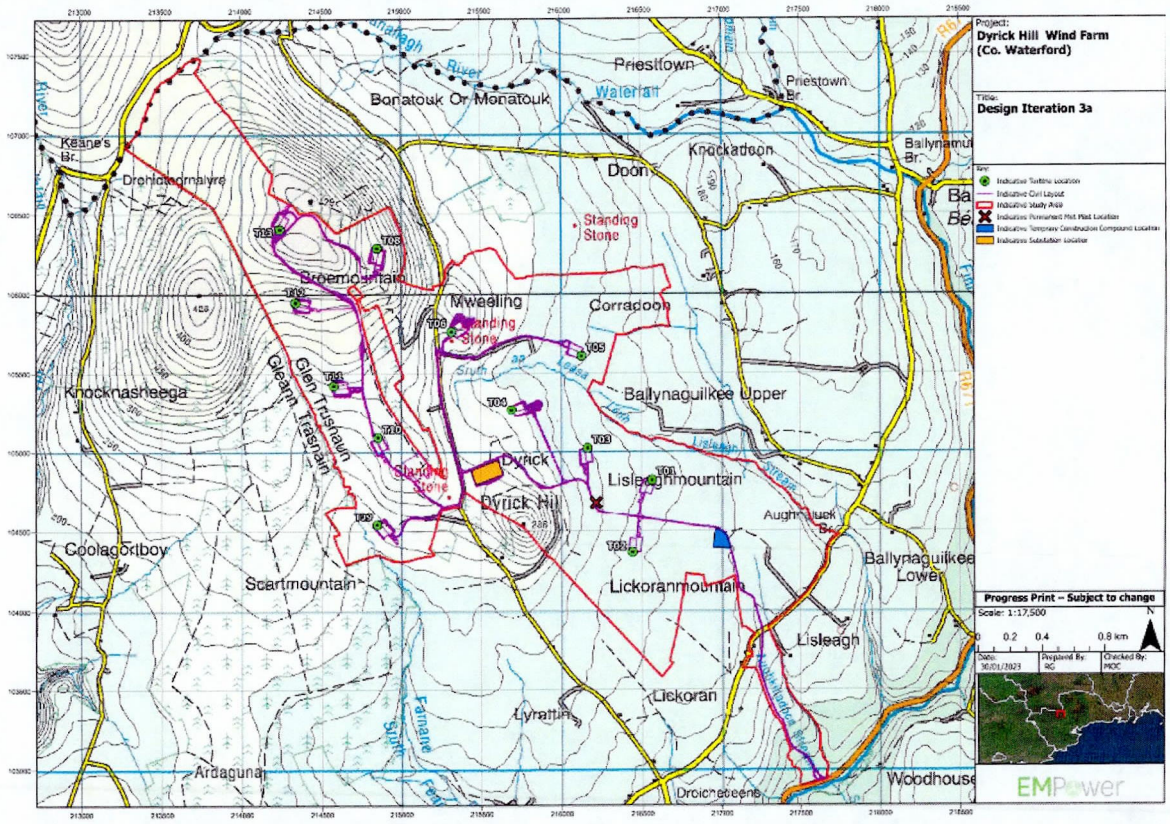


Figure 3.3.1 **Proposed turbine layout of Dyrick Hill wind farm.** Source: *Planning Application Documents Figure-2.1 Overall Site Layout excluding full extent.pdf*

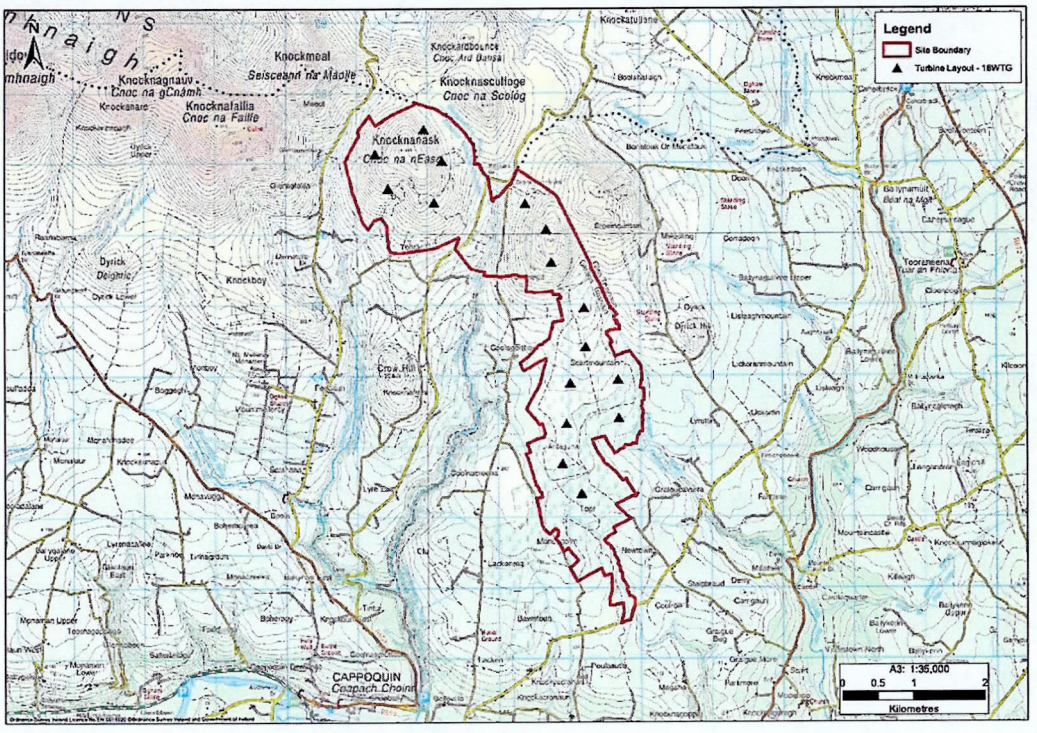


Figure 3.3.2 **Proposed turbine layout of Scartmountain wind farm.** Source: Figure-2.1-Overall-Site-Layout-excluding-full-extent.pdf https://scartmountainwindfarm.ie/wp-content/uploads/2023/06/Scart-Mountain-Wind-Farm-Newsletter3_Web.pdf

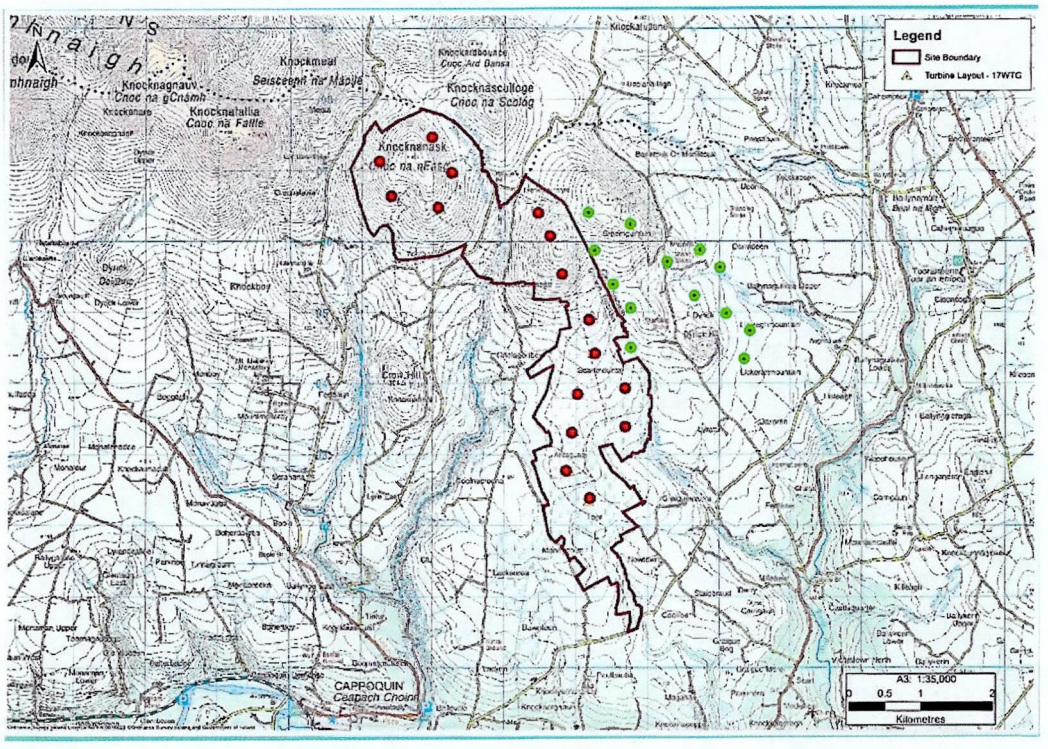


Figure 3.3.3 **Proposed turbine layouts of both Scartmountain and Dyrick Hill wind farms.** Source: work undertaken by members of the Knockmealdown Protection Group.

As the Board will see from these illustrations, five turbines on the proposed Dyrick Hill Wind Farm would be less than 500 metres away from the turbines planned for Scartmountain wind farm, and both wind farms, if permitted, would have a combined total of 28 wind turbines. Both wind farms share an area of 5.5 km^2; and, it should be noted by the Board, would be located (if permitted) in an area designated as a Wind Exclusion Zone in the Waterford City & County Development Plan 2022-2028 (see section 4.1.2 below).

We would also draw the attention of the Board to the fact that in the applicant's Dyrick Hill Wind Farm LVIA Photomontages, Book 2, the photomontages entitled "*N25 At Barranalira (Viewing Point) (VP30) – Wireline Model and N25 At Barranalira (Viewing Point) (VP30) – Cumulative Wireline View*" show the proposed turbines for Dyrick Hill Wind Farm and the Coumnagappul Wind Farm turbines. Yet, for some unexplained reason, the turbines for the proposed Scart Mountain Wind Farm (the turbine layout for which has been in the public domain since October 2022) have been completely omitted.

We have also noted that Coumnagappul wind farm is included in the applicant's Table 5.2 (our Table 3.3 above). This project is also being developed by EMPower; and, similar to Scart Mountain wind farm, in a pre-application consultation phase (An Bord Pleanála Case Ref.: P.C93.309259). The Board's decision was made on 19 May 2023, the same month in which the final Screening Report for Appropriate Assessment for Dyrick Hill Wind Farm was dated. It is it is therefore difficult to understand how the applicant has excluded the Scart Mountain wind farm because it was at a pre-application consultation stage, while at the same time including the Coumnagappul wind farm, which is at the same planning stage, but is being developed by the applicant.

It is therefore our submission that the applicant's assessment of in-combination effects is incomplete and inaccurate, and it cannot guarantee with certainty that there will be no in-combination effects, and the Board should not rely on it. Ignoring in-combination effects is a serious omission, and is a robust ground on which the Board should refuse planning permission.

3.4 Ownership of the proposed Wind Farm Site; Rights of Commonage

The area marked in Figure 3.4 below in interlocked brick pattern and labelled as Broemountain is not registered in accordance with the Land Registry. https://www.landdirect.ie (Accessed 15 July 2023)

In the case of an unregistered title, the ownership is proved by the production of a chain of deeds tracing ownership from a sale at least 15 years before. There must ultimately be a deed showing the transfer of the property concerned to the current owner. There is no state guarantee of title or ownership under this system.



Figure 3.4 **Broemountain commonage, shown as an interlocked brick pattern and labelled as "Broemountain"**

In the EIAR Chapter 2: Development Description, Page 6, Section 2.3.4, entitled Land Ownership, the applicant states that:

> *"The majority of the site is located on lands under the ownership of third-party private landowners who have consented to the application and the Development. A portion of the site is shared land (commonage). All stakeholders party to the use of the commonage lands are contractually involved in the proposed development".*

Furthermore, in the Landowner Consent section of the application documents, the documentation provided by the applicant claims that 14 landowners own "*all of the property situated at Dyrick Hill, Co. Waterford, and shown outlined on the map attached to this letter (Property)".* However, we would point out that the lands on which the Applicant intends to construct turbines T9, T10, T11, T12 & T13 is unregistered land in the townland of Broemountain, and not in Dyrick townland. The map, stated to be attached to the letter of consent, was not included among the application documents; and the applicant has provided no evidence that this unregistered land is, in fact, commonage.

If this land is commonage, is our understanding that the only right given to shareholders is to permit grazing of animals, i.e., farm livestock. There is no right to use or interfere with the land beyond this use; and a shareholder cannot buy or sell commonage; it is owned by the State and shares in it come with the land deeds of neighbouring farms. No evidence has been submitted in this application listing the active shareholders, inactive shareholders and dormant shareholders. Each commonage parcel must be maintained in Good Agricultural and Environmental Condition with the objective of achieving a sustainable commons resource for now and their future generations.

On page 24 of the Screening Report for Appropriate Assessment, the applicant states that:

> *"The borrow pit will be located on the commonage land and will provide excavated material to provide fill for the roads, hardstands, upfill to foundations and temporary compounds".*

If this is commonage land, as we understand it is, the applicant has no right to use or interfere with the land beyond grazing. We also wish to point out that the applicant is not a shareholder in the commonage, as Dyrick Hill Wind Farm Ltd is not only a limited company, but is a wholly owned subsidiary of EMPower (EMP), established in 2015.

A further point which we would make to the Board is that there is no Commonage Management Plan for Broemountain shown in the planning application for Dyrick Hill Wind Farm. Advice or observations received from local farm advisors or from the Department of Agriculture, Food and the Marine (DAFM) have not been included in the planning application; and we find this surprising, as we would have

expected to see a Commonage Management Plan (CMP) which incorporates a restoration programme for the site, and this plan should be designed in conjunction with those who would be expected to implement it, i.e., the active shareholders.

EU and national environment policy makers are coming to realise the importance of commonages as a valuable cultural, ecological landscape type in themselves. Ireland's Rural Development Plan clearly states that appropriate management of these areas will contribute to meeting priority 4A, which involves "*restoring, preserving and enhancing biodiversity including in NATURA 2000 areas and in the areas facing natural or other specific constraints and high nature value farming as well as the state of European regulations.*"

4. PLANNING AND LEGAL CONTEXT

4.1 Waterford City and County Development Plan 2022-2028

The Waterford City and County Development Plan, 2022-2028, was adopted on Thursday 07 June 2022, and came into effect on Tuesday 19 July 2022; it is therefore the relevant statutory development plan applying to the site which is the subject of the wind farm planning application.

4.1.1 Policies on Renewable Energy

The planning authority's general policy on renewable energy is stated in Policy Objective UTL 13 (County Development Plan, Volume 1: Section 6.9):

> *"It is the policy of Waterford City and County Council to promote and facilitate a culture of adopting energy efficiency/renewable energy technologies and energy conservation and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County. It must also be recognised that other sources of electricity generation such as natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand. This will be achieved by:*
>
> - *Supporting the delivery of renewable energy to achieve the targets identified in Table6.3 of the Development Plan;*
> - *Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities including the necessary infrastructure required for the development of offshore renewable energy developments developed fully in accordance with the Waterford Renewable Energy Strategy, the wind energy designation map (Appendix 2 of the RES), the Waterford Landscape and Seascape Character Assessment undertaken to inform this Development Plan, and the National Wind Energy Guidelines, or any subsequent update/review of these;*
> - *The Council recognises and supports the role that the County can play in facilitating the onshore infrastructure required for the construction, operation and maintenance of off-shore wind farm developments. This infrastructure includes but is not limited to: construction facilities, storage and lay-down areas, cable landfalls, onshore cable routing to substations, port and harbour infrastructure and coastal operations and maintenance bases, as well as use, reuse or repowering of existing infrastructure where appropriate;*

- *The Wind Energy Designation Map and the Landscape and Seascape Character Assessment Map identify different landscape character areas and associated landscape sensitivities. These designations encompass the concept of buffers between areas of sensitivity which vary across the different landscape character types and their different locations. These buffers allow for a gradual change between contrasting landscape sensitivities and associated wind energy designations to be considered, as necessary, when determining any development proposal;*
- *Promote and encourage the use of renewable energy, and low carbon resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and onshore wind, biomass as well as micro-generation among business, agriculture, education, health, and other sectors;*
- *Promoting, encouraging, ensuring, and facilitating community engagement, participation and implementation of/in renewable energy projects;*
- *Implementing, including in the Council's own activities and in the provision of services/ works, the use and integration of low carbon, renewable energy infrastructure and technologies;*
- *Supporting appropriate options for, and provision of, low carbon and renewable energy technologies and facilities, including the development and provision of district heating (and/o r other low carbon heating technologies); anaerobic digestion and the extraction of energy and other resources from sewerage sludge;*
- *The preparation and implementation of a Climate Action Plan (including adaptation and mitigation measures) for Waterford; and,*
- *To support in conjunction with other relevant agencies, wind energy initiatives, both onshore and offshore, and wave energy, and onshore grid connections and reinforcements to facilitate offshore renewable energy development when these are undertaken in an environmentally acceptable manner.*

At the initial design stage full consideration should be given to reasonable alternatives and existing infrastructural assets. Environmental assessments should address reasonable alternatives for the location of new energy developments, and where existing infrastructural assets such as sub-stations, power lines and roads already exist within proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.

All planning applications for Renewable Energy Projects such as wind farms and solar farms shall be accompanied by a Decommissioning and Restoration Plan (DRP) consistent with the Wind Energy Guidelines 2006 or any update thereof. Issues to be addressed shall include details of proposed restorative measures, the removal of above ground structures and equipment, the restoration of habitats, landscaping and/or reseeding roads, etc".

Section 5.24 in Volume 2 of the City and County Development Plan 2022-2028 sets out the Council's development management standards for renewable energy developments, and states that:

The Council will support renewable energy developments in line with policy objective UTL 13 of the Development Plan (Volume 1: Section 6.9). Al applications for wind energy developments should be compatible with the 2006 Wind Energy Development Guidelines issued by the DoEHLG (or any updated revision of same), the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), and the Waterford Renewable Energy Strategy (Appendix 7 of the Development Plan and in particular the wind energy designation map contained within the Strategy (Appendix 2 refers)) and the renewable energy targets set out in Table 6.3 of the Development Plan, while regard should also be had to the Waterford Landscape and Seascape Character Assessment (Appendix 8 of the Development Plan.

4.1.2 Waterford City and County Council's Assessment of Landscape Status And Visual Impact

The County Development Plan states that it is a Strategic Objective of Waterford City and County Council (as set out in Chapter 10, Volume 1 of the CDP) to:

- *Protect our sensitive landscapes and seascapes which contribute to the distinctiveness of Waterford as a place*

A Landscape and Seascape Character Assessment was prepared for Waterford City and County in 2020 (see Figure 10.1 and Appendix 8 of the CDP), and this assessment identified seven landscape types; coastal landscapes, river corridor and estuary landscapes, farmed lowland landscapes, foothill landscapes, upland landscapes and urbanising landscapes. These landscapes are subject to varying forces for change and in turn have varying capacity to accommodate development that can impact on that particular landscape character.

Each unit of character is assigned an indicator of sensitivity, which indicates the extent to which the landscape will be vulnerable to change in its character. The categories (most sensitive, high sensitivity, low sensitivity and least sensitivity) reflect the criteria of the capacity to absorb new development as well as the potential to create disproportionate visual impacts.

The site of the proposed Dyrick Hill wind farm is located in an area which is designated as "**Most Sensitive**". As such, it has been determined by the planning authority that this area is characterised by very distinctive features with a very low capacity to absorb new development without significant alterations of existing character over an extended area.

It is the policy of the planning authority that, to be considered for permission, development in or in the environs of these areas must be shown not to impinge in any significant way upon its character upon its character, integrity or uniformity when viewed from the surroundings. Particular attention should be given to the preservation of the character and distinctness of these areas as usual from scenic routes and the environs of archaeological and historic sites.

4.1.3 Cultural Heritage and Archaeological Protection

Waterford City and County Council is aware, and the Knockmealdown Protection Group members have also noted from their experience of living in the area, that there is a significant number of sites on the Record of Monuments and Places which are included within, or which lie in close proximity to, the site the proposed wind farm.

The archaeological heritage of Waterford is unique and a special resource, which forms a distinctive element of the landscape and local identity. The archaeological heritage is composed of structures, constructions, groups of buildings, developed sites, all recorded monuments as well as their contexts, and moveable objects, situated both on land and under water.

The policies and objectives of Waterford City and County Council for the protection of archaeological heritage are listed as:[6]

> *"It is the policy of the Council to protect, and enhance in an appropriate manner all elements of the archaeological heritage including the following categories:*
>
> *a) Sites and monuments included in the Sites and Monuments Record as maintained by the Department with responsibility for the protection of Ireland's archaeological heritage;*
>
> *b) Monuments and places included in the Record of Monuments and Places (RMP) as established under the National Monuments Acts;*
>
> *c) Historic monuments and archaeological areas included in the Register of Historic Monuments as established under the National Monuments Acts;*

[6] Waterford City and County Development Plan 2022-2028, Volume 1, section 11.17, Policies AH-01 and AH-04, pages 299 - 301.

d) *National Monuments subject to Preservation Orders under the National Monuments Acts and National Monuments which are in the ownership or guardianship of the Minister with responsibility for archaeological heritage or the Local Authority;*

e) *Archaeological objects within the meaning of the National Monuments Acts;*

f) *Wrecks protected under the National Monuments Acts or otherwise included in the Shipwreck Inventory maintained by the National Monuments Service, underwater archaeology, riverine, coastal or lacustrine locations; and,*

g) *Archaeological features not as yet identified but which may be impacted on by development".*

It is the policy of the Council to:

"Ensure that development in the vicinity of a site of archaeological interest shall be designed and sited sympathetically and shall not be detrimental to the character of the archaeological site or its setting by reason of its location, scale, bulk or detailing".

4.1.4 Observations by Waterford City and County Council on the Planning Application by Dyrick Hill Wind Farm Ltd

On 14 July 2023, Waterford City and County Council submitted observations to An Bord Pleanála on the planning application for Dyrick Hill Wind Farm, and the Council's senior planners expressed the following concerns:

1. *The planning authority has very serious concerns regarding the carrying capacity and safety of road network serving the proposed development and the adequacy of the local road network to accommodation heavy construction traffic associated with the proposed development.*

2. *The planning authority accepts that the EAR submitted with the application complies with relevant legislation and guidelines for the preparation of such assessment reports but strongly rejects the findings and conclusions contained as they relate to the visual impacts of the proposed development on this sensitive upland area, the nature and scale of the impact on the local road network during the construction phase of the proposed development and the conflicts between the proposal and the adopted policies and objectives of the planning authority in relation to the siting and location of large scale wind energy infrastructure.*

Waterford City and County Council concluded its submission by recommending that planning permission should be refused for the following reasons:

1. *Notwithstanding the general planning policy support for wind energy at national, regional and local policy level, including Policy Objective UTL 13 of the Waterford City and County Development Plan 2022-2028, which seeks to support where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities, in relation to the specific site which is the subject of this application, that policy goes on to state that all such proposals shall be considered having regard to the wind energy designation map (Appendix 2 of the Renewable Energy Strategy) and the Waterford Landscape and Seascape Character Assessment which form an integral part of the development plan.*

2. *The subject site is located in an upland area which is designated as "most sensitive" with very distinctive features with a very low capacity to absorb new development without significant alterations of existing character over an extended area.*

3. *In addition, Landscape Policy Objective L02 of the Waterford City and County Development Plan 2022-2028 states that protection of the landscape and natural assets of the county shall be a priority having regard to the character, integrity, distinctiveness or scenic value of specific areas by ensuring that development proposals are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the uplands, along river corridors, coastal or other distinctive landscape character units.*

4. *Furthermore, the Renewable Energy Strategy of the Waterford City and County Development Plan designates the site of the proposed development as an "exclusion zone" or a "no go area" for new wind energy developments.*

5. *The proposed development would be sited on lands that are located within an area where wind farm development is not normally permissible for reasons relating to landscape sensitivity and, accordingly, it is considered that the proposed development would materially contravene policies UTL 13 and L 02 of the development plan and would, therefore, be contrary to the proper planning and sustainable development of the area.*

4.1.5 Observations by the Knockmealdown Protection Group on Waterford City and Council's Recommended Refusal of Planning Permission for the Proposed Dyrick Hill Wind Farm

The Knockmealdown Protection Group is aware that An Bord Pleanála does not have to follow the recommendations of the relevant planning authority, and may disregard a planning authority's advice or decision, if considered necessary by the Board. However, our understanding is that An Bord Pleanála may override or disregard such advice or decision only for serious national issues, if the proposed development is of national importance, or to ensure that the Board's decision is compliant with government policy or with a Ministerial Direction.

The Knockmealdown Protection Group agrees with the reasons proposed by Waterford City and County Council for concluding that planning permission should be refused for the proposed Dyrick Hill wind farm, and urges the Board to refuse permission on similar grounds. In this submission, the group has provided additional grounds for refusing permission, and urges the Board to take these into consideration also.

The Knockmealdown Protection Group is very much in agreement with, and supports, Waterford City and County Council's intention to fully protect the County's cultural and archaeological heritage, as expressed in the County Development Plan; and we would point out to the Board that the area in which the proposed wind farm would be located (if permitted) is particularly rich culturally and has many archaeological sites. In support of our assertion, we are attaching (as **Appendix I**) a detailed and relevant paper on the cultural heritage of the Sliabh gCua Area, written by Dr. Kathleen Fitzpatrick B.Ed., M.Sc., PhD. We would urge the Board to read this paper as part of our submission, as it provides evidence of the importance of the cultural and historical features and character of the area in which the windfarm site is located.

4.2 The Purpose and Importance of a Natura Impact Statement

A Screening Report for Appropriate Assessment and a Natura Impact Statement (NIS) have been provided by the applicant in support of the planning application.

The screening report concluded, on the basis of objective information, that, in the absence of appropriate mitigation, it could not be excluded at the screening stage that the wind farm project, individually or in combination with other plans or projects, would have a significant effect on six European sites.

On the basis of that conclusion, the applicant's consultant correctly determined that stage 2 of the Appropriate Assessment process was required in order to assess the implications of the project for the six European Sites. In accordance with Section 177T of the Planning and Development Act, a Natura Impact Statement (NIS) of the project was prepared by Doherty Environmental Consultants in order to assist the competent authority, incorrectly stated as Waterford County Council, in carrying out its Appropriate Assessment.[7]

The NIS is described as providing an examination, analysis and evaluation of the likely impacts from the wind farm project, both individually and in combination with other plans and projects, in view of best scientific knowledge and the conservation objectives of the European Sites concerned.

In this section of our submission, we wish to emphasise the importance of a Natura Impact Statement (NIS), and its assessment by the competent authority in order to complete the Appropriate Assessment process. Because An Bord Pleanála has a specific responsibility in this regard (i.e., the Board is the competent authority in this case), a brief summary of the purpose of a Natura Impact Statement and the process of Appropriate Assessment forms part of our submission.

As the Board will be aware, a Natura Impact Statement (NIS) considers whether a proposed development, alone or in combination with any other project,[8] might have adverse effects on the integrity of one or more Natura 2000 sites with respect to its/their conservation objectives. An adverse effect on integrity is one that prevents the site from making the same contribution to favourable conservation status for the relevant features as it did at the time of designation.

Mitigation measures to avoid, reduce or offset negative effects may have to be considered, but if there is any element of doubt or risk to the integrity of one or more sites, or to any of the habitats or species for which one or more sites have

[7] Natura Impact Statement Dyrick Hill Wind Farm, Doherty Environmental Consultants Ltd, May 2023, Section 1, Introduction, page 5.

[8] Our observations on the applicant's inadequate discussion of in-combination effects is in section 3.3 above

been selected, or to these sites' conservation objectives, consent cannot be given by the competent authority.

If doubt exists, i.e., if it cannot be proved on the basis of the best scientific information, that the proposed development will not have any significant adverse effect on a Natura 2000 site (SAC or SPA), planning permission should not be granted.

This strict requirement is clearly stated in Article 6 of the EU Habitats Directive 92/43/EEC, especially in Articles 6(3) and 6(4) which set out the procedural and substantive safeguards governing plans and projects likely to have a significant effect on a Natura 2000 site.

4.2.1 Relevant Irish Legislation, a Recent High Court Judgment and a Judgment of the Court of Justice of the European Union

The provisions of Article 6 have been transposed into Irish national law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), which clarify the State's responsibilities to comply with EU Directives on nature conservation, and which also address transposition failures identified in judgements of the European Court of Justice.

The 2011 Regulations define the legal responsibilities and powers of local authorities and An Bord Pleanála under the Planning and Development Acts to ensure that the requirements of the Birds and Habitats Directives are strictly observed in the adoption of development plans and the granting of development consents. All other statutory authorities must adhere to the provisions of the new Birds and Habitats Regulations in their planning, consent and operational functions. In addition, general obligations are placed on all public authorities to exercise their functions to secure compliance with the Birds and Habitats Directives and to uphold and enforce the requirements of the Regulations.

These Regulations, and the Planning and Development (Amendment) Act 2010, require planning authorities, when considering plans or projects that are likely to have a significant effect on an SAC or SPA, to ensure that an **appropriate assessment screening** is undertaken; and, where required, a **Natura Impact Statement** must be produced, followed by a full **appropriate assessment** of the implications of the plan or project for the conservation status of the site.

Sites may contain priority or non-priority habitats and species. The only justifications for damaging a qualifying "*priority*" site are "*considerations relating to human health and public safety, to beneficial consequences of primary importance of the environment, or further to an opinion from the European Commission, to other imperative reasons of overriding public interest*" (IROPI), but this can be allowed only after an assessment is made in line with the Article

6 procedure, and there are no other alternatives, and an agreement is reached with the European Commission.

The Planning and Development Act, 2000, as amended by the insertion of Part XAB (inserted by the Planning and Development (Amendment) Act, 2010), contains significant provisions requiring the relevant competent authority to undertake an appropriate assessment. Part XAB is lengthy, and for the purpose of this submission, the most relevant sections are as follows.

Section **177U** is the section of the amended Act which addresses screening for appropriate assessment:

> *"(1)* ***A screening for appropriate assessment*** *of a draft land use plan or application for consent for proposed development* ***shall be carried out by the competent authority to assess****, in view of best scientific knowledge,* ***if that*** *land use plan or* ***proposed development, individually or in combination with another plan or project is likely to have a significant effect on the European site****"* [our emphasis].
>
> *"(2) A competent authority shall carry out a screening for appropriate assessment under subsection (1) before —*
>
> *(a) a land use plan is made including, where appropriate, before a decision on appeal in relation to a draft strategic development zone is made; or,*
>
> *(b) consent for a proposed development is given".*
>
> "*(4) The competent authority shall determine that an appropriate assessment of a draft land use plan or a proposed development, as the case may be,* ***is required if it cannot be excluded****, on the basis of objective information,* ***that the*** *draft land use plan or* ***proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site****"* [our emphasis].
>
> *"(5) The competent authority shall determine that an appropriate assessment of a draft land use plan or a proposed development, as the case may be,* ***is not required if it can be excluded****, on the basis of objective information,* ***that the*** *draft land use plan or* ***proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site****"* [our emphasis].

Section **177S (2)** defines "*competent authority*" as *"the planning authority to whom an application for permission is made or the Board* [An Bord Pleanála], *as the case may be."*

The relationship between the granting or with-holding of planning consent and the result of an appropriate assessment carried out by the competent authority under Article 6.3 of the Habitats Directive is clarified by sections **117V (1)** and **117V (2)**:

> *"(1) An appropriate assessment carried out under this Part shall include a determination by the competent authority under Article 6.3 of the Habitats Directive as to whether or not a draft land use plan or proposed development would adversely affect the integrity of a European site and an appropriate assessment shall be carried out by the competent authority, in each case where it has made a determination under section 177U(4) that an appropriate assessment is required, before —*
>
> *(a) the draft land use plan is made including, where appropriate, before a decision on appeal in relation to a draft strategic development zone is made; or,*
>
> *(b) consent is given for the proposed development.*
>
> *(2) In carrying out an appropriate assessment under subsection (1) the competent authority shall take into account each of the following matters:*
>
> *(a) the Natura impact report or Natura impact statement, as appropriate;*
>
> *(b) any supplemental information furnished in relation to any such report or statement;*
>
> *(c) if appropriate, any additional information sought by the authority and furnished by the applicant in relation to a Natura impact statement;*
>
> *(d) any additional information furnished to the competent authority at its request in relation to a Natura impact report;*
>
> *(e) any information or advice obtained by the competent authority;*
>
> *(f) if appropriate, any written submissions or observations made to the competent authority in relation to the application for consent for proposed development; and,*
>
> *(g) any other relevant information.*

(3) *Notwithstanding any other provision of this Act … a competent authority shall … give consent for proposed development only after having determined that the … proposed development shall not adversely affect the integrity of a European site.*

(4) *Subject to the other provisions of this Act, consent for proposed development may be given in relation to a proposed development where a competent authority has made modifications or attached conditions to the consent where the authority is satisfied to do so having determined that the proposed development would not adversely affect the integrity of the European site if it is carried out in accordance with the consent and the modifications or conditions attaching thereto".*

This legislation transposes into Irish planning law the principles of Article 6 of the EU Habitats Directive 92/43/EEC, which also applies to Directive 79/409/EEC on the conservation of wild birds.

In brief, screening for Appropriate Assessment must be carried out by the competent authority, which in this case is An Bord Pleanála; and, if the Board is **not completely satisfied** [our emphasis] that the proposed wind farm development (in combination with any other plans and projects) would have no adverse impact on the integrity of a European site, the Board must then carry out an Appropriate Assessment, taking into account the applicant's Natura Impact Statement and any other relevant information.

This obligation to carry out a screening of all the Natura sites on which the development may have an effect has been clarified by Ms. Justice Finlay Geoghegan in *Kelly -v- An Bord Pleanála [2014] IEHC 400* (Judgment delivered on 25 July 2014). At paragraph 26 of her Judgment, the High Court Judge quoted from European case C-258/11:

26. *There is a dispute between the parties as to the precise obligations imposed on the Board in relation to the stage 1 screening by s.1777U but its resolution is not strictly necessary in these proceedings. There is agreement on the nature and purpose of the screening process which is well explained by Advocate General Sharpston in Case C-258/11 Sweetman at paras 47-49:*

"47. It follows that the possibility of there being a significant effect on the site will generate the need for an appropriate assessment for the purposes of Article 6(3). The requirement at this stage that the plan or project be likely to have a significant effect is thus a trigger for the obligation to carry out an appropriate assessment. ***There is no need to establish such an effect; it is, as Ireland observes,***

> ***merely necessary to determine that there may be such an effect*** [our emphasis].

The Judgment in CJEU Case 258/11 – *Sweetman, Ireland, the Attorney General, and the Minister for the Environment, Heritage and Local Government -v- An Bord Pleanála* – clarifies even further the point made by the High Court in the case cited above. At paragraph 44 of the Judgment in Case 258/11, the CJEU unequivocally determined the high standard to which an Appropriate Assessment under the Habitats Directive must be carried out:

> *"44. So far as concerns the assessment carried out under Article 6(3) of the Habitats Directive, it should be pointed out that* ***it cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned****."* [our emphasis].

It is a key point in our submission that the competent authority (An Bord Pleanála) must not fail in its duty to comply with this legal standard when making its decision on whether to grant or refuse planning permission for the proposed wind farm, and that An Bord Pleanála does not have the legal power to grant planning permission if this standard is not met. If the Board is not satisfied, to the extent stated clearly in the Judgment of the CJEU quoted above, it follows that the only appropriate and legal course of action for the Board to take would therefore be to refuse planning permission.

4.3 Observations on the Applicant's Reliance on the Wind Energy Guidelines

One of the issues raised by the planning application for the Dyrick Hill wind farm, is the status of the "*Wind Energy Development Guidelines for Planning Authorities*" (DoEHLG, 2006), commonly referred to as the "2006 Guidelines".

When assessing the potential for shadow flicker (EIAR, Chapter 15, section 15.3), the applicant relies heavily on the "2006 Guidelines", stating that the relevant Irish guidance for shadow flicker is derived from the "*The Draft Wind Energy Development Guidelines for Planning Authorities*" (Department of the Environment, Heritage and Local Government (DoEHLG), 2019). Several other references to these guidelines are made in this chapter of the EIAR; and, in Chapter 4, section 4.7.4.3, the revised draft wind energy guidelines are stated as:

- setting out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission; and,

- providing a consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Relatively recent information about the status of the Wind Energy Development Guidelines may be found in a Dáil question and answer session on Tuesday, 25 January 2022, when Mr Peter Burke, T.D., Minister of State at the Department of Housing, Local Government and Heritage replied to a question by Mr Denis Naughten, stating that:

> *"My Department is currently undertaking a focused review of the 2006 Wind Energy Development Guidelines. The review is addressing a number of key aspects including noise, setback, shadow flicker, community obligation, community dividend and grid connections.*
>
> *Guidance on the noise aspect is currently being finalised by my Department in conjunction with the Department of Environment, Climate and Communications (DECC), which has primary responsibility for environmental noise matters. Significant work has been undertaken on the noise elements and the two Departments recently met to discuss new developments in this regard including consideration of the impact of the revised 2030 target to generate up to 80% of our electricity from renewable sources and the need to ensure that proposals regarding the measurement and assessment of noise from wind turbines are fit for purpose. These aspects are currently being considered and further engagement between the Departments is expected imminently. Following this inter-departmental engagement, I will be in a better position to provide an update on the expected publication date of the revised Guidelines, the finalisation of which remains a priority.*
>
> *It should also be noted that the review and finalisation of the Guidelines has been included as a specific action in the recently published Climate Action Plan.*
>
> *When finalised, the revised Guidelines will be issued under section 28 of the Planning and Development Act 2000, as amended. Planning authorities and, where applicable, An Bord Pleanála, must have regard to guidelines issued under section 28 in the performance of their functions generally under the Planning Acts.* ***In the meantime, the current 2006 Wind Energy Development Guidelines remain in force****"* [our emphasis].

It is our observation that the Minister's reply ignores two problems which have a bearing on the this wind farm planning application, and which must be taken into account by the Board.

Firstly, the original Wind Energy Development Guidelines, issued in 2006, have an "official" status; they are intended to provide planning guidance to the relevant authorities, and we might add that the Government has defended them as an

important policy since the time when they were issued. Therefore there is no doubt that the 2006 Guidelines constitute a "policy" within the meaning given in the EU Directive 2001/24/EC on the assessment of the effects of certain plans and programmes on the environment, otherwise known as the Strategic Environmental Assessment Directive (SEA).

It is also clear, and Board will be aware, that the 2006 Wind Energy Development Guidelines have not been subjected to Strategic Environmental Assessment, and their legality must therefore be in doubt. By allowing these guidelines to remain in force, Ireland is in breach of the EU Strategic Environmental Directive 2001/24/EC (see section 4.3.1 below).

Secondly, while we understand that the "2019 Draft Guidelines" may have been subjected to Strategic Environmental Assessment, the Minister's reply has made it very clear that these draft guidelines are not yet in force, and the "2006 Guidelines" must be considered and taken into account by An Bord Pleanála when assessing the planning application.

It is therefore our observation and submission to the Board that:

i) When determining the current planning application for the Dyrick Hill wind farm, the Board should **not** have regard to the 2006 Wind Energy Development Guidelines, even if they remain in force simply because of a failure to bring a revised set of guidelines into force;

ii) The 2006 Wind Energy Development Guidelines are hopelessly out of date, given the increasing size and height of wind turbines, and their environmental impacts, together with the increasing recognition that large-scale onshore wind farms are not the optimum way to increase Ireland's share of renewable energy; and,

iii) Given that the draft Revised Wind Energy Guidelines 2019 have not been formally adopted, and they do not have legal force, the Board should not be bound be them, or use compliance with these guidelines as a basis for granting planning permission for the proposed wind farm.

4.3.1 Requirement that the Competent Authorities of a Member State must Comply with EU Legislation and Judgments of the CJEU – Case C 24/19

The fact that the 2006 Wind Energy Development Guidelines are considered to be those in force (as stated by the Minister), but which have not been subjected to Strategic Environmental Assessment (SEA), may appear an obscure matter, but in fact there are serious consequences for An Bord Pleanála if the 2006 Wind Energy Development Guidelines are relied upon by the Board.

These consequences follow from the judgment in case **C 24/19**, in which the Court of Justice of the European Union, responded to a request for a preliminary ruling on the interpretation of Articles 2(a) and 3(2)(a) of Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment – the Strategic Environmental Assessment (SEA) (OJ 2001 L 197, p. 30).[9]

The background to this important and relevant case was that, on 30 November 2016, following a procedure that began in 2011, the Flanders Department of Land Planning (Belgium) granted development consent for the installation and operation of five wind turbines. The consent was subject to compliance with certain conditions laid down by: (i) an order of the Flemish Government (the 'Order'); and, (ii) a circular on the '*Assessment framework and conditions for the installation of wind turbines*' (the 'Circular'). It will be immediately obvious that this 'Circular' was in some respects similar to Ireland's Wind Energy Development Guidelines.

The applicants in the case, known only as "***A and Others***", in their capacity as residents near the site proposed for the wind farm project, brought an action before the Council for Consent Disputes (equivalent to An Bord Pleanála) seeking an annulment of the development consent. In support of their action, they submitted that the Order and the Circular, based on which the consent had been granted, infringed Article 2(a) and Article 3(2)(a) of Directive 2001/42, as neither the Order nor the Circular had been subject to Strategic Environmental Assessment, contrary to the provisions of the Directive. Against this background, the Council for Consent Disputes decided to stay the proceedings and to refer questions for a preliminary ruling to the CJEU.

Essentially, the local residents in Belgium challenged a wind farm consisting of five turbines which had been permitted, based on conditions outlined in a regional government Order from 2006 and a Circular on the Assessment framework and conditions for the installation of wind turbines. They argued that the consent granted should be annulled on the basis that the Order and the Circular should have been preceded by a SEA, and were therefore in breach of Article 2(a) and Article 3(2)(a) of Directive 2001/42 on the assessment of the effects of certain plans and programs on the environment (the SEA Directive).

At issue was the interpretation of the above Articles. Article 2(a) defines plans and program as: "*plans and program ... - which are subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or*

[9] Judgment of the Court (Grand Chamber), delivered 25 June 2020, in Case C-24/19, *A and Others against Gewestelijke stedenbouwkundige ambtenaar van het departement Ruimte Vlaanderen, afdeling Oost-Vlaanderen*

Government, and - which are required by legislative, regulatory or administrative provisions"

Article 3(2)(a) provides that an environmental assessment shall be carried out for all plans and programmes:

> *"(a) which are prepared for agriculture, forestry, fisheries,* ***energy*** [our emphasis], *industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use and which set the framework for future development consent of projects listed in Annexes I and II to Directive 85/337/EEC"*

The Court of Justice of the European Union (CJEU) had to consider whether the Order and the Circular amounted to a plan or programme, and also the implications for a development such as the proposed wind farm, in the event that the Court found that there was a violation of EU law by a Member State.

4.3.2 What Are Considered to be Plans and Programmes Within the Meaning of the Directive

According to established case law (cases C-567/10, C-160/17, and C-321/18), the CJEU considered that, under Article 2(a) of the Directive, the adoption of plans or programmes (in this case the Order and the Circular) does not need to be compulsory. It is sufficient that such plans and programmes are provided for by national legislative or regulatory provisions, which determine which are the competent authorities, and what is the procedure for their adoption.

Therefore, a measure must be regarded as 'required' under Article 2(a) of the SEA Directive where the legal basis of the power to adopt the measure is found in a particular national legislative provision, even if the adoption of that measure is not mandatory. Therefore, in the case discussed, the definitions of plans and programmes covers the Order and, subject to verification by the referring court, also covers the Circular.

The CJEU therefore found that the Order and the Circular constituted plans or programmes under the SEA Directive, and it found that a SEA should have been carried out prior to their adoption by the Belgian government in 2006.

4.3.3 The Circumstances Under which a Strategic Environmental Assessment (SEA) Must be Carried Out

Firstly, the Order and the Circular concern the energy sector, which is specifically referred to in Article 3(2)(a) of the Directive as one of the sectors for which an environmental assessment is required.

Secondly, as regards the question of whether the Order and the Circular define the framework for future development consent for projects, as set out by Article

3(2)(a) of the Directive, the CJEU stated the following: According to established case law (cases C-671/16 and C-43/18), the environmental assessment is needed if the measure "*establishes a significant body of criteria and detailed rules for the grant and implementation of one or more projects that are likely to have significant effects on the environment".*

In this regard, the CJEU considered that the concept of a 'significant body of criteria and detailed rules' must be construed qualitatively and not quantitatively. Therefore, in the Belgian case cited, the importance of the requirements laid down by the Order and the Circular – that provide conditions relating to the installation and operation of wind turbines as regards, *inter alia*, shadow flicker, safety procedures, and noise emissions – indicate that those instruments constitute a framework, which is non-exhaustive, but which is sufficiently significant from a qualitative point of view to require the preparation of a strategic environmental assessment (SEA).

Both the Order and the Circular contained various provisions in relation to the installation and operation of wind turbines, including measures on shadow flicker, safety, and noise levels.

4.3.4 The Consequences of the CJEU Judgment for the Competent Authorities in a Member State

The Court of Justice outlined the consequences for a Member State and national competent authorities (such as An Bord Pleanála) of a breach of EU law in the following terms:

a) Member States are "*required to eliminate the unlawful consequences"* of breaches of EU law. Competent national authorities are "*under an obligation to take all the necessary measures, within the sphere of their competence, to remedy the failure to carry out an environmental assessment" which can involve "adopting measures to suspend or annul that plan or program".*

b) Only the Court of Justice may, in exceptional cases, temporarily suspend the Application of EU law.

The CJEU concluded that in cases where a SEA is required but is not carried out, **the plan or program, as well as all permissions for projects based on the plan or program, must be annulled**.

In the Belgian case, construction of the wind farm had not yet commenced. The Court of Justice stated that it was clear that the consent must therefore be annulled, as it was granted on the basis of the plan or program which "*was itself adopted in breach of the obligation to carry out an environmental assessment".* The Court of Justice also held that where installation of a windfarm project "*has*

commenced, or is even completed", the consent granted can be annulled (paragraph 89 of the CJEU Judgment).

4.3.5 The Conditions Under Which An Official National Guideline which Breaches EU Law can be Provisionally Maintained in Force

The Court also addressed itself to considering those circumstances in which consent granted for projects would not have to be annulled, and these were stated to be limited to the following two situations:

1. Where there is a risk that the annulment "*could create a legal vacuum that is incompatible with that Member State's obligation to adopt measures to transpose another act of EU law concerning the protection of the environment*"; (paragraph 90 of the CJEU Judgment); or,

2. If the consequences of such annulment were "*a genuine and serious threat of disruption to the electricity supply of the Member State concerned which could not be remedied by any other means or alternatives, particularly in the context of the internal market*" (paragraph 92 of the CJEU Judgment).

When considering those particular circumstances where a grant of permission or consent would not have to be annulled, the CJEU cited case C-411/17. In Case C-411/17, the Court stated that it was permissible to continue the operation of a large-scale energy plant (two nuclear reactors), where this was necessary for the security of energy supply of the Member State as a whole.

However, in its consideration of case **C 24/19**, the Court held that the cessation of activity of a limited number of wind turbines was not likely to have significant implications for the supply of electricity for the whole of Belgium.

It is our submission that the same criteria apply to the proposed wind farm at Dyrick Hill; if An Bord Pleanála refused planning permission for the proposed wind farm, this decision would not be likely to have significant implications for the supply of electricity for the whole of Ireland.

It is therefore our concluding observation that the Board cannot grant permission for the proposed Dyrick Hill windfarm, given the applicant's reliance on the 2006 Wind Energy Development Guidelines, and given the judgement of the CJEU case **C 24/19** cited above, and the implications of that judgement.

4.4 Legal Requirement to Provide Precise and Exact Details of a Proposed Wind Farm in the Relevant Planning Application

4.4.1 Implications of the Judgment in the Case of *Sweetman -v- An Bord Pleanála* (2020 / 557 JR)

There is no doubt that An Bord Pleanála will be aware of the Judgement delivered by Mr. Justice Humphreys on 16 June 2021, in *Sweetman -v- An Bord Pleanála* (**2020 /557 JR**), neutral citation ***[2021] IEHC 390***.

In this High Court case, the applicant successfully challenged the legality of a decision by An Bord Pleanála to grant planning permission to Bórd na Móna Powergen Ltd (a Notice Party in the case) for a 24-turbine windfarm on a 1,908 hectare site in the Mountdillon group of peat extraction bogs, County Longford.

The case, frequently referred to as the Derryadd Wind Farm case, concerned a proposed wind farm, for which the applicant sought planning permission directly from the Board under the Planning and Development (Strategic Infrastructure) Act, 2006. Even though this case was not an appeal to the Board from a decision by a planning authority, it is our observation that the result of this case directly affects the way in which the Board must approach the planning application by Dyrick Hill Wind Farm Ltd, the subject of our observations.

The applicant's case in *Sweetman -v- An Bord Pleanála* is set out at paragraph 38 of the Judgment:

> *"(i). the application does not give precise details of the design of structures but only "typical" arrangements;*
>
> *(ii). the application also fails to specify dimensions for the structures, only maximum dimensions;*
>
> *(iii). the application does not specify the exact location of all of the structures and foundations".*

At paragraph 39, Mr. Justice Humphreys commented that:

> *"In particular, the turbine heights and blade lengths are expressed in terms of maxima, not the actual proposed dimensions. That is equivalent to applying for planning permission for a house on the basis that it could be anything from a one-storey bungalow to a ten-storey mansion, and contending that proper details have been furnished as long as a maximum dimension is provided."*

The Judge then went on to refer, at paragraph 51, to Article 214(1) of the 2001 Planning and Development Regulations (as amended) which includes the following requirements:

> *"[s]ubject to sub-article (2), when making an application for strategic infrastructure development, the applicant shall send to the Board – (a) 10 copies of the* ***plans and particulars*** *of the proposed development (including any* ***plans, particulars or other information*** *indicated by the Board under article 210(2) and of* ***the EIAR and, where the application is accompanied by an NIS, of the NIS*** *...".*[our emphasis].

He further commented at paragraph 52:

> *"While the concept of "plans and particulars" isn't defined by the regulation, it must mean something specific –* ***in particular something specifically measured and capable of being drawn on a plan****. That can't include a widely variable design envelope. Otherwise one wouldn't be talking about a plan, still less particulars".* [our emphasis].

And at paragraph 71:

> *"The greater the variability in what is permitted in an application, the less definite information is there for other interested parties availing of public participation, and the greater the range in terms of what the built outcome on the ground would look like".*

The final decision of the High Court was that providing typical details of certain aspects of the proposed wind farm, which the Board had accepted as adequate, did not amount to the legal requirement to provide "*plans and particulars*" of a proposed development. Specifying particulars of the works for which permission is sought is a statutory obligation.

The Court ruled that on foot of those findings, the Board's decision should be quashed.

While the importance of this Judgment is self-evident, we wish to emphasise a number of points which are explicitly relevant to our observations on the planning application for the Dyrick Hill wind farm:

(a) The crux of the Respondent's arguments was the reliance on the industry concept of "design envelope" — a process which was borrowed from the British cases of *R. v Rochdale Metropolitan Borough Council ex parte Milne* (No. 1), *R. v Rochdale Metropolitan Borough Council ex parte Tew* [1999] and *R. v Rochdale Metropolitan Borough Council ex parte Milne* (No. 2) [2000][10], and referred to by Mr Justice Humphreys at paragraph

[10] *R. v Rochdale Metropolitan Borough Council ex parte Milne*. Queen's Bench Division (Crown Office List) [2001] Env. L.R. 22. Judgment by Sullivan J., 31 July 2000.

61 of his Judgement as the "*Rochdale envelope*". This approach allowed developers a range of flexibility in their initial submission of plans and particulars which then permitted them to finalise details at the construction stage, in accordance with the most up-to-date technologies.

(b) However, Mr Justice Humphreys concluded that "*the facts in Rochdale are a world away from the facts here*" (para 70), this concept was of industry design, it was derived from British law, it had no basis in Irish Planning Law, and for the Court to endorse the principle of the "*Rochdale envelope*" would amount to an impermissible modification of the relevant Irish enactments. As such, it could not be used to circumvent the strict requirements of Articles 22 and 23 of the Planning and Development Regulations 2001 (as amended).

(c) Much of the contention in the above cited case taken by Peter Sweetman against the Board centred on the relevance of Articles 22 and 23 of the Planning and Development Regulations 2001 (as amended) to Strategic Infrastructure Development (SID). Ultimately, the High Court concluded that Article 214 (relating to SID) should be interpreted in the light of Articles 22 & 23. **As such, there is no question but that the strict requirements of Articles 22 & 23 in relation to the specificity of Plans and Particulars should apply in full** (for the convenience of the Board, we quote Articles 22 & 23, and Article 26, in section 4.4.2 below).

It is therefore follows from the above High Court Judgment in *Sweetman -v- An Bord Pleanála* that the lack of precise detail in the planning application by Dyrick Hill Wind Farm Ltd, and especially the inadequate information about the proposed wind turbines, and the inconsistency and lack of precise and exact information about relevant key aspects of the proposed development (to which we have referred extensively in section 3.2 above), leave no choice to the Board but to refuse planning permission.

4.4.2 Observations on Articles 22 and 23 of the Planning and Development Regulations, 2001 to 2020 (as amended)

In the High Court case described above, the applicant, Mr Peter Sweetman, asserted that the Board must examine a planning application to ascertain if the contents of the application comply with the Planning Regulations, in particular Articles 22 and 23 of the 2001 Regulations. For the convenience of the Board, we quote these Articles below.

Article 22 specifies the content of planning applications generally; while **Article 23** specifies the requirements for plans and particulars to accompany a planning application under Article 22.

The importance of **Article 23** is that it states precisely that:

"(1) Plans, drawings and maps accompanying a planning application in accordance with article 22 shall all be in metric scale and comply with the following requirements:

(a) site or layout plans shall be drawn to a scale (which shall be indicated thereon) of not less than 1:500 or such other scale as may be agreed with the planning authority prior to the submission of the application, the site boundary shall be clearly delineated in red, and buildings, roads, boundaries, septic tanks and percolation areas, bored wells, significant tree stands and other features on, adjoining or in the vicinity of the land or structure to which the application relates shall be shown,

(b) other plans, elevations and sections shall be drawn to a scale of not less than 1:200 (which shall be indicated thereon), or such other scale as may be agreed with the planning authority prior to the submission of the application in any particular case,

(c) the site layout plan and other plans shall show the level or contours, where applicable, of the land and the proposed structures relative to Ordnance Survey datum or a temporary local benchmark, whichever is more appropriate,

(d) drawings of elevations of any proposed structure shall show the main features of any buildings which would be contiguous to the proposed structure if it were erected, whether on the application site or in the vicinity, at a scale of not less than 1:200, as may be appropriate, and where the development would involve work to a protected structure or proposed protected structure, shall show the main features of any buildings within the curtilage of the structure which would be materially affected by the proposed development,

...

(f) plans and drawings of floor plans, elevations and sections shall indicate in figures the principal dimensions (including overall height) of any proposed structure and the site, and site or layout plans shall indicate the distances of any such structure from the boundaries of the site".

Article 26 is of equal importance, as it describes the exact procedure which a planning authority (including An Bord Pleanála) must follow on receipt of a planning application; and, apart from requirements such as stamping and acknowledging receipt of the planning application, the planning authority must:

"(1) ... consider whether the applicant has complied with the requirements of articles 18, 19(1)(a) and 22 and, as may be appropriate, of article 24 or 25.

(3) Where, following consideration of an application under sub-article (1), a planning authority considers that –

(a) any of the requirements of articles 18, 19(1)(a) or 22 and, as may be appropriate, of article 24 or 25 has not been complied with, or

(b) the notice in the newspaper or the site notice, because of its content or for any other reason, is misleading or inadequate for the information of the public,

the planning application shall be invalid.

(4) Where, on inspection of the land to which the application relates, the planning authority considers that the requirements of articles 17(1)(b), 19 or 20 have not been met, or the information submitted in the planning application is substantially incorrect or substantial information has been omitted, the planning application shall, notwithstanding the fact that an acknowledgement has been sent to an applicant in accordance with sub-article (2), be invalid".

Given the uncertainties and lack of definite information about many elements of the proposed wind farm development described in section 3.2 above, it is our observation that the Board cannot grant planning permission on the basis of a fundamentally unsound planning application which contains significant gaps and inconsistencies; and, as we assert in our submission, fails to comply with the above relevant articles of the Planning and Development Regulations 2001 to 2020 (as amended).

5. Observations on Certain Sections of the Planning Application

5.1 Landscape and Visual Impact of the Proposed Wind Farm

5.1.1 Introduction

The Irish landscape is one of the primary assets for tourism in the country and has been the cornerstone of international tourism marketing campaigns for decades. International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore, as the Irish landscape is one of the primary reasons for visiting the country, it is essential that the quality, character and distinctiveness of this valuable resource is protected.

The proposed Dyrick Hill Wind Farm development is located along the foothills of the Knockmealdown mountain range, which is located on the border of counties South Tipperary and Waterford, running east and west between the two counties. The highest peak of the range is Knockmealdown. On the western side of the summit, the range is crossed by a high pass called 'The Vee'. The Vee is predominantly famous because of the breath-taking panoramic views afforded to locals and tourists alike going through the pass. The journey rises to about 610m above sea level above Bay Lough, and as it does so it gives wonderful views of a portion of the 'Golden Vale' between the Knockmealdown and Galtee Mountain Ranges.

As stated in the Applicant's EIAR Chapter 11 Landscape & Visual Amenity, Section 11.3.7.5, Tourism, Recreational and Heritage Features, page 32:

> "*the Study Area comprises a variety of amenity features, most notably walking and cycling trails. Some of the most noteworthy walking trails include the East Munster Way, the Tipperary Heritage Way, the Blackwater Way (Avondhu Way), the Nire Valley Trails and the Knockmealdown Trails.*"

However, we must point out that the applicant has completely omitted St. Declan's Way, which is a 115km ancient Pilgrim Path that follows the route St. Declan took when going to Cashel to meet St. Patrick in the fifth century. In turn, it is the way that Pilgrims have taken to visit Saint Declan's monastery, holy well and grave in Ardmore for the past one and a half thousand years. Part of this historic and crucially important route – which is also referred to as Ireland's Camino – crosses over the Knockmealdown mountain range from Goatenbridge via Mount Melleray to Lismore.[11]

[11] https://www.stdeclansway.ie

The Proposed Development will have a damaging effect on the stunning, unique and uninterrupted views for hillwalkers in the Knockmealdowns and beyond (please see Table at the end of this section, with details of walks and trails). For a long time the Knockmealdown mountain range has been a sought-after area for recreational hillwalkers, and it has been described as *'a hill walker's dream with mountain trails, forestry tracks and mountain climbs in abundance'*, and has been mentioned in many articles. Travel writer Christopher Somerville described it as *"a little slice of heaven, put it like that. This is a view to make anyone stop and stare"* in a walking series for *The Irish Independent.*

Located in the Knockmealdown mountain range, Mount Melleray is a spiritual haven and is also well known to those looking for tranquillity, peaceful surroundings, stunning scenery and amazing views.

5.1.2 Landscape Character Assessment

As stated at the beginning of Appendix 8, Landscape and Seascape Character Assessment, in the Waterford City and County Development Plan (2022-2028):

> *"The Planning and Development (Amendment) Act 2010 specifies that development plans shall contain particular objectives relating to landscape, including objectives in accordance with 'relevant policies or objectives … relating to providing a framework for identification, assessment, protection, management and planning of landscapes having regard to the European Landscape Convention".*

The management of Waterford's landscape involves:

- Ensuring adequate protection to our most sensitive and vulnerable landscapes through appropriate policies and objectives;
- Providing for development that will enhance and benefit the receiving environment; and,
- Protecting the landscape from inappropriate and unsustainable development.

Waterford City and County Council commissioned a Landscape and Seascape Character Assessment in 2019 to review their City and County Development Plan 2022-2028. This assessment identifies different landscape character areas and associated sensitivities.

The objective of this assessment is to assist in development management by providing criteria for decision making based on a systematic and scientific methodology and alerting applicants and designers to the need for special

requirements in certain areas for landscape fit or design to facilitate the integration of development in a particular landscape character type or area.

It is a 'Strategic Objective' of the Waterford City and County Development Plan to:

> *'Protect our sensitive landscapes and seascapes which contribute to the distinctiveness of Waterford as a place.'* (Chapter 10: Landscape, Coast/ Marine and Blue Green Infrastructure)

It therefore follows that the proposed Dyrick Hill wind farm would be incompatible with the main Strategic Objectives of the landscape assessment cited in the Waterford City and County Development Plan. This proposed development would drastically alter the landscape by changing the visual outlines of the areas to such an extent that the distinctiveness of the Knockmealdown uplands and foothills would be changed.

Appendix 8 of the Waterford City and County Development Plan, states:

> *"The Landscape Character Assessment classifies areas within Waterford City and County according to their capacity to absorb development without changing the distinctiveness and character of that particular landscape type. A landscape that could readily absorb development without disproportionately affecting the landscape is considered to be an area of least sensitivity. Areas where a development could easily cause a change in the character of the landscape and have impact over a wide area would be an area of most sensitivity."*

The Waterford City and County Development Plan Landscape Policy Objective Protecting our Landscape and Seascape [L02] states:

> '*We will protect the landscape and natural assets of the County by ensuring that proposed developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area and ensuring that such proposals are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the uplands, along river corridors, coastal or other distinctive landscape character units.'*

The capacity of an area to visually absorb development is influenced by a combination of the following factors:

1) Topography – development in elevated areas will usually be visible over a wide area; development in enclosed areas will not.
2) Vegetation – areas which support (or which have the potential to support) trees, tall hedges and woody vegetation can screen new development

from view. Areas which cannot easily sustain such vegetation will be unlikely to screen new development.

3) Development – New development is less likely to be conspicuous in the context of existing development in the landscape.

5.1.3 Location of the Proposed Wind Farm in an Area of Sensitive Landscape Character

Table A8.1 Landscape Character Units in Waterford, shown in Appendix 8, Landscape and Seascape Character Assessment, identifies seven landscape character types, which include the following and which are applicable to the proposed Dyrick Hill Wind Farm development:

- Foothill Landscape – Tooraneena Foothills (5C)
- Upland Landscape – Knockmealdown Mountains (6B)

The proposed development straddles the border of the Upland and Foothill landscape types and across the landscape character unit (5C Tooraneena Foothills & 6B Knockmealdown Mountains).

As shown in the Applicant's EIAR Chapter 11 Landscape & Visual Amenity, Figure 11.5, Page 21, the proposed Dyrick Hill wind farm, if permitted, would be located across three sensitivity classifications as indicated in the Waterford City and County Development Plan: – 'Most Sensitive', 'High Sensitivity' and 'Low Sensitivity'. The most elevated part of the site to the west in the surrounds of the summit of Broemountain have been classified as 'Most Sensitive' designation, while the less elevated eastern parts of the site are classed as 'Low Sensitivity' designation.

As shown in Figure 5.1.3 below:

1. Eight of the 12 proposed wind turbines are positioned in an area according to the character assessment as **Most Sensitive** (*Very distinctive features with a low capacity to absorb new development without significant alternation of existing character over an extended area*).

2. Two of the proposed wind turbines are positioned in an area according to the character assessment as **High Sensitivity** (*Distinctive character with some capacity to absorb a limited range of appropriate new development while sustaining its existing character*).

3. Two of the proposed wind turbines are positioned in an area according to the character assessment as **Low Sensitivity** (*A common character type with a potential to absorb a wide range of new development*).

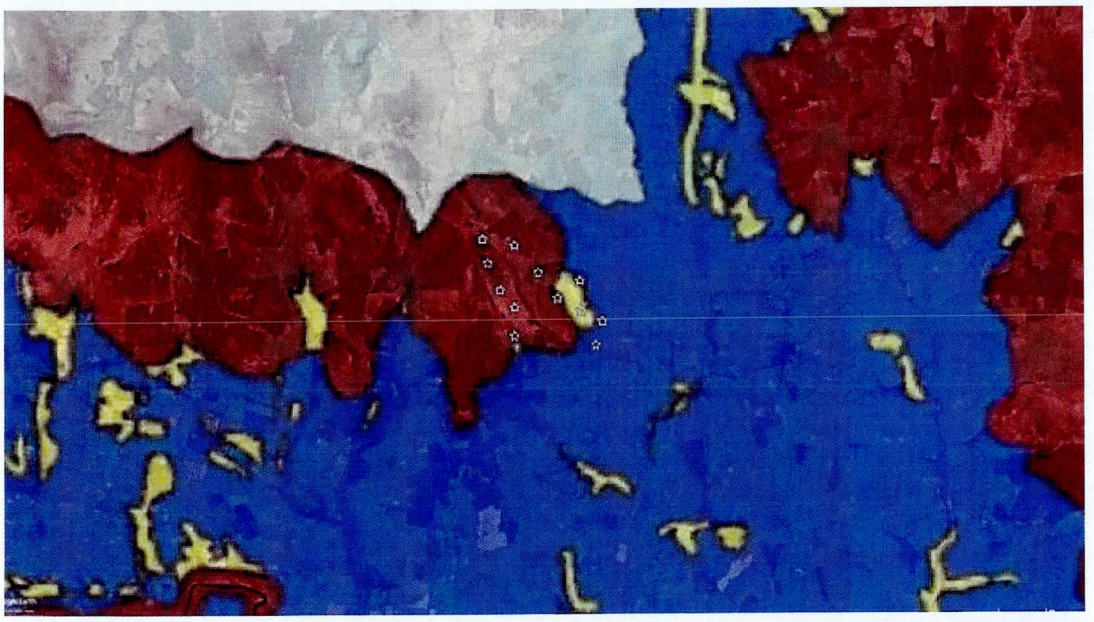


Figure 5.1.3: Excerpt from the current Waterford City and County Development Plan 2022 - 2028 map showing landscape sensitivity classification around the proposed wind turbine locations (red: most sensitive; yellow: high sensitivity; blue: low sensitivity).

It is the policy of the planning authority, Waterford City and County Council, that to be considered for permission, any proposed development in or in the environs of these areas must be shown not to impinge in any significant way upon its character, integrity or uniformity when viewed from the surroundings. Particular attention should be given to the preservation of the character and distinctiveness of these areas as viewed from scenic routes and the environs of archaeological and historic sites.

5.1.4 County Tipperary Development Plan (2022-2028)

The Applicant's EIAR, Chapter 11, Landscape and Visual Amenity, Section 11.3.6, Page 23, states that:

> *"Although the proposed development is wholly contained within county Waterford, it sits immediately adjacent to the Tipperary border and as a result it is important to include any neighbouring landscape designations within County Tipperary".*

The Tipperary County Council Landscape Character Assessment identifies four Universal Landscape Architypes - 'A – The Plains', 'B – The Lakelands', 'C – The Foothills' and 'D – The Uplands'. These are further subdivided into seven Landscape Character Types and 23 Landscape Character Areas. Designated within the Uplands, Landscape Area Number 23, is the 'Knockmealdown Mountain Mosaic'.

As a D1 Mountain & Upland Landscape Type and Archetype, the Knockmealdown Mountain Mosaic[12] is characterised as an *'Area of solitude, dominated by natural vegetation, and harsh climate overlook the busy, fertile pains and settlements of Tipperary. Though seldom visited these areas viewed across wide expanses of lowlands form the backdrop to almost all of the most scenic areas of the county.'* (Tipperary County Development Plan 2022-2028, Appendix 3, Landscape Character Assessment and Schedule of Views and Routes, Table 3.1 Derivation of Landscape Character Areas from Landscape Types and Archetypes, page 21).

Furthermore, Volume 5 Strategic Environmental Assessment Statement and Environmental Report of the Tipperary County Development Plan, Section 4.13. Landscape, page 67, states:

> *'The Landscape Character Areas in County Tipperary are classified according to their level of sensitivity, ranging from: 'Vulnerable'; 'Transitional Vulnerability'; 'Sensitive'; 'Transitional Sensitivity'; 'Normal'; and 'Robust'. The 'Vulnerable' areas are the most sensitive to development; developments that are likely to create a significant visual impact will best be absorbed in areas where the landscape is most robust, i.e. where the landscape has the capacity to absorb development without significantly changing its character. Landscape Character Areas in the County that are classified as 'Vulnerable' include: [...] Knockmealdown Mountain Mosaic'*

As explained in Table 5.1 Objectives and Policies for Types of Landscape Sensitivities in Appendix 3, Derivation of Landscape Character Areas from Landscape Types and Archetypes, 'Vulnerable' sensitivity is: *'Class 5 Unique – Change would alter the character to the landscape'.* It has a *'Very Low'* capacity and is described as an area *'to be avoided on account of a very significant potential for change of appearance or character due to the presence of development or use'.* And the relevant Objective and Guideline state that: *'Control unavoidable new developments or uses, or the intensification or expansion of established patterns of use and settlement – unless they can demonstrate capacity to sustain existing appearance and character.'*

And finally, Tipperary County Council has rated *'LCA 23 – Knockmealdown Mountain Mosaic'* as having 'Least' Compatibility with wind farm development.

[12] Volume 5 Strategic Environmental Assessment Statement and Environmental Report of the Tipperary County Development Plan, Section 4.13. Landscape, page 67.

5.1.5 Wind Energy Exclusion Zone

Continuing further on the topic of compatibility with wind farm development, the Waterford City and County Development Plan has three classifications of areas of suitability for wind farm development in its Wind Energy Policy. These are: '**Preferred Areas**', '**Areas Open to Consideration**' and '**No Go Areas**. As may be seen in **Figures 5.1.5** and **5.1.6** below, the entire site for the Proposed Development is located within a 'No-Go' **exclusion zone for wind energy**. And it is located in excess of 1.5km-2km from areas that are classified as 'preferred' or 'open for consideration'.

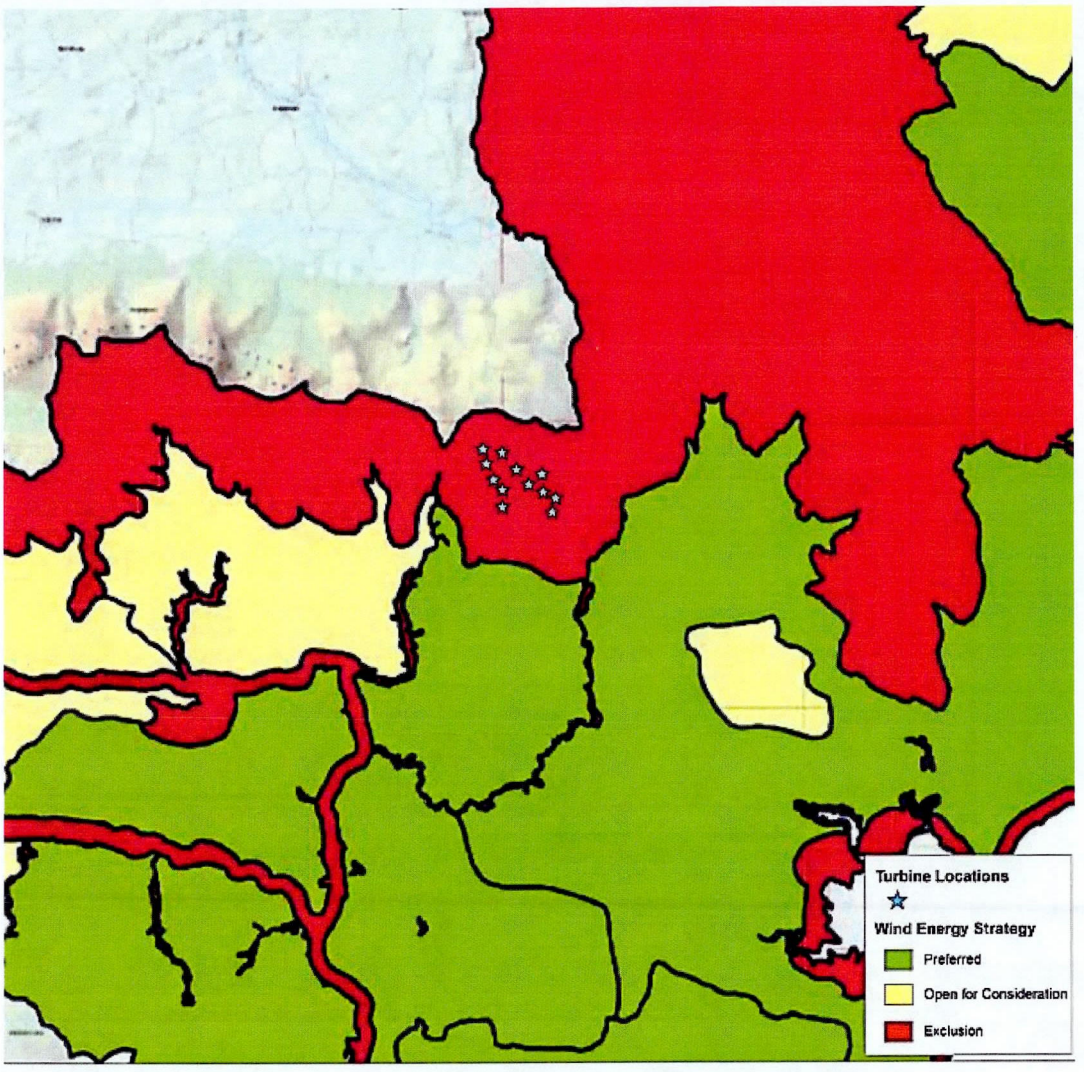


Figure 5.1.5 **Excerpt from Appendix 2 of the Current Renewable Energy Strategy.**
Source: Applicant's EIAR Chapter 9, Section 11.3.5.2 (Figure 11.6)

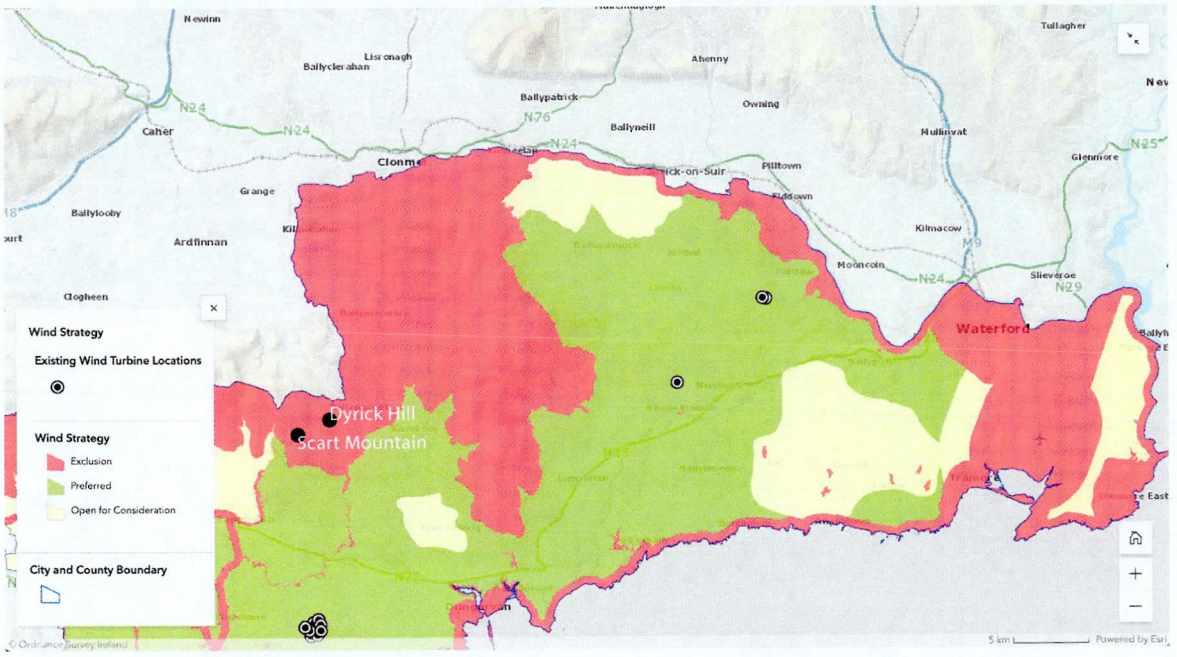


Figure 5.1.6 **Map from Waterford City and County Council's Wind Energy Strategy.**

Source: Waterford City and County Council Development Plan Wind Energy Map;
https://storymaps.arcgis.com/stories/39cb4846c01e40f7b94ed562b9077bfe
with locations of both proposed developments – Dyrick Hill Wind Farm and Scart Mountain Farm – added.

5.1.6 Scenic Routes & Protected Views

There is a significant number of sites on record of monuments and places that are included within or lie in close proximity to the subject site. The policies and objectives of the planning authority in relation to the protection of our archaeological heritage are set out in Section 11.17 of the Waterford City and County Development Plan (2022-2028).

Appendix 8, Landscape & Seascape Character Assessment, Section 5, states that:

> *'Scenic routes and protected views indicate public roads and viewing points from which views and prospects of areas of natural beauty and interest can be enjoyed. Sightseeing visitors are more likely to be concentrated along these routes. The onus should be on the applicant for permission to develop in the environs of a scenic route, to demonstrate that there will be no obstruction or degradation of the views towards visually vulnerable features nor significant alterations to the appearance or character of sensitive areas.'*

As per Table 11.5 on Page 29 of the Applicant's EIAR Chapter 11 Landscape & Visual Amenity, 13 Scenic Routes are identified as '**Relevant**' when it comes to views of the proposed turbines. Particular attention needs to be given to the

preservation of the character and distinctiveness of the Dyrick region and the environs of archaeological, protected views and historical sites, as the proposed wind farm would have a detrimental impact on the landscape and scenic views in this area. Any proposed wind farm development should have regard to whether the area of the visual impact has been adhered to, to a reasonable minimum, so that a development does not impose disproportionate effects on the wider community and environment.

There is a high degree of perceived naturalness on the site of the Proposed Development, which is viewed as 'valued' for the sense of naturalness of the surrounding landscape and is highly sensitive to visual intrusion of wind turbines.

5.1.7 Photomontages

Photomontages provide a graphic depiction of the view from each viewshed reference point after introduction of the turbines.

As stated in the Wind Energy Development Guidelines 2006:

> *'The landscape depicted in the photomontage should represent the most open view possible in the direction of the wind energy development. Care should be taken so as not to place an object such as vegetation or structures between the wind energy development site and the camera.'*

The Photomontages provided by the Applicant in their **LIVA Photomontages** consist of existing views, wireframe views and proposed views. In the images below of the proposed views, the **wind turbines are hidden behind trees and vegetation** and a proper assessment of the visual impact and sheer scale and magnitude of wind turbines are not clearly displayed.

Dyrick Hill Wind Farm LVIA Photomontages Book 1

- Local Road at Sillaheens – amenity feature (East Munster Way)

  * Note: Care has not been taken to ensure vegetation is not obscuring wind turbines at local road at Sillaheens. This is an important walking route and a true reflection of the visual impact has not been depicted in this image.
- Local road at Boolahallagh (VP3 – local community view)
- Local road at Meol (VP9 – Scenic view)
- Local road at Corradoon (VP 12 – local community view)
- Local road at Tooraneena (VP13 – centre of population & local community view)
- Local Road at Dyrick (VP14 – Local community view)
- Local road at Doon (VP14 – Local community view)

Dyrick Hill Wind Farm LVIA Photomontages Book 2

- Local road at Coolagortboy (VP14 – local community view)

  * Note: wind turbines completely obscured by houses – How could this location even be considered for Photomontage?
- Local road at Ballynaguikee Upper (VP16 - local community view)
- Local road at Lyrattin (VP16 – local community view)
- Local road at Coolnacreena (VP20 – Scenic route & - local community view)
- R669 at Boherboyrea (VP23 – Scenic route & major route)
- Redgate crossroads at Newtown (VP24 – local community view)
- N72 at Kilcogher.
- Photomontage of local road at Farnane Upper doesn't contain any turbines added to images are per wireline model or cumulative wireline view?

The **Waterford City & County Council Planning Department Pre-Planning Report, dated 23/6/2021 – Ref -2022/149** states:

> *"it was noted that the viewpoints were very localised to the site and appeared to be taken from relatively minor vantage points. It was recommended that viewpoint locations be taken from* ***more prominent vantage points and based on worst case scenarios*** *i.e. heavily traffic routes (e.g. R672, R671, N72), centres of population. The applicant to liaise further with the planning authority on this matter."*

The feedback provided in Waterford County Council planning department's Pre-planning Report was ignored and not taken into consideration in the planning application when preparing the LIVA Photomontages provided by the applicant in both books.

Visualisation is very useful in communicating information, but the full visual impact is not displayed in these photomontage images. Most of the images are taken from local community views as opposed to scenic routes, from low positions; and those taken for scenic routes are taken from vantage points that don't reflect the true scale and impact to the landscape caused by the introduction of wind turbines.

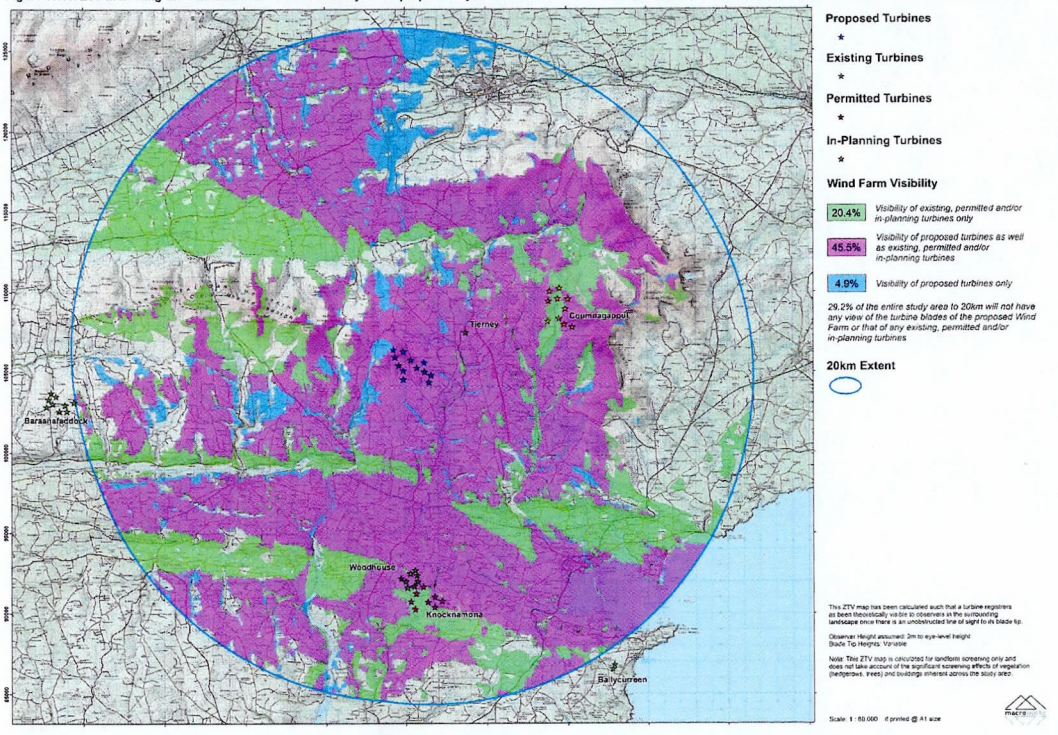
In the Applicant's Dyrick Hill Wind Farm LVIA Photomontages Book 2, the photomontages entitled *N25 At Barranalira (Viewing Point) (VP30) – Wireline Model and N25 At Barranalira (Viewing Point) (VP30) – Cumulative Wireline View* show the proposed turbines for Dyrick Hill Wind Farm and the Coumnagappul Wind Farm turbines. Yet the turbines for the proposed Scart Mountain Wind Farm development (whose turbine layout has been in the public domain since October

2022) have been completely omitted. And this omission alone and ignoring of in-combination effects renders the application incomplete, inaccurate and invalid, and on these grounds should be refused.

5.1.8 Extent of Visibility

The Applicant's Figure 11.11 ZTV indicating the cumulative theoretical visibility of the proposed Dyrick Hill Wind Farm in combination the potential future cumulative baseline wind farms in the study area (below) shows that the Proposed Development would be visible from as far as Dungarvan as well as Clonmel, Ardfinnan, Clogheen and plausibly Cahir in Co. Tipperary.

Figure 11.11: ZTV indicating the cumulative theoretical visibility of the proposed Dyrick Hill Wind Farm in combination the potential future cumulative baseline wind farms in the study area



There are grave concerns expressed regarding the scale of the development notwithstanding that ZTV was theoretical and based on bare landscape. Especially due to the fact that it also completely omits the proposed Scart Mountain Wind Farm development.

It is accepted that new-generation wind turbines by reason of height and scale are not easily hidden. It is of concern that they have become a dominant element on the horizon when you consider the fact that turbines in Cork, Tipperary and Kilkenny are viewable across county boundaries.

The proposed development will be visible from, and to, exceptional landscapes in both County Waterford and County Tipperary and will impact on the sensitivity of such landscapes. Significant concerns remain regarding the detrimental impact

on our upland and mountain trails, including Nire Valley Walks, Rathgormuck Walks, Mahon Valley Walks, Lismore Walks, Colligan Woodland Walks, Villerstown/Dromana Woodland Walks, Saint Declan's Way from Cashel to Ardmore and the East Munster Way, to name just a few. Not to mention all the surrounding Scenic Routes (Drives and Cycle Ways)

5.1.9 Conclusion

The Waterford City & County Development Plan 2022-2028 came into effect on 19 July 2022 and all new proposed wind farm applications should be assessed to this plan. In their Pre-planning Report, Waterford City & County Council Planning Development write '*It was advised that the Planning Authority would be guided by policies of the new Development Plan*' and '*The EIAR shall detail direct, indirect and in-combination effects of the development in an area recognised for its high landscape and scenic amenity*'. The Applicant has had complete disregard for adherence to the Waterford City & County Development Plan 2022-2028, has not detailed in-combination effects with regards to the adjacent proposed Scart Mountain Wind Farm development, and has ignored the fact that Waterford County Council have communicated that they would **NOT** be supportive of this development.

There are inherent conflicts between the wind energy policies and the policies relating to landscape and scenic routes, as set out in the Waterford City & County Development Plan 2022-2028.

Notwithstanding the fact that the proposed site is to be located in an **exclusion zone for wind energy development** as per the Renewable Energy Strategy of the Waterford County Development Plan 2022-2028, An Board Pleanála needs to have regard to the following deficiencies in the Applicant's EIAR and other documents submitted by the Applicant in the course of the application:

- inadequate assessment of visual impacts and potential impacts on tourism,
- inadequate assessment in relation to transportation and local road improvements (including potential impacts on architectural heritage and ecology), and
- inadequate assessment of potential ecological impacts including on bird species and on the Natura 2000 network in the wider area.

We also ask the Board to have serious regard to the location of the proposed development in the Knockmealdown Uplands Landscape Character Area, and to the overall size and scale of the proposed development comprising 12 wind turbines with a maximum blade tip height of 185m (in combination with a possible further 16 x 185m turbines of the adjacent proposed Scart Mountain wind farm). Eight of the proposed turbines are in an area identified as 'Most Sensitive' in the

Landscape and Seascape Character Assessment, 2 are in a 'High Sensitivity' designation and 2 in the 'Low Sensitivity' designation. This means that, if the Application is permitted, the Proposed Development will become a dominant feature and impact detrimentally on the environmental quality and scenic landscape of the Knockmealdown mountain range, the surrounding area of the Proposed development and the Designated Walks, Trails, Scenic routes and Views highlighted in both the Waterford City and County Development Plan (2022-2028) and the Tipperary County Development Plan (2022- 2028) that fall inside the zone of theoretical visibility (ZTV).

As we have pointed out in section 3.3 above, the applicant's EIAR has omitted the proposed Scart Mountain wind farm and it does not take into account the back-to-back locations of these two proposed wind farms and the cumulative impacts which they would have on the region. Therefore, this application should be deemed incomplete, inaccurate and invalid.

We draw the Board's attention to the previous refusal of a wind farm development in the Knockmealdown Mountains by An Bord Pleanála in 2001. The reason for refusal is as follows

> *'Would seriously injure the scenic and natural amenities and distinctive character of the remote area'. [It would also] 'detract from the amenities of an important walking route and would set an undesired precedent for further similar development at elevated locations in the Knockmealdown mountain range'.'*

This site is an area designated as a 'scenic landscape' in the Waterford County Development Plan and was adjacent to an area of 'primary amenity value' in South Tipperary.

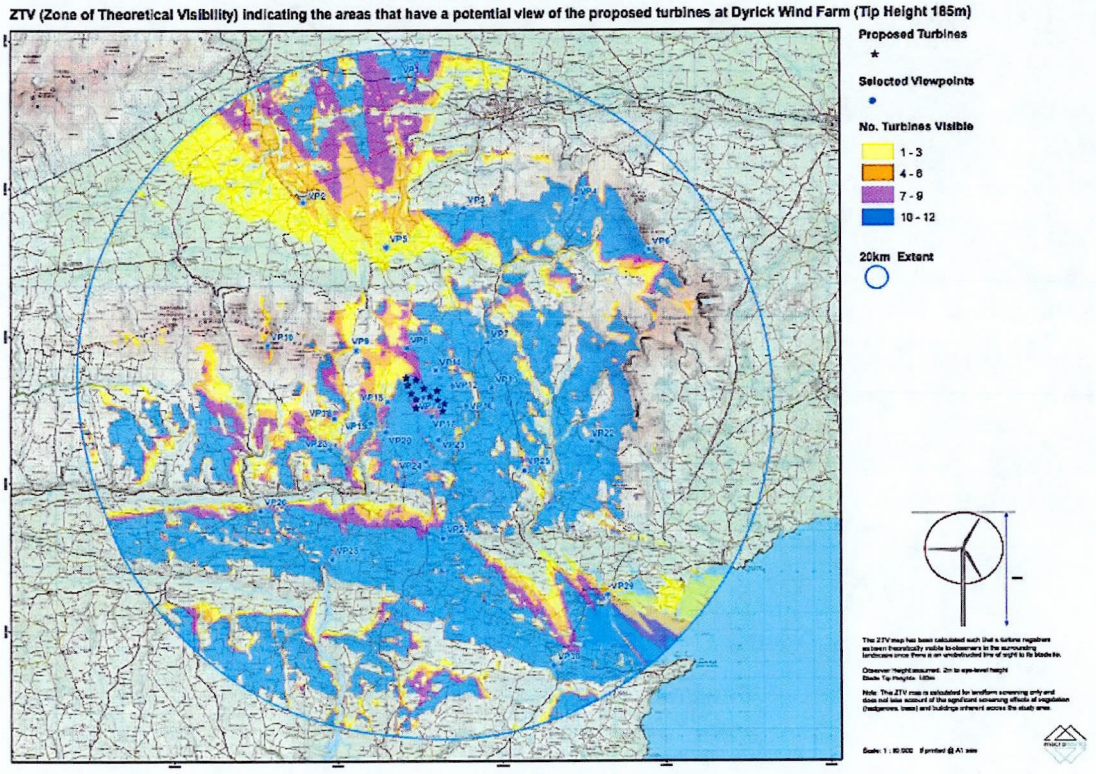
The Board must be satisfied beyond reasonable doubt that the Proposed Development would not have significant adverse effects on the landscape and environment and to the proper planning and sustainable development of the area. Precedent has already been set with the rejection of the wind farm in the Knockmealdown mountains in 2001. The proposed height of turbines in 2001 was 50m, compared to 185m in the Dyrick application.

Table highlighting all the Walks & Trails listed in the Waterford City & County Council Development Plan 2022-2028, Volume 1: Written Statement, Section 10.4 Walking Trails and Public Rights of Way (page 276) that will be visually impacted by the Proposed Development.

Source of information: The Developer's 'Zone of Theoretical Visibility' (ZTV) map (added below the Table) from which we were able to ascertain which of the walks are affected. Figures stated taken from ZTV Map Legend.

	WALK/TRAIL	VISIBILITY BASED ON 20km Zone of Theoretical Visibility	Number of turbines visible
Dunmore Wast Walks		Outside of ZTV range	
Tramore Walks		Outside of ZTV range	
Waterford Estuary Wals		Outside of ZTV range	
Standalone Coastal Trails		Outside of ZTV range	
	The Cunnigar Walk	**YES**	**10-12 Turbines**
	Ardmore Cliff Walk	Outside of ZTV range	
Nature Trails			
	Anne Valley Walk	Outside of ZTV range	
	Fenor Bog	Outside of ZTV range	
Waterford City Walks		Outside of ZTV range	
Long Distance Trails/ Greenways			
	Waterford Green Way	NO	
	East Munster Way	**YES**	**7-9 Turbines**
	St Declans Way (Pilgrim Path)	**YES**	**10-12 Turbines**
Nire Valley Walks			
	Coumduala Loop	**YES**	**7-9 Turbines**
	Coumlare Loop	**YES**	**10-12 Turbines**
	Gap Walk	**YES**	**7-9 Turbines**
	Sgillogues Walk	**YES**	**10-12 Turbines**
Rathgormuck Walks			
	Boolas Loop	NO	
	Glenpatrick Bridge Loop	NO	
	Lough Mogra Loop	NO	
	Rathbeag Loop	NO	
Mahon Valley Walks			
	Mahon Falls Walk	NO	
	Crough Wood Walk	NO	
Woodland Trails			
Lismore Walks			
	Lady Louisa Walk to Roundhill	NO	
	The Towers Walk	NO	
	Glenshalane Woodland Blue Trail	NO	
	Glenshalane Woodland Green Trail	**YES**	**1-3 Turbines**
	Glenshalane Woodland Red Trail	**YES**	**4-6 Turbines**
	Glenshalane Woodland Grotto Walk	**YES**	**4-6 Turbines**
Portlaw Woodland Walks		Outside of ZTV range	
Colligan Woodland Walks			
	Inchidrisla Loop	**NO**	
	Greenane Loop	Outside of ZTV range	

ZTV (Zone of Theoretical Visibility) indicating the areas that have a potential view of the proposed turbines at Dyrick Wind Farm (Tip Height 185m)



5.2 Soils And Geology

5.2.1 Peat Bogs and the Risk of Peat Slides

The wind farm's proposed turbines are planned on areas that the Geological Survey of Ireland have given the Landslide Susceptibility Classifications of **high** and **moderately high**, and vital information is absent from the application. A landslide could have catastrophic consequences for the Blackwater SAC.

One of the greatest ecological disasters to occur in Ireland was The Derrybrien Wind Farm Landslide in 2003. The collapse of a peat bog caused extensive damage, resulting in the death of livestock, destruction of habitats and pollution of nearby rivers. As well as having to pay a lump sum of €5 million to the European Commission, the State had to pay the European Commission €15,000 in daily fines from November 2019 until February 2023, over breaches of environmental safeguards during the construction phase of the Derrybrien Wind Farm almost 20 years ago.

We would hope that such an event would never happen again, and yet in 2020, during the construction of a wind farm in Meenbog, near County Donegal, a large quantity of peat slid into the Mourne Beg River near Castlederg, destroying a key spawning river for Atlantic salmon – a protected species.

And yet here we are in 2023, looking at a map provided by the applicant with plans for a wind farm to be constructed (if permitted) over an area with Landslide Susceptibility Classifications of **high** and **moderately high**, as designated by the Geological Survey of Ireland.

The Irish Peatlands Conservation Council in their Consultation Response to the Dyrick Hill Wind Farm is deeply concerned by the project:

> "*The proposed turbine locations are a cause for concern and need to be extensively reviewed. It has come to IPCC's attention that current best-practice methods for assessing the probability and/or risk assessment for peat slippage and bog bursts/flows may not be fit for purpose."* And then add the chilling: *"There is a high possibility that if there is a peat slide event, it would affect neighbouring designated sites which would be unacceptable and disastrous. If there is a possibility of any more damage occurring to the designated sites and ANNEX I habitats as a result of this development, then the project should not go ahead."*

Despite the Applicant's assurances of no significant finds of peat during the four days they dedicated to probing (two to trial pit excavation, and two to attempted gouge cores), turf-cutting is still in living memory in this area. The photo evidence (**Figure 5.3** below) shows Tom Flynn (a local man now passed away) transferring turf from a bog on Scart Mountain to the car of Nora and Breeda Walsh from Coolnasmear.

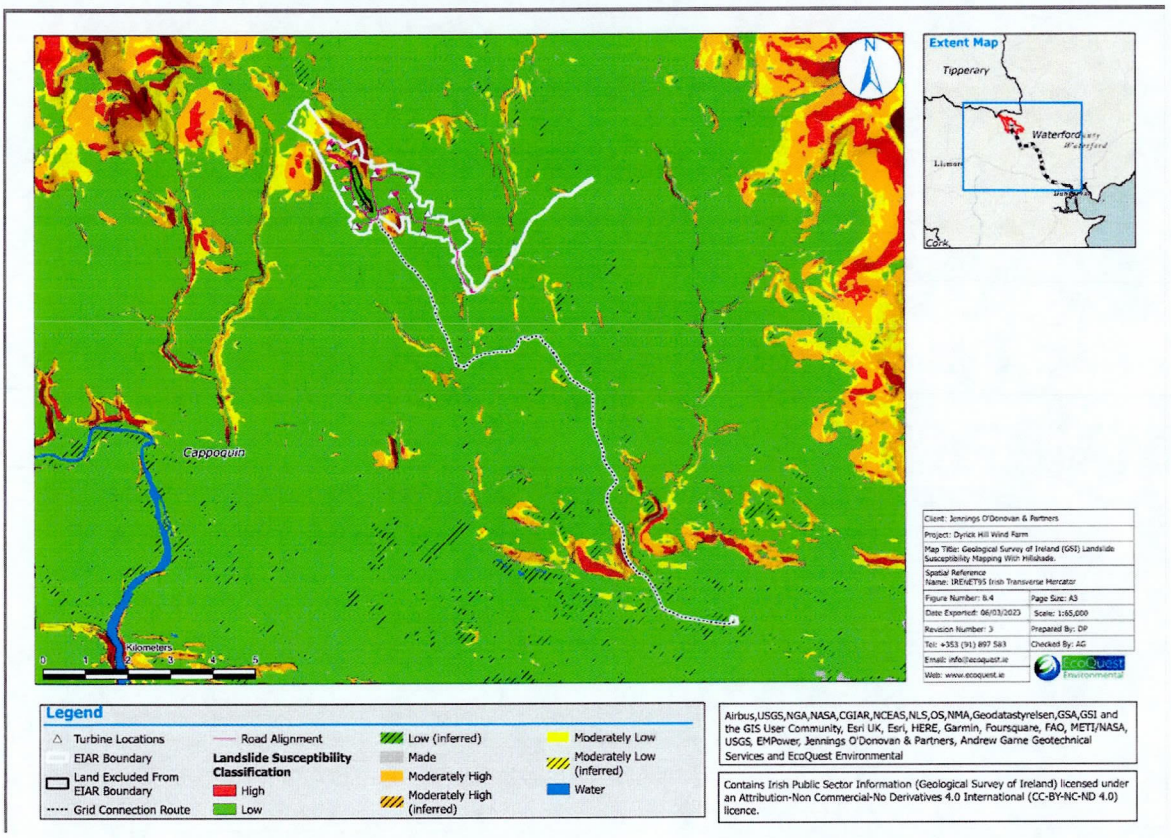


Figure 5.1 *From Figure-8.4-Landslide-susceptibility-classification (in application)*

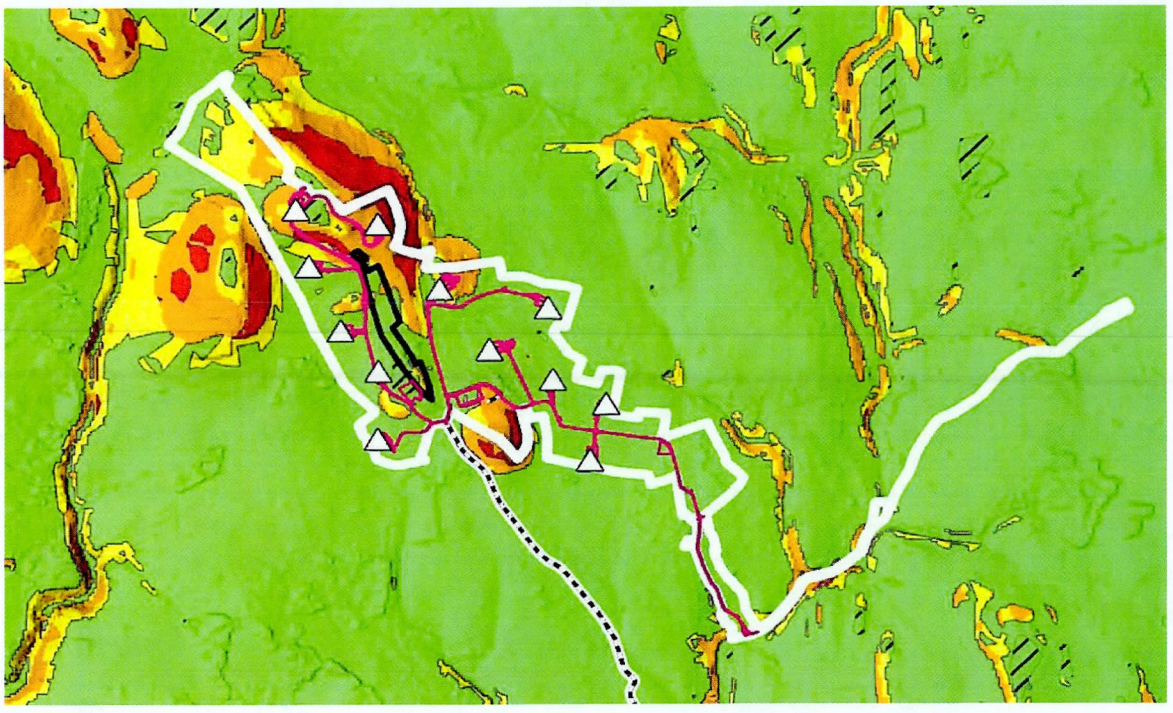
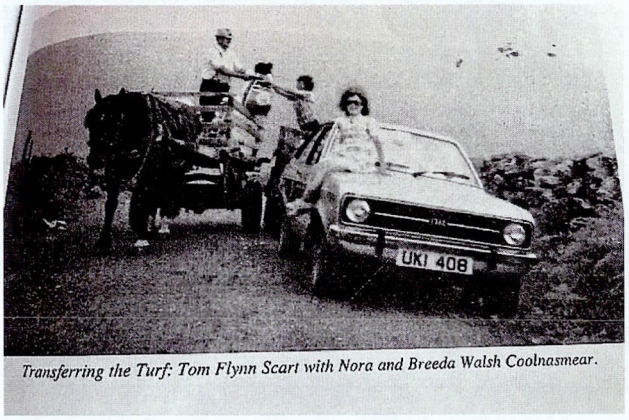


Figure 5.2 As you can see in the close-up, some turbines are literally placed on HIGH and MODERATELY HIGH areas of Landslide Susceptibility.



Transferring the Turf: Tom Flynn Scart with Nora and Breeda Walsh Coolnasmear.

Figure 5.3 **Transferring the turf on Scart Mountain**. *Image source: Sliabh gCua Annual (no.23 2017).*

The EPA website features the Corine 2018 map, which shows a large amount of the site as having peat bogs. Turbines 9, 10, 11, 12 and 13 are located on these areas. The map below has been taken from the EPA website and we have added indicative locations of the turbines using information sourced from the applicant's own maps and applied by us to our best ability. Even though this is not precise, it shows that the turbines are well within the peat bog zone.



Figure 5.4 **Corine 2018 map, showing a large amount of the application site as having Peat Bogs.** *Source: original map from EPA website: https://gis.epa.ie/EPAMaps/*

5.2.2 Incomplete Studies Carried Out

Chapter 8 Soils and Geology, page 14, 8.3.6.2 Trial Pits and Gouge Cores, states that:

> *A total of 15 trial pits were excavated on 1/7/22 and 2/7/22 at the proposed locations of the turbines and the substation. Where excavator access to the turbine location was not possible (due to steep saturated slopes or trees), the trial pit was excavated at the nearest accessible location (T05, T08, T12, T13) and gouge cores were later attempted at the turbine locations on 3/8/22 and 4/8/22 in order to check for the presence of peat/soft soils.*
>
> *No peat or soft soils were observed beneath the topsoil within any trial pits or gouge cores.*

Firstly, if the slope was too steep for a test, then a turbine should not be allowed to be placed there due to the landslide susceptibility (particularly as turbines 08, 12 and 13 are located in areas of Moderately High and High Susceptibility to Landslides as shown in the Applicant's map above).

Furthermore, the applicant fails to include any information in Table 8.7: Trial Pit Summary or anywhere else in Chapter 8 dedicated to Soils & Geology as to the location of where these 'nearest accessible locations' are (i.e. x-amount of metres away, coordinates etc), rendering the document provided incomplete.

After further delving/searching, we have found information in the CEMP, which includes the following:

> **T05:** *Hard digging below 2m. Unable to excavate past 2.5m due to possible bedrock; undertaken **98m NW** of T05 due to trees.*
>
> **T08:** *Unable to excavate past 1.7m due to possible bedrock. Undertaken **148m west** of T08 due to gradients and wet ground.*
>
> **T12:** *Unable to excavate past 3.1m due to possible bedrock. Undertaken **28m west** of T12 due to gradients.*
>
> **T13:** *Unable to excavate past 2.0m due to possible bedrock. Undertaken **200m west** of T13 due to fence/gradients/wet ground.*

These distances seem incredibly far away from the actual turbine location to be able to determine for sure its safety and suitability. Too far away in fact. And therefore there is absolutely no guarantee that what was found at these locations is the same as what is in the ground at the actual proposed location of each turbine.

Combined with the Landslide Susceptibility mapping by GSI, the Soil Information System National Soils Map (as mentioned by the Applicant on page 41 of the Screening Report for Appropriate Assessment) which shows peat in the north-western part of the Site (the steepest part of the Development and where it is proposed that several of the turbines will be located) and the IPCC's conclusion that *"current best-practice methods for assessing the probability and/or risk assessment for peat slippage and bog bursts/flows may not be fit for purpose"*, the seriousness of a landslide cannot be ignored or dismissed.

And yet this is exactly what the applicant does – the risk of a peat slippage is ignored in the application. Examples are listed below, as found in the Screening Report for Appropriate Assessment and Chapter 8 Soils and Geology of the Applicant's EIAR .

The applicant's Screening Report for Appropriate Assessment, Page 41, Section 3.3, Soils & Geology states that:

> *According to the Soil Information System National Soils Map, pockets of peat exist at the north-western extent of the site. However, no peat has been identified at the site during the geotechnical surveys at the site (EIAR Chapter 8: Lands, Soils and Geology) and it is likely that the areas mapped as pockets of peat on the National Soils Map correspond to areas of heathland habitat occurring in the commonage area of Broemountain.*

Chapter 8 Soils and Geology, Page 14, 8.3.6.2 Trial Pits and Gouge Cores states that:

> *No peat or soft soils were observed beneath the topsoil within any trial pits or gouge cores. A summary of the ground conditions observed within the trial pits and gouge cores are given below. Details of the trial pits are presented in* ***Appendix 8.1***.

There is no Appendix 8.1 on either the An Bord Pleanála website or the Dyrick Hill Planning website, and therefore without this information, the report and, thus the application, is incomplete.

5.2.3 Omission of Designated Sites in the Study and Report and Disregard of IPCC requests

Chapter 8 Soils and Geology, Page 17, 8.3.11 Designated Sites states:

> *The following areas are designated according to the EPA's Map Viewer: • Blackwater River SAC (Site Code 002170) and pNHA. The Farnane River flows north to south along the western boundary of the site and into the Finisk River which flows north to south, approximately 1km east of the site. Both rivers are part of the Blackwater River SAC. The site is also dissected*

by the Lisleagh Stream which also flows southeast into the Finisk River at Millstreet.

However, the applicant has ignored several SACs and pNHAs in its study and report, which were specifically mentioned as areas that 'need to be given due attention' in the Consultation Response by Irish Peatland Conservation Council:

The Irish Peatland Conservation Council have identified a number of designated sites within the proximity of the proposed windfarm which need to be given due attention in ascertaining the impacts to biodiversity from the proposed project. In particular, developments have the potential to disrupt the hydrology of peatland and even small impacts to the water table may have disastrous consequences for specialised peatland species that live within minimal ranges of chemical and hydrological limits, such as the Vertigo whorl snails. An appropriate distance from the proposed project area, depending on the possible source of detrimental influence (such as hydrology) has to also be included within any proposed plan that has the potential to disrupt the natural environment. Developers need to ensure that their project in no way affects the integrity of the habitats and qualifying interests including species of the designated sites.

In terms of pNHA - Lismore Woods (Sitecode: 667), Glenboy Woods (Sitecode: 952) and the Blackwater River and Estuary (Sitecode: 72) have been identified within a 10km boundary of the proposed project area.

In terms of SAC - Lower River Suir SAC (Sitecode: 2137), Comeragh Mountains (Sitecode: 1952), Nier Valley Woodlands (Sitecode 668) and the Blackwater River (Cork/Waterford) (Sitecode: 2170) have also been identified within a 10 Km boundary of the proposed development area.

In addition, The IPCC Peatland Sites Database holds records that Bewick Swans, Otter, Curlew, Greenland White- Fronted Geese, Freshwater Pearl Mussel and Atlantic Salmon have been recorded in Lismore Woods pNHA. Rhododendron is also listed as an issue at this site.

The IPCC Sites DB also lists that Comeragh Mountains SAC as being utilised by Hen Harrier and that Shining Sickle Moss and Slender Green Feather Moss are present. Afforestation(private/Coillte), burning and overgrazing have been listed as ongoing threats to this site. Recreation is also a use for this site as a walking route "The East Munster Way" is listed as being present.

Furthermore, it is our observation that the applicant has omitted several other factors which were included in the IPCC's Consultation Report.

In the Scoping Responses and Consultation, Page 9, Section 8.2.5.4. the applicant states:

The only responses relevant to this Chapter of the EIAR were received by the IPCC [Irish Peatlands Conservation Council] and GSI [Geological Survey of Ireland)], and these are summarised in Table 8.5.

However, in Table 8.5. the applicant has not included the IPCC response expressing concern about nitrogen deposition and biosecurity (page 2 of the IPCC Consulting Response), wetlands (page 3 of the IPCC Consulting Response), and the all-important conclusion reached by the IPCC.

The proposed windfarm is situated within an area of high biodiversity, ANNEX I habitat and surrounded by designated sites. The risk to these from construction coupled with the already degraded nature of some of the areas would put them at increased strain with disastrous consequences to the aquatic and terrestrial environment if there is a peat slide. The developers also need to assess the cumulative effects of windfarms, afforestation, peat extraction, drainage, overgrazing on the environment - specifically including the designated sites - and also assess the implications of impacts on annexed species and biodiversity. It is IPCC's understanding that the peat soils will still be drained while the turbine (hardstands) are being constructed and operational.

What will be the impact of this on the Water Framework Directive and carbon storage compared to straight restoration of the habitat, such as forestry removal and drain blocking? Taking into account that the peatland, once restored, would last for 1000s of years (sequestering carbon and providing refugia for biodiversity) and that off-shore windfarms are being planned, is it appropriate to further fragment and destroy one of the rarest habitats in Europe even more than it is at present?

There are concerns, especially with species such as Curlew, where disturbance from turbines displaces and dissuades them from returning as they are site specific (Higgins et al, 2009). This would negate the point of providing areas of conservation in the first place. As the amount of peatland in County Waterford has been reduced to 29% of its original resource, a globally unique habitat, and as the amount of wetlands in Europe have been lost to less than 10% (BOGLAND, EPA, 2011), it is imperative that they are protected from development or Ireland will not recover from the Climate and Biodiversity Emergency. The carbon cost of this project also needs to be accounted for, and this has to also include the other habitat degrading activities such as forestry, peat extraction and fragmentation (roads/cabling etc, already present and proposed as part of this project) over the lifespan of the project. Any future plans to upgrade the turbines also needs to be a feature of this proposal, along with the proposed impacts.

Furthermore, in the Screening Report for Appropriate Assessment, Section 3.3 Soils & Geology, Page 42, the applicant fails to mention that the Farnane River and Finisk River (and tributaries thereof) are actually part of the Blackwater SAC, which is a fundamental flaw in information as this should be provided in an Appropriate Assessment document.

5.2.4 Slope Failure

On Page 25, 8.4.2.3.3 Peat Stability and Slope Failure, of Chapter 8 Soils and Geology, the applicant states that:

> *The effects of peat stability and slope failure are discussed in Section 8.3.10. Due to the absence of peat found during surveys, the possibility of a peat slide is considered to be negligible. Any slide or slope failure which does occur would be small and localised due to the absence of peat and the topography of the Site. However, given the proximity of the designated Sites, both to the east and west of the Site, any ground instability which did occur could potentially result in some minor damage to nearby aquatic habitats and aquatic species. Due to the absence of peat however, the effect of this is considered to be insignificant, permanent and negative.*

The applicant therefore appears to have stated that due to the absence of peat found during surveys, the possibility of a peat slide is considered to be negligible.

However, it is our submission that, as we do not know the exact details of the peat probes due to the lack of Appendix 8.1, we cannot ascertain for sure where they were employed. This lack of vital information is of concern and makes the report incomplete.

It is not enough for the applicant to make such a categorical statement that there is no peat simply because they did not find peat in their four days of surveying. That does not suffice. As previously mentioned, the Soil Information System National Soils Map shows evidence of peat in the area and turf-cutting is still in living memory. The Applicant cannot simply discount the existence of peat because of the lack of it in their probes – particularly when some were taken so far away from a turbine's actual location – and, as a result, not provide any mitigation measures and claim that 'the possibility of a peat slide is considered to be negligible'.

The applicant therefore appears to have stated that any slide or slope failure which does occur would be small and localised due to the absence of peat and the topography of the Site.

It is our submission that the applicant's statement about the risk of a peat slide or peat slope failure actually admits that there is a possibility of a landslide, and the wording used suggests that it would be okay to have such a landslide '*because it would only be small due to lack of peat*'. Any landslide – small, large, localised

or not – is unacceptable. especially because of the site's proximity to surface water streams which flow into an SAC.

The applicant has also concluded that:

> *However, given the proximity of the designated Sites, both to the east and west of the Site, any ground instability which did occur could potentially result in some minor damage to nearby aquatic habitats and aquatic species. Due to the absence of peat however, the effect of this is considered to be insignificant, permanent and negative.*

In the above statement, the applicant admits that it is possible for ground instability to have an effect on *nearby aquatic habitats and aquatic species* – which are all linked to an SAC and (EU-) protected aquatic species. The mere possibility of this is not acceptable and negates the applicant's conclusion that peat slope failure consequences would be insignificant. At the same time, the applicant seems to believe it is acceptable to state that the effect will be 'insignificant' due to the 'lack of peat'.

Furthermore, the applicant uses the wording 'permanent' and 'negative', which is actually stating that these effects could be of extremely serious consequence. This cannot be allowed to be dismissed and belittled in this way.

We realise the Board's job is not an easy one, and we are reluctant to add any more pressure to the Board's task, but with the horrendous results of Meanbog and Derrybrien and the Irish Peatlands Conservation Council's questioning of the validity of methodology, an extremely cautious approach is called for, based on previous disasters. The consequence of a wrong decision in this area would be literally catastrophic, and provides a strong reason for our urging the Board to refuse this application.

5.3 European Sites – the Applicant's Screening Report and Natura Impact Statement

It is our submission that the Natura Impact Statement which accompanies this planning is fatally defective, as six Special Areas of Conservation (SAC), four Special Protection Areas (SPA), and twenty-three Proposed Natural Heritage Areas (NHA) are screened out by the applicant. Furthermore, the methodology used is questionable.

5.3.1 The EU Habitats Directive (Council Directive 92/43/EEC)

The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. These habitats and species are listed in the Habitats and Birds Directives, and Special Areas of Conservation (SAC) and Special Protection Areas (SPA) are designated to afford protection to the most vulnerable of them. These two designations are collectively known as the Natura 2000 network.

European and national legislation places a collective obligation on Ireland and its citizens to maintain habitats and species in the Natura 2000 network at favourable conservation condition. The Government and its agencies are responsible for the implementation and enforcement of regulations that will ensure the ecological integrity of these sites.

A site-specific conservation objective aims to define favourable conservation condition for a particular habitat or species at that site. Favourable conservation status of a habitat is achieved when:

- its natural range, and area it covers within that range, are stable or increasing, and
- the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and
- the conservation status of its typical species is favourable. The favourable conservation status of a species is achieved when:
- population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and

- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Page 6 of the Screening Report for Appropriate Assessment states: "*Under the Habitat Regulations, all sites that have been identified as part of the N2K Network [Natura 2000 Network], including SACs, SPAs, candidate SACs (cSACs) and proposed SPAs (SPAs) are referred to as European Sites*". Yet **the Applicant has failed to include several SACs, SPAs and proposed SACs and SPAs that are in proximity to the Proposed Development in their report.**

The Applicant's Screening Report for Appropriate Assessment and the Natura Impact Statement (NIS) are defective because they fail to consider the risk of potential effects of the Proposed Development on the six SACs listed below.

Site Name	Site Code	Distance from Dyrick Hill Wind Farm
Lower River Suir	002137	6km North
Comeragh Mountains	001952	8km East
Nier Valley Woodlands	000668	12km Northeast
Glendine Woods	002324	12.5km Southeast
Galtee Mountains	000646	24km Northwest
Ballymacoda	000077	35km Southeast

Table 5.3.1 Site names, site codes and distances of Natura 2000 sites from the proposed wind farm site

In this context, we request the Board to be mindful of this recent European Court Judgement:

> *"EUR-Lex - 62021CJ0444 - EN - EUR-Lex (europa.eu)" – Judgement of the Court of 29 June 2023 (European Commission Vs Ireland) - Failure of a Member State to fulfil obligations – Environment – Directive 92/43/EEC – Conservation of natural habitats and of wild fauna and flora – Special areas of conservation – Atlantic biogeographical region – Article 4(4) and Article 6(1) – Failure to designate special areas of conservation and to set conservation objectives – Absence or insufficiency of conservation measures. Case C-444/21".*

Below is some information drawn from the applicant's Appendix 6.2 Bat Report which shows the distance of the European Designated Sites from the proposed development site as well as features of interest.

Table 3-1: Summary Special Areas of Conservation within 15 km of the development

Designated Site	Site code	Features of Interest	Approximate Distance (Km) from Site (at closest point)
Blackwater River (Cork/Waterford) SAC	002170	Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Perennial vegetation of stony banks [1220] *Salicornia* and other annuals colonising mud and sand [1310] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260] Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles [91A0] Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae) [91E0] *Margaritifera margaritifera* (Freshwater Pearl Mussel) [1029] *Austropotamobius pallipes* (White-clawed Crayfish) [1092] *Petromyzon marinus* (Sea Lamprey) [1095] *Lampetra planeri* (Brook Lamprey) [1096] *Lampetra fluviatilis* (River Lamprey) [1099] *Alosa fallax fallax* (Twaite Shad) [1103] *Salmo salar* (Salmon) [1106] *Lutra lutra* (Otter) [1355] *Trichomanes speciosum* (Killarney Fern) [1421]	200m to the west of the proposed wind farm site. Crossed by the grid connection route and the haul route.
Lower River Suit SAC	002137	Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410]	6km north of the proposed wind farm site. 7km north of the haul route.

Designated Site	Site code	Features of Interest	Approximate Distance (Km) from Site (at closest point)
		Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260] Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430] Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles [91A0] Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae) [91E0] *Taxus baccata* woods of the British Isles [91J0] *Margaritifera margaritifera* (Freshwater Pearl Mussel) [1029] *Austropotamobius pallipes* (White-clawed Crayfish) [1092] *Petromyzon marinus* (Sea Lamprey) [1095] *Lampetra planeri* (Brook Lamprey) [1096] *Lampetra fluviatilis* (River Lamprey) [1099] *Alosa fallax fallax* (Twaite Shad) [1103] *Salmo salar* (Salmon) [1106] *Lutra lutra* (Otter) [1355]	11km north of the grid connection route.
Nier Valley Woodlands SAC	000668	Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles [91A0]	8km northeast of the proposed wind farm site. 7km north of the haul route. 11km north of the grid connection route.
Comeragh Mountains SAC	001952	Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110] Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260] Northern Atlantic wet heaths with *Erica tetralix* [4010]	8km to the east of the proposed wind farm. 5km to the east of the haul route. 6km to the east of the grid connection route.

Designated Site	Site code	Features of Interest	Approximate Distance (Km) from Site (at closest point)
		European dry heaths [4030] Alpine and Boreal heaths [4060] Blanket bogs (* if active bog) [7130] Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) [8110] Calcareous rocky slopes with chasmophytic vegetation [8210] Siliceous rocky slopes with chasmophytic vegetation [8220] *Hamatocaulis vernicosus* (Slender Green Feather-moss) [6216]	
Glendine Wood SAC	002324	*Trichomanes speciosum* (Killarney Fern) [1421]	12.5km southeast of the proposed wind farm. 4.5km east of the grid connection route and the existing Dungarvan substation. 150m north of the N25 section of the haul route.

Table 3-2: Summary of National Sites within 15 km of the development

Designated Site	Site Code	Features of Interest	Approximate Distance (Km) from Site (at closest point)
Glenboy Wood pNHA	000952	Woodland	2.5km north of the proposed wind farm site. 6km north of the grid connection route. 8.5km northwest of the haul route.
Blackwater River And Estuary pNHA	000072	See SAC above	20km south of the proposed wind farm site. 19km to the southwest of the grid connection route. 19km to the southwest of the haul route.
Nier Valley Woodlands pNHA	000668	See SAC above	8km northeast of the proposed wind farm site. 7km north of the haul route. 11km north of the grid connection route

5.3.2 Questionable Methodology Used by the Applicant in Preparation of the Natura Impact Statement (NIS)

Page 9 of the NIS it states that:

> *"The EC (2021) guidelines outline the stages involved in undertaking an assessment of a project under Article 6(3) and 6(4) of the Habitats Directive. The assessment process comprises the three stages outlined below. This NIS presents the findings of an examination, analysis and evaluation of the project to inform a Stage 2 Appropriate Assessment of the project".*

Further on page 10, the NIS continues:

> *"Stage 2 – Appropriate Assessment: If a plan or project is likely to have a significant affect an Appropriate Assessment must be undertaken. Case law has established that such an Appropriate Assessment, to be lawfully conducted, in summary: […]*
>
> *(ii) Must contain complete, precise and definitive findings and conclusions and may not have lacunae or gaps;"*

Without a clear indication that these areas were studied and without evidence that there would be no impact on these areas, the Board cannot be certain beyond any doubt that any of these Sites would not be affected. The question that needs to be answered – not avoided – is: "*Does European Site occur within the Projects Zone of Influence?* On these grounds, the Screening Report for Appropriate Assessment is incomplete or misrepresentative and should be rejected.

Page 9 of the Applicant's NIS, Section 2.1 GUIDANCE, states that:

> *"This NIS has been undertaken in accordance with National and European guidance documents: Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (DEHLG 2010) and Assessment of Plans and Projects Significantly Affecting Natura 2000 sites – Methodological Guidance of the Provisions of Article 6(3) and (4) of the Habitats directive 92/43/EEC. The following guidance documents were also adhered to during the preparation of this NIS:*
>
> - *A guide for competent authorities. Environment and Heritage Service, Sept 2002. Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2010). DEHLG.*

- *Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites – Methodological Guidance of the Provisions of Article 6(3) and (4) of the Habitats Directive 92/42/EED. European Commission (2021).*

- *Managing Natura 2000 Sites – The provisions of Article 6 of the Habitats Directive 92/43/EEC. European Commission (2018)".*

However, page 49 of the Screening Report for Appropriate Assessment, 5.2 Source-Pathway-Receptor Model, states that:

> *"Current guidance informing the approach to screening for Appropriate Assessment defines the zone of influence of a proposed development as the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. It is recommended that this is established on a case-by-case basis using the Source-Pathway-Receptor (SPR) model".*

And also on page 89, section 7.0 Screening Conclusion:

> *"The project has been screened for its potential to result in likely significant effects to surrounding European Sites. A Source-Pathway-Receiver model was used to identify potential impact pathways linking the project site to European Sites".*

However, the applicant does not state where this guidance comes from, but our research brought us to page 8 of the *Practice Note PN01 Appropriate Assessment Screening for Development Management document by the* Office of the Planning Regulator (OPR). Here the Zone of Influence is described as:

> *'The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km).'*

This Guidance document is **not listed** on page 9, Section 2.1 Guidance, in the applicant's NIS report. This raises the question of why the consultant who prepared the NIS had decided to use this methodology while claiming to be using and adhering to the "*Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities".*

Page 31 of this guidance document states that:

> *"The approach to screening is likely to differ somewhat for plans and projects, depending on scale and on likely effects, but the following should be included:*

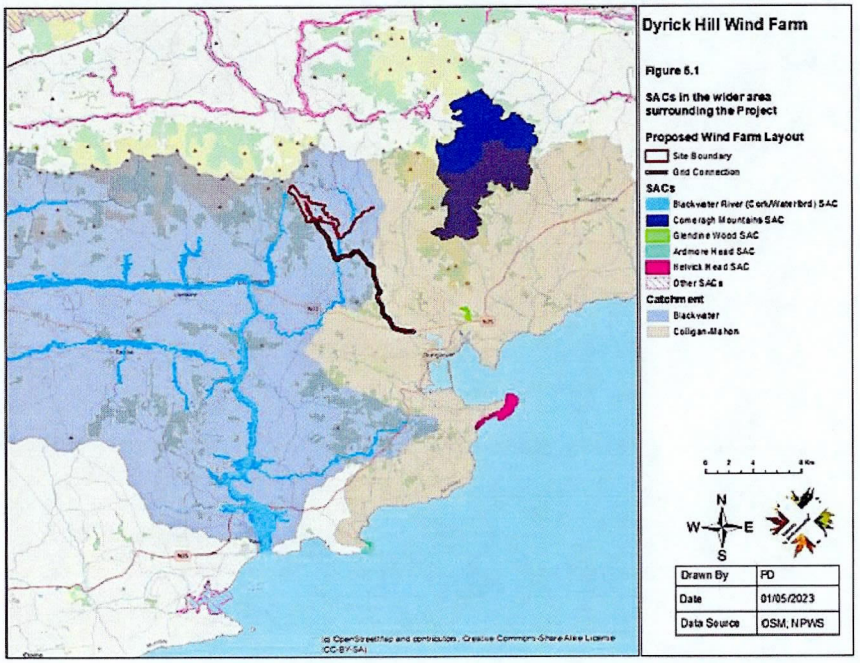
1. *Any Natura 2000 sites within or adjacent to the plan or project area.*

2. *Any Natura 2000 sites within the likely zone of impact of the plan or project. A distance of 15km is currently recommended in the case of plans, and derives from UK guidance (Scott Wilson et al., 2006). For projects, the distance could be much less than 15km, and in some cases less than 100m, but this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects.*

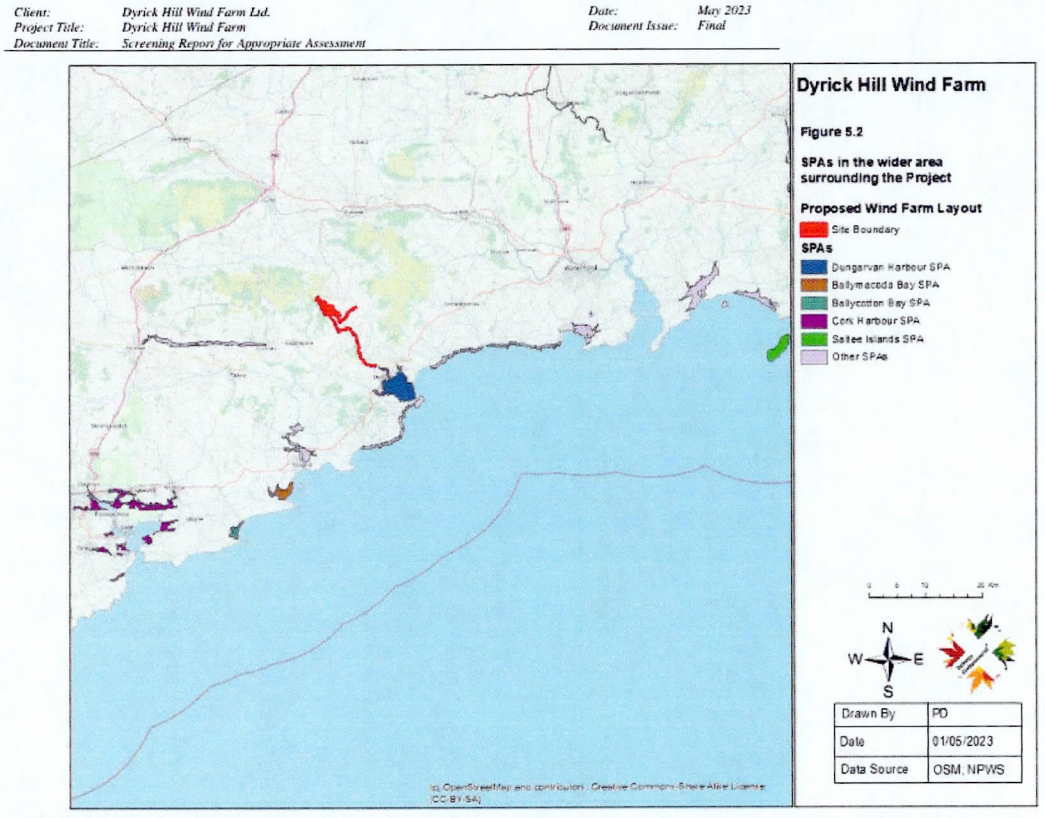
3. *Natura 2000 sites that are more than 15km from the plan or project area depending on the likely impacts of the plan or project, and the sensitivities of the ecological receptors, bearing in mind the precautionary principle. In the case of sites with water dependent habitats or species, and a plan or project that could affect water quality or quantity, for example, it may be necessary to consider the full extent of the upstream and/or downstream catchment."*

It is our submission that the applicant appears to have chosen to ignore this advice and has therefore failed to include several European Sites, as evident in Screening Report for Appropriate Assessment page 55, Section 5.3. European Sites in the Zone of Influence.

The map below is taken from page 56 of the Applicant's Screening Report for Appropriate Assessment (Figure 5.1) and shows 'SACs in the wider area surrounding the project'.



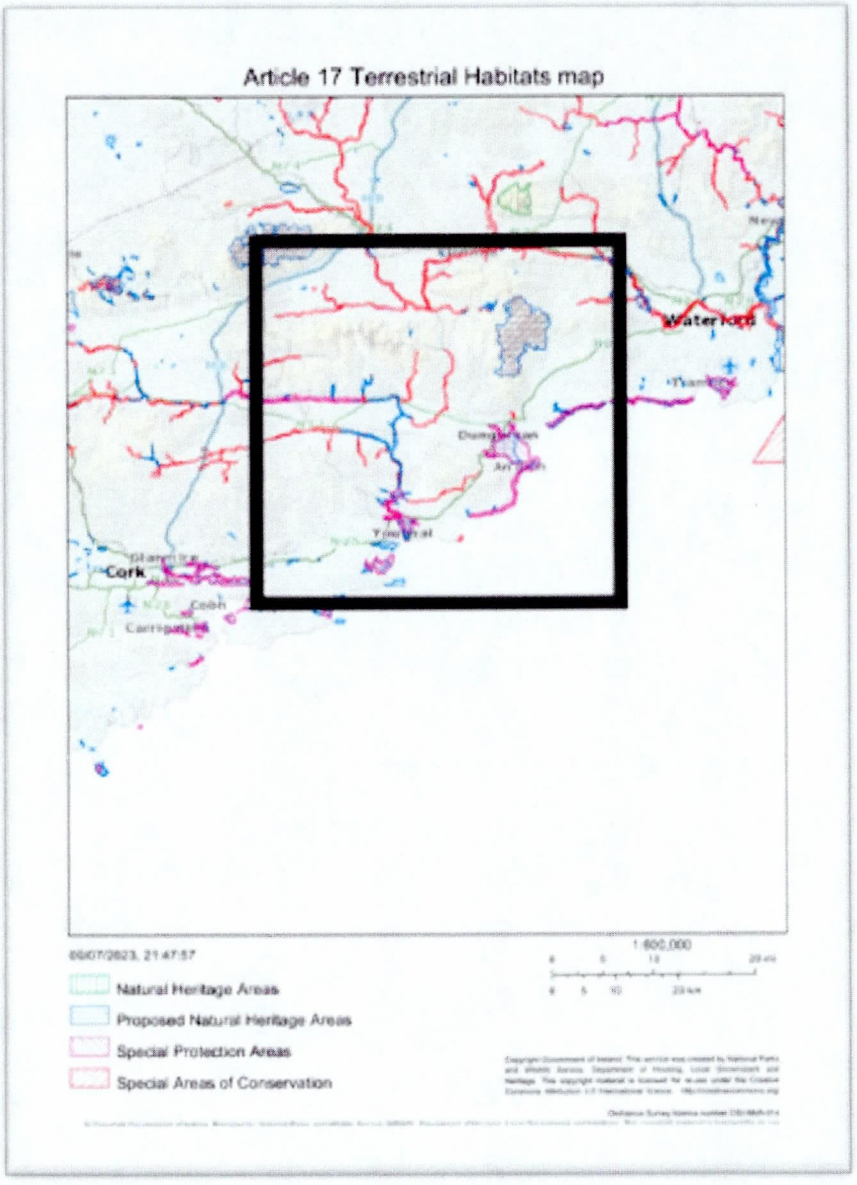
The next map is taken from page 57 of the Applicant's Screening Report for Appropriate Assessment (Figure 5.2) and shows 'SPAs in the wider area surrounding the project'



We would like to draw the Board's attention to the following map, which has been taken from the NPWS website: *The Status of EU Protected Habitats and Species in Ireland.*

The black square on the map below is a crop of the map identical to the square shown in the Applicant's Screening Report for Appropriate Assessment, Figure 5.1: *SACs in the wider area surrounding the project,* and within that area there is a large number of EU Habitats Directive Protected Areas that have not been included by the Applicant (listed below).

It should also be noted by the Board that the applicant has not used the same distance measurements for SPAs, and has included SPAs that are much further afield, such as Cork Harbour and Saltee Islands, yet omitted others (incl. SACs) which are closer to the proposed wind farm development site.



https://storymaps.arcgis.com/collections/1a721520030d404f899d658d5b6e159a?item=1

In terms of SACs, the Lower River Suir SAC (Site code: 2137), Comeragh Mountains (Site code: 1952), Nier Valley Woodlands (Site code 668) and the Blackwater River (Cork/Waterford) (Site code: 2170) have also been identified within a 10km boundary of the Proposed Development area.

In terms of pNHAs (Proposed Natural Heritage Areas), Lismore Woods (Site code: 667), Glenboy Woods (Site code: 952) and the Blackwater River and Estuary (Site code: 72) have been identified within a 10km boundary of the Proposed Development area.

Even if in the Screening Report for Appropriate Assessment, the applicant tries to conclude that the above-omitted protected European Sites and areas are not affected, they still need to be included for the Appropriate Assessment to be valid. There has not even been any mention that these were studied/looked at.

Page 48 of the applicant's Screening Report for Appropriate Assessment states:

> *"5.0 Identification Of European Sites Within The Zone Of Influence Of The Project*
>
> *5.1 Within/Adjoining European Sites*
>
> *In order to identify European Sites that could potential be located within the zone of influence of the project, the current digital mapping (shapefile) of European Sites in Ireland, as published by the NPWS, was reviewed to identify the European Sites that could conceivably be connected to the project site via pathways".*

A copy of this map has not been provided in the NIS to show *the European Sites that could conceivably be connected to the project site via pathways*. The Applicant is expecting the Board to simply believe what they say; yet evidence must be provided for any decision to be made. The Board cannot simply take the applicant's word on what is connected to the project site and what isn't.

Furthermore the applicant's EIAR, Volume I Non-Technical Summary (NTS) states that:

> *"Scoping and pre-application consultation is important to the development of a comprehensive and balanced EIAR. Requests for Scoping Opinions were submitted to the prescribed bodies and key consultees in September 2021. The request was accompanied by a Description of the Project, a Site Location Map, an Overall Masterplan Drawing and a Scoping Letter. Scoping Opinions received are included as Appendix 1.1 of Volume IV. This included agreement on excluding from the EIAR, assessment of effects on certain receptors or features, where it was agreed there was no potential for significant effects."*

In the planning application we could not find any instance where any prescribed body or any other consultee agreed that features or certain receptors could or should be excluded from assessment. To the contrary, and as one example of the opposite, the Irish Peatland Conservation Council (IPCC) had this to say:

> *The Irish Peatland Conservation Council have identified a number of designated sites within the proximity of the proposed windfarm which need to be given due attention in ascertaining the impacts to biodiversity from the proposed project. In particular, developments have the potential to*

disrupt the hydrology of peatland and even small impacts to the water table may have disastrous consequences for specialised peatland species that live within minimal ranges of chemical and hydrological limits, such as the Vertigo whorl snails. An appropriate distance from the proposed project area, depending on the possible source of detrimental influence (such as hydrology) has to also be included within any proposed plan that has the potential to disrupt the natural environment. Developers need to ensure that their project in no way affects the integrity of the habitats and qualifying interests including species of the designated sites.

5.3.3 The Importance and Relevance of the Water Framework Directive (WFD) Requirements and the Objectives of the National River Basin Management Plan

The Board will be aware that Water Framework Directive (WFD) (2000/60/EC) is perhaps the third most important EU Directive (after the Birds and Habitats Directives) which must be considered when making a planning application for a development which may have an impact on water quality, for the following reasons:

i) The WFD specifies objectives for water quality, including environmental and ecological objectives which must be achieved where possible;

ii) The objectives are also intended to protect water-dependant habitats and species, and are closely linked with the objectives of the Birds and Habitats Directives, and to maintaining the integrity of protected areas in the Natura 2000 framework; and,

iii) Compliance with the WFD requires dealing with agricultural production as a principal source of rural diffuse source pollution, that measures must be taken to reduce such pollution, and that becoming sustainable is critical to achieving the objectives of the WFD.

The Directive, which came into force in December 2000, establishes a framework for community action in the field of water policy, and has been transposed into Irish law by the European Communities (Water Policy) Regulations 2003 (S.I. 722 of 2003), the European Communities Environmental Objectives (Surface Water) Regulations 2009 (S.I. 272 of 2009), and the European Communities Environmental Objectives (Groundwater) Regulations 2010 (S.I. 9 of 2010).

Both sets of Regulations were amended in 2016 to transpose the provisions of the updated Directive 2013/39/EU on Priority Substances, and Directive 2014/80/EU which amends Annex II to Directive 2006/118/EC on the protection of groundwater against pollution and deterioration. The Regulations place a legal obligation on public authorities to aim to achieve the objectives of the WFD in the performance of their statutory functions.

During the first cycle of implementation of the WFD, River Basin Management Plans were prepared for eight River Basin Districts (RBDs); these plans were valid for a six-year period and ran from 2009-2014.

5.3.3.1 National River Basin Management Plan 2018 - 2021

For the 2nd Cycle of WFD implementation, the Eastern, South Eastern, South Western, Western and Shannon River Basin Districts were merged to form one national River Basin District covering an area of 70,273 km^2. A single National River Basin Management Plan (NRBMP) was published in August 2018 by the Department of Housing, Planning, and Local Government.

Section 6.1 of the NRBMP lists the environmental objectives in Article 4 of the Water Framework Directive, and considers how those objectives will be best achieved, and identifies possible exemptions. The WFD objectives for the different categories are: [13]

A. Objectives for Surface Waters:

- ✓ To prevent deterioration of the status of surface waters;
- ✓ To protect, enhance and restore surface waters with the aim of achieving good status (ecological and chemical) for all water bodies;
- ✓ For heavily modified water bodies and artificial water bodies, the aim is to protect and enhance those bodies to achieve good ecological potential and good chemical status; and,
- ✓ To progressively reduce pollution from priority substances and cease or phase out emissions, discharges and losses of priority hazardous substances into surface waters.

B. Objectives for Groundwater:

- ✓ To prevent deterioration of the status of groundwater;
- ✓ To protect, enhance and restore all bodies of groundwater, and ensure a balance of abstraction and recharge, with the aim of achieving good groundwater status (quantitative and chemical); and,
- ✓ To reverse any significant and sustained upward trends in the concentration of pollutants in groundwater.

C. Objectives for Protected Areas:

- ✓ To achieve compliance with objectives and standards under which the individual protected areas have been established.

[13] National River Basin Management Plan for Ireland, 2018 - 2021; Section 6: Environmental Objectives of the Water Framework Directive, page 47.

The National River Basin Management Plan states that one of its key purposes is to set out priorities and ensure that the implementation of the Plan is guided by this prioritisation. Based on work undertaken by the Environmental Protection Agency, the following prioritisation was selected for this cycle of the Plan:

- ✓ Ensure full compliance with relevant EU legislation;
- ✓ Prevent deterioration;
- ✓ Meet the specific water-related objectives for protected areas;
- ✓ Specifically protect and restore high-status-objective water bodies;
- ✓ Prioritise catchment areas for action that facilitates:
  - (1) the targeting of water bodies where evidence suggests they could achieve status improvements during this cycle; and,
  - (2) the progression of pilots in sub-catchments with more complex issues that require multi-disciplinary and cross-agency approaches;
- ✓ Improve knowledge and understanding of hydromorphology and barriers as pressures which impact on water quality, identify the scale of these issues, and build the expertise necessary to address them.[14]

The NRBMP also states that the EPA and Inland Fisheries Ireland will improve assessment methods and knowledge of the physical condition of rivers, lakes and marine coastal waters to inform and support future management measures.

5.3.3.2 Third Cycle Draft River Basin Management Plan 2022-2027

Preparation of the 3rd cycle of Ireland's River Basin Management Plan (RBMP) for the period of 2022-2027 began in September 2021 when a draft of the plan was issued for public consultation by the Department of Housing, Local Government and Heritage (DHLGH). Following a six-month period of public consultation to 31 March 2022, a consultation report was published in July 2022, summarising the issues raised in the submissions received by the Department. This report is currently being reviewed in line with the EU Water Framework Directive (WFD) (2000/60/EC) requirements.

However, on **26 January 2023**, the European Commission decided to refer Ireland to the Court of Justice of the European Union (CJEU) for failing to correctly transpose the Water Framework Directive (Directive 2000/60/EC) into national law. The basis for these infringement proceedings is that, despite some progress being made by the adoption of new legislation in June and December

[14] National River Basin Management Plan for Ireland, 2018 - 2021; Section 6.2: Prioritisation for the Second-Cycle River Basin Management Plan, page 47.

2022, the Commission considered that the Irish authorities had not yet fully addressed the issues previously raised by the Commission.

The facts that the third Cycle Draft RBMP for the period 2022-2027 is still in draft, and that Ireland has been referred to the CJEU, have created an uncertainty which leaves only the 2018 – 2021 National RBMP as the plan effectively in force.

5.3.3.3 Relevance of the Water Framework Directive Requirements and the Objectives of the National River Basin Management Plan

The NRBMP as a whole is relevant to the Board's consideration of this planning application in that it recognises the need for alignment and integration with the planning system in order to ensure effective water management, and to provide compatibility between the WFD objectives and the consideration of developments which may need planning permission.

Therefore, when considering the potential impact of the proposed wind farm on a Natura 2000 site, we must take into account whether or not the water quality status of any water bodies associated with protected areas might be affected, particularly if water-dependent habitats or species are among those listed for protection.

5.3.3.4 Groundwater Protection Requirements

The European Communities Environmental Objectives (Groundwater) Regulations 2010 came into operation on 27 January 2010 to give effect to the measures needed to achieve the objectives established for groundwater by Article 4(1)(b) of the Water Framework Directive, and to give effect to the requirements of Directive 2006/118/EC (the Groundwater Directive).

These Regulations include:

- measures to prevent or limit the input of pollutants into groundwater and to prevent the deterioration of the status of all bodies of groundwater, in accordance with the requirements of Article 4(1)(b)(i) of Directive 2000/60/EC and Article 6 of Directive 2006/118/EC; and,
- measures to protect, enhance and restore all bodies of groundwater and to ensure a balance between abstraction and recharge of groundwater, with the aim of achieving good groundwater status, in accordance with Article 4(1)(b)(ii) of Directive 2000/60/EC.

The relevance of these regulations arises from the fact that the proposed wind farm development may give rise to a discharge of wastewater to groundwater, especially during construction and particularly during and after periods of

exceptionally heavy rainfall, events which are predicted to become more frequent as a consequence of climate change.

5.3.3.5 Requirement by An Bord Pleanála to Protect Water Quality

We therefore wish to emphasise that Ireland has legal obligations under the WFD to ensure that all rivers and lakes are of "Good Ecological Status" by 2027, and it is therefore essential that the Board must ensure that the proposed wind farm development will not adversely impact on the water quality and lower Ireland's standing with our legal obligations in protecting our waterways. Silt runoff and chemical/construction pollution can be disastrous for aquatic wildlife, and this should also be factored into the management and construction plans for the proposed development.

The rivers monitored by the EPA, and surrounding the proposed development area range from "Moderate", "Good" and "High". The proposed development should not be allowed to go ahead if any degradation of the aquatic habitats is possible as an outcome. There may also be rivers or waterways that are not monitored by the Environmental Protection Agency and these should also be evaluated ecologically and hydrologically to and included in pathways of influence assessment.

The Screening Report for Appropriate Assessment and the NIS are therefore incomplete and mean that the Proposed Development cannot meet the threshold for approval.

Furthermore, a current application before the planning authority (Planning Reference number 2360089, Waterford City & County Council), contains a submission from Clonea/Mothel Solar Action Group which has a letter appended from Dr Evelyn Moorkens, Ireland's most renowned fresh water pearl mussel expert, outlining issues with developments in areas where there is connectivity to highly sensitive freshwater pearl mussel sites on the River Suir. This raises a concern that the applicant in the subject case for the proposed development of the Dyrick Hill wind farm did not even include the Lower River Suir SAC in the screening process, even when advised by The Irish Peatland Conservation Council to do so.

It is clear that Ireland is failing in its obligations under the Habitats Directive. It cannot be possible to grant further development until the existing issues are resolved. It could not be possible to adequately assess this development with reference to conservation objectives when those objectives have either not been set or are failing already.

5.4 Effects of the Proposed Wind Farm on Specific Vulnerable or Protected Species

5.4.1 Freshwater Pearl Mussels

The legal basis on which SACs are selected and designated is the EU Habitats Directive, transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended. The Directive lists certain habitats and species that must be protected within SACs. The river Blackwater SAC (site code 0002170) includes as its qualifying interest the Freshwater Pearl Mussel (*Margaritifera margaritifera*).

Freshwater Pearl Mussels are protected by the following legal instruments:

- Habitats Directive [92/42/EEC] Annex II, Annex IV;
- Wildlife Acts;
- European Communities Environmental Objectives (Freshwater Pearl Mussel);
- Wildlife (N.I) Order (1985); and,
- Environment (N.I) Order (2002).

The lifecycle of the freshwater pearl mussel is very complex and also very unusual. The male pearl mussels release sperm into the water, which is then filtered by the females. The eggs are fertilised, and develop in the female's breeding pouch before being released as larvae. Each female mussel can release up to 4 million larval mussels. These larvae (also known as glochidia) are then washed downstream by the flow of the river, and if they are lucky, they attach themselves to the gills of young salmon or trout. The young mussels live as a parasite on the gills of the fish for approximately nine months, before dropping off the fish and settling into the river gravels. They then grow in the river bed and develop into juvenile pearl mussels. The juvenile mussels take about 15 years to mature, and during this time they are very sensitive to pollution and sedimentation.

Margaritifera margaritifera populations are found in relatively fast flowing water with a high oxygen content, low nutrient and low calcium content, mainly over non-calcareous rock. Substrate is ideally gravel or gravel and coarse sand with no silt and free of extensive filamentous algae coverage.

Watercourses with high water quality (Q value) are strongly associated with Freshwater Pearl Mussel populations and especially those populations where there is juvenile recruitment. In Ireland, rivers with high Q values are generally at higher elevations with lower stream order.

Populations comprised solely of adults, where juveniles cannot be recruited due to siltation of stream-bed interstitial spaces, still exist in lowland rivers due to the

great age achievable by the species. These populations would have been extant before the threats currently faced by the species became prevalent.

Habitats required by pearl mussels are:

- Eroding / upland rivers (FW1)
- Depositing / lowland rivers (FW2)[15]

According to the NPWS publication "Overall Trend in Conservation Status", 90% of all freshwater pearl mussels died out across Europe during the twentieth century.

The proposed windfarm site is 2km west of the Finisk River and 1.3km east of the Glenshelane River with functional hydraulic connections to the Blackwater SAC. The site is immediately east of the Blue dot sub-catchment of the Glenshelane River. Section 5.4, table 5.4, in the applicant's screening report for Appropriate Assessment, states that the fresh water pearl mussel is "*Outside the zone of influence".*

It is our submission that the applicant has not assessed correctly the consequences for the pearl mussel when making the planning application for Dyrick windfarm, and has not determined to the necessary degree of accuracy whether there would be adverse effects on the fresh water pearl mussel as defined by the conservation objectives and status of the nearby Blackwater SAC. The applicant must prove beyond reasonable doubt that lifecycle of the pearl mussel is not affected in any way from, i.e., water sources/tributaries getting polluted as a result of the windfarm construction, operational or decommissioning stages of the project.

The applicant's EIAR, Volume IV, Appendices, Appendix 1.1 – Consultation Responses, contains the following response from the Irish Peatland Conservation Council:

> *"The IPCC Peatland Sites Database holds records that Bewick Swans, Otter, Curlew, Greenland White- Fronted Geese,* ***Freshwater Pearl Mussel*** *and Atlantic Salmon have been recorded in* ***Lismore Woods pNHA****. Rhododendron is also listed as an issue at this site."*

As Appropriate Assessments (AA's) are to be undertaken in view of Natura 2000 sites' conservation objectives, the AA should include scientific analysis of how the proposed plan or project could impact upon the relevant attributes and targets, in view of their current condition. The current condition, which informs the 'integrity' of a qualifying freshwater pearl mussel population can be considered to consist of the condition of the species' habitat and the condition of

[15] Moorkens, E. A., 2000; Moorkens, E., 2011; Moorkens, E. A., 2000; and Fossitt, J.A. 2001.

the population itself. No AA has been undertaken on the Fresh Water Pearl mussel in this application.

The Board will be aware that Mr Peter Sweetman brought proceeding aimed at preventing any legislation or administrative act from removing the freshwater pearl mussel as a "qualifying interest" from any part of the Munster Blackwater SAC. Mr Sweetman claimed the State's decision related to the population of freshwater pearl mussels in the main river channel of the Blackwater, which flows through counties Waterford and Cork, and is a designated site of European importance.

The applicant's NIS, and the Appropriate Assessment to be undertaken by the Board must therefore consider the current unfavourable condition of populations and their habitat, particularly whether the proposed wind farm project could:

1. Prolong the poor condition of the freshwater pearl mussel habitat
2. Result in further deterioration in freshwater pearl mussel habitat condition
3. Increase the area of freshwater pearl mussel habitat negatively effected

And in so doing:

1. Prevent juvenile recruitment, owing to unsuitable juvenile habitat condition
2. Cause stress to adult mussels resulting in reproductive failures
3. Cause mortalities of adult mussels, impacting population size
4. Result in an extended 'gap' in the population's age profile, impacting population size and future reproductive potential
5. Increase the patchiness of mussel distribution, impacting future reproductive potential.

The Board should therefore take account of the Judgement of the European Court of 29 June 2023 (*European Commission v Ireland*; Case C-444/21): failure of a Member State to fulfil obligations – Environment – Directive 92/43/EEC – Conservation of natural habitats and of wild fauna and flora – Special areas of conservation – Atlantic biogeographical region – Article 4(4) and Article 6(1) – Failure to designate special areas of conservation and to set conservation objectives – Absence or insufficiency of conservation measures.

As stated in Article 6 of the directive:

> *"For special areas of conservation, Member States shall establish the necessary conservation measures involving, if need be, appropriate management plans specifically designed for the sites or integrated into*

other development plans, and appropriate statutory, administrative or contractual measures which correspond to the ecological requirements of the natural habitat types in Annex I and the species in Annex II present on the sites".

"Member States shall take appropriate steps to avoid, in the special areas of conservation, the deterioration of natural habitats and the habitats of species as well as disturbance of the species for which the areas have been designated, in so far as such disturbance could be significant in relation to the objectives of this Directive".

We would also urge the Board to refer to the fresh water pearl mussel, Sub-Basin Management Plan in the SEA Scoping Document, Table 1, which lists 27-sub basin catchments designated as SACs for freshwater pearl mussel populations (Including the Blackwater SAC).

Nowhere does the application mention that the entire Blackwater SAC must be taken into consideration in order to protect the fresh water pearl mussel population.

It is our observation that the Dyrick Hill windfarm planning application is a prime example of a project without a clear and precise demonstration that it could become part of ongoing measures to achieve the conservation objective of maintaining the population of fresh water pearl mussels in the Blackwater River SCA. It is the responsibility of NPWS and of various government agencies, i.e. EPA, Irish Water, Local County Councils, etc., to work together to protect all SACs. Ireland's failure to take due care to protect SACs based has led to the Judgement of the Court of 29 June 2023 (*European Commission v Ireland*), which we have cited above.

5.4.2 Fish

The Aquatic Fauna statement in the Applicant's NIS is not based on evidence and seems to be misleading.

The applicant's NIS, Section 3.13.8 Aquatic Fauna, Table 3.6, "*Assessment of Fishery Habitat*" is only a theoretical review of the likelihood of salmon (*Salmo salar)* at various life stages in the streams that run through the site, and we therefore conclude that the following statement by the applicant (on the page immediately after Table 3.6) must be considered unreliable:

" the three primary streams draining the project site support conditions that are overall not representative of optimal spawning or nursery habitat for salmonids".

The expression "not optimal" only defines the conditions of the Farnanes Stream, Lisleagh Stream and Aughkilladoon Stream as not perfect; the statement that the

streams do not appear to sustain optimal spawning or nursery habitats for salmonids, does not mean that there are no salmonids present, or thatany salmonid populations present are not viable. The applicant's statement is an 'evaluation' of the streams' suitability; it is not based on an actual fish study.

It is our observation that no salmonid surveys have been carried out on the Farnanes, Lisleagh and Aughkilladoon Streams; there have been no 'on site' surveys of actual fish through spot checks or TEF (Ten Minute Electrofishing). (Spot Checks and TEF are the methods used by Inland Fisheries Ireland.)

It is also our observation that no lamprey (*Lampetra fluviatilis)* survey has been carried out on the Farnanes, Lisleagh and Aughkilladoon Streams; there have been no 'on site' surveys of actual fish through Spot Checks or TEF (Ten Minute Electrofishing).

It is our further observation that no eel (*Anguilla Anguilla)* survey has been carried out on the Farnanes, Lisleagh and Aughkilladoon Streams; there have been no 'on site' surveys of actual fish through Spot Checks or TEF (Ten Minute Electrofishing).

Furthermore, an examination of Table 6.7 on page 49 of Chapter 6 Biodiversity will show that the data contradict the conclusions made in the Applicant's NIS (with the exception of the Aughkilladoon Stream).

Jennings O'Donovan & Partners Limited Consulting Engineers Sligo

Table 6.7: Summary Results of the Aquatic Surveys that were undertaken at the Site (WQ1-WQ4) on 13th September 2022

Water Quality Site	WQ1	WQ2	WQ3	WQ4
River/Stream Name	Farnane River	Lisleagh Stream	Aughkilladoon Stream	Finisk River
River Sub-basin	Finisk sub-basin	Finisk sub-basin	Finisk sub-basin	Finisk sub-basin
River/Stream Order	1st Order	1st Order	1st Order	1st Order
Margaritifera sensitive area	No	No	No	No
EPA code	18F06	18D06	18L04	18F02
EPA Q-Value	Q5	Not assigned	Not assigned	Q4
Q-Value	Q5	Q4	Q4	Q4
WFD Class	A	A	A	A
WFD Status	Good	Good	Good	Good
Salmonid Suitability	Yes, suitable nursery, spawning and holding habitat. Important salmonid river.	Limited suitable nursery, spawning and holding habitat. Subject to low flows.	No. Stream is subject to low flows and drying out	Yes, suitable nursery, spawning and holding habitat. Important salmonid river.

It is therefore our conclusion that insufficient data have been provided, the result of inadequate field work and analysis, on the Farnanes Stream, Lisleagh Stream and Aughkilladoon Stream. It is therefore impossible for the Board to judge the impact of the proposed development on these streams. These waterways run through the site and this information is critically important.

5.4.3 Birds

5.4.3.1 Hen Harrier

The Knockmealdown mountains range is identified as *Zone 2* in **Figure 5.4.3.1** below, it is a 'Non-Designated Regional Zone' of importance for breeding Hen Harriers (listed as Annex 1 on the Birds Directive (Directive 2009/ 147/EC) and Amber-listed on the Birds of Conservation Concern in Ireland. Seven breeding pairs of Hen Harriers live within Zone 2 according to NPWS (2022), Hen Harrier Conservation and the Wind Energy Sector in Ireland. Supporting document to the Hen Harrier Threat Response Plan, National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

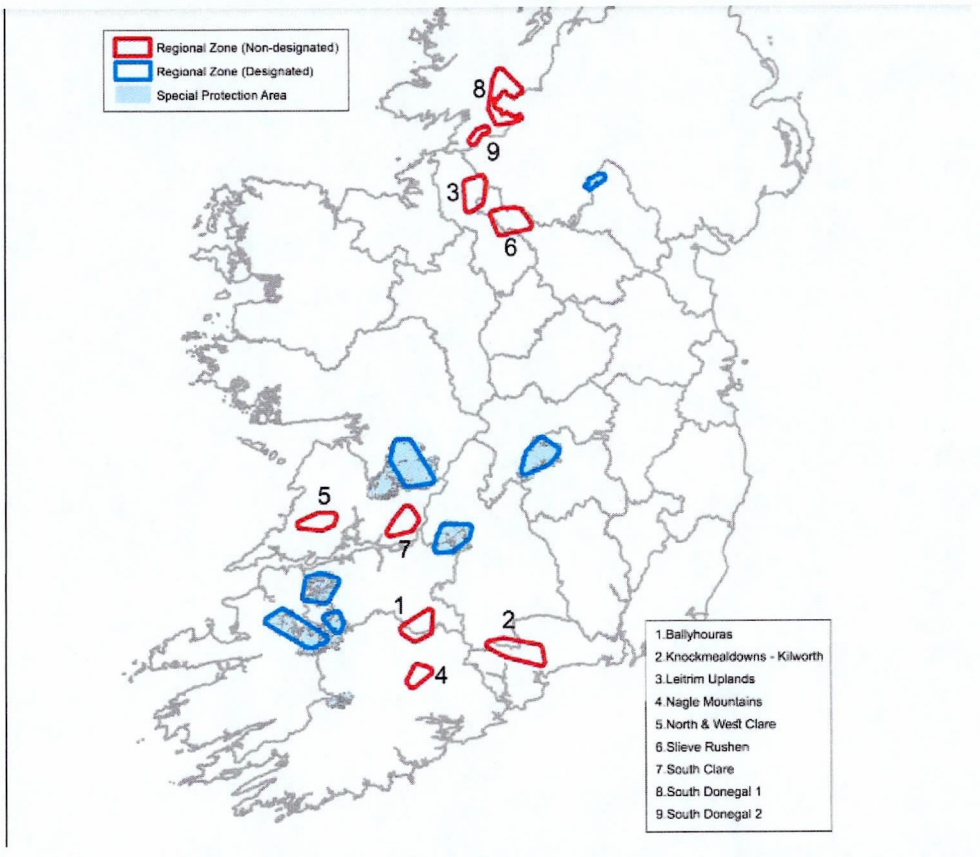


Figure 5.4.3.1 The distribution of relatively important breeding populations of hen harriers (i.e., designated and non-designated regional zones) as defined by Rudock *at al* (2016b), using 2010 and 2015 survey data. Source: NPWS figure 14.

Under Regulation 39 of the European Communities (Birds and Natural Habitats) Regulations 2011-2015, provision is made for the development and implementation of appropriate threat response plans. The purpose of such plans is to cease, avoid, reduce or prevent threats, pressures or hazards that may be having an adverse effect on the conservation status of a species of bird referred to in Article 1 of the Birds Directive, and/or may be causing the deterioration of

the habitats of species for which a European Site (or Natura site) has been classified pursuant to the Birds Directive (Directive 2009/147/EC).

The Hen Harrier (*Circus cyaneus*) is listed on Annex 1 of the Birds Directive. In 2007, six European Sites (Special Protection Areas; SPAs)) were designated for the conservation of this breeding species. A survey of breeding Hen Harriers in 2010 recorded 128 to 172 breeding pairs (Ruddock et al., 2012); this was broadly similar to the totals recorded in the previous survey in 2005 (Barton et al., 2006). However, notable declines were recorded in some of the stronghold SPA sites (Ruddock et al., 2012). The 2015 survey of breeding Hen Harrier (Ruddock et al., 2016a) recorded further national declines with 108 to 157 breeding pairs estimated. Further declines were noted within four of the six SPAs and overall, the total SPA breeding population of Hen Harriers was shown to have declined by approximately 10% since the 2010 survey and 27% since the 2005 survey.

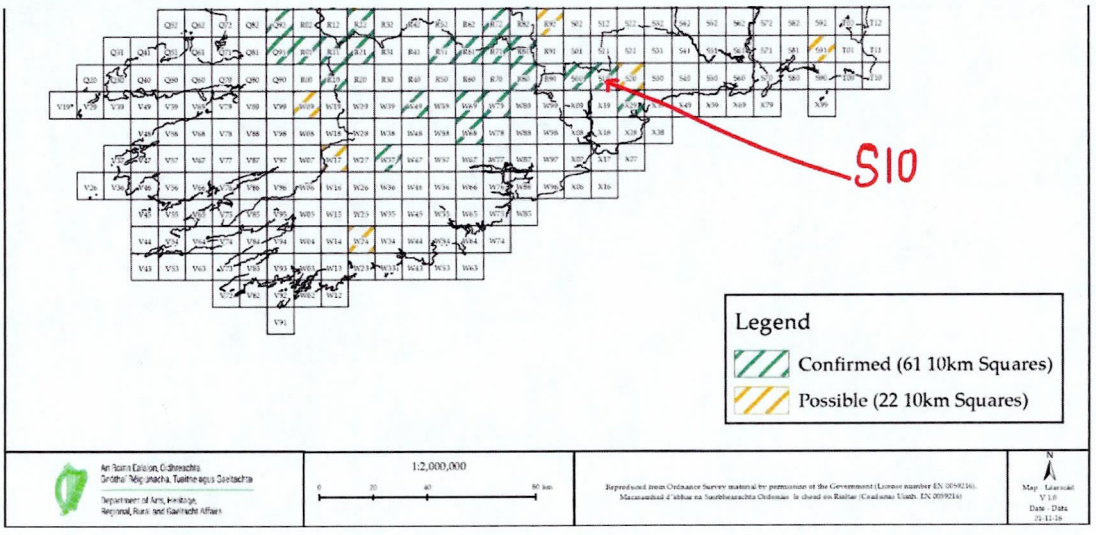


Figure 5.4.3.2 Hen Harrier records of 10km squares, from National Surveys in 2015/2010/2005; square 10, in which is located the site of the proposed wind farm is marked in red.

Hen Harrier records of 10km square S10, from National Surveys in 2015/2010/2005 (**Figure 5.4.3.2**):

- Three confirmed breeding sites in 2015
- One confirmed breeding site and one additional sighting in 2010
- Seven sightings in 2005

The 10km square S10 also overlaps with one of the nine non-designated but regionally important breeding areas for Hen Harriers, as established in the 2015 National Hen Harrier Survey. The area of overlap is 89.6 square kilometres.

Below are confirmed sightings recorded on Biodiversity Ireland's database (**Figure 5.4.3.3** below). There were three sightings within 11 days in May 2015 of Hen Harriers flying overhead of the proposed site for Dyrick Hill Wind Farm. During November 2017 and April 2021, there were confirmed sightings of a Hen Harrier in The Vee in the Knockmealdowns. The breeding season is mid-April to Mid-June, and most sightings are during breeding season.

Birds of Ireland - S1005

Name	Birds of Ireland
Grid Resolution	1000
Grid	S1005
Site	Knockboy
Dataset	Birds of Ireland
Survey	
Precision	1km
Recorder	Alan Bryan
Determiner	
Taxon	Circus cyaneus
Common Name	Hen Harrier
Date	24/05/2015

Additional Attributes:

Abundance	1
Activity	Flying over
County	Waterford
Vice-county	Waterford

Birds of Ireland - S1005

Name	Birds of Ireland
Grid Resolution	1000
Grid	S1005
Site	Knockmealdowns
Dataset	Birds of Ireland
Survey	
Precision	1km
Recorder	Peter Foss
Determiner	
Taxon	Circus cyaneus
Common Name	Hen Harrier
Date	28/05/2015

Additional Attributes:

Abundance	1
Activity	Flying over
County	Waterford
Record comment	One male flying over

Birds of Ireland - S0407

Name	Birds of Ireland
Grid Resolution	1000
Grid	S0407
Site	Vee Road
Dataset	Birds of Ireland
Survey	
Precision	1km
Recorder	Eugene Kelly
Determiner	
Taxon	Circus cyaneus
Common Name	Hen Harrier
Date	11/11/2017

Additional Attributes:

Abundance	1
County	Waterford

Birds of Ireland - S0307

Name	Birds of Ireland
Grid Resolution	1000
Grid	S0307
Site	Boggaghbaun
Dataset	Birds of Ireland
Survey	
Precision	1km
Recorder	Luke Heffernan
Determiner	
Taxon	Circus cyaneus
Common Name	Hen Harrier
Date	03/06/2015

Additional Attributes:

Abundance	1
Activity	Flying over
County	Waterford
Vice-county	Waterford

Birds of Ireland - S01L

Name	Birds of Ireland
Grid Resolution	2000
Grid	S01L
Site	The Vee
Dataset	Birds of Ireland
Survey	
Precision	2km
Recorder	Aisling Farrell
Determiner	
Taxon	Circus cyaneus
Common Name	Hen Harrier
Date	24/04/2021

Additional Attributes:

Abundance	1
Common name	Hen Harrier
County	Tipperary

Figure 5.4.3.3 Confirmed sightings of Hen Harriers recorded on Biodiversity Ireland's database

The applicant's Natura Impact Statement, which was prepared by DEC Ltd, is silent on documented evidence of the existence of the Hen Harrier. It states in Section 3.13.6 that suitable habitat exists on or near the site.

O'Donoghue (2004) described the modern landscape of the Irish-breeding Hen Harrier as:

- upland, typically above 100m above sea level and dominated by pastoral-based livestock farming, with holdings often covered in rushes and bordered by hedgerows;
- active and degraded peatland;
- scrub; and
- commercial forestry plantations of different ages.

Six sites have been designated as SPAs for breeding Hen Harriers in Ireland. The SPAs comprise a combined area of some 167,000 ha, and consist mainly of non-native coniferous plantation forests, open upland peatland habitats, and a spectrum of agricultural grasslands (from unimproved to improved) (NPWS, 2007; Moran and Wilson-Parr, 2015). It is estimated that approximately 52% of

the total land area in these six SPAS is afforested. As of June 2016, there were 308 connected wind turbines within or close to (i.e. within 500m of) the Hen Harrier SPAs (NPWS, unpublished). The combined breeding Hen Harrier populations within these SPAs during the 2010 national survey (Ruddock et al., 2012) was 77 territories, a decline of 18.1% compared to the 94 territories recorded in the 2005 survey.

The results of recent research have raised the possibility that the Hen Harrier may be subject to an ecological trap in Ireland because of its habitat preferences and potential interactions with other land management and land uses. This, coupled with concerns that the extent and rate of change to the Hen Harrier's habitat (due to factors such as continued afforestation, increases in wind energy development and agricultural intensification) were linked to the recently recorded declines.

To obtain consent for individual wind energy developments, applicants need to submit a Natura Impact Statement (NIS) if they have determined that significant effects may arise on a European Site as a result of the proposed development. An NIS is to be prepared by ecological experts in order to allow the planning authority to complete the Appropriate Assessment process and their determination as to whether adverse effects on the integrity of European Sites may or will arise. The need to apply the precautionary principle in Appropriate Assessments has been enshrined in ECJ case law (e.g. where effects may arise but have not been proven) (e.g. Waddenzee Judgment (ECJ, 2004). Public authorities shall give consent to a plan or project, or adopt a plan or project, under Article 6 (3) of the Habitats Directive (92/43/EEC), only after having determined that it shall not adversely affect the integrity of a European Site. Furthermore, Appropriate Assessments should "*include complete, precise and definitive findings and conclusions that are* ***capable of removing all scientific doubt as to the effects of the proposed development*** *on … [sites] concerned*" (High Court, 2014).

Wind energy development interactions with birds can have lethal or non-lethal effects. Wind turbine construction and/or development work present three main risks to birds (Desholm, 2006), namely:

1) Direct mortality due to collision with the turbine blades, nacelles, towers and/or ancillary wind energy development infrastructure (e.g. meteorological masts) (Barrios and Rodriguez, 2004; Band et al., 2007; Drewitt and Langston, 2008; Bellebaum et al., 2013);
2) Loss of breeding and/or foraging habitat, due to the footprint of construction, or fragmentation of breeding, wintering or foraging habitats (de Lucas et al., 2008; Pearce-Higgins et al., 2009a; Fijn et al., 2012; Zimmerling et al., 2013)

3) Displacement of birds as a result of increased disturbance (Devereaux et al., 2008; Fielding and Haworth, 2010; Fijn et al., 2012), and/or loss of suitable habitat, and barrier effects caused by turbine arrays (Barrios and Rodriguez, 2004; Desholm and Kahlert, 2005; Masden et al., 2009).

In Ireland, as part of their review and study of flights behaviour, Wilson et al. (2015) recorded that:

(i) during sky dancing displays, Hen Harriers achieved flight heights that put them at potential risk from wind turbines;

(ii) average flight heights of adult Hen Harriers did not change in response to wind turbine presence, although it is possible that birds altered their flight height in the proximity of individual turbines;

(iii) adult male Hen Harriers spent up to 12% of their flight time at wind turbine rotor swept height; and

(iv) newly-fledged juvenile Hen Harriers spent the majority of their time below turbine rotor sweep height, in and around the nest area.

Overall, it was concluded that the risk of direct collision with wind turbine rotors was low (Wilson et al., 2015). However, since that study's conclusion in 2015 and even in the absence of robust carcass searches, NPWS-DHLGH has received reports (including photographic evidence) of one "possible" case and three "probable/confirmed" incidences of Hen Harrier mortality caused by turbine strike.

Studies in Ireland show that Hen Harriers may relocate their breeding sites at increasing distances from turbines following construction, e.g. a 200-300m average increase in distance away from turbines was observed at a site that had been a Hen Harrier territory for more than 20 years (O'Donoghue et al., 2011). That study observed total displacement during the year of construction; after construction, average set-back distance of nests was 501m (range 140m-760m) from nearest turbines.

O'Donoghue et al. (2011) also noted that the breeding Hen Harrier territories examined had significantly different breeding success, with 79.2% breeding success in areas where there were no proposed wind energy developments, compared to 16.7% in areas with energy development proposals. This was not directly linked to extant wind energy development sites but may be indicative of (unconfirmed) persecution or accidental disturbance during the early/pre-construction phases of wind energy development.

Volunteer surveyors conducted field observations as part of the 2010 National Hen Harrier Survey. Subsequently, Ruddock et al., 2012 reported wind energy development-related disturbance as the suspected reason for Hen Harrier breeding failure at five separate locations in Co. Cavan, Co. Kerry, Co. Cork and Co. Limerick. In the 2015 survey (Ruddock et al., 2016a), disturbance was

examined in greater detail at the national level, reports of wind energy developments being the cause of breeding failure (i.e. the 11th most frequently recorded pressure within 500m and 2km of Hen Harrier territories). However, it was the fourth most frequently recorded pressure within four of the six SPAs.

As noted previously, generally, foraging Hen Harriers prefer open habitats. In particular, heath/bog, low intensively farmed grassland and semi-natural open habitats with well-established hedgerows, pre-thicket forest and areas of scrub are the main habitats used by foraging Hen Harriers (Irwin et al., 2012; O'Donoghue, 2012). Therefore, loss, change, degradation or fragmentation of these types of habitats as a result of wind energy developments, particularly the preferred habitats, could affect foraging Hen Harriers through direct loss or changes to habitats.

Wilson et al. (2015) completed a strategic vantage point study of Hen Harrier habitat usage at wind energy developments and control sites. This found that Hen Harriers foraged preferentially over peatland and pre-thicket habitats, while avoiding closed canopy and natural and semi-natural open habitats. At wind energy development sites, Hen Harriers preferentially foraged in peatland and also avoided closed canopy forest. Hen Harriers at wind energy developments did not use thicket areas for hunting, but preferentially used areas of natural and semi-natural open habitats. The study highlights the importance of open habitats (rough grassland, natural grasslands, scrub and peatland) for foraging Hen Harriers in Ireland.

Based on data derived from the 2000 and 2010 national surveys, Wilson et al. (2015; 2016) found evidence that population decline may be associated with the presence of wind turbines.

Based on this report's review of available studies and best available knowledge, it can be concluded that the development of a wind energy development in, or immediately adjacent to, Hen Harrier habitat will result in some loss and/or reduction in quality of existing or current breeding habitat, through effects on, for example, breeding success and prey availability, which may result in negative changes to breeding productivity.

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5.4.3.2 Golden Plover

5.4.3.2.1 Insufficient and Non-Existent Mitigation Measures

In the applicant's Natura Impact Statement, Section 5.2.3.1, Habitat Loss during the Construction Phase, the suggested mitigation methods are based on the viability of surrounding areas to support Golden Plover. For example: '*GIS analysis was completed to estimate the area of potentially suitable habitat occurring within the wider area surrounding the Dungarvan Harbour SPA.'*

However, Golden Plover are highly selective in their land use, which is shown in the publication "*Time budgets and foraging of breeding golden plover Pluvialis apricaria"* by M.J. Whittingham[16], first published 25 December 2001, where it is stated that "*Only 17 of 85 fields in the study area were used for foraging by breeding Golden Plover.*"

The applicant's exercise in pointing out theoretically suitable land for Golden Plover is purely academic and offers nothing in the form of mitigation.

In the operation phase of the proposed development (NIS, Section 5.2.3.3 Indirect Effects resulting in Disturbance & Barriers to Movement during the Operation Phase), the applicant's NIS comes to the conclusion on the barriers' effect of the wind farm:

[16] M.J. Whittingham, Edward Grey Institute for Ornithology, Department of Zoology, University of Oxford. https://besjournals.onlinelibrary.wiley.com/doi/full/10.1046/j.1365-2664.2000.00519.x

> *"In terms of barriers to movements Krijgsveld et al., (2009) noted high avoidance rates of wind farms and changes in densities within wind farms post construction, as described by Pearce-Higgins et al., 2012, and suggests that wind farms act as significant barriers to golden plover. Barriers to movement of golden plover will have the potential to result in to result in energy expenditure that could in turn have significant effects to this species during migrating flights inspiring and autumn. The presence of a barrier to daily movements will also represent an impact of long-term moderate significance for golden plover."*

However, the NIS makes no mention of disturbance during operation which is, in fact, the biggest danger to golden plover according to the article: "*Negative impact of wind energy development on a breeding shorebird assessed with a BACI study design".*[17]

> *"Disturbance activity during construction had no significant effect on Golden Plover breeding abundance or distribution. In contrast, once turbines were erected, Golden Plover abundance was significantly reduced within the wind farm (−79%) relative to the baseline, with no comparable changes in buffer or control areas. Golden Plovers were significantly displaced by up to 400 m from turbines during operation."*

The Applicant's NIS offers nothing in terms of mitigation for the most significant impact on the Golden Plover. Neither does Chapter 17 Interactions of the Foregoing (Page 5: Biodiversity & Ornithology: *All interactions for any habitat or species including those associated with Special Protection Areas (SPA) or Special Areas of Conservation (SAC) are considered in the Natura Impact Statement and not considered further here.'*

5.4.3.2.2 Potential for Breeding Disturbance

In the NIS, Section 5.2.3, page 25, the applicant states that "*Golden plover was recorded on 19 occasions during breeding season vantage point surveys completed for the proposed wind farm".* Although no nesting sites were found, the presence during breeding season could suggest the potential of 'unfound' nesting sites or nesting sites near the wind farm site. Looking at Graph 5.1: Number of observations of golden plover per month during vantage point surveys ((NIS, page 27 & provided below in **Figure 5.4.3.4**), it shows that the highest number of sightings of Golden Plover were in the months of March and April. It should be noted that the breeding season of Golden Plover is April and May. The rise in numbers during this time is worth noting as is the sensitivity of the birds during this most important period.

[17] Alex Sansom, James W. Pearce-Higgins, David J. T. Douglas, 2016. IBIS, International Journal of Avian Science, Volume 158, Issue 3, 08 March 2016.

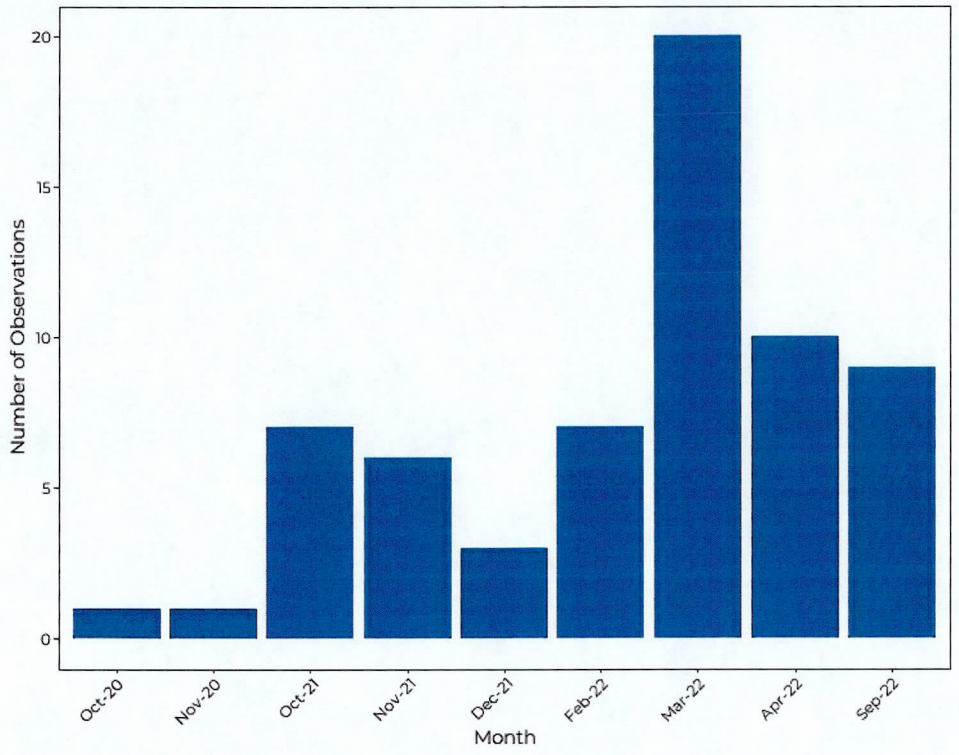

Figure 5.4.3.4 **Number of observations of golden plover per month.** Source: applicant's, NIS, *Graph 5.1: Number of observations of golden plover per month during vantage point surveys.*

5.4.3.2.3 Collision Risk

On page 26, Section 5.2.3 Golden Plover of the NIS, it states that *"On the 6th of October 2020, 27 golden plover were recorded flying in the height band 50 – 100m for a total time of 75 seconds."* We would like to point out that 50-100m is very much in the 'impact zone' of turbine blades.

5.4.3.2.4 Impact on Dungarvan Harbour SPA

As stated on page 27 of the NIS:

> *'The zone of sensitivity for golden plover, which is underpinned by this species' wintering foraging distance, used as part of this examination is circa 12km. The circa 12km distance is sourced from Gillings & Fuller (1999) who reported winter season foraging flights of up to 12km for golden plover. The circa 12km golden plover foraging range results in an overlap between the SPA [Dungarvan harbour SPA as mentioned on page 25 under 5.2.2] population and the boundary of proposed wind farm site. It is noted that all proposed turbine locations are situated outside the 12km buffer distance from this SPA, with the nearest turbine, T1 being located approximately 12.3km from the SPA boundary.'*

This distance of 12.3km to the nearest turbine is accurate (**Figure 5.4.3.2** below), and outside of the 'defined foraging range of 12km by a petty 0.3km. However the Dyrick Hill Wind Farm site boundary is only 10.6km away from the boundary of The Dungarven Harbour SPA (**Figure 5.4.3.3** below).

There is an overlap of 1.4km of foraging area between Dyrick Hill Wind Farm and Dungarvan Harbour SPA. It is therefore our observation, based on the scientific evidence quoted, that the proposed wind farm will undoubtedly threaten the Red-listed and Annex I-protected Golden Plover and the Dungarvan Harbour SPA.

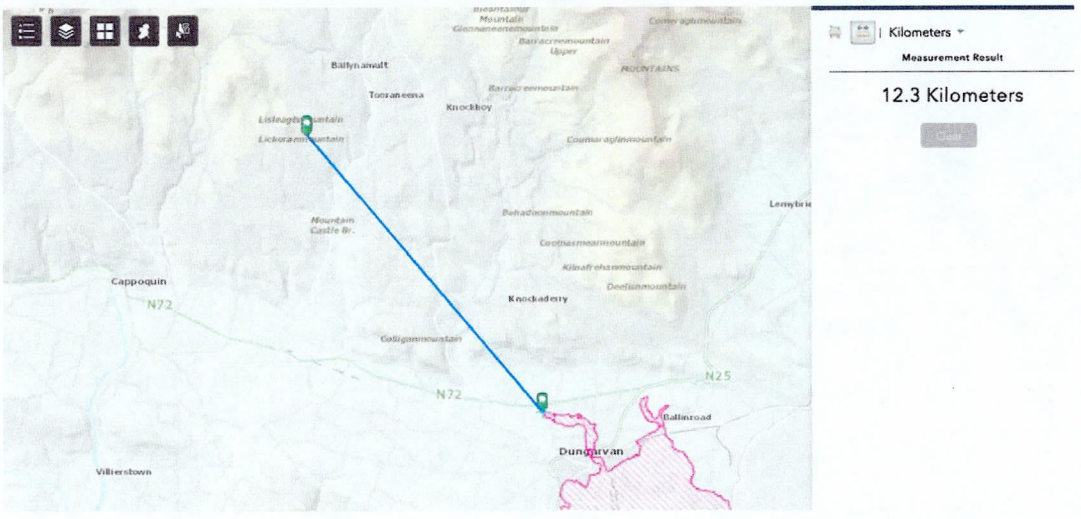

Figure 5.4.3.5 ***Distance to turbine T02 is 12.3 km from Dungarvan Harbour SPA***

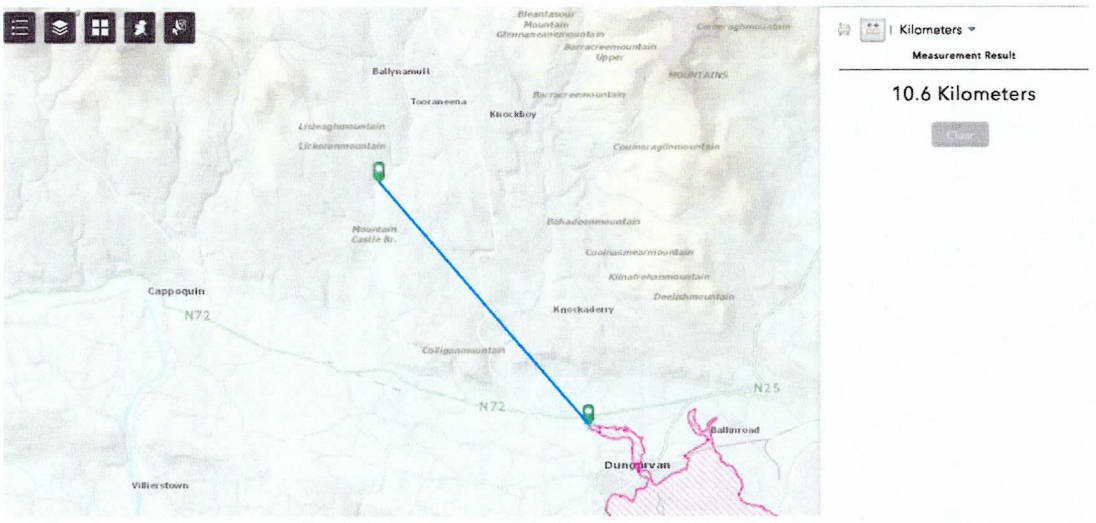

Figure 5.4.3.6 Distance to Dyrick Hill Wind Farm site is 10.6 km

It is therefore our conclusion on the Golden Plover that it cannot be stated with any confidence that the application "provides complete, precise and definitive findings, which are capable of removing all reasonable doubt."

5.4.4 Otters (*Lutra lutra*)

The applicant's Screening Report for Appropriate Assessment, section 3.5.3.2, Non-volant Mammals, page 45, states:

> *'No breeding or resting places for protected non-volant mammals such as badgers or otters have been recorded within the proposed wind farm site or along watercourses crossed by the proposed grid connection route.'*

However, the Screening Report should also refer to, and reach a conclusion on, the delivery haul route, but there is no such conclusion.

The lack of evidence about the presence or absence of otters is in contrast to the description of the Blackwater SAC in Table 5.4, page 84 of the Screening Report for Appropriate Assessment:

> *'Lutra lutra (Otter) [1355] Inside the zone of influence - This species is known to occur along the Finisk River at and downstream of the project site.'*

The applicant's EIAR, Chapter 6, Biodiversity, Section 6.5.6.2 Terrestrial Mammals – Badger and Otter, page 63, , states:

> *'No evidence indicating the presence of otters, their holts or couches were observed along the stretch of the Farnane Stream to the west and south of the proposed turbine location T9 and north to its source, west of the proposed turbine T11. Similarly, no evidence indicating the presence of otters, their holts or couches was recorded along the section of the Lisleagh Stream running west from the Waterford Wetland Site 239, downstream to a confluence with another minor tributary (northeast of the proposed turbine T1).*
>
> *The Aughkilladoon Stream that rises within the proposed wind farm site to the east of the proposed turbines T1and T2 is a minor stream that is subject to variable flows with much of the stream drying out during dry periods. It is of low foraging habitat potential for otters and no evidence indicating the presence of otters, their holts or couches were observed along this stream.'*

Whether we can trust these observations from the same people that appeared to be unable to identify a deer – Ireland's largest mammal – is debatable, but what is very interesting is that the biodiversity chapter of the EIAR does not mention the Finisk River. So, we have looked for evidence elsewhere.

The *"Survey of Bats and Bridges in County Waterford"*, by Carl Dixon, Patrick Smiddy and Sorcha Sheehy Carl Dixon, Patrick Smiddy and Sorcha Sheehy, on behalf of The Heritage Council, page 20, states:

'2.4.18 Other species

Terrestrial and aquatic mammal and bird evidence seen at each bridge was also recorded. In general, this meant evidence of mammal species such as Otter and Mink, and bird species such as Grey Heron, Mallard, Grey Wagtail and Dipper. It should be noted that no specific survey for birds and other mammals was carried out however where these species were observed they were recorded. Therefore, these species may have been under-recorded.'

One of the bridges studied was Millinacoorka Bridge that crosses the Finisk River Blackwater SAC, Grid Ref: S 18685 03980 Road No.: L5071 *(Survey of Bats and Bridges in County Waterford Appendix 1, page 40)* and is part of the Delivery Haul Route (see **section 3.2.7.3** above).

If we then look at *Survey of Bats and Bridges in County Waterford,* Appendix 3. Bird, mammal and other species recorded during survey, page 46, we find the result:

Bridge 85 Millinacoorka. Grey wagtail, Dipper, Goldfinch, Chiffchaff, ***Otter.***

Based on that evidence, there are otters present along the haulage route for delivery of wind turbine components and other equipment to the proposed wind farm site. Because of the extent of engineering works and amount of disturbance required to make the haulage route possible for the heavy and very lengthy vehicles which the wind farm construction requires, it must therefore follow that otters could be significantly affected by the development; and yet we find that no mitigation measures are proposed to protect the otter population. The otter is listed on Annex II and Annex IV of the EU Habitats Directive.

It is also worth noting that the title in the Screening Report for Appropriate Assessment on Table 5.4, page 83, reads:

'Identification of qualifying features of interest of the Connemara Bog Complex SAC within the zone of influence of the proposed development.'

The Connemara Bog Complex SAC is 319km away. This is most likely a cut-and-paste error from another report, which raises the question: What other (less obvious) information could also be incorrect? It is therefore our observation that this entire section of the Screening Report should be invalidated on these grounds alone.

5.4.5 Bats

It is our submission that the applicant's batt survey is incomplete; the survey does not provide 'complete, precise and definitive findings, which are capable of removing all reasonable scientific doubt'. And for this reason, it should be rejected. Our reason for reaching this conclusion follows.

Appendix 6.2 Bat Report, Section 4.4 Discussion, page 107, paragraph 4, states that: '*A bat roost survey of the farmhouse and sheds at Site 5 needs to be undertaken, as there was no access permission during the present surveys.*'

The farmhouse in question was deemed to have a '*moderate roost suitability due to its age and slate roof'.*

This report is, by its own admission, **incomplete**. As a result of this it is neither **precise** nor **definitive** and is incapable of **removing all reasonable scientific doubt.**

All eight species of bats identified in the survey are considered 'at most risk of extinction within the foreseeable future'.

The Screening for Appropriate Assessment, Section 3.5.3.1 Bats, page 45, states: '*Eight species of bats have been recorded as present at the development during the bat surveys. All are listed as 'Least Concern' on the Irish Red List, and Annex IV of the EU Habitats Directive.'*

This is true, but 'least concern' needs to be given context. Any animal on the Red List is considered **at risk of extinction**. The National Parks and Wildlife Service defines Red Lists as "*documents which list the threatened species within a geographical area. Species are assessed against standard criteria and assigned a threat status. Ideally, no species should appear on a Red List, but the species that do are those which are considered at most risk of extinction within the foreseeable future*".[18]

By using the term 'least concern' in the way that it does, the Applicant is using it in a way that undermines their vulnerability.

The Applicant has failed to define their methodology of assessment. There is no way to validate their findings. We are not being presented 'complete, precise and definitive findings'.

[18] https://www.npws.ie/research-projects/animal-species/invertebrates/red-lists#:~:text=Red%20Lists%20are%20documents%20which,and%20assigned%20a%20threat%20status.

Appendix 6.2 Bat Report, Section 2.4 Limitations, page 26, states that:

> *"Ecobat is an online tool which makes assessments of bat activity levels by comparing data entered by the user with bat survey information from similar areas at the same time of year. Specifically, a median bat activity level is calculated which corresponds to a bat activity category. Ecobat was offline for essential maintenance at the time of this assessment and was not used. Therefore, a conservative interpretation of the activity levels within the site was provided as a prudent measure."*

Should the methodology of 'conservative interpretation' not be defined as it is such a critical measurement?

> *'It is not considered that any of these survey specific constraints represent a significant limitation barrier or data gap to adequately assessing the impacts of the development on bat species within and surrounding the site.'*

This 'consideration' does not come with any justification. We do not know if this is an opinion or a verifiable fact. Without an understanding of the methodology or how this conclusion has been reached. Therefore, any conclusions reached cannot be considered as facts, and therefore, the information presented is not complete, precise or definitive.

The development will result in the 'probable' destruction of habitats of EU Protected Annex IV species.

Appendix 6.2 Bat Report, Section 4.4 Discussion, page 108, states:

> *'Eighteen trees with Potential Roost Features were identified on site via a basic ground level tree survey. There is a probability that some of these trees would require felling if the wind farm is granted permission. This may result in the loss of potential or actual bat roosting (and foraging) opportunities. Best practice in tree-felling with respect to protection of potential bat roosts should be employed, including hiring a climbing specialist with bat training and licensing to check roost features with an endoscope for bats where necessary. If bat roosts are confirmed, then it would be necessary to apply for a bat roost destruction derogation license from the National Parks and Wildlife Service. Bat boxes should be erected on suitable trees on site to compensate for the loss of potential natural tree roosting opportunities.'*

Bat boxes are a weak mitigation strategy in real conservation terms. To quote the *Survey of Bats and Bridges in County Waterford* by Carl Dixon, Patrick Smiddy and Sorcha Sheehy and published by The Heritage Council, Page 33,

Section: 5.2 Artificial bat roosts: '*Bat boxes may provide bat roosting habitat but should be considered as a last resort where maintenance of a bat roost or suitable conditions for a bat roost are not possible*.' It can in no way be considered an alternative or transplant of habitat.

It is highly probable that bat roosting and foraging areas will be destroyed to build Dyrick Hill Wind Farm. Not only would granting this application conflict with the *Waterford* City and *County Development Plan* 2022-2028, it would also conflict with the Bern Convention on the Conservation of European Wildlife and Natural Habitats (1982), and the Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention 1979, Enacted 1983).

The site is home to multiple nesting sites and maternity roosts which have absolutely the highest conservation value. One turbine is only 70 metres from a confirmed roost.

The site is, by all accounts, an excellent habitat for bats. There are five confirmed nesting sites and a further three deemed 'moderately suitable'. One of the roosts is a confirmed maternity roost for the Long-Eared Bat. And a 'probably maternity roost' of a Whiskered Bat.

See Appendix 6.2, Bat Report, Table 3.7, page 72 below.

CLIENT: EMPower
PROJECT NAME: Dyrick Hill Wind Farm
SECTION: Bat Report

Table 3-7: Locations/details of potential (and confirmed*) roost sites as labelled in Figure 3-1.

Map/text ref.*	Notes	Dusk survey date(s)	Passive detector deployment dates	Roost suitability category*
1	Ruin of old stone house with no roof north perimeter of site	-	-	Low
2A*	Derelict house with small brown long-eared bat minor day roost and night roost	02/07/2022	-	Confirmed
2B	Large farm sheds/hay sheds	-	-	Low
3A*	Ruin of old stone house with multi-species bat roost. Brown long-eared bat summer maternity roost and night roost. Whiskered small regular day roost and night roost. Soprano pipistrelle regular minor day roost. Common pipistrelle occasional minor day roost	24/07/2021 & 06/08/2022	30/07/2021-11/08/2021 & 23/03/2022-28/03/2022	Confirmed
3B	Modern farm shed open walls	-	-	Low
4	Low culvert over Lisleagh Stream	-	-	Negligible
5	Occupied farmhouse and sheds	-	-	Moderate
6	Ruin of old stone house with no roof in middle of fields	-	-	Low
7A	Small concrete block shed with corrugated iron roof. Bull in field	-	-	Low
7B	Old stone ruins of house, no roof. Bull in field	-	23/03/2021-28/03/2021	Moderate
8A*	Derelict 2-storey house beside modern farm sheds. Probable minor day roosts of brown long-eared bat and common pipistrelle.	30/07/2021	-	Confirmed
8B	Large modern farm sheds beside derelict 2-storey house	-	-	Low
9	Modern farm shed	-	-	Low
10*	Ruin of small old stone house near upland transect. Brown long-eared bat night roost.	-	-	Confirmed
11	Stone arch bridge over Lisleagh Stream		23/03/2021-28/03/2021	Moderate
12*	Ruin of old stone house and sheds with courtyard. Whiskered bat summer roost & brown long-eared bat important night roost and probably day roost.	11/08/2021 & 09/09/2022	31/07/2022-07/08/2022	Confirmed

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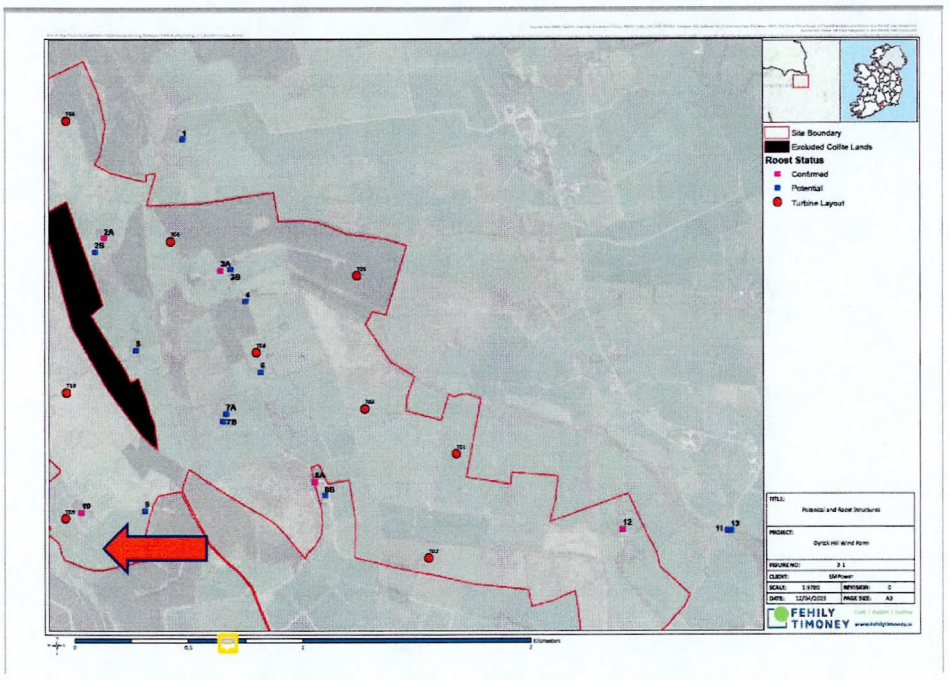
Despite the above findings, the applicant has still deemed it appropriate to place a turbine only 70 metres (based on map provided) from a confirmed roost as appropriate. The EUROBAT guidance on bats and wind turbines recommends a minimum distance of 200 metres between wind turbines and important bat

habitats (*Guidelines for Consideration of Bats in Wind Farm Projects - Revision 2014*. EUROBATS Publication Series No. 6 [2]). And in *Estimating habitat loss due to wind turbine avoidance by bats* by Barré K., Le Viol I., Bas Y., Julliard R. & Kerbiriou C. (2018),[19] it states '*reduced bat activity has been recorded up to 1,000 m from wind turbines.*'



Roost Status Map. Source: Appendix 6.2 Bat Report, page 74

5.4.5.1 Conclusion

The study is incomplete and, therefore, unsuitable for submission.

The proposed site is home to a large number of bats and bat species, including maternity roosts. All species at the Site are considered 'at most risk of extinction within the foreseeable future'.

It is an area that is protected by law (The Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention, 1982) and the Conservation of Migratory Species of Wild Animals (Bonn Convention 1979, Enacted 1983).

[19] https://www.sciencedirect.com/science/article/abs/pii/S0006320718305469

5.4.6 Marsh Fritillary Butterfly



This species is listed in the appendices to the European Union Habitats & Species Directive. The effect of this legislation is to give protection to both the animal and its habitat.

The Marsh Fritillary (*Euphydryas aurinia*) is Ireland's only legally protected insect, listed on Annex II of the EU Habitats Directive. The poor conservation status and ongoing degeneration of its habitats have resulted in an overall population reduction of more than 30% over the past 10 years in Ireland. To assist conservation of this species, Biodiversity Ireland Data Centre was tasked with the delivery of an all-Ireland monitoring scheme by the Department of Arts, Heritage and the Gaeltacht in collaboration with the North of Ireland Environment Agency and Butterfly Conservation Northern Ireland.

The applicant carried out field surveys between 09 and 24 April 2022 and 16 and 29 September 2022. The Marsh Fritillary is in its butterfly stage of its lifecycle only during May and June so it is not surprising that the surveyor didn't find any. However, what he/she did find within the commonage area of Broemountain, within the proposed wind farm site, is that the marsh fritillary larval food plant, *Succisa pratensis*, occurs. This plant species grows on areas of wet grassland habitat; this is situated directly on the area where T9, T10, T11, T12 and T13 of the proposed wind farm site layout are positioned. Therefore, as the food source of a protected species, there is a responsibility to protect the habitat in accordance with the EU Habitats Directive (Council Directive 92/43/EEC).

As the Board will be aware, the effect of this Directive, and the Statutory Instruments transposing this Directive into Irish legislation, is to give strict legal protection to both the animal and its habitat. If the Board were to grant permission for the proposed wind farm without being absolutely assured, based on the best scientific evidence, that the habitat of the marsh fritillary larval food plant would not be diminished, affected or damaged in anyway, the Board would be in breach of their Habitats Directive.

5.4.7 Small Heath Butterfly

The Small Heath Butterfly is classified as 'Near Threatened' under the Red List of Irish Butterflies. It has become confined to sites where its preferred habitat, dry semi-natural grassland remains. It is a grass-feeding species preferring fine-leaved species that have been lost with agricultural improvement.

The clearance of upland vegetation on heath is a threat to the Small Heath. Clearance of vegetation is planned as part of this wind farm. This would change the vegetation that Small Heath requires to complete its lifecycle.

The Applicant's Screening Report for Appropriate Assessment, Section 3.5.3.4, page 47 clearly states that "*Invertebrates recorded at the proposed wind farm site include the small heath butterfly which was recorded within the commonage area during the field surveys.*"

5.5 Impacts of the Proposed Wind Farm on Human Health and Society

5.5.1 Shadow Flicker

Shadow flicker is the effect of rotating turbine blades causing brightness levels to vary periodically at locations where they obstruct the Sun's rays. This phenomenon is due to the light that is escaping through the gaps between the blades of the turbine from the light that is shining behind them. Out of all the negative effects that come with the increase of wind energy and construction of more wind turbines all around the world, one of the most reported issues with the new technology is shadow flicker. Shadow flicker can become a nuisance to people who live in homes that are directly next to the wind turbine. In some instances, it has been described as having a similar effect as strobe lighting and distracting people from the task they are trying to complete as well as causing vehicle driver distraction.

The magnitude of shadow flicker effects varies both spatially and temporally, and depends on a number of environmental conditions coinciding at a particular point in time, which include:

- time of day and year;
- wind direction;
- height of wind turbine and blade length;
- position of the sun in the sky;
- weather conditions;
- proportion of daylight hours in which the turbines operate;
- type and frequency of use of the affected space; and
- distance and direction of the wind turbine from the receptor.

As the weather forecast if often unpredictable, there is no way of knowing exactly when the wind will be blowing. This means there is no way of preparing for the effects that might come for those who live in the shadows of the enormous turbines that greatly impose over houses in the area, even if setup distance is 500m or greater.

5.5.1.1 Negative Health Effects

Studies have shown that shadow flicker from wind turbines can cause a range of health issues, including headaches, nausea, eyestrain and dizziness. These effects have been reported in people living close to wind turbines and can be

particularly pronounced in those who suffer from pre-existing conditions such as motion sickness or migraines.

In addition to the annoyance and headaches that can come from the constant flickering being cast out by wind turbines, shadow flicker can result in other illnesses, including depression. The connection here is down to lack of sleep and/or (natural) daylight when the annoyance of the constant shadow flicker causes people to keep their curtains closed as the effects of the flicker become too much to bear. Another factor is 'bad view'. An epidemiology study conducted by the World Health Organization determined that a 'bad view out of window' increased the risk of depression by 40% (please refer to the Appendix: Shadow Flicker Australian Parliament House, page 3).

5.5.1.2 Relevant Legislation and Guidance

The Applicant's EIAR Chapter 15, Section 15.3 Relevant legislation and guidance, page 5, states:

"*The relevant Irish guidance for shadow flicker is derived from the 'The Draft Wind Energy Development Guidelines for Planning Authorities' (Department of the Environment, Heritage and Local Government (DoEHLG), 2019) and the 'Best Practice Guidelines for the Irish Wind Energy Industry' (Irish Wind Energy Association, 2012).*"

The 2006 Guidelines, the status of which we have examined in section 4.3 above) recommend a maximum threshold of **30 hours shadow flicker per year or 30 minutes per day** at dwellings and offices within 500 metres of the windfarm development.

The Draft Revised Wind Energy Development Guidelines 2019 for Planning Authorities (which the Applicant states they are using for guidance; but which we argue in **section 4.3** above should not be relied on) adopts a new position in relation to shadow flicker. These Guidelines recommend that there should be **No** shadow flicker at neighbouring properties, stating that with careful site design and appropriate mitigation (most critically the use of appropriate equipment and computer software) no existing dwelling or other affected property should experience shadow flicker.

> "*If a suitable shadow flicker prediction model indicates that there is potential for shadow flicker to occur at any particular dwelling or other potentially affected property, then a review of site design involving the possible relocation of one or more turbines to explore the possibility of eliminating the occurrence of potential flicker is required. Following such a review, if shadow flicker is not eliminated for any dwelling or other potentially affected property then clearly specified measures which provide*

for automated turbine shut down to eliminate shadow flicker should be required as a condition of a grant of permission".[20]

As the applicant states in the EIAR, Chapter 15, Section 15.2, page 2 "*the only potential shadow flicker impacts that could arise from the Development would be during the operational phase*", the Board should require that the Applicant provide evidence as part of the planning application that shadow flicker control mechanisms will be in place for the operational duration of the wind energy development project. In the planning application the applicant does not include the exact make and model of the wind turbine (section 3.2 above).

Should the Board decide to grant the application for the proposed Dyrick Hill Wind Farm permission, it should be recommended as a condition that clearly specified measures which provide for automated turbine shutdown to eliminate shadow flicker be required.

The Board is required to assess the application in the context of the Draft Revised Wind Energy Development Guidelines 2019; and, even if the original Guidelines published in 2006 remain in force, the Board is still obliged to have regard to these Guidelines. While the Board is not bound by the guidance contained in the draft guidance, given the passage of time since the publication of the 2006 Guidelines, technical and scientific changes and updated industry practices have occurred in the intervening period, and the Board is not precluded from having regard to the more up to date information presented in the Draft Revised Wind Energy Development Guidelines 2019. Throughout the application, the applicant has referred to both the 2006 & 2019 (Draft Review) versions of the Wind Energy Development Guidelines, suggesting that the applicant intends to use the Draft Revised Wind Energy Development Guidelines 2019 as a main point of reference. The legal implications of the applicant's reliance on either of these sets guidelines are discussed in section 4.3 above.

5.5.1.3 Assessment Methodology

The Applicant's EIAR, Chapter 15, Section 15.2.1 Assessment Methodology, page 4, states that:

'*Shadow flicker may have the potential to cause disturbance and annoyance to residents if it affects occupied rooms of a house.*'

It is our submission that residents should **not** be affected or disturbed by shadow flicker if automated turbine shutdown systems for shadow flicker are in place or turbines are sited correctly. It is a basic human right that no one's life should be

[20] Draft Revised Wind Energy Development Guidelines 2019; Section 5.8.2 Shadow Flicker Control.

impacted by the intrusion of industrial scale wind turbines being imposed on them in a rural setting and in one the most scenic landscapes in Ireland.

Furthermore, the assessment methodology is incomplete and inaccurate for several reasons. In Chapter 15, Section 15.2.1 Assessment Methodology, page 3, the applicant states that:

> *"In order to ensure the full extent of the moving shadow that would be created by the turning turbines is considered in the assessment the following scenario was modelled:*
>
> • *Twelve 6.0 – 7.2 MW wind turbines,*
>
> • *Overall ground to blade tip height of 185m,*
>
> • *A rotor diameter of 162m, and*
>
> • *A hub height of 104m.*
>
> *This scenario was included in the assessment along with the cumulative impacts of nearby wind farms (within 2km) in order to fully assess the impact of the Development. Tierney Single Turbine which is located 3.5km northeast of the site boundary. Due to the proximity of this wind turbine to the site (Further than 2km), it was not evaluated in the Shadow Flicker Analysis as there will be* ***no cumulative impacts*** [our emphasis]".

As we have described at some length in section 3.3 above, the applicant has completely omitted the proposed 16-turbine Scart Mountain Wind Farm which is currently in Pre-application Consultation phase with An Bord Pleanála (Case Ref.: PC93.315920) and which would be directly adjacent to the proposed Dyrick Hill, if permitted (see **Figure 3.3.3** above which shows the proposed turbine layouts of both Scartmountain and Dyrick Hill wind farms). It is our submission that the applicant has not assessed the in-combination effects of shadow flicker with the proposed Scart Mountain Wind Farm, and due diligence must be taken based on the scales and close proximity of these two proposed developments.

Secondly, the hub height which the applicant has quoted on several occasions throughout the planning application does not exist in the Vestas range of wind turbines which the applicant claims they will be using.

5.5.1.4 Assessment of Potential Effects

The Applicant's EIAR, Chapter 15, page 16, states that:

> *"It is demonstrated in Table 15.3, there will be potential for up to 73 receptors out of 112 to experience some degree of theoretical shadow*

flicker impact. 39 receptors will experience no theoretical shadow flicker impact. None of the evaluated receptors are modelled to receive more than 30 hours of Shadow flicker per year. Property H102, is predicted to be the worst affected receptor with a total of 21 hours and 14 minutes per year modelled in the theoretical shadow flicker scenario.'

As already mentioned above, the Draft Revised Wind Energy Development Guidelines 2019, page 83 state that:

> *"If a suitable shadow flicker prediction model indicates that there is potential for shadow flicker to occur at any particular dwelling or other potentially affected property, then a review of site design involving the possible relocation of one or more turbines to explore the possibility of eliminating the occurrence of potential flicker is required. Following such a review, if shadow flicker is not eliminated for any dwelling or other potentially affected property then clearly specified measures which provide for automated turbine shut down to eliminate shadow flicker should be required as a condition of a grant of permission."*

Based on the Applicant's assessment of potential effects, '*there will be potential for up to 73 receptors out of 112 to experience some degree of theoretical shadow flicker impact'.* Yet according to the new position adopted by the government in the Draft Revised Wind Energy Development Guidelines 2019, **none** of these receptors should be impacted by shadow flicker. The applicant is aware of the number of houses potentially impacted by shadow flicker and so mitigation actions should have been taken into account during assessment, and measures should be taken to ensure no residence is impacted in any way i.e. the relocation of turbines prior to submission of application to eliminate shadow flicker following assessment and awareness.

In addition to the above, we also add a more personal observation: a number of these residents or 'receptors' have lived in the Dyrick region all their lives. And some are living with health conditions such as autism and other issues on which shadow flicker would have a detrimental impact. With the possible development of twelve 185metre-tall wind turbines, their lives will be gravely impacted. We ask the Board to give serious regard to the residents in the area as no one should be negatively impacted by wind turbines creating shadow flicker which can affect their homes, health and livelihoods.

The applicant's EIAR, Chapter 15, section 15.3.3, Mitigation Measures & Residual Effects, on page 18 states that:

"Due to the potential for shadow flicker to affect receptors within the shadow flicker study area, it is proposed that a shadow control system will be installed on each of the wind turbines. The control system will calculate, in real-time:

- *Whether shadow flicker has the potential to affect nearby properties, based on pre-programmed co-ordinates for the properties and turbines*
- *Wind speed (can affect how fast the turbine will turn and how quickly the flicker will occur)*
- *Wind direction*
- *The intensity of the sunlight*
- *When the control system detects that the sunlight is strong enough to cast a shadow, and the shadow falls on a property or properties, then the turbine will automatically shut down; and will restart when the potential for shadow flicker ceases at the affected properties.*

It is intended that the measures outlined above, subject to safe shut down time of approximately 60 seconds, will eliminate the potential for shadow flicker to affect any of the properties within the study area, this will be the case regardless of which turbine is selected within the turbine range. In the event that complaints of shadow flicker are received by the Developer / Site Operator or by Waterford City and County Council, an investigation will take place and the complaints frequency, duration and time of complaints will be considered and specialist modelling software will be used to confirm the occurrence(s). Should the complaint persist, a shadow flicker survey involving the collection of light data will also be carried out at the property in which the complaint was made. Further refinement of the blade shadow control system will be conducted to eliminate the shadow flicker occurrence. This could result in the shutting off turbines at specific times of day.'

In the absence of the aforementioned mitigation actions being taken into account during assessment and any measures being taken to ensure that no residence is impacted in any way prior to the submission of the Applicant's application (as mentioned in Assessment of potential effects section above), a **timeframe** for the mitigation measures cited at the start of this section needs to be included, explaining / detailing how quickly complaints regarding shadow flicker will / must be resolved. Individuals should not have to endure the effects of shadow flicker for long periods of time while waiting for investigations and assessments to be carried out (at the Applicant's convenience).

5.5.1.6 *Misleading Information in Public Communications*

We would finally like to draw the Board's attention to the fact that the applicant provided misleading information in their communications to the public regarding shadow flicker.

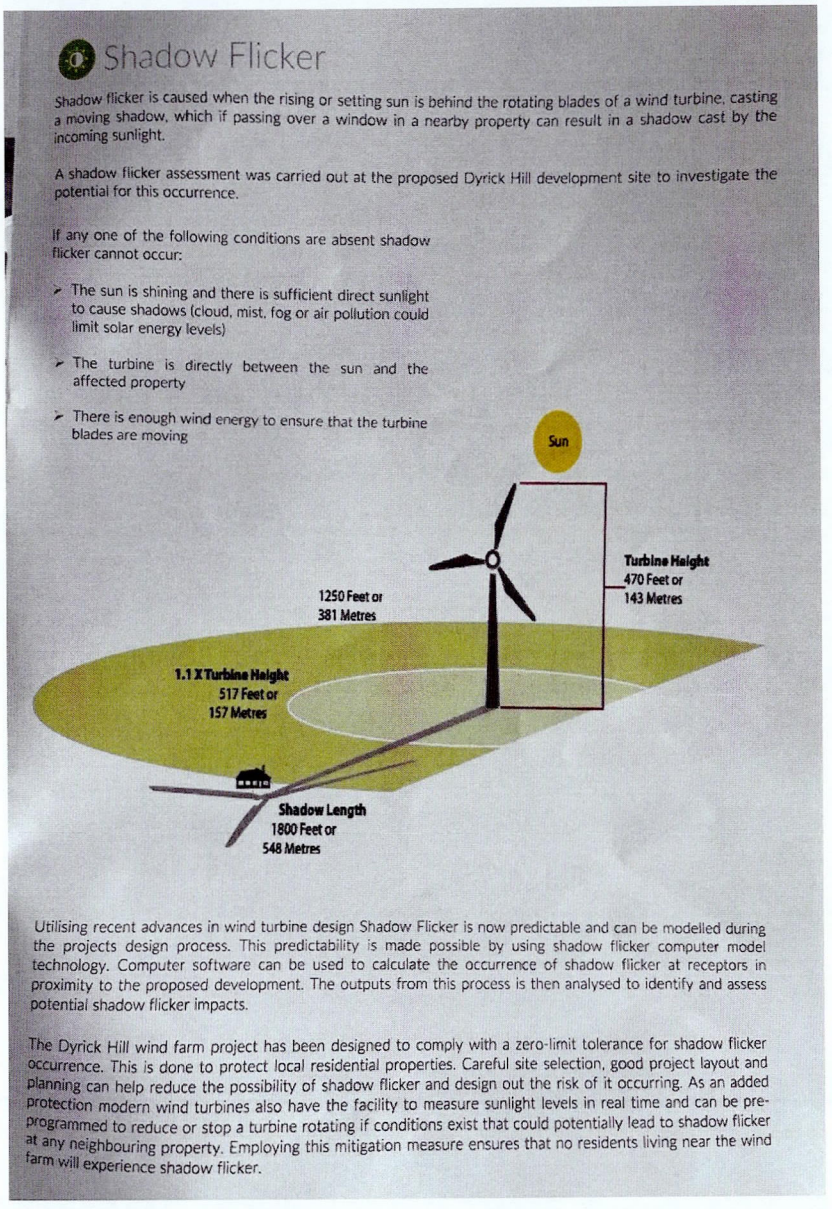


Figure 5.5.1.6 Description of shadow flicker provided in the Dyrick Hill wind farm company's newsletter dated February 2023

In the applicant company's Newsletter number 5, distributed in February 2023, the applicant includes a page about shadow flicker (**Figure 5.5.1.6** above). The information provided however is misleading, as the applicant has used a large image to visualise the shadow length of a turbine to support its claims of shadow flicker impacts. Yet as the Board will notice, the turbine height used in this image

is 143m high, and **not** the 185m height of the wind turbines which would be used for the proposed development, if permitted.

It is our observation that the applicant should avoid presenting incorrect factual data when informing the community of how people may be impacted, as it cannot be assumed that everyone will look at this image and realise/notice the incorrect height being used.

5.5.1.7 References

1. https://dbldkr.com/the-shadow-flicker-effect-what-is-it-wind-turbine-shadows/#:~:text=The%20World%20Health%20Organization%20conducted%20research%20on%20this,affected%20by%20the%20shadow%20flicker%20of%20wind%20turbines.

5.5.2 Noise

Two recent studies of the effects of wind turbine noise on people living near windfarms have come to similar conclusions:

> *People who live near wind turbines complain of symptoms that include some combination of the following: difficulty sleeping, fatigue, depression, irritability, aggressiveness, cognitive dysfunction, chest pain/pressure, headaches, joint pain, skin irritations, nausea, dizziness, tinnitus, and stress. These symptoms have been attributed to the pressure (sound) waves that wind turbines generate in the form of noise and infrasound. However, wind turbines also generate electromagnetic waves in the form of poor power quality (dirty electricity) and ground current, and these can adversely affect those who are electrically hypersensitive. Indeed, the symptoms mentioned above are consistent with electrohypersensitivity. Sensitivity to both sound and electromagnetic waves differs among individuals and may explain why not everyone in the same home experiences similar effects.*[21]

Noise regulations can be a considerable barrier to Industrial Wind Turbines (IWT) developments, as they can have a substantial effect on wind turbine spacing and, therefore, the cost of wind-generated electricity. Industrial wind turbines are being placed in close proximity to family homes in order to have access to transmission infrastructure.

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[21] *Adverse health effects of industrial wind turbines*, by Roy D. Jeffery, MD FCFP, et al, and in *Wind Turbines Make Waves: Why Some Residents Near Wind Turbines Become Ill* by Magda Havas and David Colling

5.5.2.1 Outdated Guidelines

The Wind Energy Development Guidelines (2006) are out of date for numerous reasons, just one of which is the scientific advance in understanding noise and its effects. They are inadequate to protect the residential amenities of inhabited houses and, while the Board must have regard to these Guidelines, having such regard doesn't amount to that much as they are no longer fit for purpose.

Furthermore, when it comes to the 2019 Guidelines that the Applicant mentions in their Application as following for guidance, the Board is of course not bound by the guidance in these Draft Guidelines but given the passage of time since the publication of the 2006 Guidelines, technical and scientific changes and updated industry practices that have occurred in the intervening period, the Board is not precluded from having regard to the more up to date information presented in the Draft Guidelines (2019).

At the time in 2006 when the mandatory minimum of 500 metres set-back distance for wind turbines near homes was being selected, why was 500 metres chosen, and not 400 metres, 600 metres or 700 metres, for example? Apart from the fact that these Guidelines are completely out of date as a result of technical development which has resulted in wind turbines becoming much larger and higher than they were 17 years ago, the set-back or separation distance in the 2006 Guidelines could be said to be arbitrarily chosen.

At the time when the 500-metre separation distance was chosen, it was accepted, and not dismissed; and it was not until some years later, when the size and height of wind turbines had increased to a very large extent, did the 500-metre distance become the subject of much criticism. Seventeen years ago, 50 metres would have been considered the normal height for a wind turbine tower, and the 2006 Guidelines would have reflected that level of engineering technology.

But technology moves on; and new materials and construction methods have allowed wind turbines to become a great deal larger, driven by better wind power density at greater heights above ground level, where there is less disturbance to the wind flow as a result of trees, buildings or uneven terrain. Unfortunately, it is not always possible for legislation or non-statutory guidelines such as the 2006 Guidelines to keep pace with technological change, and this may be a reason why many County Councils in Ireland have sought to provide in their Development Plans a more restrictive zoning around sensitive or vulnerable receptors (e.g., inhabited houses, equine facilities, individuals with certain conditions and so on).

While the Board must have regard to the (outdated) 2006 Guidelines, the Board also needs to take into consideration the specific local situation and the legitimate

concerns of the local residents and the statutory consultees who have expressed considerable concern about the proposed Dyrick Hill Wind Farm development, its location and its effects. It is also important to consider the status of the 2006 Guidelines.

In January 2022, Peter Burke (Minister of State at the Department of housing, local government and heritage) stated:

> *"My Department is currently undertaking a focused review of the 2006 Wind Energy Development Guidelines. The review is addressing a number of key aspects including* ***noise****, setback, shadow flicker, community obligation, community dividend and grid connections. Guidance on the noise aspect is currently being finalised by my Department in conjunction with the Department of Environment, Climate and Communications (DECC), which has primary responsibility for environmental noise matters.*
>
> *However, in the meantime, the current 2006 Wind Energy Development Guidelines remain in force".*[22]

Furthermore, neither the 2006 Wind Energy Development Guidelines nor the draft 2019 Guidelines take account of infrasound, which is considered to cause significant discomfort and possible ill-health effects in susceptible individuals.

5.5.2.2 Global Reports of Effects

During the past few years there have been cases reported of adverse effects. A 2006 Académie Nationale de Médecine working group report notes that noise is the most frequent complaint. The noise is described as piercing, preoccupying, and continually surprising, as it is irregular in intensity. The noise includes grating and incongruous sounds that distract the attention or disturb rest. The spontaneous recurrence of these noises disturbs the sleep, suddenly awakening the subject when the wind rises and preventing the subject from going back to sleep. Wind turbines have been blamed for other problems experienced by people living nearby. These are less precise and less well described, and consist of subjective (headaches, fatigue, temporary feelings of dizziness, nausea) and sometimes objective (vomiting, insomnia, palpitations) manifestations. [3]

Furthermore, in their study of the effects of industrial wind turbine noise on sleep and health, Nissenbaum *et al,* 2010, used validated questionnaires in a controlled study of 2 Maine wind energy projects. They concluded that:

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[22] Wind Energy Guidelines – Tuesday, 25 Jan 2022 – Parliamentary Questions (33rd Dáil) – Houses of the Oireachtas: https://www.oireachtas.ie/en/debates/question/2022-01-25/138/

"the noise emissions of IWTs disturbed the sleep and caused daytime sleepiness and impaired mental health in residents living within 1.4 km of the two IWT installations studied".[23]

"Industrial wind turbines (IWTs) are a new source of noise in previously quiet rural environments. Environmental noise is a public health concern, of which sleep disruption is a major factor. To compare sleep and general health outcomes between participants living close to IWTs and those living further away from them, participants living between 375 and 1400 m (n = 38) and 3.3 and 6.6 km (n = 41) from IWTs were enrolled in a stratified cross-sectional study involving two rural sites. Validated questionnaires were used to collect information on sleep quality (Pittsburgh Sleep Quality Index - PSQI), daytime sleepiness (Epworth Sleepiness Score - ESS), and general health (SF36v2), together with psychiatric disorders, attitude, and demographics.

Descriptive and multivariate analyses were performed to investigate the effect of the main exposure variable of interest (distance to the nearest IWT) on various health outcome measures. Participants living within 1.4 km of an IWT had worse sleep, were sleepier during the day, and had worse SF36 Mental Component Scores compared to those living further than 1.4 km away. Significant dose-response relationships between PSQI, ESS, SF36 Mental Component Score, and log-distance to the nearest IWT were identified after controlling for gender, age, and household clustering. The adverse event reports of sleep disturbance and ill health by those living close to IWTs are supported".[24]

5.5.2.3 Indirect effects and annoyance

When assessing the adverse effects of IWTs, it is important to consider what constitutes human health. The World Health Organization (WHO) defines health as '*a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity*'.[25]

And according to the night noise guidelines for Europe: "*Physiological experiments on humans have shown that noise of a moderate level acts via an indirect pathway and has health outcomes similar to those caused by high noise*

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[23] Adverse health effects of industrial wind turbines - PMC (nih.gov): https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3653647/

[24] https://pubmed.ncbi.nlm.nih.gov/23117539/

[25] https://www.who.int/data/gho/data/major-themes/health-and-well-being#:~:text=The%20WHO%20constitution%20states%3A%20%22Health,of%20mental%20disorders%20or%20disabilities

exposures on the direct pathway. The indirect pathway starts with noise-induced disturbances of activities such as communication or sleep".[26]

5.5.2.4 Ambiguous and missing information in the Applicant's EIAR

In the Applicant's EIAR Chapter 10 Noise, Section 10.2.5 Acquisition and Analysis of Background Noise Data, it states:

> *'A Met Mast located within the Site during the noise survey was used for wind data measurements at heights of 81m and 60m with wind shear derived and used to calculate to the* ***proposed*** *turbine hub height wind speed of 104m.*
>
> *For EIA purposes two candidate turbines, the Vestas V162-6.0 megawatts (MW) operating in unrestricted mode PO6000 and the Vestas V162-7.2MW operating in unrestricted Mode PO7200, both with serrated trailing edge (STE), have been selected with a hub height of 104m for the EIA technical assessment. The tip of the blades with STE lowers noise emissions without reducing energy output, and the selected turbine will have STE as standard. The worst-case sound power level at each wind speed from 4m/s to 12m/s was input into the noise model.'*

We ask the question: How can proper noise assessment be carried out based on a **proposed** turbine (and based on a turbine that does not actually exist as there are none with a hub height of 104m). Noise can vary significantly based on turbine model, turbine dimensions, turbine height etc.

As mentioned in several of the sections in our submission, the use of '**proposed**' throughout this application is incredibly ambiguous and of great concern, and the Applicant's application should be considered invalid as there are far too many unknowns, including the aforementioned wording, the lack of accurate relevant recordings for any assessments performed in relation to a specific wind turbine, and precise design details. We repeat: wind turbine noise varies with wind speed, therefore specific measurement and analysis methods are **essential** to assess noise levels correctly.

5.5.2.5 Location of the Proposed Wind Farm

The proposed development straddles the border of the Upland and Foothill landscape types and across the landscape character unit (5C Tooraneena foothills & 6B Knockmealdown Mountains and the wind turbine noise would dominate the environment. The landscape for the proposed development is

[26] https://apps.who.int/iris/bitstream/handle/10665/326486/9789289041737-eng.pdf?sequence=1&isAllowed=y

undulating and can potentially create amplitude modulation at resident's houses, making the area unsuitable for wind turbines.

According to the Applicant, there are between 112 and 117 Eircodes within 2km of the proposed Dyrick Hill Wind Farm turbines (there seems – worryingly – to be some confusion and uncertainty by the applicant as to the exact amount as they have quoted different quantities throughout their application). And as the proposed Site is located in a rural setting that is densely populated, serious consideration needs to be given to the residents in relation to noise generated from wind turbines.

5.5.2.6 Evidence of Adverse Noise Impact from Wind Farms Increases

According to GP van den Berg, whose work has been at the forefront of understanding amplitude modulation noise from wind farms and particularly in identifying night-time problems with wind shear and atmospheric stability, '*The evidence of adverse noise impact from wind farms, wind turbines and (excess) amplitude modulation is growing*'.[27]

The figure below (**Figure 5.5.2.6**), provided by GP van den Berg on the MAS Environmental website, illustrates the 'best time' amplitude modulation can be heard.

And as this comes into the fore more, cases are being taken to court against wind farm developers in relation to noise and the impacts of wind farms on local residents and their ability to get a good night sleep.[28]

Empirical evidence needs to be considered at the planning stage and it is incumbent on the competent authority to vindicate the property rights and the residential amenity of residents located within the zone of noise impact from the development. A full evaluation of the impact of the (actual vs proposed) turbines on residential amenity is necessary as there is a need for an integrated approach to the consideration of amenity impacts which evaluates noise, landscape impacts, visual dominance, shadow flicker and rotational impact of the blade movement on residential amenity.

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[27] Find out more about Noise from Wind Farms and Wind Turbines - MAS Environmental Ltd: https://www.masenv.co.uk/find-out-more-about-noise-from-wind-farms

[28] https://www.gtlaw.com.au/knowledge/windjunction-granted-against-wind-farm-causing-noise-nuisance-neighbours#:~:text='Windjunction'%20granted%20against%20wind%20farm%20causing%20noise%20nuisance,them%20to%20take%20steps%20to%20reduce%20that%20noise

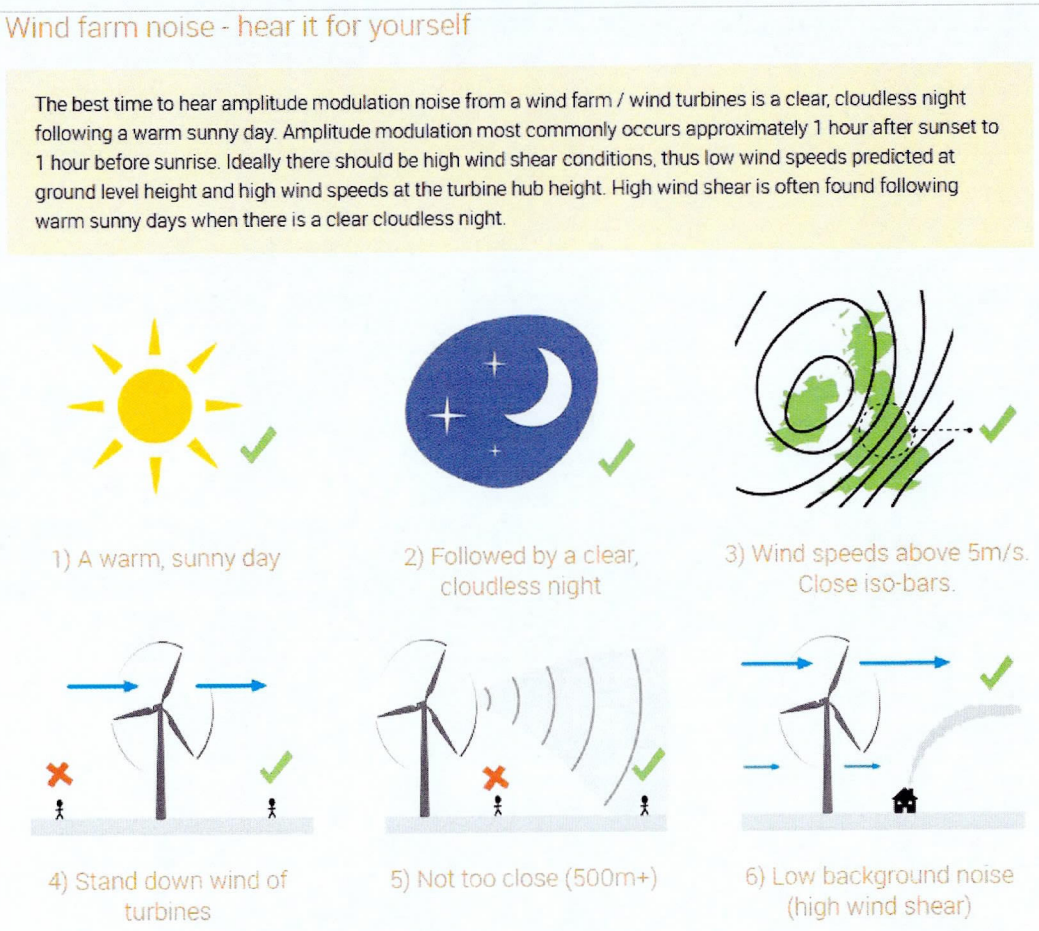

Figure 5.5.2.6 Wind farm noise during night and day time periods and different weather conditions

5.5.2.7 In-Combination Effects

It is also important that it is not just the number of noise sensitive receptors in the vicinity of the proposed development that should be considered, but also the **cumulative impact** of the numerous wind turbines in the area around the proposed Dyrick Hill Wind Farm development.

As stated in the Applicant's EIAR Chapter 10, Section 10.4.4 Cumulative Effects Assessment, page 40: '*An assessment of the cumulative effects of noise from the Development together with a nearby* ***single operational turbine****, located northeast of the Development has been undertaken'.*

Yet in the Applicant's EIAR Chapter 11 Landscape and Visual Amenity, Section 11.3.8 Cumulative Baseline, page 40, the Applicant states: '*Within the Study Area there are 4 existing wind farms and 2 consented wind farm developments. There*

is also 1 wind farm at the pre-planning stage within the Study Area. The cumulative developments are set out below.

Table 11.8: Cumulative Windfarms within the Study Area

Windfarm Name	Number of Turbines	Distance and Direction from the Development Site Boundary	Status
Coumnagappul Wind Farm	11	7.1km east of site	Pre-planning
Tierney Single Turbine	1	3.5km northeast of site	Operational
Woodhouse Wind Farm	8	10.8km south of site	Operational
Knocknamona Wind Farm	8	11.6km south of site	Consented
Barranafaddock Wind Farm	9	20km west of site	Operational
Ballycurreen Wind Farm	2	20km southeast of site	Operational

Figure 5.5.2.7 Applicant's listing of wind farms "within the study area"; note that Scart Mountain wind farm is not listed

In section 3.3 above we have examined carefully the applicant's reasons for not including Scart Mountain wind farm when considering in-combination effects, and we considered that the applicant's reasons for the omission were spurious and not believable. It is also extraordinary that seven windfarms were considered within the study area for Landscape and Visual Amenity, but not all of these were included by the applicant when assessing the effects of noise assessment. The question therefore needs to be asked – why are not all of the nearby wind farms included from the noise assessments performed?

As examined in section 3.3 above, Scart Mountain Wind Farm, which is currently in Pre-planning Consultation phase (An Bord Pleanála PC93.315920), has been completely omitted from studies, assessments and In-Combination Effects reports, including noise study, throughout the entire application.

Located adjacent to the proposed Dyrick Hill Wind Farm, the proposed Scart Mountain Wind Farm (see **Figure 3.3.3** in section 3 above, or **Figure 5.5.3.5** in section 5.5.3 below) is a back-to-back development consisting (to date) of 16 turbines, which – should both wind farms be approved – could result in a total of 28 turbines in an area of 5.5 km^2. And yet the Applicant has made no mention of this in the application, with no Appropriate Assessments carried out or reported regarding the noise implication on (a far greater amount than Dyrick Hill Wind Farm's 112-117 Eircode) local residents.

5.5.3 Impacts on Telecommunications

5.5.3.1 Overview

In this section of our submission we will demonstrate how wind turbine developments affect signals used in telecommunications. The planning application by Dyrick Hill Wind Farm Ltd for the proposed Dyrick Hill wind farm development asserts that there would be no impacts on the communications activities being carried out by Vodafone, Enet, Tetra Ireland Communications, Radio Service, RTE Radio, RTE TV and Broadcasting Authority of Ireland.

However, the Consultation Response[29] report does not consider the Wireless (Satellite) Broadband telecommunication signals that the residents living near this Proposed Development depend on for rural Internet broadband services. Rural communities in the area between the Knockmealdown and Comeragh Mountains are dependent on the use of wireless broadband devices and its technology for both personal and business purposes. This service is dependent on direct line of sight signal broadcasting from transmitters in mountain areas to local resident receivers, i.e., mini satellite dishes.[30]

5.5.3.2 Purpose

The purpose of this report is to demonstrate that the developer of Dyrick Hill Wind Farm has not considered the impacts of the proposed wind farm on Wireless (Satellite) Broadband telecommunication signal technology in the regions of the Proposed Development.

5.5.3.3 Scope

There are certain conditions that need to be satisfied with regard to signal interference, also known as Electromagnetic Interference (EMI), see section 5.5.3.8 below. This type of interference can disrupt, degrade or interfere with the effective performance of an electronic technology device. Rural society is dependent on the use of devices that utilise electromagnetic energy such as power and communication networks.

5.5.3.4 Wind Turbine Interference

Wind turbines affect signals. In some cases, this causes noticeable interference at nearby residences. It is common for planning authorities to set conditions that

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[29] https://dyrickhillwindfarmplanning.ie/wp-content/uploads/2023/06/Appendix-1.1-Consulation-Responses.pdf

[30] https://waveinternet.co.uk/line-of-sight-broadband/#:~:text=Line%20of%20sight%20broadband%20is,sight%20to%20a%20dedicated%20mast.

oblige wind farm developers to investigate and mitigate any signal interference caused by their turbines. The proposed wind turbines for the Dyrick Hill Wind Farm would have a height of 185m which would cause signal degradation and reflections ('ghosting') of signals. Broadcast radio, wireless broadband, cable head-ends and even radar have impacts by the presence of wind turbines. There are three ways that wind turbines affect signals:

1. Blocking of the signal – the wind turbine as a physical structure reduces the strength of the signal behind it. This is like a building blocking the path between two walkie-talkie handsets.
2. Reflection of the signal – the large surfaces of a wind turbine can redirect TV signals in other directions.
3. 'Chopping' of the signal – if the path of the signal from transmitter to receiver passes through the spinning rotor, the received power level can fluctuate significantly (illustrated in **Figure 5.5.3.1** below).

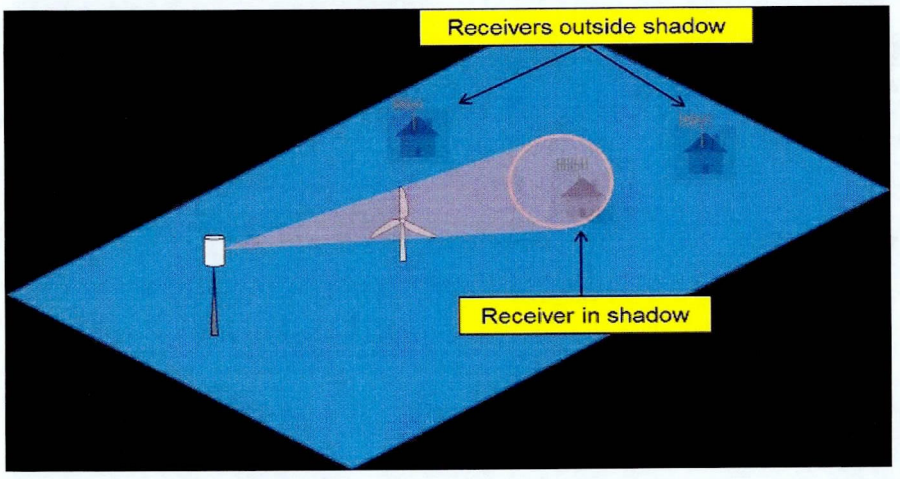

Figure 5.5.3.1 Signal Interference Path (Source data: https://dyrickhillwindfarmplanning.ie/wp-content/uploads/2023/06/Appendix-1.1-Consulation-Responses.pdf)

The applicant's planning application for Dyrick Hill Wind Farm to An Bord Pleanála does not take into consideration the Wireless (Satellite) Broadband telecommunication Super High Frequency (SHF) signal frequency band. This will affect all the local residences using this technology in the regions around the Proposed Development.

5.5.3.5 Super High Frequency (SHF) Overlook

Super high frequency (SHF) is the ITU designation for radio frequencies (RF) in the range between (3Ghz to 30Ghz) ranges. This band of frequencies is also known as the centimetre band or centimetre wave as the wavelengths range from

one to ten centimetres. These frequencies fall within the microwave band, so radio waves with these frequencies are called microwaves. The small wavelength of microwaves allows them to be directed in narrow beams by aperture antennas such as parabolic dishes and horn antennas, so they are used for point-to-point communication and data links.

This frequency range is used for most radar transmitters, wireless LANs, satellite communication, microwave radio relay links, satellite phones (S band), and numerous short-range terrestrial data links. They are also used for heating in industrial microwave heating, medical diathermy, microwave hyperthermy to treat cancer, and to cook food in microwave ovens. Data sourced from Wikipedia.[31]

Figure 5.5.3.2 demonstrates what frequency ranges are used across all telecommunication technology devices. The applicant has stated that there would be no impacts on communications from Vodafone, Enet, Tetra Ireland Communications, Radio Service, RTE Radio, RTE TV and Broadcasting Authority of Ireland, which only accounts for VHF and UHF frequency bands. The VHF and UHF bands only support frequencies between the (30Mhz to 3Ghz) ranges.

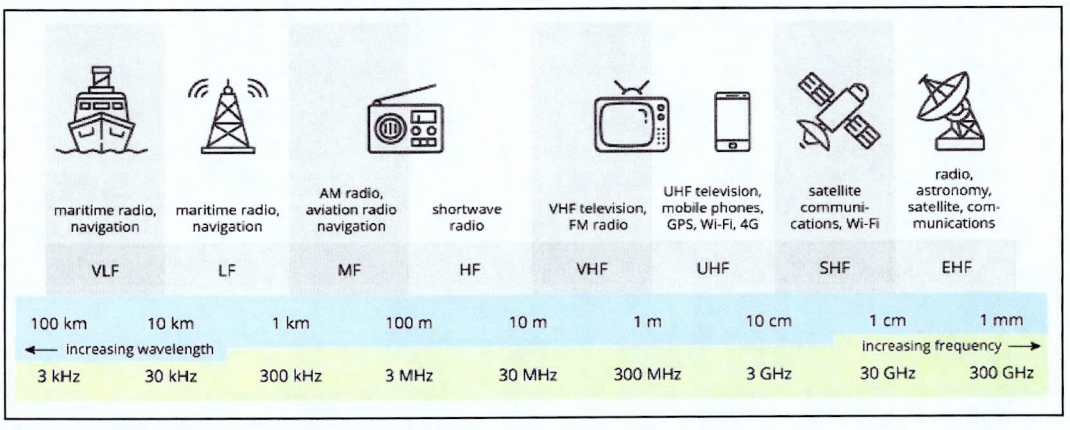

Figure 5.5.3.2 Full Frequency Ranges

This means no Telecommunication Impact Assessment was performed by the applicant in the SHF band (3Ghz to 30Ghz) range, which uses Wi-Fi Wireless (Satellite) broadband signal communications.

The ranges from 17.8Ghz – 18.6Ghz, 18.8 Ghz – 19.3Ghz and 37.5Ghz – 42.5Ghz are used for satellite to gateway transmissions. Gateways are locations on the ground that can send and receive data from satellites to connect satellite internet users to the websites and other internet services that they wish to use.

[31] https://en.wikipedia.org/wiki/Super_high_frequency

The ranges are specified in the Electronic Communications Committee (ECC) in the European Conference of Postal and Telecommunications Administrations.[32]

A full technical assessment of each of the providers shows that the highest ranges in the applicant's application to An Bord Pleanála were only up to 3.4Ghz for Vodafone and 4Ghz for Three, see **Figure 5.5.3.3** below for details.

Communication Provider	Freq.	Class
Three	2100Mhz	3G / 4G (LTE)
	3400Mhz	5G
	3600-4000Mhz	5G
Vodafone	800Mhz	4G
	900Mhz	2G/3G
	1400Mhz	4G
	1800Mhz	2G
	2100Mhz	3G
	2600Mhz	4G
	3400Mhz	5G
Enet	868.3Mhz	N/A
Tetra Ireland Communciations - National Digital Radio Service	380-400Mhz	
RTE Radio	3Mhz	
RTE TV	30-300Mhz	
Broadcasting Authority of Ireland	30-300Mhz	

Figure 5.5.3.3 Data from Consultation Response Report

This is a very serious omission because there are six rural Wireless (Satellite) Broadband services currently active in the region of the proposed development.

1. My Net (http://www.mynet.ie)
2. Tipp Broadband (https://tippbroadband.ie)
3. Solar Broadband (http://www.solarbroadband.ie)
4. Imagine (https://www.imagine.ie)
5. Rural Wi-Fi (https://ruralwifi.ie)
6. Regional Broadband (https://www.regionalbroadband.ie)

There was no mention of any of the above broadband providers in the applicant's planning application to An Bord Pleanála and there is no evidence that theses active broadband providers were contacted about this Proposed Development.

5.5.3.6 Additional Wind Turbine Developments

It must be noted that this proposed development is not in isolation, as is outlined in Chapter 2, section 2.3.3, page 5 of the applicant's EIAR report.[33] This section of the EIAR shows "*the location of proposed, pre-planning, permitted, and*

[32] https://docdb.cept.org/download/4316

[33] https://dyrickhillwindfarmplanning.ie/wp-content/uploads/2023/06/Chapter-2-Development-Description-.pdf

operational wind farm installations within a 20km radius of the proposed [Dyrick Hill Wind Farm] turbines."

And section 2.3.3 of the EIAR also states that "*the nearest operational wind farm is Woodhouse Wind Farm which is located 10.8km to the south of the site.*" (see **Figure 5.5.3.4** below).

The applicant's study is very misleading as it is mentions only the currently existing developments and the proposed Coumnagappul Wind Farm by EMPower, and does not take other wind farm proposals into consideration within the same region.

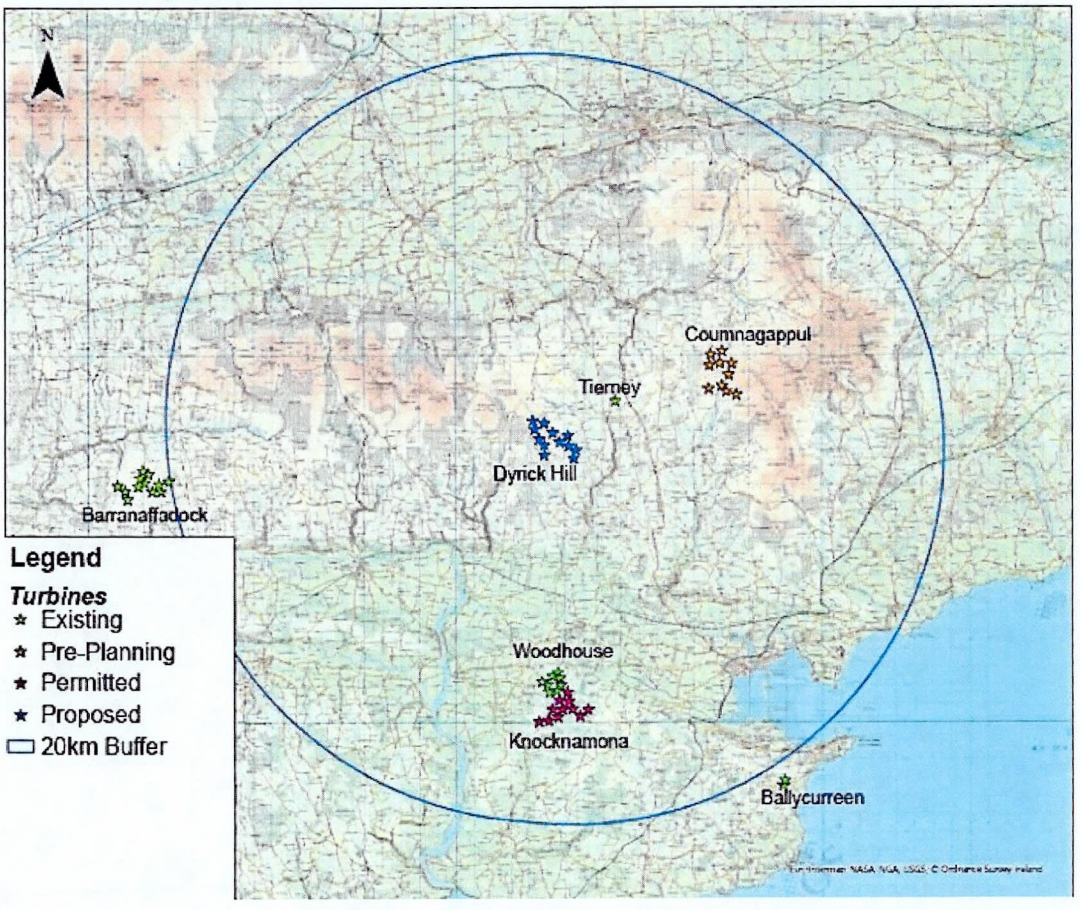

Figure 5.5.3.4 Dyrick Hill and Other Wind Farms in the Area

As we have already pointed out in section 3.3 of our submission, the applicant has failed to consider in-combination effects between the proposed Dyrick Hill wind farm and Scart Mountain wind farm, which is a 16- turbine proposal by Future Energy Ireland that is currently in Pre-Application Consultation stage with An Bord Pleanála (Case ref.: PC93.315920). Figure 3.3.3 in section 3 above, and reproduced below for convenience as **Figure 5.5.3.5** details a map of Dyrick Hill Wind Farm (Green) & Scart Mountain Wind Farm (Red) turbines.

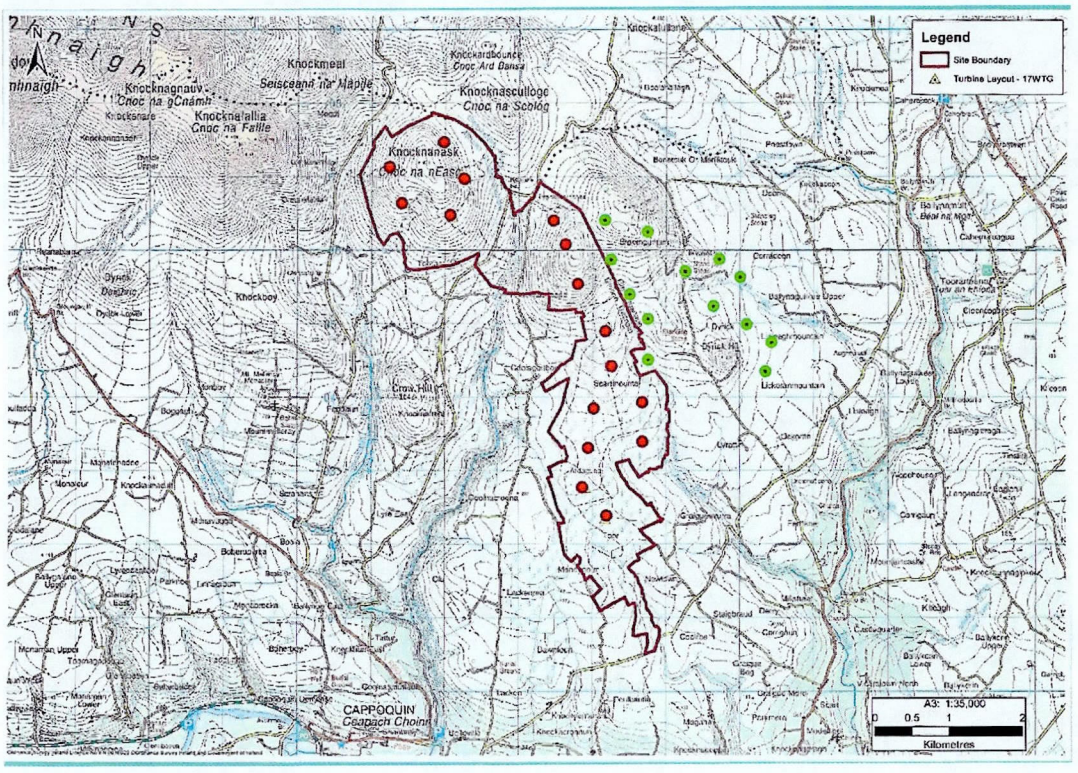

Figure 5.5.3.1 Map showing Dyrick Hill Wind Farm (Green) & Scart Mountain Wind Farm (Red) Turbines

In the same chapter and section of its EIAR, the applicant goes on to state that "*Coumnagappul, which is currently in pre-planning stage has been included within the EIAR study as the developer is also the developer of this wind farm*", which is important but does not take into consideration the in-combination effects of all other wind farm developments within the region.

The combination of existing wind farms and the other wind farms going through the planning process will result (if all planning permissions are given) in a total of **56 Turbines** located within a 20km radius.

This will ultimately affect the Wi-Fi Wireless (Satellite) Broadband signal communications because of the significant number of turbines existing, pre-planned, permitted and proposed in the region.

The size and scale of the turbines is another factor. Of the 39 turbines proposed for the region, plus the existing 8 turbines at Woodhouse, this would mean a total of 47 turbines at a height of 185m. As outlined in Section 5.5.3.4 of this report, wind turbines affect signals due to blocking, reflection and chopping of signals.

Each turbine has a blade sweep area of 5.1 acres meaning the total acreage of 239.7, which is equivalent to 185 soccer fields (see **Figure 5.5.3.6** below).

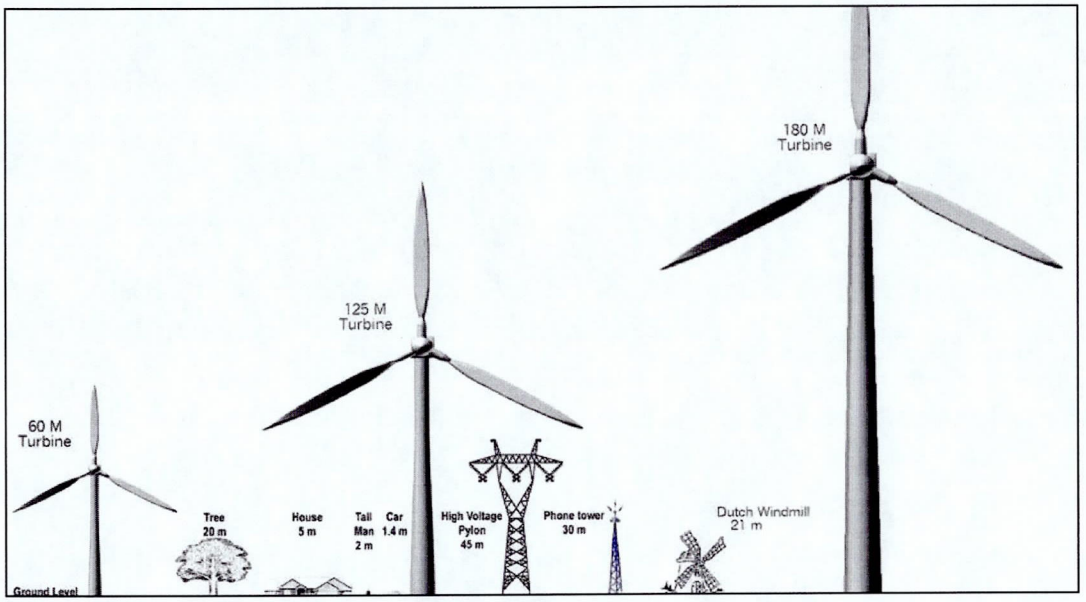

Figure 5.5.3.2 Scale and sizes of wind turbines

5.5.3.7 Post Analysis - If the Development goes ahead

There is significant evidence available demonstrating that existing wind turbines affect Wireless (Satellite) Broadband services. Here are just three examples of where wind turbines affected local services, how local councils rejected wind farm developments due to impacts on rural broadband services.

1. Westnet Broadband Services based in Co. Mayo

This company Westnet Broadband located in the West of Ireland, installs wireless equipment in an elevated location so the signal can be sent to households spread over a remote area by line-of-sight transmission. They had to upgrade their equipment to boost the signal stability power due to the high wind speeds the turbines were creating.

"*We struggled with the wind turbines because of the high wind speeds at these sites. Traditional horizontal axis wind turbines were literally shaken to pieces, only lasting months.*" (Peter Moore, Director of Westnet Broadband).[34]

2. Annagh Wind Farm Ltd

Annagh Wind Farm Ltd was refused planning permission by Cork County Council in North Cork (Planning application ref: 217246).[35] A media release in the Echo

[34] https://www.westnet.ie/westnet-broadband-provides-internet-access-to-villages-and-communities-in-remote-parts-of-co-mayo/

[35] http://planning.corkcoco.ie/ePlan/AppFileRefDetails/217246/0

Live.ie website was released on the 10th of January 2023 highlighting the impacts to rural satellite broadband services.[36]

3. CommScope Blog

CommScope is a communications technology company that creates the world's most advanced networks. The company designs, manufactures, installs and supports the hardware infrastructure and software intelligence that enable our digital society. They provide advanced broadband, enterprise and wireless networks to power progress and create lasting connections. This company has outlined how the rapid growth of wind turbines, has led to a new obstacle – wireless signal obstruction.[37]

5.5.3.8 Electromagnetic Interference (EMI)

Electromagnetic interference (EMI) is any type of interference that can potentially disrupt, degrade, or interfere with the effective performance of an electronic device. These devices utilise electromagnetic energy such as power, communication networks, electrified railways, and computer networks. Wind turbines disrupt electromagnetic signals, and the nature of the interference depends on:

1. The location of the wind turbine between receiver and transmitter;
2. Characteristics of the rotor blades and receiver;
3. Signal frequency; and,
4. The radio wave propagation in the local atmosphere.

EMI is "Electromagnetic interference (EMI), also called radio-frequency interference (RFI) when in the radio frequency spectrum, is a disturbance generated by an external source that affects an electrical circuit by electromagnetic induction, electrostatic coupling, or conduction. The disturbance may degrade the performance of the circuit or even stop it from functioning. In the case of a data path, these effects can range from an increase in error rate to a total loss of the data".[38]

5.5.3.9 Conclusion

The applicant's planning application to An Bord Pleanála for the Dyrick Hill Wind Farm does not take into consideration the Wireless (Satellite) Broadband telecommunication Super High Frequency (SHF) signal frequency band. This

[36] https://www.echolive.ie/corknews/arid-41045024.html

[37] https://www.commscope.com/blog/2012/windmills-and-wireless/

[38] https://en.wikipedia.org/wiki/Electromagnetic_interference

will affect all the local residences using this technology in the regions around the Proposed Development, for personal and for business purposes.

The applicant has stated that there will be no impacts on communications from Vodafone, Enet, Tetra Ireland Communications, Radio Service, RTE Radio, RTE TV and Broadcasting Authority of Ireland, which only accounts for VHF and UHF frequency bands.

There was no Telecommunication Impact Assessment performed by the applicant; and, as a result, the application to An Bord Pleanála for the Dyrick Hill Wind Farm is incomplete and invalid.

6. CONCLUDING OBSERVATIONS

Having examined in some detail the planning application for the proposed Dyrick Hill wind farm, and the supporting documentation, there is very little doubt that the location proposed is unsuitable for many reasons; the planning application is deficient, and contains a significant number of errors and omissions, together with numerous inconsistencies.

Therefore we urge An Bord Pleanála to refuse planning permission for this proposed windfarm development; and, if the Board were to grant permission, it is likely that such decision would be in breach of at least one EU Directive and the relevant Irish legislation, and would leave the Board's decision open to a legal challenge.

Jack O'Sullivan

Environmental Management Services

On behalf of

The Knockmealdown Protection Group

Environmental Management Services
Comhairleoirí Comhshaoil
Environmental and Planning Consultants

Strategic Infrastructure Development Application by Dyrick Hill Wind Farm Ltd for Planning Permission to Construct a 12-Turbine Wind Farm at Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), and other named Townlands, County Waterford

An Bord Pleanála Reference PA93.317265

SUBMISSION TO AN BORD PLEANÁLA BY THE KNOCKMEALDOWN PROTECTION GROUP

APPENDIX I

UNDERSTANDING THE LANDSCAPE: THE CULTURAL HERITAGE OF THE SLIABH gCUA AREA

Dr. Kathleen Fitzpatrick B.Ed., M.Sc., PhD.

This report is referenced in section 4.1.5 of the submission by the Knockmealdown Protection Group

02 August 2023

Understanding the landscape:

The cultural heritage of the Sliabh gCua Area



Dr. Kathleen Fitzpatrick B.Ed., M.Sc., PhD.

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Introduction

Contrary to the developer's description of the area, the local folklore of the Dyrick and Broe mountain suggests a rich material culture of archaeological finds and a tradition of respect for the monuments in the area. It is important that local people know the significance of this fragile and ancient landscape in the face of major developments that may alter it or lead to the permanent loss of archaeological, cultural and ecological material. The aim of this document is to give a greater insight into the history, archaeology, customs, folklore and traditions of the Sliabh gCua area. There is so much of life and history centred here, a place, a landscape and the people who shaped their lives within these boundaries of community, parish and county, who know this terrain and love it. This document seeks to provide an understanding of the special area of Dyrick Hill and Broemountain, also known as Sliabh gCua. The intact natural world, the warmth of its people, the striking landscape, untouched hedgerows, its pilgrim paths, the beautiful and fascinating landscape, an area of high biodiversity, ANNEX I habitat, scenic paths and routes and surrounded by designated archaeological sites is the area proposed by EMPower for its windfarm. The risk to these from construction, operation and decommissioning coupled with the already degraded nature of some of the areas would put them at increased strain with disastrous consequences to the aquatic and terrestrial environment.

Heritage is all about People and Place and the area in question, Dyrick and Broemountain, part of Sliabh gCua, has a fascinating history which has been attracting people with a love of gaeilge, music, song, dance and of learning. Contrary to the developers presentation, Sliabh gCua is steeped in folklore and rich tradition. This snapshot of the Dyrick/Broemountain, Sliabh gCua area, constitute a micro-history, which show the continuity and change that are part of every landscape and that are part of the larger national story. The records of national monuments, boreens, limekilns that were in place hundreds of years ago have none of the stories or accounts of those who were there at the time. Their stories, the folklore of an area, have a very short shelf life, only a generation or two, unless they are documented and shared. They do however, give a better understanding of the landscape in which we live.

This small West Waterford region with its tranquil and beautiful landscape, ripples with over 5,000 years of history and has a remarkable heritage of Irish language and scholarship. Up to the 1930s Irish was widely spoken and the old native speakers of Sliabh gCua always used the plural when greeting a person, "Dia is Muire Dhiabh". According to old Irish tradition a person is never completely alone and the Guardian Angel was included in the salutation. People had a strong devotion to their Guardian Angel and they are now hoping that their beautiful, unique landscape will be protected from this large scale industrial development or else it will be lost forever.

Sliabh gCua

Dating back to pre-historic times the name is derived from a chieftain named Cua who held sway over the entire area. Sliabh gCua, Cua's mountain, is overlooked to the East by the mountain called *'Seefinn'*, Finn's seat, which was a favourite resting place for Fionn Mac

Cumhail and the Fianna, a band of militia of standing army in the service of the Monarc, King Cormac Mc Art (3rd century). Fionn was the son-in -law of the king and here in the heart of Sliabh gCua he would hold training camps for his elite troops. This is how the local village, Touraneena or Toor a fianna, the valley or hollow of the Fianna, derived its name. One of the most beautiful old Irish poems is entitled "Seilg ar Shliabh gCua", which describes an epic deer hunt held there by the Fianna. To the North-West rise the peak of the Cnoc Maol Donn, on the lower slopes of which is a massive round tower erected in memory of General Liam Lynch who was killed there in the closing days of the civil war. Through the heart of Sliabh gCua flows the river Finisk, *Fionn uisce,* meaning clear water or the waters of Fionn. The Finisk rises in Monatouk, flows down through Ballinamult, and wanders along the valley of Millstreet and Cappagh and joins the Blackwater at Dromana. According to legend Fionn bathed, and fished for salmon in this river. The Finisk is also mentioned in the traditional song lamenting the defeat of the Irish Chiefs at the Battle of Aughrim before they fled to France.

Our good ship then we sought her
Where rolled the deep Blackwater
The gentle Bride and Finisk to swell bosom came;
From all a farewell taking,
With sad hearts cold and breaking,
For Sean O' Duibhir 's gleanna
We were worsted in the game. (News Link, first edition)

Historians believed initially that Sliabh gCua was this area from Broe/Eastern Knockmealdowns to Modeligo, on the way to Cappoquin & Lismore, rather than the very much larger interpretation of Sliabh gCua nowadays.
However, much of the knowledge of the history and culture of the Sliabh gCua area has been in the oral tradition and therefore the developer could not possibly have had any appreciation of its rich and varied past. The developer has therefore ignored much of this vital local knowledge of the cultural history, ancient mysteries, hidden stories, folklore and millennia-old myths as well as its rich archaeological nuggets of history. The area of Dyrick hill and Broe Maountain is a rural upland landscape in the west Waterford area. Throughout history it has served as an important thoroughfare, a pilgrim route, a seat of learning and the birth place of many poets, writers and religious. Such strong Christian traditions, customs and values make the area, Sliabh gCua, a place apart in its literary, cultural and social traditions. As this document will attempt to show, the Sliabh gCua area has played a significant role as a transitory location in Ireland's landscape, holding a now-forgotten prestige in our cultural, historical and mythological zeitgeist. It is said that our ancestors had a tradition of linking things into groups of three. This is called *Traidisuin na dtriad* and was said to be based on the doctrine of the Trinity. The three gifts which Sliabh gCua was said to have were *Leinn, Feile, agus Filiocht* (wisdom, hospitality and poetry). A story is told of three Franciscan friars who were fleeing from the Redcoats. They were in grave danger of being captured but when they came to a pleasant valley they were given shelter and food. Before they left they knelt in prayer and asked God to reward the people of the valley. This is how the valley of Sliabh gCua came to receive the three gifts. The following will confirm that the Sliabh gCua area did indeed receive these three precious gifts.

Cultural Heritage

> *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, Dyrick Hill EIAR, p.1)*

It is my contention that the following, which is but a glimpse into the non-tangible resource, was not part of the review undertaken by the developer and therefore *"a comprehensive cultural heritage baseline"* was not in fact established. It is my contention that the developer has not considered the local history in this region, the ancient people who left their trace with ringforts, standing stones, burial grounds, mass rocks, hedge schools, churches etc. Those who struggled to revive the Irish language, to write poetry, to pass on their knowledge and traditions to future generations, those who lived through the famine and penal times, others who emigrated or died leaving derelict cottages and outbuildings. From these modest dwellings the people from Sliabh gCua went out into the world a left their mark beyond their parish and beyond this country.

> *The first mention of the place called Sliabh Cua (otherwise Sliabh gCua) in the Annals of the Four Masters occurs under the year of world 3790. In recording the death of the legendary Angus Olmuchadha, the annalists relate among other matters that he gained the battle of Sliabh Cua against the Erna John 0 Donovan, in a footnote, identifies the Sliabh Cua of the Four Masters thus:- Sliabh Cua. - Now Sliabh Gua, anglice, Slieve Gua, in the parish of Sheskinan, barony of Decies-without-Drum, and county of Waterford. The more elevated part of this mountain is now called Cnoc Maoldomhnaigh. But the whole range was originally called Sliabh Cua.*
>
> (Journal of the Old Waterford Society Decies, No 46, p. 5)

It may well be therefore, that this area was the original Sliabh Cua which gave its name to that famous range of mountains so often mentioned in hagiological, historical and legendary literature; and perhaps it was in this district that the battles of Sliabh Cua mentioned in the annals were fought. Apart from the altogether legendary battle supposed by the annalists to have been fought in the year of the world 3790, we find mention in the annals of two battles fought at Sliabh gCua in historic times, one in 5975 and the other in 10316.
The district thus defined as bearing the name of Sliabh Gua is situated about halfway between Clonmel and Dungarvan and corresponds more or less to the Catholic parish of Tooraneena and the Nire. This parish is really the united parishes of Seskinan and Lickoran which comprise or are in close proximity to the development site.

Place Names

The only mention of placenames in the developers plan states that they could only find;

> *....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. However, there are countless place names within the area mentioned that give an insight into the cultural heritage of the area. Furthermore, in relation to the developers contention that the placenames of Dyrick & Broe have no meaning: On the contrary the following is confirmed;*

However, Dyrick does have a meaning but it is a lot more deep and mystical and of great antiquity than the developer's time could afford.

DYRICK, Deighiric *Firbolgs or neolithic aboriginals spoke a non-Aryan language. As in some small degree corroborative 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.* (power, p. 6).

- BROE, Breo. Meaning unknown; the word certainly **signifies flame** or fire but its sense as a place-name is hard to determine. Portion of the townland runs into the neighbouring parish of Seskinane. Area, 387 acres (power, p. 78).
- Lickoran: 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 Archaaological Society, Vol. III., p.77.
- LICKORAN, Leac Fhuaráin - "Flag stone of the Cold Spring." Area (in two divisions), 311 acres.
  "Leac Fhuaráin na mbodhrán mbriste " (Old Rhyme).
  To illustrate the quality of the pasture here it is told that the Glas Gaibhneach patronised it. She spent a night at Lickoran, a second night at Newcastle, the third at Glenanore, and departed thence by the "Gap" to Rathgormac.
- LISLEAGH, Lios Liath - "Grey Lios."
  "Lios Liath bhí riamh ag Pilib " i.e., Philip McGrath of Sleady, 17th century. (Old Ryhme). Area (in two divisions), 360 acres.(P. 79)
- DOON, Dún – "Fort." The "Dun" here is an artificial "fort" or Lios which crowns the summit of a small limestone bluff. The builders found a natural rath-shaped mound ready to their hand, and with the minimum of labour they transformed it into a formal (Power, 1952, p.130).
- CORRADOON, Cora an Dúin - "Weir of the Fort." Fort-like Hill. Cora is the name applied locally to an irrigation channel. Area, 567 acres.
  S.DD. *(a)* Goirtín na gCriostalaí - "Little Garden of the (Quartz) Crystals."
  (b) Mweeling (O.M.), Maolinn - "Hill Top."

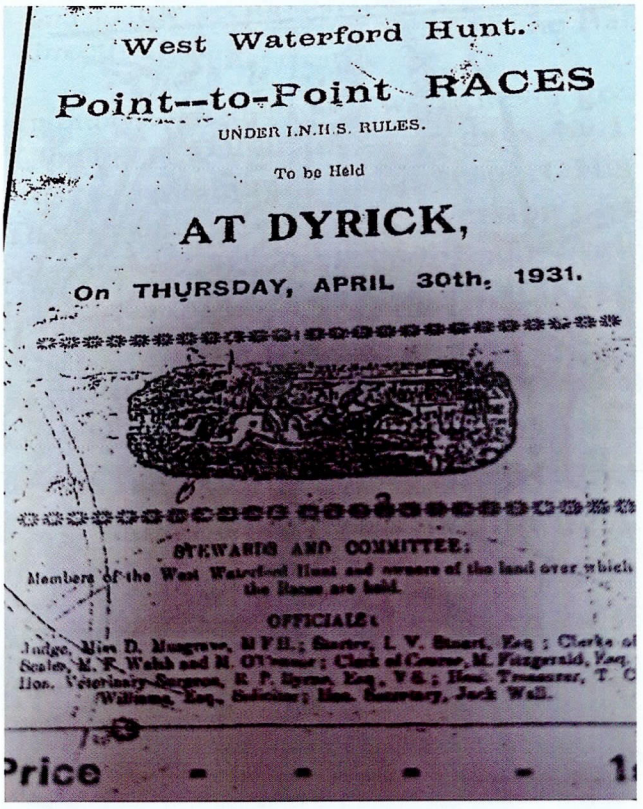
(c) Tonn na gCoradh - "Swamp of the Irrigation System."
(d) Other sub-denominations: - Caol Gorm, Páirc na Caoile and Buatais. Curradoon stretches about four miles from the slopes of Broemountain to Ballinamult, close to the Finisk river. In the 1901 census , part of the National Archives, there were 53 people living in Curradoon. Eight houses had thatched roofs and four were slate.

- In explanation of the last of the three names it is told locally (believe who will) that an outlaw, before his execution in Waterford, disclosed he had buried a boot of gold in the place.
  DOON, Dún - "Natural Rath-like Mound." Area, 453 acres (Power, P.84).
  S.DD. *(a)* Toberadoon (O.M.), Tobar an Dúin - "Well of the Doon.
- BONATOWK MONATOUK, Bun an tSeabhaic - "Hollow of the Hawk" (O.D.); more generally however, Muin' an tSeabhaich, "Shrubbery of the Hawk".
- REANADAMPAUN, Ré na dTeampán - "Mountain Plain of the Round Boulders." "The Tampauns" are five great standing stones, which seem to be portion of a dismantled dolmen; they are now incorporated in a fence. Cian "na Mionn Óir" (of the golden diadems), from whom Kilkeany is named, was a Druid and possessed of a famous Slat Draíochta or "Rod of Enchantment." On a certain day three brothers, wayfarers, with their mother whom they carried on their shoulders, called at the Druid's house seeking hospitality. The master happened to be from home, but a maid, who was kneading bread for dinner, requested them to await Cian's return. The strangers, not liking the slovenly appearance of the girl and the manner in which she manipulated the dough, refused to stay. When Cian returned for dinner and heard the story he flew into a rage that his hospitality should be spurned, and seizing his Magic wand, he started in pursuit of the travellers. He overtook them on the mountain plain, where, with a touch of his druidic slat, he changed them and their two dogs into these five pillar stones. Two large pillars (the two travellers) support a third (the mother) ; two smaller pillars are the petrified wolf dogs. Area, 1,003 acres. S.DD. *(a)* Móin an Chuithe - "Bog of the Pit (or Pits)." (Power, 1952, p.84).

Ballinamult, *Baile na Molt* got its name from the sheep fairs held there in olden times by the banks of the Finisk river. "Today that small well sheltered townland with the triple peaks of Dyrick, Broe and Monatouk at its back and a beautiful view of the Comeraghs facing" (News link 1990).

According to many elderly people of the Sliabh gCua area there were four big occasions throughout the year, the day of the Stations, Threshing days, Christmas Day and the day of the local point-to-point races.

Dyrick point-to-point races were traditionally held on the last day of Spring. It was lauded as 'one of the best in the South of Ireland' by the Cork Examiner because it was laid out on an inner and outer circle with the horses always near the spectators who from the slopes of the high hill above the winning post can obtain a perfect view. Local farmers willingly gave their land for this annual event and it was a very important event in the local calendar. cz



West Waterford Hunt.

Point--to-Point RACES

UNDER I.N.H.S. RULES.

To be Held

AT DYRICK,

On THURSDAY, APRIL 30th, 1931.

STEWARDS AND COMMITTEE:

Members of the West Waterford Hunt and owners of the land over which the Races are held.

OFFICIALS:

Price - - - - 1

Folklore of Sliabh gCua

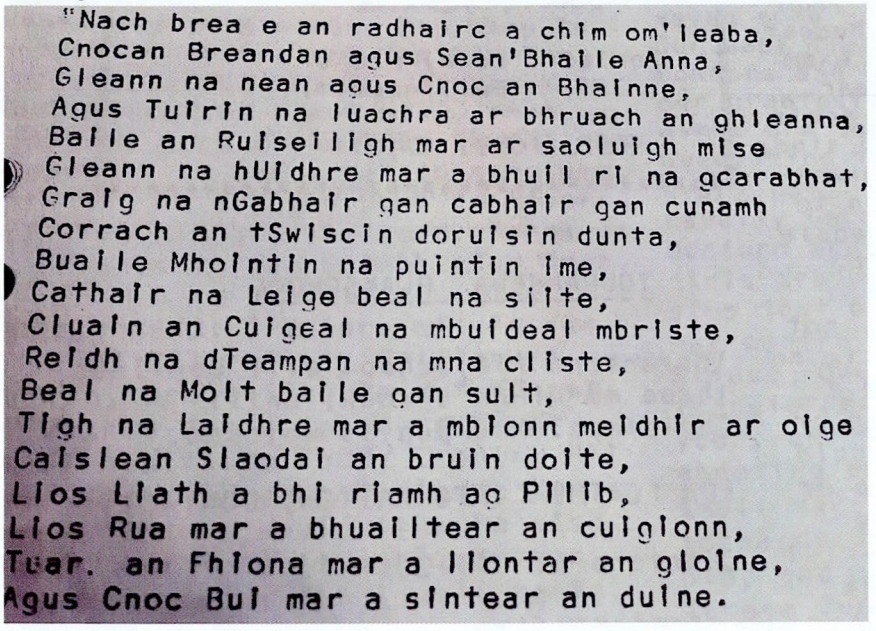
Before the advent of radio or television, the main indoor pastime among the local people was storytelling. The most popular stories were those about ghosts, banshees or the legendary 'Petticoat Loose'. The following is a mere fragment of a huge bank of legends and folklore of the area;

One of Sliabh gCua's earliest folktales concerns a Druid called Cian who lived at Cill Ciana. He was a very wealthy man and very hospitable. Anyone who called to his house would receive some refreshment. One day while he was away three hunters called to his house. Cian's wife offered them food and drink but they refused. When Cian heard this he was furious, he followed the man and caught up with them ar Reidh na dTeampan. He then turned the men and their dogs into stone. The stones are still to be seen in Reanadampaun. The site was examined by an archaeologist, Prof Macallister, who came to the conclusion that the site was a sacred place of Druid worship.

Stories were sometimes told about songs in different parts of Ireland but in Sliabh gCua the following story is often told with bated breath by people who believe that the 'other world' was as near and as real as the one in which they lived. The beautiful song 'Cailín Deas Cruite na mbó' was once banned by the clergy in this part of Munster and this was because of the following legend. On winter's night a priest was called out to a dying person. He was travelling over a bridge in the Sliabh gCua area when he heard a beautiful voice singing 'Cailín Deas Cruite na mbó'. The song was so mesmerising that the priest could not move from the spot. When the song ended he looked over the wall of the bridge to see who was singing and to his horror he saw the devil who laughed mockingly at him. The priest began to pray and the devil

vanished. For many years after that the song was not sung but the melody was put to different words in dedication to Our Lady (News link, June 1986).

Stories about highway men were common in Irish folklore and during the 18th century in Waterford the most famous was William Crotty, who was hanged in 1740. The exploits of William Crotty were often recalled around the winter firesides of Sliabh gCua. To his enemies, the 'Brits' and the 'landed gentry' he was a robber and a murderer but to the common people he was hero. In folklore he was credited with one poem which he wrote whilst looking out from his high mountain hideout at the surrounding Déise countryside.


"Nach brea e an radhairc a chim om'leaba,
Cnocan Breandan agus Sean'Bhaile Anna,
Gleann na nean agus Cnoc an Bhainne,
Agus Tuirin na luachra ar bhruach an ghleanna,
Baile an Ruiseiligh mar ar saoluigh mise
Gleann na hUidhre mar a bhuil ri na gcarabhat,
Graig na nGabhair gan cabhair gan cunamh
Corrach an tSwiscin doruisin dunta,
Buaile Mhointin na puintin ime,
Cathair na Leige beal na siite,
Cluain an Cuigeal na mbuideal mbriste,
Reidh na dTeampan na mna cliste,
Beal na Molt baile gan sult,
Tigh na Laidhre mar a mbionn meidhir ar oige
Caislean Slaodai an bruin doite,
Lios Liath a bhi riamh ag Pilib,
Lios Rua mar a bhuailtear an cuiglonn,
Tuar. an Fhiona mar a liontar an gloine,
Agus Cnoc Bui mar a sintear an duine.

In 1840 a highway man named Eamon O' Rian operated in the area. One night he called to a house in Cill Ciana where an old lady lived with a young boy. The lady and the boy were terrified but Eamon reassured them as said that all he wanted was something to eat. The boy was ordered to give him the food that was on his plate, milk and potatoes. When the boy began to cry the highway man asked what was wrong. He explained that they were to be evicted the following day unless they could pay the £30 due in rent to the landlord. The highway man reassured the boy and told him this would not come to pass. The following day Eamon returned with two bags of coins, one for the rent and the other for themselves. To their amazement, when the agent and his bailiffs arrived the money was handed over and they left. However, shortly afterwards they were confronted by a masked man carrying a pistol and they were forced to hand over the money. Eamon then took off in the direction of the Nire Valley and it is said that he had fully repaid the hospitality which had been shown to him in Sliabh gCua.

Until about seventy years ago Irish was widely spoken in Sliabh gCua. If you did a good turn for someone you were rewarded with prayers such as 'Go Bhfágaidh Dia do shláinte agat' or 'Ná raibh an fhaid sin de luíechán bliana ort'. It is said that there was a tradesman who lived to be 104 and he attributed his longevity to the many prayers people said for him. The old proverb "Ar scáth a chéile a mhaireann na daoine", people live in the shadow of one another was certainly true of Sliabh gCua.

The last folk tale recounts that when the church was built in Seskinane it was lacking a bell to call the faithful to Mass. It was decided to take a bell from the nearby Kilkeany church (this church has not survived to the present but its location is still remembered) and use it in Knockboy. Thus the bell was removed from the belfry and transported to Knockboy. However, when the bell was installed in Knockboy it was found that no matter how hard it was rung the bell would not chime. It was said that the bell broke from where it was hung and made its way back to Kilkeany, in the middle of the night, chiming the whole length of the journey. Shrieks of mocking laughter could be heard through the night.

Ancient Churches

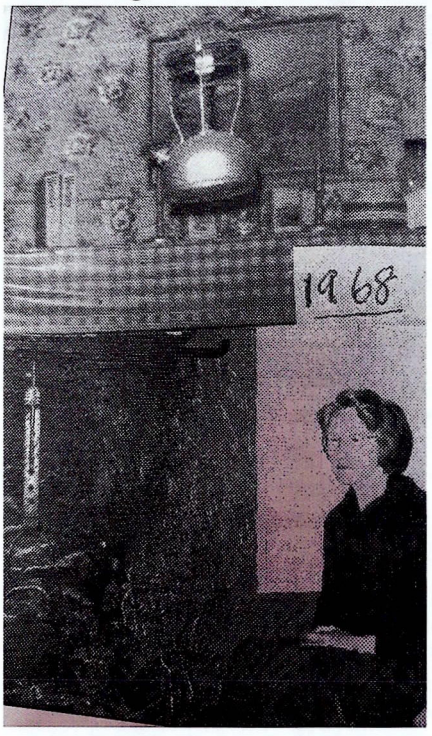
There are six early church sites in the area; Ballinagulkee, Bleantasour, Cloonacogaiil, Kilcooney, Kilkeany and Lyre. There are two fileds called mass fields in Bleantasour and Kilkeany, suggesting that they were used for catholic worship during Penal times. The ancient parish church of Seskinane, now in ruins, is situated on Knockboy (within the 10km radius) and hence bears the name Knockboy. The church at Knockboy was rectangular in plan with a double bell cote rising from the summit of the west gable. An extraordinary feature of this church are the ogham inscribed lintels of its windows and doors. It is believed that these lintels may earlier have served as headstones in early christian times before transfer to their present position and purpose. In fact, Broe is inscribed on one of the six ogham stones, suggesting or indicating that it may have originated on Broe mountain. Though itself an erection of the fifteenth century it evidently replaced a very ancient church, and all the evidence goes to show that there was on this spot or at least in the near vicinity a pagan cemetery which, at an early period, was converted to Christian use. All but one of the doors and lintels are Ogham-inscribed and, as the diocesan historian of Lismore writes, 'must have served their purpose as headstones in a pagan or early Christian cemetery before their present position and purpose'. People travel from far and wide to view these unique stones depicting the oldest written alphabet and dating from 1st century.



Prior to the 1800's there was one other church in the district at Fernane which served the parish of Lickoran. Other earlier church sites in the parish include Ballinaguilkee, Bleantasour, Clonigagale, Kilcooney, Kilkeany and Lyre. There are also fields in the area known as Mass fields which suggest places of assembly for Mass during the Penal times.

The Stations of the Cross

The Stations were a great annual event for all the neighbours of this rural community and they were celebrated twice a year in different houses. It was a great honour to have Mass celebrated on the kitchen table and this came around every 4-5 years for each house. Preparations for the big event were extensive and involved the whole community. Everything inside and outside was freshly painted. The parlour, a special room in the house reserved for visitors and the Station breakfast. On the day of the station the house would be full of people, all the neighbours and the table set with a table cloth, the best china and the best cutlery. After the mass people would sing, chat and dance for the remainder of the day and into the night hours.



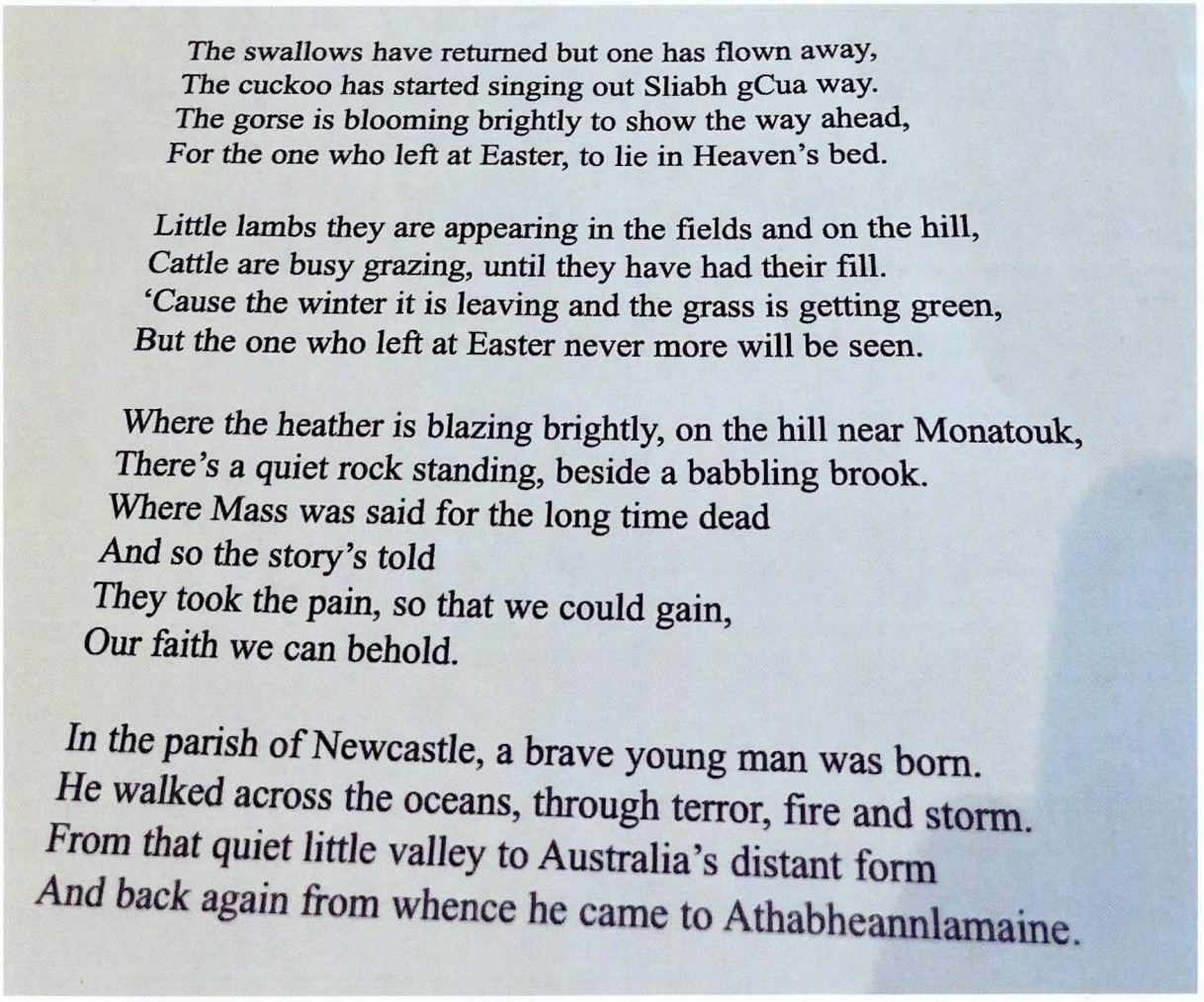
Biddy Power describes this picture of her mother, in her house in Dyrick, waiting for the kettle to boil.
The big open kitchen was where *" .... People sat here, ate and chatted around the big open turf fire, which had been cut and saved from our own hillside"(Dyrick Hill).*
Biddy fondly recalls "those stations up at Broe, all those moons ago now, a treasured piece of history...."
Biddy also recalls starting school in 1949, walking from Dyrick to Touraneena (4 miles) *"...through bog land, reaghs and fields. We had to cross no fewer than 3 rivers. It was tough in the wintertime when there were floods, as the firest two rivers had only stepping stones to get across...."*

Mass Rock

Knockanaffrin; Cnoichin An Aifrinn

Cnoc an Aifrinn "the little hill of the Mass", at the foothills of the Knockmealdown Mountains is, according to local legend, the traditional site of a penal days Mass Rock. The name speaks

for itself, it is indeed a little hill, just a gentle slope, a few hundred yards from the village of Monatouk and four miles from Newcastle on the road to Mellery. The Mass rock is called Monatouk Mass Rock. Every year hundreds of active participants people gather to make the Pilgrimage to celebrate this traditional Mass offered up for our forefathers, at the Mass rock on the slopes of the Knockmealdown mountains. The Mass serves to recall the sacrafices which earlier generations made to participate in the central act of catholic worship some people make the journey on foot while others opt for the comfort of a jeep and the remainder are ferried across the mountain by tractor and trailer. Among the congregation are many cross Channel and overseas visitors who make the journey to experience this unique celebration as sweet music and the sound of well-trained vocal cords travel around the mountainside on a Summers evening.



The swallows have returned but one has flown away,
The cuckoo has started singing out Sliabh gCua way.
The gorse is blooming brightly to show the way ahead,
For the one who left at Easter, to lie in Heaven's bed.

Little lambs they are appearing in the fields and on the hill,
Cattle are busy grazing, until they have had their fill.
'Cause the winter it is leaving and the grass is getting green,
But the one who left at Easter never more will be seen.

Where the heather is blazing brightly, on the hill near Monatouk,
There's a quiet rock standing, beside a babbling brook.
Where Mass was said for the long time dead
And so the story's told
They took the pain, so that we could gain,
Our faith we can behold.

In the parish of Newcastle, a brave young man was born.
He walked across the oceans, through terror, fire and storm.
From that quiet little valley to Australia's distant form
And back again from whence he came to Athabheannlamaine.

Figure 1 Ode to Fr. Paddy's life (The Sliabh gCua Annual No. 15 2009)

All modem writers seem to agree that the Sliabh gCua, so frequently mentioned in the ancient literature of Ireland, represented by the fine range of mountains called the Knockmealdowns, which form the boundary between the counties of Waterford and Tipperary for almost their entire length. However, the elevated table-land between Clonmel and Dungarvan extending

into the ancient parishes of Lickoran, Seskinane and Modeligo still bears the name Sliabh Gua and it suggests that this was probably the area to which the name was originally applied. There are, of course, many references to Sliabh gCua in ancient Irish literature. The life of St. Mochuda we are told that on his way to Clonfert Molua from Déise Mumhan he crossed over Sliabh Cua, from the summit of which he saw angels ascending and descending on the banks of the river Nemh (now called Blackwater). From this we infer that Sliabh Cua was, indeed, the Knockmealdown range. This appears to be confirmed by the account given in the same 'Life' of Mochuda's settlement at Lismore after his expulsion from Rahan. He is depicted as meeting the King of the Wise (Maelochtraigh) at Ard Breanainn - the modern Ardfinnan - where the king offered him a site for his church at Lismore.

The life of St. Declan also throws some light on the situation of Sliabh Cua and its relation to the Knockmealdown mountains. Saint Declan is said to have been instructed by an angel to proceed as quickly as possible to the plain called Inneoin, there to meet St Patrick. Since the saint was told to make no delay and is depicted in the 'Life' as hurrying in all haste to the said place, we must suppose that he took the most direct route from Ardmore. A look at the Ordnance Survey map will show that the most direct route from Ardmore to Mullaghneony is that taken by the modem road through Kilcloher, Modeligo and Ballinamult. The saint's 'Life' however states expressly that he proceeded through Sliabh Cua, crossing the river Suir and arriving at his destination the following morning. From this passage we gather that the Sliabh Cua of early christian Ireland was believed by the writer of the narrative to have extended farther east than the Knockmealdown range and to have, in effect, included part at least of the area now popularly called Sliabh Gua in Irish. In conclusion, there is sufficient documentary evidence to allow us to state with certainty that the ancient Sliabh Cua included in fact the entire mountain mass at the present day the name Sliabh Gua is restricted to the comparatively small area between Clonmel and Dungarvan comprised more or less in the united parishes of Seskinane and Lickoran with part of Kilronan and part of Modeligo.

This rural community was famous in the mid-18th century for its poetry court or *cúirt filíochta.* A leading light in this, was the legendary figure of Donncha Rua Mac Namara (1715-1810). Later the spirit and excitement of these gatherings was brought into modern times through the work of a whole series of notable Gaelic scholars. There was Dónal Ó Fearachair (1852-1929), Pádraig Ó Milleadha (1877-1947), and Pádraig Ó Fiannuasa (1914-1990). Moreover, Pádraig Ó Cadhla (1875-1948) helped to found Ring College. In fact, Sliabh gCua, was once one of the richest gaeltachts in the country and it was the home of the last of the great schools of Irish poetry. According to Dr. Padraig O Machain, (Dublin Institute of advanced studies) "One of the best books to be published in recent times is undoubtedly Séamus Ó Caoimh's account of life in Cnoc na Faille, near Mount Mellery; his book entitled *An Sléibhteánach,* was published in 1989" Another 20th Century writer Pádraig Ó Fiannúsa, a native of Ré na dTiompán, devoted his life to the promotion of the Irish language. His book published in 1974, *Ghaibh a leithéid an tslí tráth* was based on the history and folklore of Sliabh gCua. Dr Padraig O Machain commented *"...it is Ó Fiannúsa's powers of description which make a lasting impression; particularly in the case of the landscape of Sliabh gCua which forms the ever-present backdrop to the events of the novel".*

In April 2008 Pádraig Tyers, director of Ionad na Gaeilge Labhartha at University College Cork, Honorary Doctor of the National University of Ireland and a native of Cahernaleague, was presented with the Gradam an Phiarsaigh. This award, named after Pádraig Pearse, is awarded in recognition of distinguished service to the nation based upon the principles to which Pearse committed his own life's work, especially in the field of education and fostering of the Irish language.

Muillean Na Choirce Bridge

Muileann na Choirce, Muillinahurca, (cover photograph) bridge appears many times in the history of Sliabh gCua. The name speaks for itself, the mill of the crushed corn. It is evident from the OS maps that there was once a corn mill at this site which was probably powered by a mill wheel, the river. The mill is referred to in the Dúchas, Children's collection (see copy fig.). According to local legend a man named Séan Hans, who owned the corn mill was unhappy with the money he was making from crushing the corn. He had a dream that there was gold buried under the mill, which was hidden under a large stone. He worked every day to try to locate the gold but in the end he had removed so much stone and rock that the mill fell down. That's how the mill fell down and the man was not able to find the gold or to rebuild the mill. He was a very poor man after that. (see figure 17).

In 1834 the enclosure of mountain commonages which deprived local people of access to turf and grazing resulted in several violent incidents in Scart, Boolavounteen and Broe Mountain. In August of that year two men were killed on Broe mountain. In the early 1840s an agent was killed near Muillean na Choirce bridge. Before he died he was heard to say the name of the man who had attacked him but the only word he could utter was 'Rua". A man from Cathair na Leige named Eamon Criostoir, also known as Eamon Rua was arrested, charged with murder and was hanged outside Waterford jail. It is sid that the innocent man faced death without any fear and a story is told that as he stood on the scaffold, a robin perched on his shoulder. Many years later another man confessed to the murder but it was too late to save Eamon Rua from the hangman's rope.
The Mullinahurca Ambush took place in 1922 after IRA men were rounded up by enemy forces at Kilbrien Church following Mass. The group were intercepted by the IRA column, who took cover on a bye road (an area on the haul route to be completely removed) at the bridge and the enemy abandoned their lorries and took cover in the nearby road fences whilst returning fire. The engagement lasted up to 40 minutes and it resulted in at least two casualties and many more being wounded. The IRA party were able to get into good positions by moving to higher ground (Fernane) and soon the enemy withdrew.

Poets of Sliabh gCua

The National Library of Ireland contains hundreds of manuscripts from County Waterford including some very interesting ones from Sliabh gCua. The oldest one dates from 1767and is signed by William Criostoir, it contains an account of the Passion of Our Lord. Also listed are

some early poems by Donnchadh Rua McNamara. A manuscript in Irish dated 1845 and signed John Morrissey, Monatouk contains St. Patrick's Hymn at Tara, it also contains an English translation.

Máire Ní Dhonogain

Máire Ní Dhonogain, poetess and bean caointe, lived in Tigh na Laidhre. She was a woman of great wit and it was said that she could compose a verse at short notice. She could converse fluently in English and Latin as well as her native Irish. It is believed that she attended the famous school in Baile na Goilcaí. One day she was sitting outside the church when the priest came along. They began to talk and in the course of conversation he asked her to compose a verse. This is what she said;

Go mairidh tú do chulaith nua,
Go mairidh tú do chlú is do chreat;
Go mairidh tú mile blian in Eaglais Chríost
Is go mairidh tú coíche ar neamh

It is reported that she had a brother who was a *'spailpín Fánach'* who travelled mostly around Cork. He worked on a farm where there was only one daughter and a match was made between them. Máire received a message that he was ill and she started to walk to Cork but when she got there he had already died. The wake was packed with people but nobody knew who Máie was. She noticed the window, stylishly dressed, smoking and chatting. She also heard her talking about the 'strange travelling woman'. Máire stood up and said;

A bhean úd thall leis an gclóca síoda,
Cos ar mhuin coise leat is tú ag caitheamh do phíopa;
Má chaillis d'fhear geóbhair arís é
Ach mo dhreathár áluinn ní bhfaghadsa coíche.

Translation;
Oh, woman yonder with the silken cloak,
You can cross your knees and enjoy your smoke;
If you lost a husband you'll find another,
But I'll never again find a loving brother.

Pádraig O' Milleadh

For centuries Ireland has been known as a land of poets and playwrights. Counted amongst its famous sons is Catholic patriot poet, Pádraig Ó Mileadha who penned his most influential work in the Irish Language. Pádraig was born in West Waterford, Sliabh gCua in 1877. His native tongue was Gaelic which he learned from his grandfather Muiris, who could not speak any other language. When he attended school he was forced to speak English and soon lost the fluency in the forbidden gaeilge. Later, as a young man, he was unwilling to accept the injustice of being denied his mother tongue and he made efforts to re-learn the Irish language. When he

was 26, like many of his compatriots, he was forced to leave his beloved homeland in search of employment. He ended up in South Wales in the Mond Nickel Works at Clydach in the Swansea valley. During his stay he wrote most of his best known work. Like the gaeilge, the Welsh language had been supressed. Whilst in Wales Pádraig turned to his roots through his native language and became a supporter of Conradh na Gaeilge. In quieter moments, Ó Mileadha would reflect on his homeland and and he began writing poetry and songs which have become a cherished part of the cultural heritage of County Waterford and indeed Ireland. Arguably his is most important pieces of work, *Sliabh Geal gCua,* written in gaeilge, celebrates the mountain of his homeland and his longing to be there (see figurexxx).
Another celebrated piece composed in Wales is the brilliant *Trí Glúine Gaedhal* or Three Irish Generations, a poetic record of some events of Irish history from 19th to early 20th century. His book of poetry *Duanta Aneas* was published in 1934 gives an insight into the history of Ireland and her language. Other famous works include *An Samhradh Filleadh go hEirinn, An Fiannai Fain, Tri Gluine Geal, An Scolaireacht* and *An Fiannaidhe Fain,* a long epic style poem which he wrote as an anti-recruitment pamphlet during the first World War. Songs include *The little village schoolroom of Kilbrien* and *the Plains of Nirevale*. Pádraig returned to his native Sliabh gCua to become a muinteor taistil (travelling teacher) and he taught Irish all over West Waterford and continued to write. Pádraig also wrote plays and in the 1930s he put on a performance of his special play for children *"Banríon Na hÚlla Órga"* in Touraneena. In 1936, Seanchas Sliabh gCua was published in Béaloidéas, the journal of the Irish Folklore Commission. This collection of songs, sayings, poetry and the lore of the area was collected and compiled by Pádraig over the course of three years, after he had interviewed the custodians of the Gaelic heritage that stretched back in time. According to Pádrain it represents only *"some of the great cultural wealth of Sliabh gCua'*, a small portion of the vast repertoire of stories of the area and it demonstrates the outstanding standard of spoken gaeilge amongst the local people at the time. Pádraig Ó Mileadha, poet and Irish language writer died in 1947 and was buried in Sliabh gCua, his native home. Such was his repute that the Irish president Sean Thomas O' Kelly attended his funeral. In 1977, a century after his birth, the then President of Ireland, Cearbhaill Ó Dálaigh, unveiled a plaque at the grave of the great 'poet of Ireland and Wales'. (*Catholic Life, April 2008).*
(See Appendix xxxxx Sliabh Geal gCua)

Pádraig Ó Fiannúsa

Ghaibh a Leithéad and tSlí Tráth written by Pádraig Ó Fiannúsa is a historical novel set in Sliabh gCua in the late 1800s and it tells the story of local characters and their exploits. Events such as the Fair Day, the Rent Day, the Battle of Beary's Cross, and characters such as The Whiteboys, the Landlord and the Agent, Crotty the Robber and many more are all present. Beautifully written as gaeilge and printed with many photographs of local areas this book includes nature, history, action, romance and tragedy, greed, revenge and mystical appearances. Pádraig was born into an Irish speaking family in Reidh na dTeampan and he inherited his great love of all things Irish from his grand aunt Mairead Ní Fheariola, an Irish scholar and a sheanachaí. He taught Irish for over 50 years while continuing his writing. He

published books on place names and proverbs and left behind a number of unpublished poems. He is buried in his native Sliabh gCua.

Hedge Schools; Báile na Golcaí

Among the many traditions of Sliabh gCua is the love of learning "Buadha an leinn". Even in the darkest days of the penal laws and before, there are references to Sliabh gCua and its great literary figures who were either natives of the area or spent time in the locality. The 'Hedge schools' were the most vital force in the development of popular education in Ireland during the 18th century. They emerged more vigorously in the 19th century and they hastened the introduction of a state system of education. Hedge schools were to be found at Sheheens, Sleady and Lickoran but the most celebrated, the famous classical hedge school at Baile na Giolcaí, which was located near Muillean na Choirce bridge on the Ballinamult to Millstreet road. The site of this famous school would be completely obliterated should this development proceed. The school is described in a book 'The Hedge Schools of Ireland' by P.J. Dowling. He said that the hedge schools owe their origin to the suppression of education of Catholics under the notorious Penal Laws. It is said that in the Sliabh gCua area every poor man or woman could be sure of a bed and a meal, nobody was ever turned away empty handed. Travellers were welcomed and given food, clothes or money by people who were almost as poor as themselves. They were treated like family members even when they grew old. In 1730 a stranger called to the home of Tomas Hannigan of Tigh na Laidgre (Tinalira) and asked for a night's lodgings. This was customary in the area of Sliabh gCua and not only did he get a warm bed but a hearty meal as well. Tomas Hannigan was considered an witty, intelligent man and he had written some Irish songs. Tomas engaged the man in conversation and soon discovered that the stranger was too smart for him. He sent for Liam Moran, an educated and wealthy man who loved in Tigh na Coille (Woodhouse). He arrived and spoke to the man in Irish, English, Latin and Greek and found that he was competent in all four. He then asked the man if he would consider staying in the area and teach the young people, if a school was provided. The stranger was Thomas Coffey from Limerick. Moran built the school in Baile na Giolcaí (Ballinagoilkee) and Coffey became the first teacher. The field where the school stood is still known as páirc na scoile.The name of Coffey spread far and wide and pupils came from all over Munster to attend. At least two bishops and many priests were educated at this school. It thrived for almost a century until the introduction of the penal laws in 1825.

Liam O' Morain

Liam O Morain was a poet and a gentleman and he was one of the most respected figures in 18th century Sliabh gCua. Whilst living in Tinalira he was in constant demand to witness legal deeds and to interview wandering school teachers. He was deeply affected by the loss of his sister at a young age and he believed her talent far exceeded his own. It is thought that O' Morain's papers are to be found in Washington county, Wisconsin. Should they be found much of the cultural heritage of 18th century Sliabh gCua would be recovered and the wonderful poems of Liam and his sister would be recited once more.

Donnchadh Rhuadh MacConmara 1715-1810

Before the beginning of recorded history Gaelic social order had lasted for centuries and in that social order the composers of poetry, poets, were considered as important as a religious institution. The bardic poet was at the centre of society, to be revered and feared. They poets fuelled the Gaelic spirit, they entertained, teased and made fun. They were people to be listened to. However, in the 17th century, at the time of the fall of Gaelic power, the bardic poet suffered a similar fate and the bardic schools began to close. The poets and bardic school principals called *ollamh* (Professor of poetry) were required to find alternative activities in order to survive. They turned to teaching and many wandered from place to place in search of employment. Harsh anti-Catholic laws, called penal laws, forbid Catholics from receiving an education. As a result illegal schools, hedge schools were set up and operated from outhouses owned by local farmers.

Teachers did not stay very long in any one place because they risked being captured by the authorities. However, poets would still meet to discuss and recite poetry and these meeting were called cúirt or court. Sometimes poets would appear in a district to start a new school or to teach in an existing one and this is how Donnchadh Ruadh Mac Conmara, a Clare poet and bard came to be associated with Waterford. It was in one such leading hedge school, Ballinaguilkee, that came to be appointed as an assistant teacher. This school was founded by Liam Ó Mórain and at the time had another teacher called Tomás Ó Coffaig. Like many a bardic poet he was economical with words and he knew the power of satire. In bardic times it might be used with effect to "guide the course of history or to humble kings" (thesis……..However, Donnchadh was a humorous poet and he liked to make fun, something that would often land him in trouble. His poems were sometimes of a satirical nature which often offended people and it is said that this is way he eventually left Ballinaguilkee. He had a deep rooted pride in his gaelic origins and in his status as a poet and a scholar. Donnchadh died in 1810 but his poetry and tradition lived on. His former pupils kept his memory alive I mbéal an phobail and introduced his work to a wider audience. Before the end of the 19th century 'an Eachtra' was being set as a text for intermediate and university students and 'Bánchnoic Éireann Óighe' had remained a firm favourite (see appendic….)

> *Donnchadh's place among the Munster poets was thus assured. With fine words and sprightly verse, he, like they, fanned the flickering flame of Gaelic tradition in its darkest hour. That is his gift, and history will remember him for it.*
> *(John J Burke, Donnchadh Ruadh Mac Conmara: A shaol agus a Shaother, 2002).*

The poets contribution to the survival of Irish language and culture ensured his place in history. His first collection of poems appeared in 1853 with a more complete collection of his work edited by Seághan Pléimionn in the Gaelic Journal (1884). *'McNamara's writings are numerous in their elegiac, lyric and sonnet style, and several are considered as masterpieces of poetic beauty* (Obituary notice, *Freeman's Journal* 5th November 1810).

The site of this school, along the haul route near Muilleann na Choirce bridge, will be completely destroyed should this development go ahead.

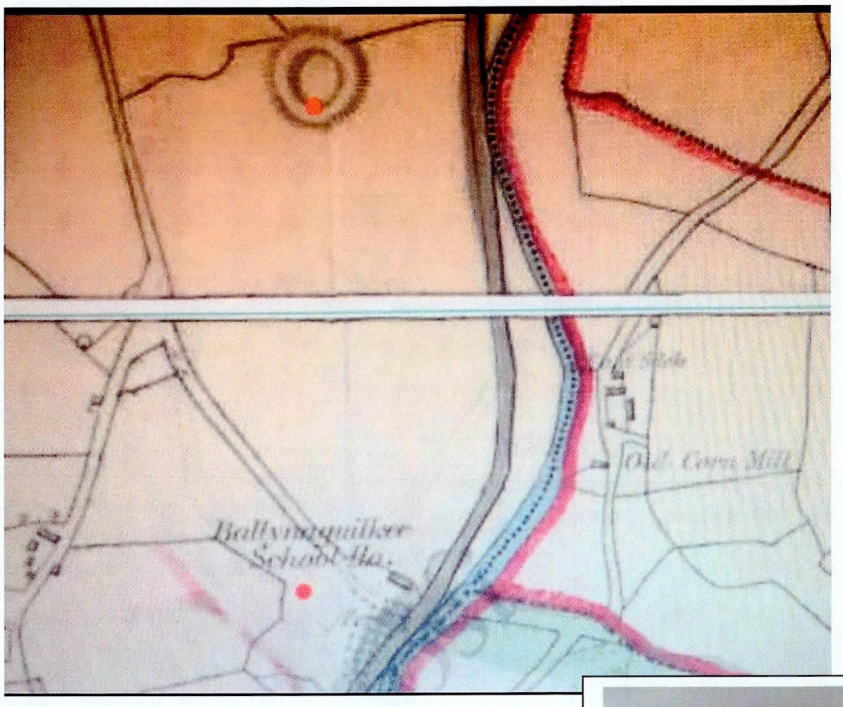
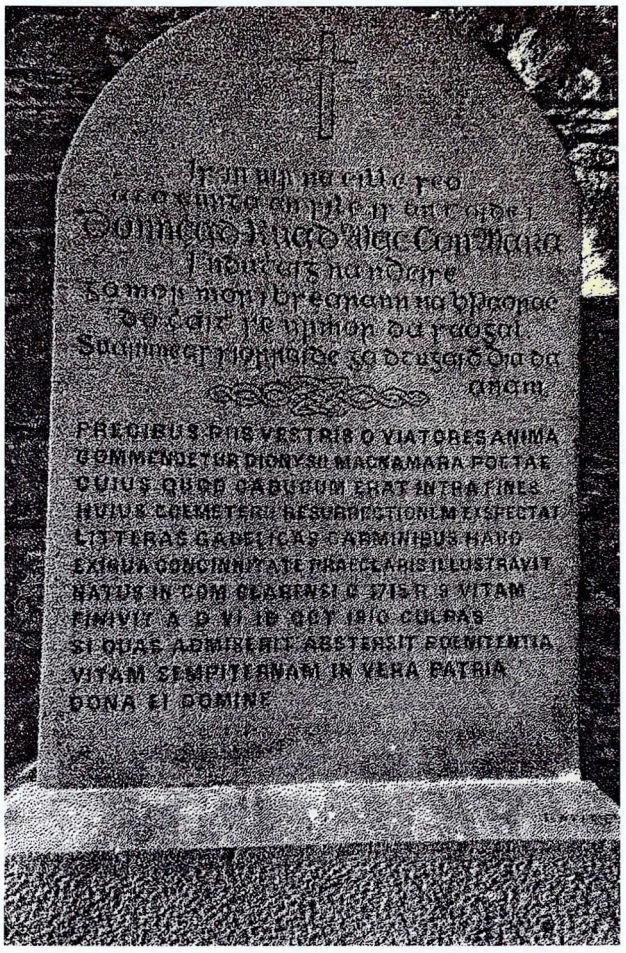


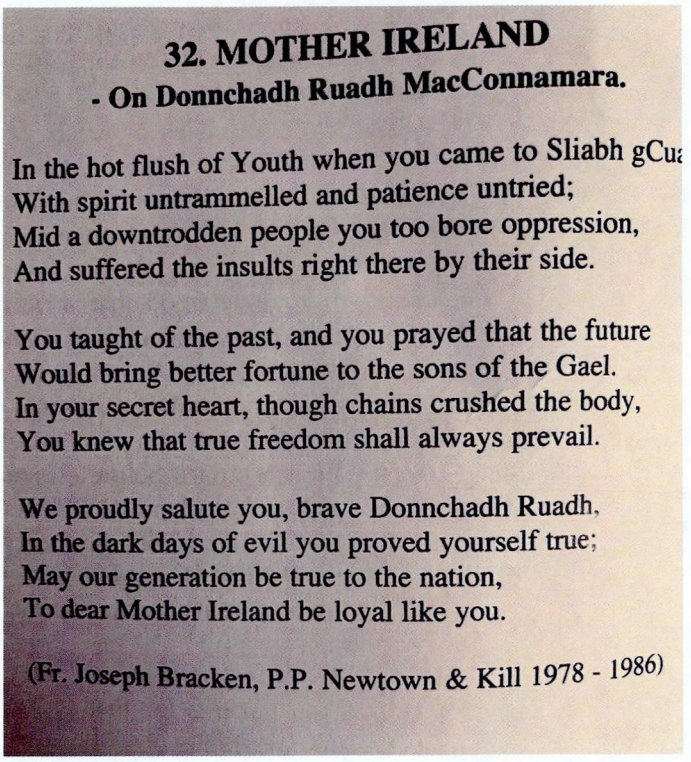
Figure 2 Muilleann na Choirce bridge



Appendix 3

Translation from the Latin by George Sigerson, of the pitaph on Tadhg Gaelach Ó Suilleabháin by Donnchadh Ruadh Mac Conmara.

This is the grave of a poet. O Wanderer, glance here in sorrow:
Famous he was and beloved, weeds shade him now and grey dust.
Woe! He is gone, he is conquered by Fate's invincible arrow –
Yet, hath his spirit, from earth, soared to the stars, 'mid the Just.
Who sings the glory of Erin? Who the heroic achievement?
Lost is our silver-voiced Tadhg, broken the Harp of our Land!
Singing his musical numbers he left us, to mourn in bereavement,
Victor, in triumph, he fled, bearing his gifts in his hand.
Often in praise of the Lord, did his song rise, flow'r-like and vernal,
Sweet now the hymns that he sings, standing mid angels above.
Weep, O ye Muses! Your nursling has gone to the regions supernal –
Dead, our macEochad is dead! Silent are woodland and grove.
Peace, he desired, while on earth: peace henceforth awaits him eternal,
Far in the Father's high home, 'mid the fair Kingdom of Love.



32. MOTHER IRELAND
- On Donnchadh Ruadh MacConnamara.

In the hot flush of Youth when you came to Sliabh gCu
With spirit untrammelled and patience untried;
Mid a downtrodden people you too bore oppression,
And suffered the insults right there by their side.

You taught of the past, and you prayed that the future
Would bring better fortune to the sons of the Gael.
In your secret heart, though chains crushed the body,
You knew that true freedom shall always prevail.

We proudly salute you, brave Donnchadh Ruadh,
In the dark days of evil you proved yourself true;
May our generation be true to the nation,
To dear Mother Ireland be loyal like you.

(Fr. Joseph Bracken, P.P. Newtown & Kill 1978 - 1986)

Figure 3 Donnchadh Ruadh Mac Conmara

Sean Ó Dalaigh 1800-1878

Sean Ó Dalaigh (John O'Daly) was born in Fernane, Lickoran, Co. Waterford (1800-1878). He was an Irish scribe, teacher, translator, bookseller and publisher. A pioneer in promoting the use and advancement of the Irish language in his own time. He authored a prominent grammar of the vernacular (Self-Instruction in Irish) and published similar works by others all of which helped revolutionize the production of handbooks in the area. Another main accomplishment was bringing Gaelic literature to notice. His "Reliques of Irish Jacobite Poetry" gave access to the to the texts of eighteenth-century Irish political verse and the world view reflected in it. O Dalaigh's "Poets and Poetry of Munster" opened up views on post-Classical Irish composition. He founded the Celtic Society, a learned society dedicated to the production of texts in Gaelic, in Dublin during the mid-1840s and the Ossianic Society in 1853. He was an active supporter of the Irish language, and an enterprising publisher of material in the Irish language that had previously circulated only in manuscript form.

His shop in Dublin became a meeting place for Irish scholars and for learned societies such as the Celtic Society (established 1845) and the Ossianic Society (established 1853). He served as honorary secretary of the Ossianic Society and was its publisher. In 1853 he also described himself as agent for the Kilkenny and South East Ireland Archaeological Society and the *Ulster Journal of Archaeology* and ensured that their publications were available for sale in Dublin.

In common with some other booksellers in Dublin in the mid-nineteenth century he was a publisher as well as a bookdealer. In 1846 O'Daly published *Féin-theagasc Gaoidheilge. Self-instruction in Irish or the rudiments of that language brought within the comprehension of the English reader without the aid of a teacher*. In 1849 he edited and published *The poets and poetry of Munster, a selection of Irish songs by the poets of the last century, with poetical translations by the late James Clarence Mangan, now for the first time published with the original music, and biographical sketches of the authors by John O'Daly*. A second edition was issued the following year and reprinted in 1851. The collection contained Irish texts with English translations of eighteenth-century songs. The target audience included the supporters of the Young Ireland movement and readers of *The Nation* who were interested in the Jacobite poetry of the eighteenth century.

John O'Daly began transcribing Irish manuscripts in the years 1824 to 1828, while still living in his home parish of Lickoran, and subsequently at Youghal in 1828–9. He was employed as a bible teacher by the Irish Society for some years and resumed his scribal activities from 1843 (De Brún, 1986, 76). The manuscripts purchased from him in 1869 included short items in his own hand, some of them containing drafts of poems that had been published by him in his anthologies of Jacobite poetry.

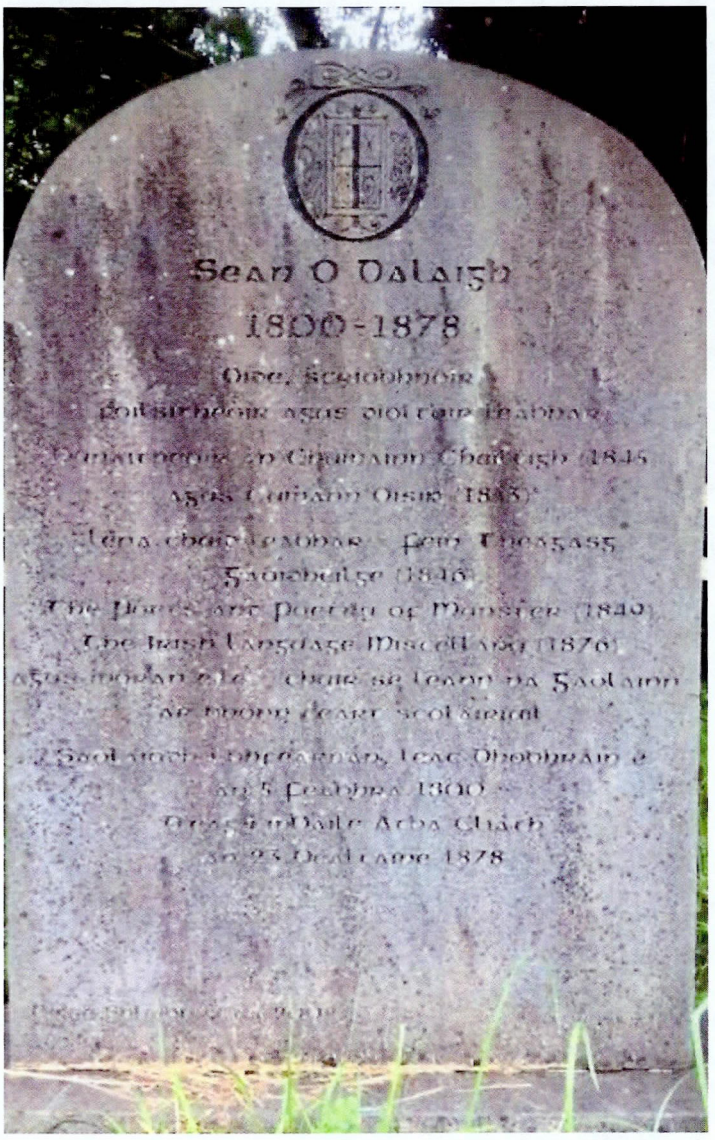


Figure 4 Sean O Dalaigh

Priests and religious of Sliabh gCua

- Fr Michael McGrath 1851-1919 entered the Cistercian Monastry at Mount Mellary in 1857 taking the name Vincent Ferrer.
- Bro. A Morrissey 1852-1888 a native of Monatook
- Fr. William Kiely 1855-1925 entered the Cistercian Monastery at Mount Mellery, was later ordained and ministered in the USA.
- Fr. John Cullinan 1875-1945 became parish priest of his native Sliabh gCua in 1935.
- Fr. John Gleeson 1870-1948 was ordained in 1889 did mission in Dundee Scotland before returning home to minister in Kilgobinet, Aglish, Modeligo and Cappoquin.
- Bro. Thomas Eusebius Ahearn 1873-1948 A native Irish speaker, joined the Holy Ghost Order in 1899, He went to Chevilly in France and later volunteered for missionary work in Gambia.

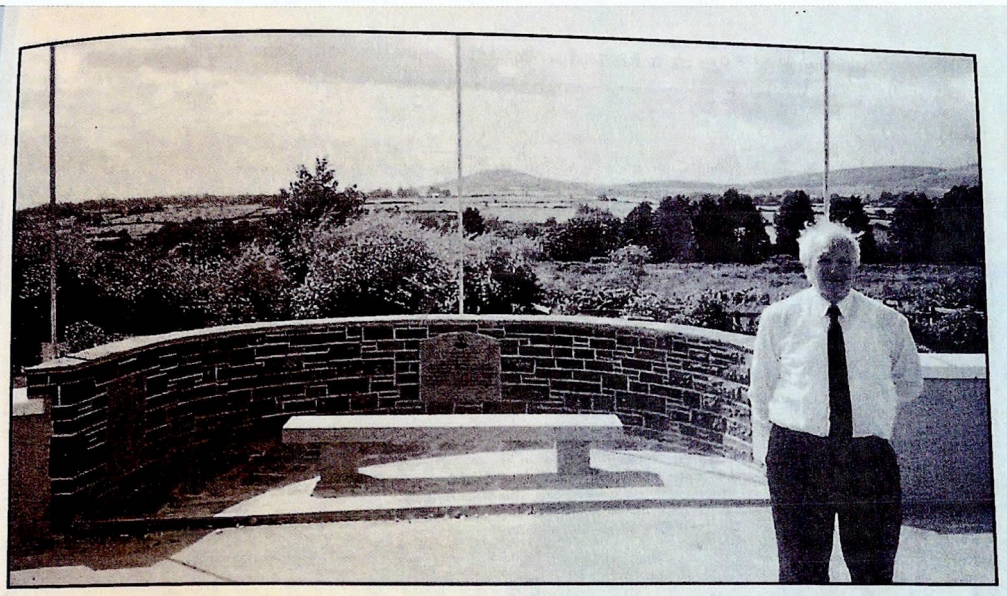
- Fr. Dan Quinlan 1902-1970 ordained in 1929, ministered in Liverpool and Cashel. Served as army Chaplain in Cahir.
- Fr. Tom Power 1889-1971 was ordained in 1915. A lifelong friend of President Eamonn De Valera, served in New York and later returned home during the War of Independence to attend to those killed and injured. He set up the Irish Tanners Leather Industry in Portlaw. A sanctuary lamp, gifted by a number of public figures, carries the signatures of Eamonn De Valera, Senator Sean Goulding and Minister P J Little as well as Kennedy O'Brien and others.
- Fr Tom Ahearn 1903-1973 was ordained in 1929 his temporary mission was in Leeds but returned home in 1933. He was a keen Violinist and was a founder member of the Waterford Festival of Light Opera. A plaque to his memory is in Waterford Cathedral.
- Fr. Pat Power 1907-1973
- Fr. John Flynn 1909-1975 Minister in Bristol and later became parish priest of Chew Manga. He is buried in Sliabh gCua.
- Fr. David Power 1892-1976 was ordained in 1920 ministered in Glasgow and Shieldmuir and later returned to Ireland to minister in Waterford.
- Fr. Paddy Hallinan 1920-2009. Served as a missionary priest in Australia, New Guinea, Singapore, Jakarta and Korea.
- Fr. Jim Kiely OSA 1936-1995 served as an Augustinian missionary priest in Nigeria in the 1960s and later became director of the Irish Bishops Chaplaincy service in Great Britain.

Currently serving Priests and Religious

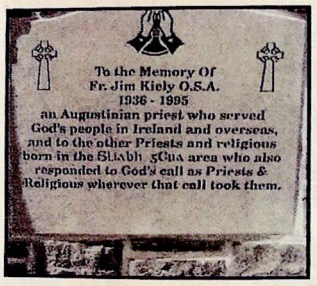
- Fr. Pierce Ahearn Was based in London and now ministers in Waterford.
- Fr Jackie Callinan Was based in Hexham and Newcastle and now serves in Waterford.
- Fr. Bob Downey joined the Selesian Order in Cheshire and visited Victoria, Melbourne and Tasmania.
- Fr. Tony Hickey volunteered for the Brazilian mission fields in 1971, he continues to minister in many remote areas of Brazil where he continues the traditional missionary sprit of Sliabh gCua.
- Fr. Liam Mc Namara was based in Kent and returned to the Archdiocese in 1969. He was appointed Canon and member of the Diocesan Chapter and V.F.

(Priests and Religious of Sliabh gCua, John Power, Litho Press Co., Middleton, Co. Cork

The photograph below shows the Memorial to Fr. Jim Kiely and the deceased religious who were born in the area. The reference to Dyrick Hill is an acknowledgement of the importance of the hill to the local community. On the 19th August 2001, this memorial was unveiled before a large gathering of people from many parts of the world. As an acknowledgement by the people of the area to the sons and daughters of Sliabh gCua who followed the call of Christ and devoted their lives at home and abroad to spreading of the Gospel and the advancement of people in health, education and development.



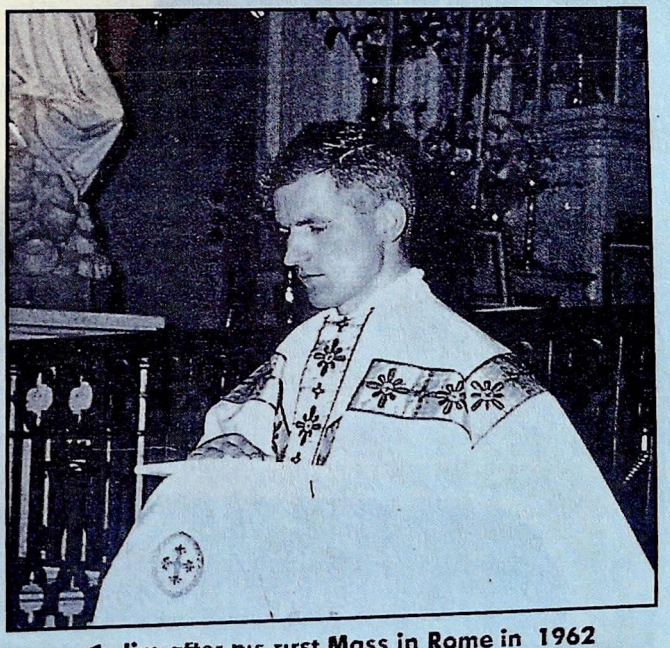
The memorial to Fr. Jim Kiely OSA (1936-1995) at his birthplace in Touraneena, Co. Waterford. In the foreground: John Power, initiator of the project, in the background is the hill 'Dyrick' in the Knockmealdown Mountain Range separating Counties Waterford and Tipperary. Sliabh gCua lies in the valley between the Knockmealdown and Comeragh Mountains.



The inscription on the memorial to Fr. Jim Kiely

local dance teacher Monnie Hallahan provided an exhibition of local dancing and music with fleadh cheoil entertainment in the village of Touraneena which was decorated for the occasion while hundreds of visitors admired the new memorial including former Augustinian colleagues Fr. Ben O'Brien OSA and Fr. Michael Leahy OSA and friends and relatives of the priests and religious listed on the memorial.

Fr. Jim's sisters Sr. Ann Kiely, Superior General of the Franciscan Missionaries, Sr. Angela Kiely and Sr. Marie Kiely were present.



Fr Jim after his first Mass in Rome in 1962

Ballynaguilkee Lower Church

"The Parish of Lickoran: Situation: this Parish is situated in the Barony of Desies, without Drumfineen, and is bounded on the north by the Parish of Sliabh gCua or Seskenane; on the east, south and west by that of Modelligo and on the north west by the Co. of Tipperary. Name: Is now pronounced by the natives Lic Uarain but they think it means St. Deóran's Stone. It is my opinion however, that the name is derived either from St. Odranus or Furaran, but nothing can at present be gathered from tradition on the subject. The old church which bears the name was situated in a glen in the townland of Farnaun, but it is all destroyed except about two or

three feet of the height of its walls, from which it can be gathered (determined) that it was an exceedingly rude and by no means ancient building , measuring fifty one feet in length and twenty feet nine inches in breath and that the walls were three feet think and built of large mountain grit stones cemented with clay mortar. Its graveyard is tilled and now growing potatoes. It sometimes goes by the name of Teampull Uarain.
(J O' Donovan & Others, Ordinance Survey Letters,1841, listed no. 105).

OS 13:14:3 (443,89)
'Church (Site of), Stone Cross (Site of)' OD 400-500 21833,10495
Church (site) In pasture on level ground at the top of a E facing slope. Early ecclesiastical site with traces of an oval enclosure (dims. 63m N-S; 46m E-W) visible as a scarp N-S and a slight dip S-W. The perimeter is incorporated into a field bank W-N. The base of the stone cross (dims.c. o.35m x o.25m; H 0.23) with interlace and fret patterns, and part of the shaft are now missing (Harbison 1992a, 24). (pg. 167 AICW)

The developer refers to this ancient site as;

> *1355 (haul route) Fernane Lower*
> *OS 22:2:5 (327, 458) 'Church (in Ruins)' OD 200-300 21713, 10244*
> *Church On the S facing slope of a W-E valley. Marked 'St. Oran's Church (in ruins) on the first ed of the OS 6 inch map. The overgrown foundations of a rectangular structure (dims. 19.5 m NW-SE; 8.5 m NE-SW) traditionally associated with a children's burial ground, survive but no enclosure or grave markers are visible There is a record of a Bullaun stone or stoup (Power 1897b, 77-8) but it can no longer be found.*
> *Bullaun stone= decorative stonework which was mobile and could be moved off site for various reasons. (See photo. The hollowed out basin or basins in the surface of a stone (pg. 252 AICW)*

Many of these ancient churches leave no trace of their existence because they were early Celtic ecclesiastical sites and as such most were pre-invasion churches. Therefore it is not surprising that no trace was left. Afterall they were made of wattle.

Locating the High Cross

The exact location of the High Cross is uncertain; while one is almost certainly the correct location many locations are suggested by local people. I large number of archaeological sites must be noted to emphasise the importance of the area as a historical landscape. The author must note that an elderly local farmer informed that the cross was buried in a field as the local farmers did not want any more officials coming down from Dublin disturbing the peace and tranquillity of the countryside. No further details could be ascertained. are not to be taken at face value, they nonetheless demonstrate the importance of a thorough investigation before any work can commence.

Rian Bó Phádraig (The ancient Highway of the Decies) (512 RMR)

(Track of St. Patrick's Cow)

In the general subject of early Irish roadways it needs to be stressed that roadways differed greatly from our understanding of modern roadways of today. In early Ireland the line of communication was a mere 'Slíghe' or 'Rian' which could be more accurately be described as a track. The Irish term 'bóthar' incorporating the term 'bó', suggests a cattle track (Power, 1957, p.110). It appears that from early Christian times, there were main roads from the provincial capitals to outlying parts of the province and so St. Declan is represented a driving his chariot from Ardmore to Cashel. This then laid the foundation for the "most venerable highway yet accurately traced out in Ireland" (Power, 1957, p. 112). Rev. P. Power, in his book 'The Rian Bó Phádruig, The ancient Highway of the Decies' (1957) accurately traced the 'Rian' or highway from Cashel stating that in places it has degenerated into a mere by-road, but the second section is 'demonstrable the whole section through'. After crossing the river Tar at the ford the "Rian shaped its course for the mouth of the gap through the Knockmealdown Ianciently Slieve Gua) range" (Power, 1957, p. 116). In a further section Sliabh gCua is again mentioned in a Newcastle track in St. Declan's 'Life'. On more than one occasion the saint is recorded to have ridden in his chariot over Sliabh Gua towards Cashel". (Power, 1957, p. 128). In his book Rev Power mentions the numerous native Irish-speaking residents he met along the way whose traditional knowledge assisted him greatly in his quest.

The earliest written account of the story of St. Patrick's cow and the Rian Bó Phádraig dates to the 18th century when it was recorded by antiquarian Charles Smith in 1746. He documents that local people referred to the Rian Bó Phádraig as a double trench in Waterford which were the remains of an ancient highway linking Cashel and Ardmore. In 1746 the trenches were clearly visible in Waterford. The road itself runs from Cashel through Ardfinnan, crossing the river Tar near Goatenbridge, heading south over the Knockmealdown mountains into Co. Waterford, passing to the east of Lismore, crossing the River Blackwater and on to Kilwatermoy. Parts of this road is now incorporated into the modern walking route St. Declan's Way.



According to Smith (1746), when St Patrick was in Cashel, a cow belonging to St Patrick had her calf. The calf was stolen and carried off towards Ardmore. The cow then pursued the calf and with her horns made a double trench in the ground, the whole way. Another variation of the legend is that the cow was stolen and she returned to Cashel ploughing up the ground as she went. Richard Brash (1877) also wrote of St Patrick's favourite white cow whose calf was stolen by people from Ardmore.

> *It is fabled that St Patrick when living at Cashel had a favorite white cow, whose calf was stolen and carried off to Ardmore; the animal, furious at its loss, followed the robbers, tearing up the ground with its horns as it rushed along, and forming two trenches which can be traced in many places to the present day. This track is name by the peasantry, Rian-bo-Phadrig, that is, the track of Patrick's cow.*
>
> Brash also makes reference to some other variations of the legend which stated that
>
> *...the cow was stolen from Cashel and brought to Ardmore, from, whence it made its escape, and facing homewards, tore up the tracks....*

Power in 1905, also recounted the folklore and during his fieldwork on this ancient track he discovered that some fields where the route passed through were called by names associated with the Rian Bó Phádraig.

Knockannanagh OS 12:10:4 (272, 222) 'Rian Bo Phadraig' OD 600-1800 20677, 10629
Road On the S-facing slope of the Knockmealdown Mountains. The 'Rian Bo Phadraig' is the surviving remnant of a roadway which connected Cashel and Lismore. Its course has been traced by Power (1905), and within Co. Waterford it extended in a straight line from a pass on the summit of the Knockmealdown Mountains to St. Carthage's monastery at Lismore (1411). The only surviving section extends from the Clogheen-Cappoquin road at the foothills of the mountains, through Reanabarna and Knockannanagh townlands, to the summit of the pass. It is visible as a stream-bed or as a sunken roadway (Width 3m; Depth 1M).

Saint Declan's way is now a National trail, a modern pilgrim walking route, an Irish *Camino*. For the past 1500 years the path follows almost the same route as the Rian bó Phádraig and it takes pilgrims from Cashel to St. Declan's Monastery, Holy Well and grave in Ardmore. It is at a particular point, the most scenic stage passing over the Knockmealdown mountains, that pilgrims can become one with nature and find true inner peace. Away from the hustle and bustle of daily life, with only the sound of the wind and wildlife, free from disturbance pilgrims can enjoy the tranquil beauty of the stunning landscape. The sight and presence of

wind turbines reaching 185m into the air would effectively destroy this wonderful recreational amenity.



Figure 5 route of The Rian Bó Phádraig

Archaeology & Architectural Heritage

It is important to point out at the outset that, in the planning application in relation to archaeological sites the word 'levelled' is widely used whilst also admitting that

> *.....the Mesolithic period (7000–4000 BC) when groups of hunter- gatherers lived on the heavily wooded island..... They did not construct any settlements or monuments that have left any above ground traces although their presence in an area can often be identified by scatters of worked flints in ploughed fields or sub-surface traces of their settlements revealed during earth-moving undertaken as part of development works.*

In relation to the Neolithic period (4000-24000 BC), the beginning of farming and more permanent settlement structures the developer further postulates that;

As a consequence of the more settled nature of agrarian life, new site-types, such as substantial rectangular timber houses, field systems and various types of megalithic tombs, begin to appear in the archaeological record. 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.

The developer is incorrect in this regard. Hut sites such as that mentioned below may date from 8000 BC, Ogham stones date from the 4th century and the cairn on the summit of Dyrick Hill possibly dates from 2000BC, pottery found in Curradoon could date from 3200 BC, linear earthworks date from the Iron Age.

It is unsurprising that very few prehistoric habitation sites have been found in comparison with the number of known burial and ritual monuments. This is due to the fact that the houses were generally flimsy structures made of wood or other perishable materials and not normally defended by large walls or banks. Such habitation sites are usually found only by accident during the excavation of some other monument or as a result of the finding of small artifacts during ploughing or other land disturbance. Any works that involve considerable disturbance of the ground surface such as drainage and land improvement works, quarrying, road and building construction and pipe laying can uncover hitherto unknown sites of all types including monuments that had been totally levelled prior to the first edition of the Ordnance Survey maps. All such finds should be reported without delay to the Chief Archaeologist (address below).
Another area of work where interesting discoveries can be made is in the cutting of turf both in the raised bogs common in the Midlands and the blanket bogs covering much upland terrain especially in the West. Toghers (wooden trackways across bogs) are the main monument type found in raised bogs but blanket bog can cover many types of monuments including megalithic tombs, cairns, stone circles, house sites and field walls. A massive Neolithic field system associated with a court-tomb and habitation sites was discovered in North Mayo during turf cutting.



Dyrick Wind Farm

Archaeological Inventory of Dyrick Hill & Broe Mountain

It is clear from the above Satellite image of the proposed Dyrick Hill wind farm and supplied by the developer, that the area is indeed littered with numerous national monuments indicating that it was very well populated since the early Bronze age (2400-500 BC and Iron Age (500BC-Ad400). Environmentally speaking the upland area holds significant ecological value.

Surveys by Waterford county council have led to its designation as visually extremely vulnerable. The proposed construction areas within the Site extend into seven townlands: Broemountain, Scartmountain, Corradoon, Ballynaguilkee Upper, Dyrick, Lisleaghmountain, and Lickoranmountain.

The following archaeological sites can be found in the Dyrick/Broemountain area. These monuments are protected under the National Monuments Acts 1930-2004. The National Monuments Act (1994) made provision for a Recorded Monuments register (RMR) which, once it has been displayed in a county and lodged locally in libraries for consultation, has an important status. Inclusion in the RMR confers on a site the protection formerly provided by the Listing Orders issued from time to time by the National Monuments Service.

The Site itself contains two prehistoric monuments of likely Bronze or Iron Age date, both of which comprise extant standing stones (WA013-020002- and WA013-021----). The surrounding 1km study area contains an additional standing stone (WA013-008----) and a Bronze Age pit-burial (WA013-042----). A review of recorded monuments within 10km of the

Redline Boundary revealed the presence of nine lithic monument types of likely Bronze Age origin, which were constructed to incorporate potential visual alignments across the landscape which related to ritual aspects of their original function. These external monuments comprise one unclassified megalithic structure, four stone rows and four standing stones pairs. In addition to the above there is one ringfort (WA013-022----) within the Redline Boundary while an additional four examples are located within the surrounding 1km study area (WA013-024-----, WA013-025- ---, WA022-002---- and WA022-004----) and these attest to the presence of farming communities within the area during the early medieval period. 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.

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. All of these are are afforded legal protection by their inclusion in the Record of Monuments and Places.

In relation to the first monument listed below, Dyrick Hill Cairn, the developer states;

> *A small, previously unrecorded, stone cairn feature of archaeological potential was identified during a fieldwalking survey of the Site carried out as part of the assessment. This feature is located c.60m to the southwest of the nearest section of the Turbine 13 hardstand and will not be directly impacted. The potential exists for the presence of sub-surface archaeological remains within the Development area. While the existence as well as location, extent and nature of such potential unrecorded, sub-surface archaeological remains are indeterminable the potential exists for direct, negative impacts on any examples that may exist within proposed development areas, and this will require mitigation. (P.39, Chapter13).*

The developer's contention that the potential exists for direct, negative impacts is contrary to the National Monuments Act 1930-2004 and to the Planning and Development Act. To suggest that the erection of a 185m turbine with a foundation base of 22m in diameter beside an ancient cairn (Early Bronze Age) does not stand up to scrutiny.
A similar important archaeological site, located on Dyrick north, is listed on the OS 6-inch sheet and is listed in the *'Archaeological Inventory of County Waterford'* (page 12) and published by the Archaeological survey of Ireland. This cairn is protected because if its

inclusion in the RMR (confers on a site the protection formerly provided by the Listing Orders issued from time to time by the National Monuments Service) Its inventory number is 77 and the townland is listed as Dyrick. The 10 figure Irish national grid reference is 20757, 10568. It further states that it is located on the summit of Dyrick Hill, has a diameter of 11m North-South and a height of 0.6m of fairly large stones, none of which are structural. There is a hollow at the Western edge. The monument was last visited on 2-10-1993.

Cairns and Ring-Cairns

Circular mounds or Cairns, such as that located on the summit of Dyrick Hill, were composed wholly of stone although they may have acquired a covering of humus, down through the years, which can support vegetation. They varied greatly in size and because of their usual siting on high mountainous terrain the available material, which was stone, was utilised. They are most likely to be Early Bronze Age or Iron Age in date and have been erected to cover prehistoric burials. These burial mounds may cover any one of a number of different types of burial (Passage-tombs, or other Neolithic or Early Bronze Age burials. The practice of burying in cists, box-like structures made of stone slabs, is first found in the Neolithic period. These large cists containing one or two burials accompanied by decorated Neolithic pottery are found covered by round mounds and to date occur only in the southern part of the country. Early Bronze Age cists are found also under mounds but are mostly smaller. Most of them are Amorphous masses of stone, particularly those on the Comeragh and Monavullagh Mountains, but sometimes they contain 'very obvious cists and elements of a kerb like that on Knocknafallia (Glennafallia 80) in the Knockmealdown Mountains' (pg 8 AICW). Furthermore, the closest parallels for the ring-cairns and cairn circles of Co Waterford are found in Wales (Lynch 1979) where some have been excavated producing small amounts of cremated bone without any grave goods. On the basis of the Welsh evidence both ring-cairns and cairn circles would date to the Early Bronze Age (ibid).

Similarly the Standing Stone located in Ballinaguilkee Upper, ref 21534,10567, was last visited on 10-05-1990 by fieldworkers and was found to be intact.
Monuments are only listed as sites when "a monument of known type existed once but the visible evidence of it has been removed, although archaeological stratigraphy pertaining to it will still survive beneath the surface" (Pg. xi AICW). 'Possible' is used where some doubts exist about the classification, or a monument is so eroded that a positive classification cannot be given, while 'tradition' records reports of antiquities which could not be substantiated by the fieldworkers to date or through reliable authentic accounts in the literature. The term 'possible site' is a precise location, but the true nature of the monument which once existed there cannot be ascertained".
The location map (see below) shows the spatial distribution of the monuments. A black dot indicates that the monument is more or less intact, a circle with a horizontal line is a located site which is either not visible at ground level or in a very degraded condition. An outer circle means that is more than one site and entry for that location. Contrary to the developers contention that

There are four recorded archaeological sites within the Site and an additional fifteen examples within the surrounding 1km study area, the majority of which are either wholly or partially levelled

It is evident from the below map that almost all of the monuments around Dyrick/Broe area are intact. And it must be remembered that levelled archaeological sites, the few that are indicated, while not retaining any surface expressions of high value do have the potential to retain sub-surface remains which may be of high values.

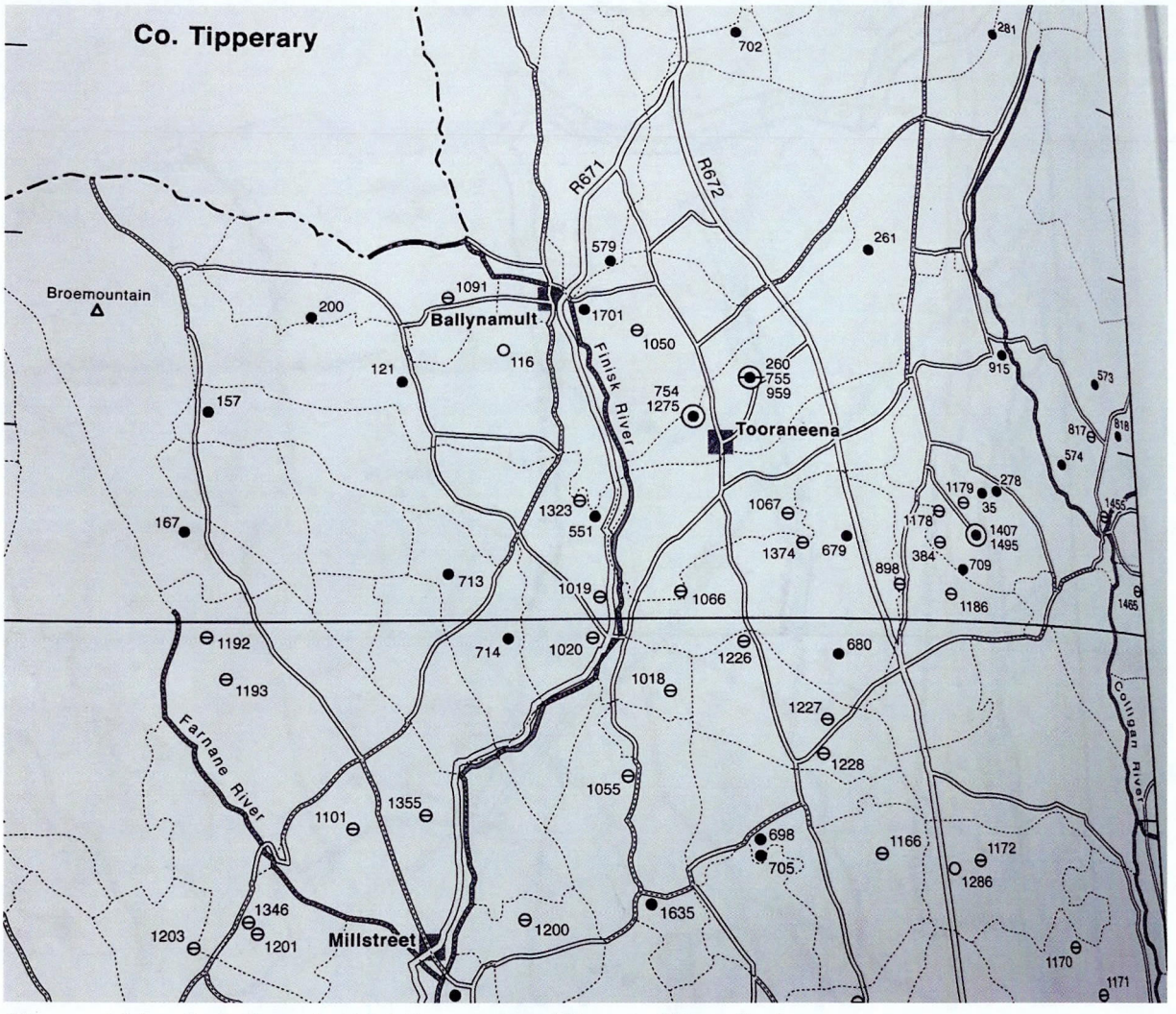


Figure 6 Map 9 Archaeological Inventory of County Waterford

Townland	Monument type	Unique inventory number NMI monument number/RMR	Within windfarm	Within 1km
Dyrick Hill	Cairn	RMR 77	Yes	
Dyrick, Broemountain	Standing Stone	WAO13-021	Yes	
Broemountain	Enclosure	WAO13-052	Yes	
Ballinagulkee Upper	Standing Stone	WAO13-020002-	Yes	
Doon	Standing Stone	WAO13-		Yes
Doon	Standing Stone	WAO-008		Yes
Doon	Ring Fort-rath	WAO13-009-		Yes
Lisleagh	Ring fort-rath	WAO13-022-	Yes	
Ballinaguilkee L	Ring fort	WAO13-024		Yes
Ballinaguilkee L	Ring Fort	WAO13-025		Yes
Corradoon	Pit-Burial	WAO13-042		Yes
Priesttown	Ogham Stone	TSO91-007		Yes
Lisleagh	Ringfort/Hut sites	WA022-003001		Yes
Ballinaguilkee	Church	WA013-023001		Yes
		WA006-022002		
	Standing Stone pair	TS091-005		
Ballinaguilkee Upper	Hut Site	WAO13-020001-	Yes	
Lyrattin	Enclosure	WAO22--001		yes
Farnane	Church	WA022-014001		Yes
Farnane	Graveyard	WA022-014002		Yes
Lyrattin	Ring Fort	WAO22-002		Yes
Ballinaguilkee	Ring Fort	WAO13-004		Yes
Middlequarter	Hut Site	TSO91-009010		
Middlequarter	Hut Site	TSO91-009011		
Clashganny West	Cairn	TSO91-009002		
Ballinaguilkee	Ogham Stone	NPL		yes
Dyrick Upper	Linear Earth	511 RMR	YES	
Ballinaguilkee	High Cross	WA013-023002		Yes
Ballinaguilkee	Ecclesiastical enclosure	1323 RMR WA013-023003		yes

Dyrick *Rian Bó Phadraig*	road	512 RMR	Yes	
Ballinaguilkee	Earthworks	1019 & 1020 RMR	Yes (Haul route)	
Ballinaguilkee	Ringfort	551RMR		
Ballinaguilkee	Standing Stone	157 RMR	Yes	
		WAO13-008		

Figure 7 Monuments of Dyrick Hill and Broe Mountain and surrounding landscape

Inclusion in the RMR requires landowners, their agents or tenants, to provide two months' notice to the National Monuments Service of any intention to conduct work on or near any site on the RMR. The onus is on landowners to inform themselves of the existence of antiquities on their property and to proceed accordingly. The RMR for Co. Waterford was issued in December 1995, and is available for consultation through the Library Service. There is no record of any notice being provided to the National Monuments Service in respect of this planning application.

Hut site

A structure, such as that located in Ballinaguilkee Upper, is usually discernible as a low, stone foundation or earthen bank enclosing a circular, oval or sub rectangular area, generally less then 5m in maximum dimension. The remains are generally too insubstantial to classify as a house but the majority probably functioned as dwellings. These may date to any period from prehistory (c. 8000 BC - AD 400) to the medieval period (5th-16th centuries AD). The developer proposes;

> *A programme of tree felling within the environs of Turbine 6 to incorporate a bat buffer will extend into the environs of the recorded location of a levelled hut site (WA013-020001-) (**Figure 13.3**). No removal of tree root bowls will occur within the designated zone of notification around this hut site and the tree stumps in this area will be left in situ to ensure that no direct impacts on any sub- surface archaeological remains associated with the hut site occur.*
>
> *The proposed felling methodology in this area will entail the use of tree-cutter plant machinery which will brace, cut and then lift the trees away from the location. This methodology will avoid any potential direct impacts resulting from trees falling on the location of the hut site as well as a standing stone site (WA013-020002-) located within a green field area 30m to the west of the edge of the plantation.* (Planning application Chapter 13 p. 40)

It should be noted that levelled archaeological sites while not retaining any surface expressions of high value do have the potential to retain sub-surface remains which may be of high values. However, while this cannot be ascertained without recourse to archaeological

excavation, such potential high value attributes are unlikely to be subject to effects in the absence of direct impacts. This site also contains a Standing Stone.

Class: Hut site
Townland: BALLYNAGUILKEE UPPER
Scheduled for inclusion in the next revision of the RMP: Yes
Description: Situated on a SW-facing slope of Mweeling Hill, with the col between Broemountain and Mweeling Hill c. 200m to the NW. A grass-covered circular platform (diam. c. 12m; H 0.2m) with some stones on the perimeter abuts a field bank. A standing stone (WA013-020002-) lies c. 30m to the W. Compiled by: Michael Moore Date of upload/revision: 12 November 2010

Pit-burial

A pit-burial can vary from an oval or sub-rectangular pit large enough to accommodate a crouched inhumation to a small circular pit with only space for a deposit of cremated bone or a cinerary urn. They date to the Bronze (c. 2400-500 BC) and Iron Ages (c. 500 BC - AD 400). Such a burial site was located in Curradoon while a farmer ploughed his field, which would indicate that it is more than likely that others may be present in the area.

Ringfort- rath

A roughly circular or oval area surrounded by an earthen bank with an external fosse. Some examples have two (bivallate) or three (trivallate) banks and fosses, but these are less common and have been equated with higher status sites belonging to upper grades of society. They functioned as residences and/or farmsteads and broadly date from 500 to 1000 AD. See Ringfort - cashel for stone equivalent.

Class: Ringfort - unclassified
Townland: LYRATTIN
Scheduled for inclusion in the next revision of the RMP: Yes
Description: Marked as a subcircular embanked enclosure (ext. diam. c. 40m N-S; c. 35m E-W) on the 1840 ed. of the OS 6-inch map. Situated in pasture on a SE-facing slope, it is not visible at ground level. The above description is derived from the published 'Archaeological Inventory of County Waterford' (Dublin: Stationery Office, 1999). In certain instances the entries have been revised and updated in the light of recent research. Date of upload/revision: 23 December 2008

A roughly circular or oval area surrounded by an earthen bank with an external fosse (see Ringfort - rath) or a stone wall (see Ringfort - cashel). The term Ringfort - unclassified is used in instances where the surviving remains are insufficient to determine whether the monument was originally a rath or cashel. They functioned as residences and/or farmsteads and broadly date from 500 to 1000 AD.

Standing stone

A standing stone is a stone which has been deliberately set upright in the ground, usually orientated on a north-east-south-west axis, although other orientations do occur, and varying in height from 0.5m up to 6m, usually marks a burial site. As well as prehistoric burial markers, they also served as commemorative monuments, indicators of routeways or boundaries and date from the Bronze and Iron Ages (c. 2400 BC - AD 500), with some associated with early medieval ecclesiastical and burial contexts (c. 5th-12th centuries).
There are a number of Standing stones to be found in the Sliabh gCua area but the most interesting one is located at Dyrick. According to Fourwinds "the most interesting standing stone in a group concentrated around Dyrick" (Fourwinds, 2007, 106). The stone resembles a skyscraper. Another stone can be found a little further away at Mwelling which stands at 1.2 metres. As mentioned previously a chieftain who gave his name to the area, gCua, was killed in this general area and therefore it may be concluded that one of these stones could be the resting place of this chieftain died and was buried.

Class: Standing stone
Townland: BROEMOUNTAIN (Decies without Drum By., Lickoran Par.)
Scheduled for inclusion in the next revision of the RMP: Yes
Description: Situated in a clearing in a coniferous forest on the E-facing slope of a col between Dyrick Hill c. 500m to the SE and a N-S spur c. 350m to the NW. This is a conglomerate stone with a rectnagular cross-section (dims. 0.7m x 0.25-0.5m; H 1.8m) oriented NE-SW. The top of the stone is damaged.

Class: Standing stone
Townland: BALLYNAGUILKEE UPPER
Scheduled for inclusion in the next revision of the RMP: Yes
Description: Situated on a SW-facing slope of Mweeling Hill, with the col between Broemountain and Mweeling Hill c. 250m to the NW. This is a sandstone monolith with a subrectangular cross-section (dims. 0.5m x 0.35m; H 1.6m) oriented NE-SW. The stone had fallen over by 2010. A possible hut site (WA013-020001-) lies c. 30m to the E.
The above description is derived from the published 'Archaeological Inventory of County Waterford' (Dublin: Stationery Office, 1999). In certain instances the entries have been revised and updated in the light of recent research. Compiled by: Michael Moore

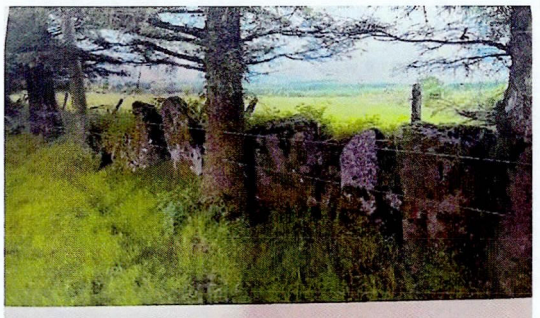
*There are four recorded archaeological sites within the Site and an additional fifteen examples within the surrounding 1km study area, the majority of which are either wholly or partially levelled (**Table 13.5** and **Figure 13.1**). The construction phase will involve ground works at a distance of 30m from the current setting of standing stone (WA013-020002-) and the recorded location of a levelled hut site (WA013-020001-) which are located to the south of Turbine 6 (**Figure 13.1**). As previously noted, the standing stone was re-erected at its existing location in recent years and the Database of Irish Excavation Reports contains no record of any archaeological supervision of this work. The construction phase will result in a negative, slight-moderate, temporary, indirect impact on the current setting of this re- erected stone during the construction phase. The location of the levelled hut site is now occupied by the margins of a commercial forestry plantation and no surface traces were noted during the field surveys carried out as part of this assessment. The construction phase, including tree felling within the adjoining forestry plantation, will result in a negative, slight, short-term, indirect impact on the recorded location of the levelled hut site during the construction phase. There are no other recorded archaeological sites located within 60m of any proposed development areas within the Site and the construction phase will not result in any other predicted indirect impacts on the known archaeological resource.*

(chapter 13, Pg42)

Whether levelled or not these sites need to be properly investigated before any possible archaeological artifacts are destroyed. To carry our such large scale works a mere 30m from such ancient sites does not stand up to scrutiny. There is potential unrecorded, sub-surface archaeological resources within the footprint of proposed construction locations. The proper and adequate recording of this resource can only be fulfilled by a full archaeological excavation.

Stone Rows

Stone Rows are simply standing stones but they often range from two to seven standing in a row. The sizes of the stones can vary. In the Sliabh gCua area there are two separate sites. The first is in Knockboy where three stones are standing in a field with a third found lying on the ground. The row is aligned northeast to southwest with the tallest stone in the Southwest. The smallest upright stone is 60cm and the tallest is 1.5 m. Another stone row is located in Reanadampaun and the legend to these is found elsewhere in this document (Keane, 2008)



The Tampauns.

Figure 8 The Tampauns

Enclosure

An area defined by an enclosing element (e.g. bank, wall, fosse, scarp), or indicated as such cartographically, and occurring in a variety of shapes and sizes, possessing no diagnostic features which would allow classification within another monument category. These may date to any period from prehistory onwards. Enclosures with a diameter greater than 70m should be classed as Large Enclosure.

Class: Enclosure
Townland: BROEMOUNTAIN (Decies without Drum By., Lickoran Par.)
Scheduled for inclusion in the next revision of the RMP: Yes
Description: At the base of a NE-facing slope in upland terrain, in pasture, overlooking a valley to the E. Monument identified on Bing Maps http://binged.it/14YWrv5. A circular area (diam. 19.8m) defined by a broad, flattened bank (int. H 0.25-0.35m; ext. H 0.15-0.6m; Wth at top 2.5m; overall Wth 7.5m) which is built into the hillslope in the uphill SW sector. There is no well-defined entrance, though there is a dip in the flattened

Class: Enclosure
Townland: LYRATTIN
Scheduled for inclusion in the next revision of the RMP: Yes
Description: Marked faintly as a small feature (diam. c. 20-25m) on the 1840 ed. of the OS 6-inch map. Situated in pasture on a S-facing slope, it is not visible at ground level. The above description is derived from the published 'Archaeological Inventory of County Waterford' (Dublin: Stationery Office, 1999). In certain instances the entries have been revised and updated in the light of recent research. Date of upload/revision: 27-08-2009

Ballinagulkee High Cross

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 what, I believe, identify as a prior church. This site is significant because it may be evidence of the passage of Máelsechnaill (the Harbison paper). While there was, according to historians, a "Knockmealdowns highway" via the Vee, they think that Máelsechnaill cut through the mountains from the Suir river via our side, which could explain the high cross base being found in Ballynaguilkee. MáelSechnaill was a high king and it is believed that he passed by Ballinaguilkee. The Harbison papers compares the high cross base found in Ballynaguilkee to a high cross from Cashel and the Ahenny High Crosses, so this is significant.

Cairn

Class: Cairn - ring-cairn
Townland: CLASHGANNY WEST
Scheduled for inclusion in the next revision of the RMP: Yes
Description: On level ground in undulating, upland, boggy terrain on Barranacullia hill in the Knockmealdown mountains. This is part of a complex of enclosures (TS091-009001-; TS091-009007-; TS091-009008-; TS091-009009-; TS091-009012-), hut sites (TS091-009003-; TS091-009004-; TS091-009006-; TS091-009010-; TS091-009011-; TS091-009015-), clearance cairns (TS091-009005-) and a field system (TS091-009013-) identified by Diarmuid O'Keeffe, 1996. Circular area (int. diam. 8.4m N-S; c. 7.2m E-W; ext. diam. 14.4m N-S; c. 13.6m E-W) enclosed by a low bank with internal revetment / kerbstones (Wth 3.4m; H of bank 0.4m; H of kerbstone 0.67m). The best section of kerbing is in the SE quadrant. There is a gap (Wth 3.5m) in the bank in the E quadrant. Compiled by: Jean Farrelly Date of upload: 25 February 2014

Class: Cairn - ring-cairn
Townland: CLASHGANNY WEST
Scheduled for inclusion in the next revision of the RMP: Yes
Description: On level ground in undulating, upland, boggy terrain on Barranacullia hill in the Knockmealdown mountains. This is part of a complex of enclosures (TS091-009001-; TS091-009007-; TS091-009008-; TS091-009009-; TS091-009012-), hut sites (TS091-009003-; TS091-009004-; TS091-009006-; TS091-009010-; TS091-009011-; TS091-009015-), clearance cairns (TS091-009005-) and a field system (TS091-

The Ogham-Inscribed stones

Ogham stones can be upright monoliths or recumbent slabs, onto which ogham script has been incised. Ogham script consists of groups of 1-5 parallel lines and notches cut along the side or across the edge of a stone to represent the sounds of the Irish language. It is usually read up the left angle. The inscription gives a person's name (usually male) and immediate antecedent/s or tribal ancestor. The stones may have functioned as memorials, grave markers or territorial markers and date from the late 4th to the early 8th century AD.

Ogham: Our earliest written source of the Irish language, the oldest documentation of Irish personal names, indeed the earliest tangible evidence of Irish scholarship and learning, the Ogham inscriptions holds a place of considerable importance in the history of Irish letters *(Ogam Stones, Damian McManus, Cork university press2004)*
We will probably never know exactly when, where or why this particular script and its unique alphabet were devised, nor what inspired them, but we do know that from the old Irish period (seventh-ninth century) until the demise of the native schools of Classical Modern Irish (seventeenth century) the Ogham system was the framework for the study of Irish letters and was regarded a uniquely Irish.

"Five-sixths of the native inscriptions, two-thirds, or thereabout, of all the known inscriptions hail from south-west Ireland (Kerry, Cork and Waterford) (The Ogham Stones, University College Cork, P. Canon Power, professor or archaeology, 1932). This strongly suggests that the script had its origin in south Munster and all inscriptions, except for a few in Scotland, are in a very early form of Irish—the earlies form known—antedating the oldest gloss, or parchment text, by some centuries. On the whole it looks as if the script had remained in use for about two centuries and a half, that is from the mid fifth to the late seventh century. They are pagan and Ogham letters ceased with the growth of Christianity but they are of immense antiquity in Ireland, probably dating from the stone age.

Landslides are common in areas of peat, rock near surface and in fine to coarse range materials (such as glacial tills), areas which are found within the proposed wind farm area. The Landslide Susceptibility map indicates variable landslide susceptibility within the wind farm boundary area, including areas of 'Moderately High' to 'High' susceptibility. Therefore the potential exists for these to be lost and that unrecorded, sub-surface archaeological resource within the footprint of proposed construction locations may be lost.

> *The Development will result in localised direct impacts on two field boundary banks that form sections of townland boundaries between Lisleaghmountain and Lickoranmountain and between Lisleaghmountain and Dyrick. An inspection of these features revealed that they are similar in form to other field boundaries in surrounding fields and do not contain any notable attributes. The construction phase will result in direct, permanent, low magnitude, slight, negative impacts on these elements of the undesignated local (low value) cultural heritage resource. (p.41)*

Linear Earthworks and Roadways

Large banks with an accompanying ditch or ditches running for great distances across the countryside probably acted as territorial boundaries and impediments to the driving off of cattle. Such linear earthworks are generally only well preserved for short stretches and the best known example is 'Rian Bó Phádraig' Ancient roadways can also be found running for long distances but, because they have for the most part been obliterated by modern roads or cultivation, they are often now only in evidence across mountain terrain or across bogs where they are known as toghers. Many toghers were built of timber planks laid lengthways on crossbeams and kept in place by pegs driven into the bog. Well preserved examples have been found during turf cutting

"The development of larger social and political groups, which is indicated in the building of hillforts, also found expression in the erection of large linear earthworks which could function as boundaries between different political or ethnic groups. The linear earthworks in Co. Waterford are likely to be later in date, as the 'Rian Bó Phadraig' appears to have been a roadway with strong traditional links with the national apostolate. However, the possibility of an earlier date cannot be dismissed. Other traditional routes within the county cannot now be traced easily and certainly none survive in an original form. The wall on the Knockmealdown Mountains, which forms the present day boundary with Co. Tipperary for much of its length, is probably of Medieval or post Medieval date. It is remarkable for its length and the fact that it is the only visible boundary in the many wildernesses of Waterford". (AICW, p. 69)

> *In our increasingly sedentary and screen filled lifestyles there is an innate need to escape to the outdoors and engage with the landscape and environment. People actively seek out a place and space for reflection and quiet meditation. There has been a renewed appreciation and interest in ancient walkways and sites such as Pilgrim Paths and Holy Wells. The existence of these sites can claim a continuity from pre-Christian times to the present day. Revisiting and engaging with our heritage sites renews our sense of place and grounds us amidst our busy lifestyles.(Waterford Heritage Plan 2017-2022, P. 6)*

(511 Linear earthworks OS 12:7:1 (464,400 Indicated OD 200-2000 20878, 10818)
"A boundary beginning at the headwaters of a small stream feeding the Blackwater river. The boundary extends north as far as the county boundary with Tipperary and follows the county boundary East for 8kmnbefore turning South between the townlands of Dyrick Upper and Knocknafallia, until it reaches the headwaters of the Monavugga River which enters the Blackwater River at Cappoquin. The boundary has total length of *c.* 20Km. At the west end, in lowland areas, it is a stone-faced, earthen field bank (Wth c. 3m; Hc. 1.5m) and it maintains this character in upland areas also, but with a sod core. On steeper slopes it is a stone-built wall (width 1-2m) Possibly Medieval in date. (p. 69 AICW)"

Conclusion

The legislation and guidelines that are relevant to this assessment comprise the following:

- National Monuments Act 1930 as amended
- Heritage Act (1995) as amended
- National Cultural Institutions Act (1997) as amended
- Architectural Heritage (National Inventory) and Historic Monuments (Misc.) Provisions Act (1999) as amended
- Planning and Development Act (2000) as amended
- Department of Arts, Heritage and Gaeltacht (2011) *Architectural Heritage Protection: Guidelines for Planning Authorities*[1]
- Department of Arts, Heritage, Gaeltacht and the Islands (1999) *Framework and Principles for the Protection of Archaeological Heritage*[2]

In the face of a windfarm development on Dyrick Hill and Broe Mountain and surrounding slopes, it is clear that many issues exist in understanding the past of the area. Peatlands in Ireland hold a great deal of cultural and ancestral history, preserved in the anaerobic conditions. Ireland has international obligations under the European Convention on the Protection of the Archaeological Heritage, ratified by Ireland in 1997. Article 1 of this convention states that Ireland must "protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study". A full archaeological survey needs to be undertaken of the entire area to ensure that no loss of archaeological information and cultural history occurs. There are a number of areas identified within the National Monuments Database that are located within the proposed boundary and within its surroundings, highlighting that there could be more artefacts of archaeological significance present. The mitigation measures presented in **Section 13.5.1** are not adequate and will not provide for either the avoidance of the potential unrecorded, sub-surface archaeological resource within the footprint of proposed construction locations or the proper and adequate recording of this resource by full archaeological excavation.

As detailed in **Section 13.4.4**, the Development will result in a range of long term, indirect negative impacts of a visual nature on the wider setting of archaeological sites within the environs of the Site which will range from imperceptible to moderate in significance. Given the nature of the wind farm turbines there are no mitigation measures that can address these indirect setting impacts. The proposed development will in fact result in direct negative impacts on the known archaeological monuments, designated architectural heritage structures and undesignated cultural heritage assets. There is major potential for the presence of unrecorded, sub-surface archaeological features within the Development area. The developer states that *"archaeological monitoring of the construction phase under licence by the National Monuments Service will be carried out by a suitably qualified archaeologist"*. However, there is no detail of how the monitoring will take place. Will an archaeologist be on site at all times or merely be on-call?

In the event that any sub-surface archaeological remains are identified during site investigations, they will be cleaned, recorded and left to remain in situ within cordoned off areas while the National Monuments Service are notified and consulted in relation to appropriate future mitigation strategies, which may entail preservation in situ by avoidance or preservation by record by archaeological excavation.

Again there is no detail as to who will carry out this task, cleaning, recording etc

The following statement is misleading in the extreme.

*The Development will result in a range of slight-moderate indirect visual impacts on the settings of archaeological monuments located within surrounding lands during the operational phase (**Table 13.10**). These indirect impacts will be long term in duration and will be reversed following the decommissioning phase.*

To contend that any structure reaching a height of 185m, will only have a *"slight-moderate indirect visual impacts on the settings of archaeological monuments"* is simply preposterous.

In conclusion,

The Sliabh gCua area is known world-wide as an area of rich cultural heritage, of traditional music, song and dance while handing on the best traditions of the past to future generations. We take great pride in our native place and we want to be celebrated for our rich cultural heritage and our beautiful scenic countryside. Sliabh gCua has a lot to be proud of, it has a soul and a spirit. Knowing our own parish past and present is fundamental to our identity. Our ancestors handed on a history rich in culture, religion and value systems and we own to them, and to ourselves, too pass it on. We also owe it to those who were forced to emigrate often bringing their home culture and values with them.

The ancient structures mentioned in this document date back to the 3-4 century, perhaps earlier, they reveal our social history. As such they warrant protection as they make a significant contribution to the archaeological and cultural heritage of our locality. As a people we are attracted to these historical sites where "light is thrown on the character of a past age by virtue of the structure's design, plan, original use, materials or location". Our archaeological and architectural heritage is a unique resource, an irreplaceable expression of the richness and diversity of our past. However, the proposed construction of a largescale wind farm, adjacent to these important protected structures, would destroy their charming setting and therefore their attractiveness. The proposed development at Dyrick Hill and Broemountain would be visually intrusive in the landscape of this these precious sites .

The Waterford County Development Plan recognises that the growth of the tourism industry is critical to the economy of County Waterford, and this is particularly the case in the rural areas where employment opportunities are reducing and traditional employment levels in agriculture are in decline. Waterford County Council have pledged to support rural tourism

initiatives based on Agri-tourism, rural enterprise and the appropriate exploitation of natural heritage and culture. It is our submission that the proposed wind farms would conflict with the Council's policy of supporting rural tourism.

Goals of the County Development Plan (Section 3.1)

The strategic goals of the County Development Plan include:

- Creating sustainable and vibrant communities and providing attractive places to live and work;
- Providing for the wellbeing of the residents of County Waterford through social and recreational initiatives; and.
- Encouraging and facilitating rural enterprises and employment.

The provision of attractive places to live and work in rural areas, and ensuring the wellbeing of residents of County Waterford could be detrimentally affected by the adverse impacts of the proposed wind farms.

International charters and conventions inform and influence government policy and legislation for protecting our archaeological and architectural heritage. The various charters require that all interventions respect the physical, historic and aesthetic character and integrity of cultural property. UNESCO's ***Convention Concerning the Protection of the World Cultural and Natural Heritage*** was drawn up in 1972 and ratified by Ireland in 1991. This convention notes that the cultural and natural heritage is increasingly threatened with destruction. Each state party to the convention recognises that the duty of ensuring identification, protection, conservation, presentation and transmission to future generations of this heritage belongs primarily to that state. Therefore, this European standard of protection for architectural heritage creates legal obligations. It stresses the importance of 'handing down to future generations a system of cultural references'.

The Council of Europe, in Article 2 of the 1985 Convention for the Protection of the Architectural Heritage of Europe (Granada Convention), states that 'for the purpose of precise identification of the monuments, groups of structures and sites to be protected, each member State will undertake to maintain inventories of that architectural heritage'. The *Convention for the Protection of the Architectural Heritage of Europe*, drawn up by the Council of Europe and signed at Granada in 1985, was ratified by Ireland in 1997. **The Granada Convention,** provides the basis for our national commitment to the protection of the architectural heritage. Under this legislation each state undertook to take statutory measures to protect the architectural heritage. The Local Government Planning and Development Bill 1998, gives statutory protection to listed buildings. The Bill extends protection to the whole structure, including its interior and curtilage, and specifies that all works which affect its character will require planning permission. Therefore the council have a duty to protect the ancient sites at Dyrick and Broemountain, its setting, and its curtilage.

The National Inventory of Architectural Heritage (NIAH) was established on a statutory basis under the provisions of the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999. The Planning and Development Act 2000 requires each planning authority to compile and maintain a Record of Protected Structures (RPS) and as our planning authority you are obliged to comply with Part IV of the Planning and Development Act 2000 on the protection of the architectural heritage. **The Heritage Act 1995,** in its definition of heritage, makes specific reference to the setting and attendant grounds of buildings. Therefore, when we identify buildings as having special cultural or historic value, we must inevitably be looking at something a little more extensive than the bricks and mortar; we see the relationships between the building and the space it commands in the World, the Place it creates (Heritage Council). The wording of the legislation extended the protection to include its **'Curtilage'**, the area of ground that is directly connected with the functioning or inhabitation of the structure. Therefore, protection of a **protected structure extends to the land and structures lying within its curtilage.** Subsidiary structures explicitly called up as being in the 'attendant grounds' of a special principal structure are protected by virtue of their relationship with the protected structure, no matter how distant from it. Therefore, standing stones, burial sites, ring forts etc., its structures and objects are afforded the same protection and restrictions.

What needs to be done;

- Understanding the archaeological significance of Sites
- Conducting further research (both textual, archaeological and oral) to determine with the highest possible certainty which site is the burial place of the Ballinaguilkee High Cross.
- Identifying the location of the buried Ogham Stone.

For this to happen, it is clear that a detailed archaeological inventory of the Dyrick & Broemountain area must be conducted to prevent these monuments from being lost. The site requires a full archaeological excavation before any development takes place.

Idír Deighric agus Broe

The beautiful air was recorded by the Chieftains on their albumn, *Heathery Breeze* in 1981 and again it was recorded by fiddle player Florie Brown in 2012.

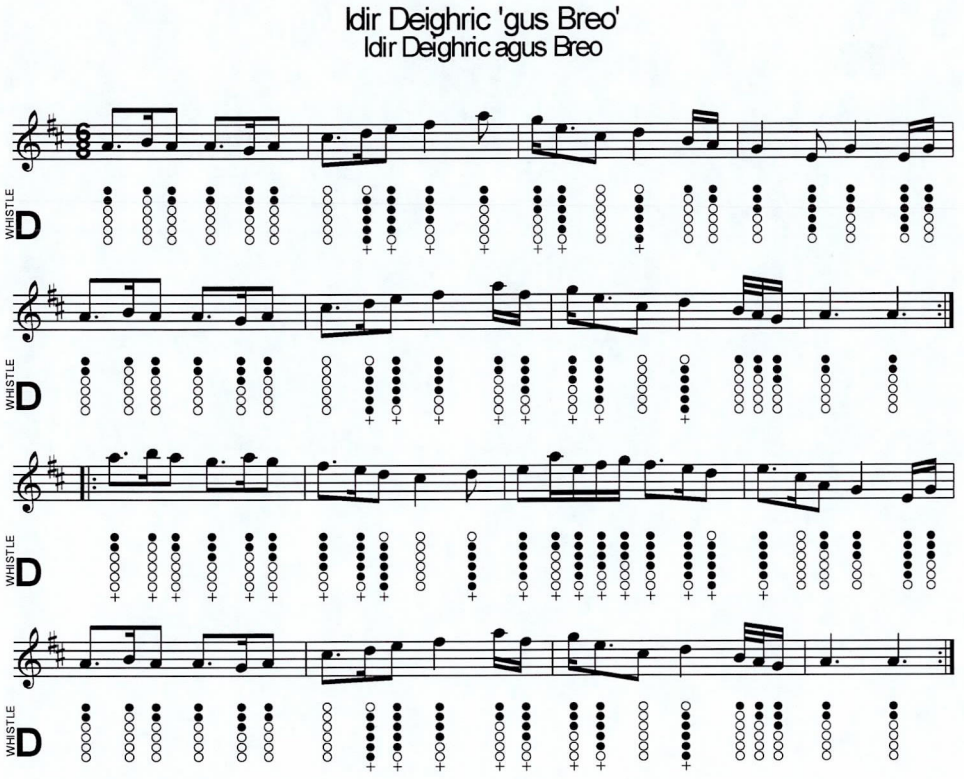
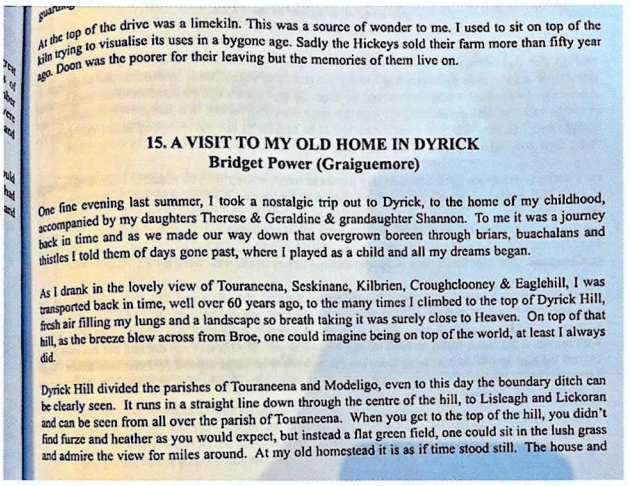


Figure 9 Idir Deighric 'gus Broe



At the top of the drive was a limekiln. This was a source of wonder to me. I used to sit on top of the kiln trying to visualise its uses in a bygone age. Sadly the Hickeys sold their farm more than fifty year ago. Doon was the poorer for their leaving but the memories of them live on.

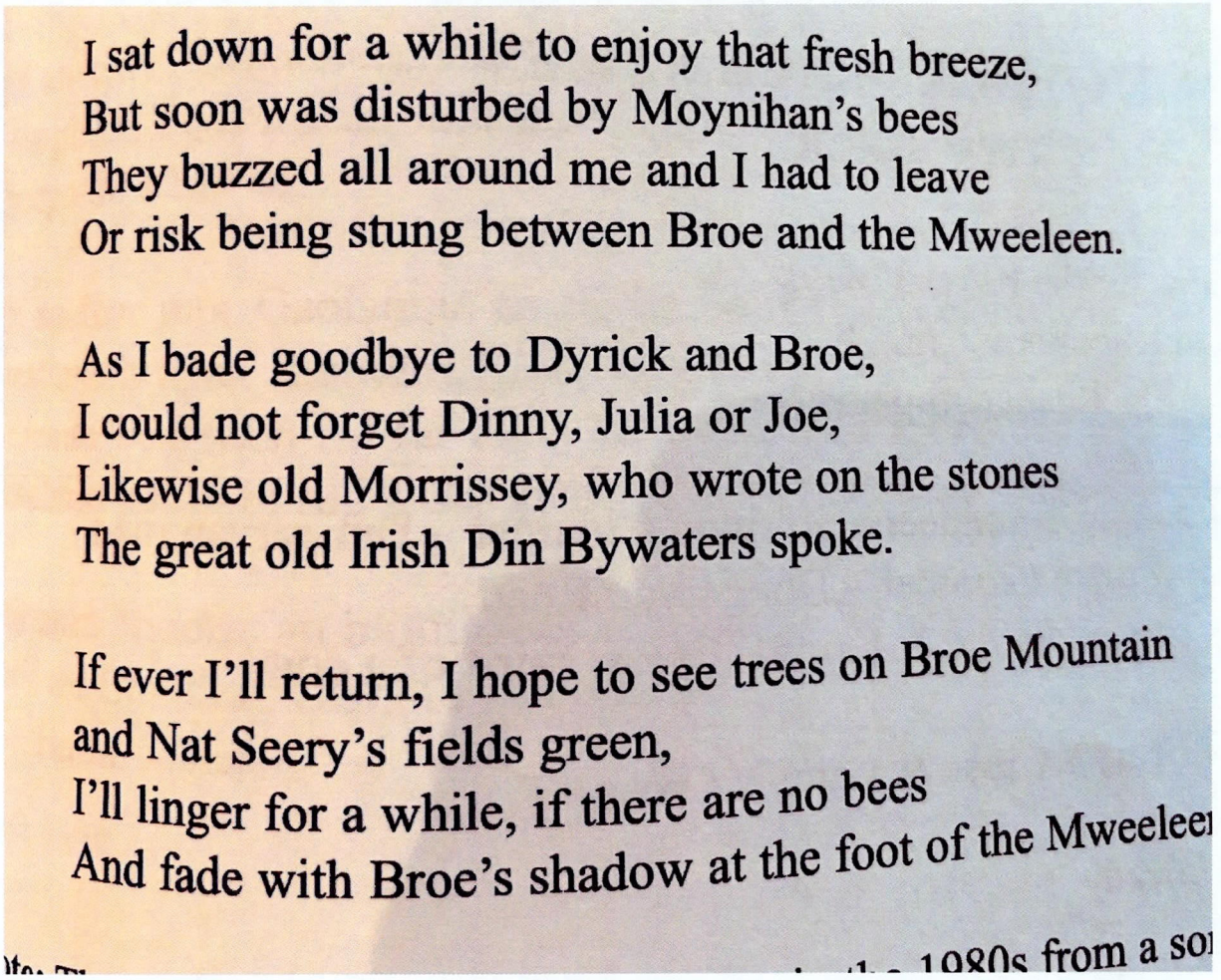
15. A VISIT TO MY OLD HOME IN DYRICK
Bridget Power (Graiguemore)

One fine evening last summer, I took a nostalgic trip out to Dyrick, to the home of my childhood, accompanied by my daughters Therese & Geraldine & grandaughter Shannon. To me it was a journey back in time and as we made our way down that overgrown boreen through briars, buachalans and thistles I told them of days gone past, where I played as a child and all my dreams began.

As I drank in the lovely view of Touraneena, Seskinane, Kilbrien, Croughclooney & Eaglehill, I was transported back in time, well over 60 years ago, to the many times I climbed to the top of Dyrick Hill, fresh air filling my lungs and a landscape so breath taking it was surely close to Heaven. On top of that hill, as the breeze blew across from Broe, one could imagine being on top of the world, at least I always did.

Dyrick Hill divided the parishes of Touraneena and Modeligo, even to this day the boundary ditch can be clearly seen. It runs in a straight line down through the centre of the hill, to Lisleagh and Lickoran and can be seen from all over the parish of Touraneena. When you get to the top of the hill, you didn't find furze and heather as you would expect, but instead a flat green field, one could sit in the lush grass and admire the view for miles around. At my old homestead it is as if time stood still. The house and

Figure 10 Figure 10 The Sliabh gCua Annual No.15 2009



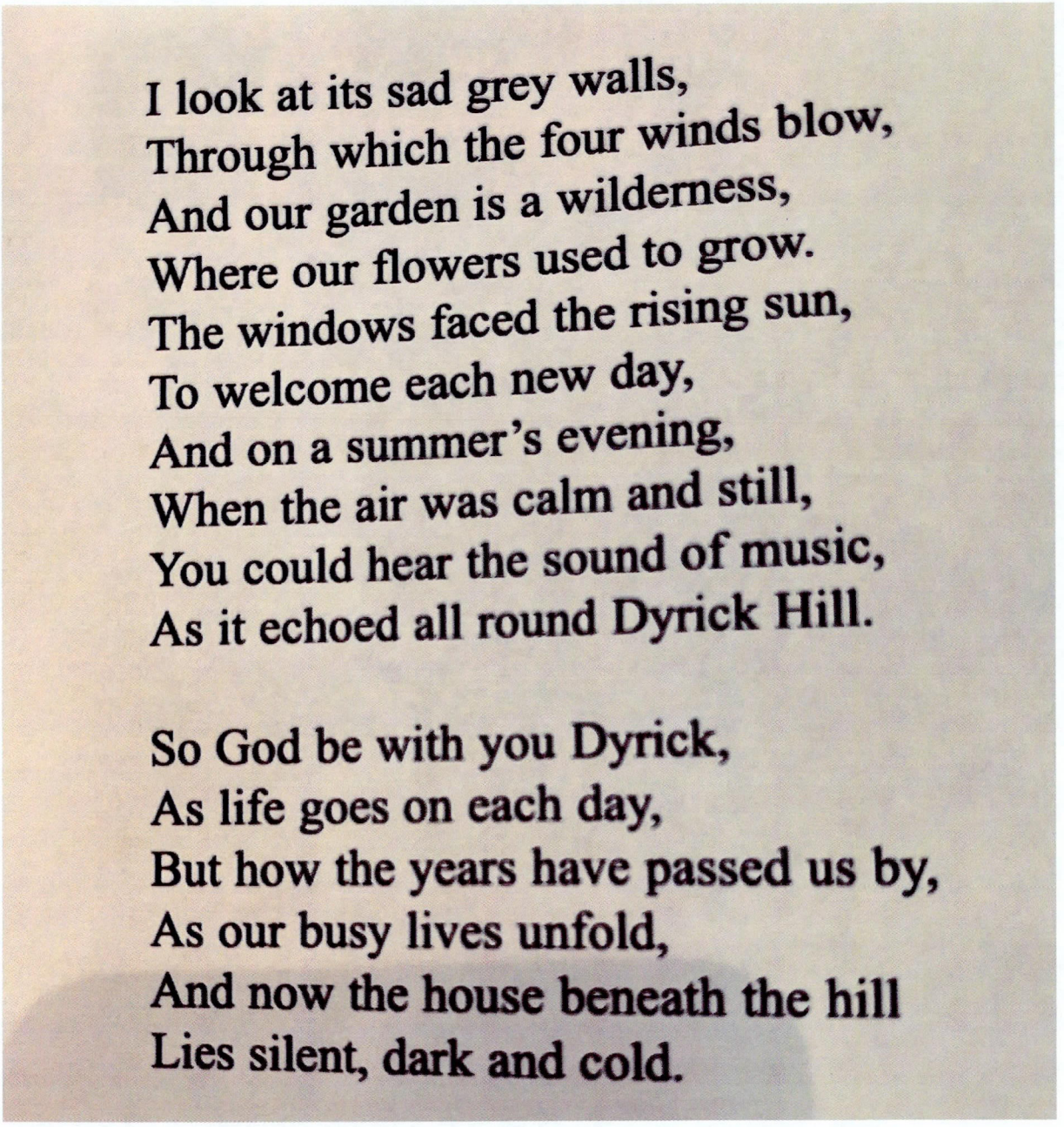
I sat down for a while to enjoy that fresh breeze,
But soon was disturbed by Moynihan's bees
They buzzed all around me and I had to leave
Or risk being stung between Broe and the Mweeleen.

As I bade goodbye to Dyrick and Broe,
I could not forget Dinny, Julia or Joe,
Likewise old Morrissey, who wrote on the stones
The great old Irish Din Bywaters spoke.

If ever I'll return, I hope to see trees on Broe Mountain
and Nat Seery's fields green,
I'll linger for a while, if there are no bees
And fade with Broe's shadow at the foot of the Mweelee

1980s from a so

Figure 11 Thoughts of an Exile by John Hanrahan (The Sliabh gCua Annual No 15 2009)



I look at its sad grey walls,
Through which the four winds blow,
And our garden is a wilderness,
Where our flowers used to grow.
The windows faced the rising sun,
To welcome each new day,
And on a summer's evening,
When the air was calm and still,
You could hear the sound of music,
As it echoed all round Dyrick Hill.

So God be with you Dyrick,
As life goes on each day,
But how the years have passed us by,
As our busy lives unfold,
And now the house beneath the hill
Lies silent, dark and cold.

Figure 12 My Old Home by Bridget Power (Sliabh gCua Annual No 15 2009)

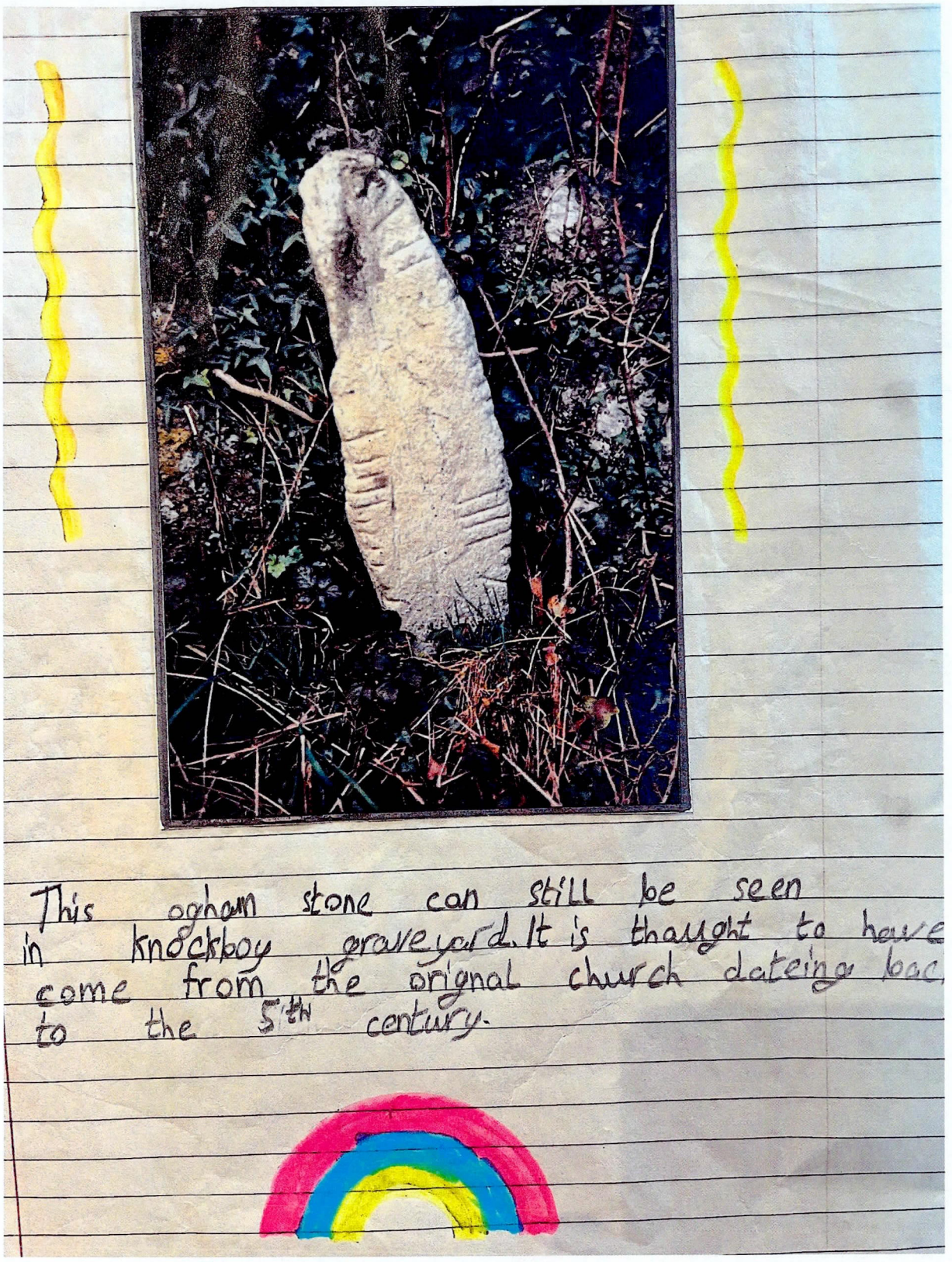


Figure 13 Oghan Stone, from Broe Mountain

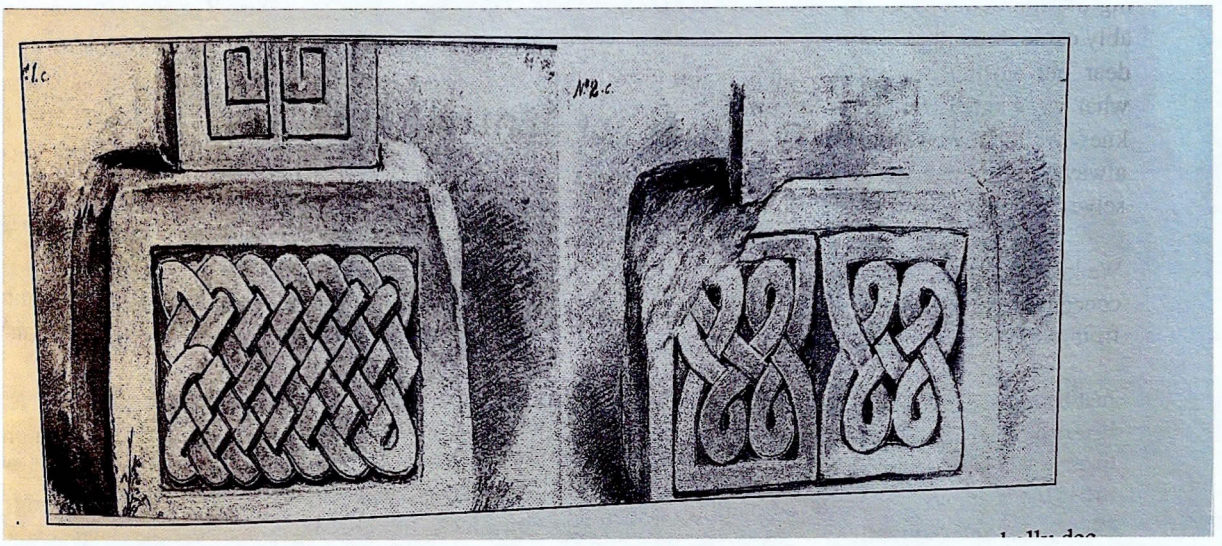
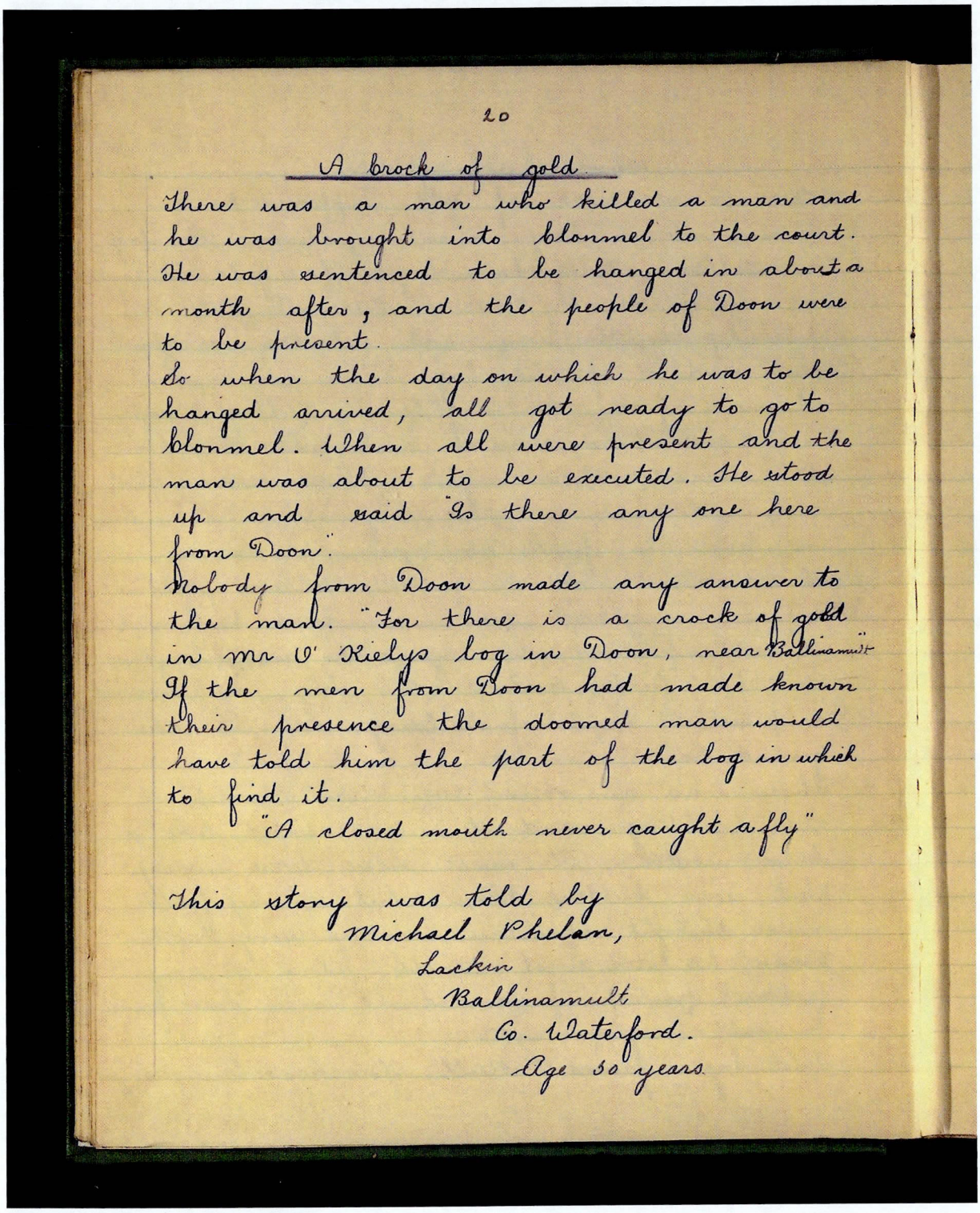


Figure 14 Du Noyer's watercolours of the plinth and shaft portion of the ancient cross of Ballinaguilkee



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A brock of gold

There was a man who killed a man and he was brought into Clonmel to the court. He was sentenced to be hanged in about a month after, and the people of Doon were to be present.

So when the day on which he was to be hanged arrived, all got ready to go to Clonmel. When all were present and the man was about to be executed. He stood up and said "Is there any one here from Doon".

Nobody from Doon made any answer to the man. "For there is a crock of gold in Mr O' Kielys bog in Doon, near Ballinamult" If the men from Doon had made known their presence the doomed man would have told him the part of the bog in which to find it.

"A closed mouth never caught a fly"

This story was told by
Michael Phelan,
Lackin
Ballinamult
Co. Waterford.
Age 50 years.

Figure 15 The Bog in Doon

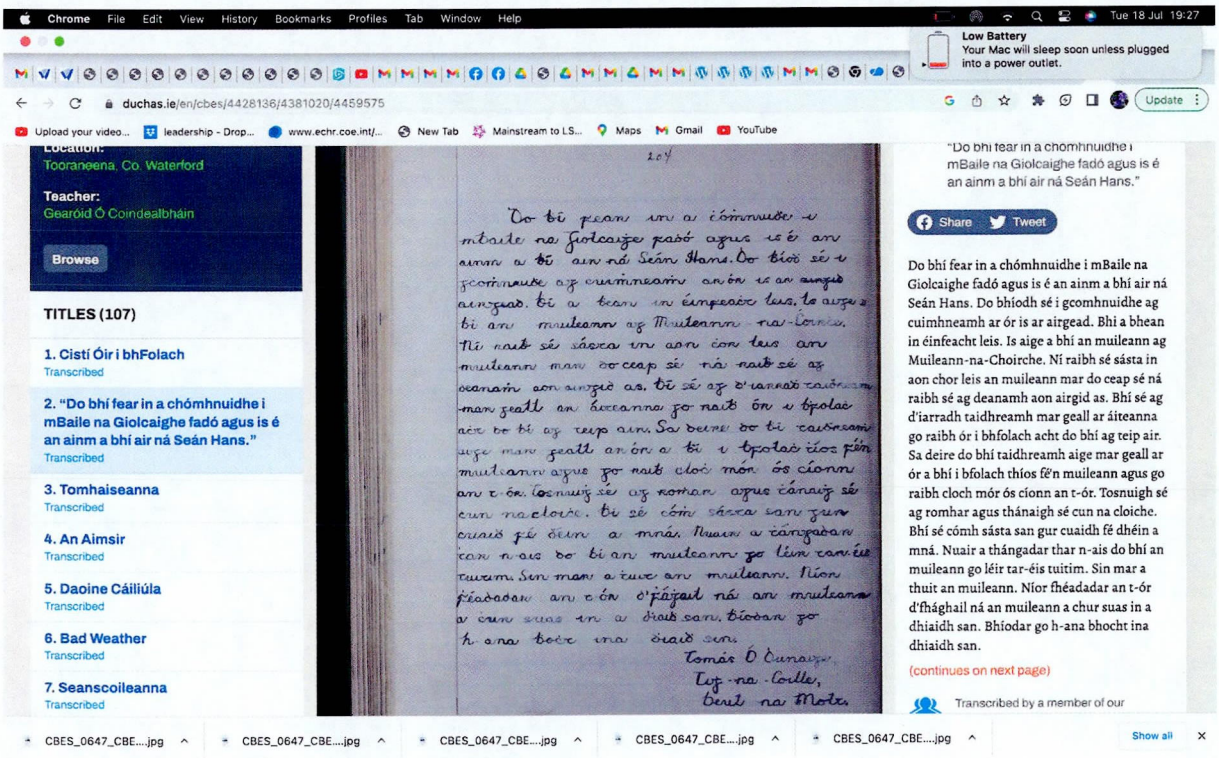
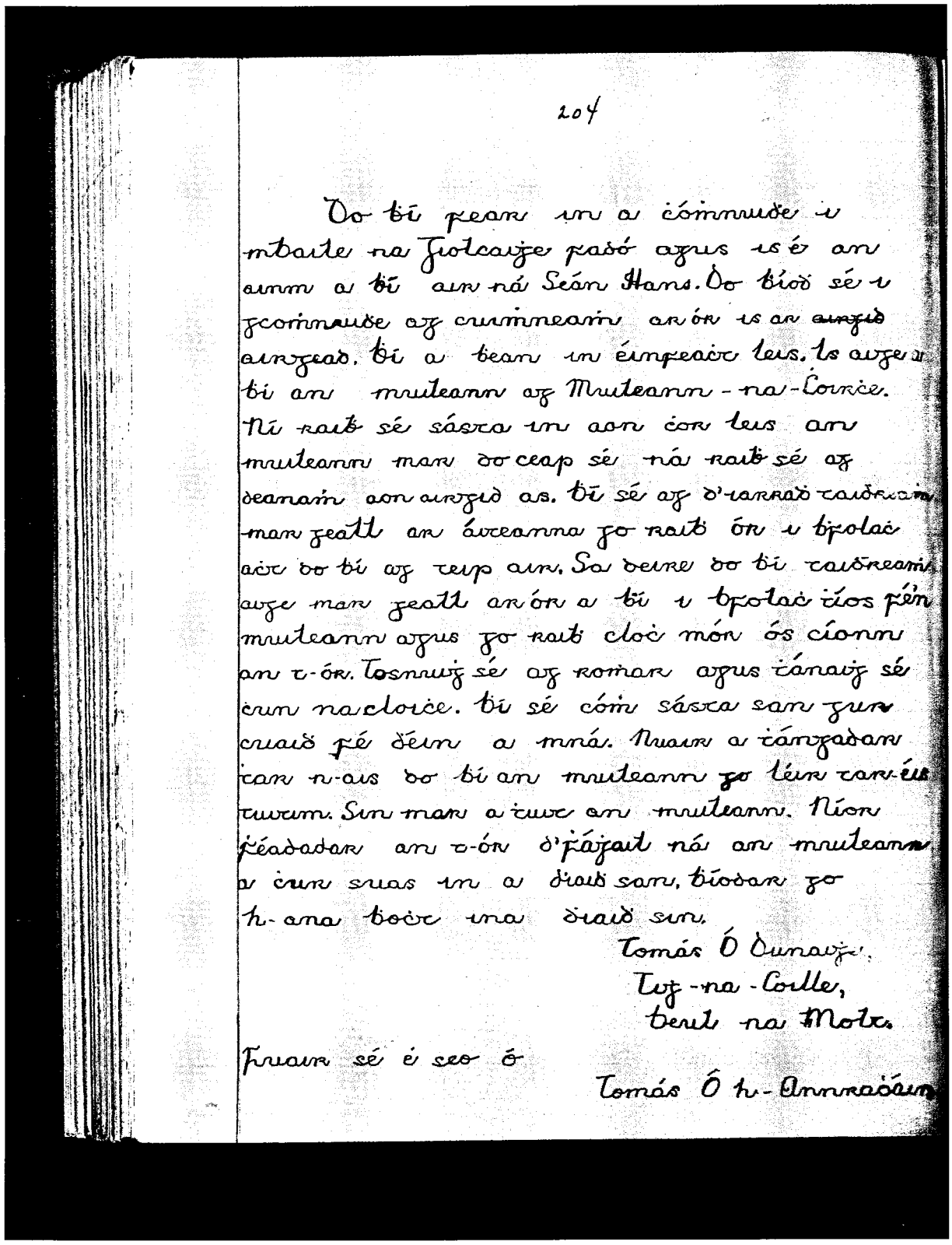


Figure 16 Muileann na Choirce Bridge



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Do bí fear in a ċómnuiḋe i
mbaile na Fiolcaiḋe fadó agus is é an
ainm a bí air ná Seán Hans. Do bíoḋ sé i
gcoṁnuiḋe ag cuiṁneaṁ ar ór is ar ~~airgid~~
airgead. Bí a bean in éinfeaċt leis. Is aige a
bí an muileann ag Muileann-na-Ċoirċe.
Ní raiḃ sé sásta in aon ċor leis an
muileann mar do ceap sé ná raiḃ sé ag
deanaṁ aon airgid as. Bí sé ag d'iarraḋ taiḋreaṁ
mar geall ar áiteanna go raiḃ ór i bfolaċ
aċt do bí ag teip air. Sa deire do bí taiḋreaṁ
aige mar geall ar ór a bí i bfolaċ ṫíos fén
muileann agus go raiḃ cloċ mór ós cíonn
an t-ór. Tosnuiġ sé ag roṁar agus ṫánaiġ sé
ċun na cloiċe. Bí sé cóṁ sásta san gur
cuaiḋ fé ḋéin a mná. Nuair a ṫángadar
ṫar n-ais do bí an muileann go léir tar-éis
tuitim. Sin mar a ṫuit an muileann. Níor
féadadar an t-ór d'fáġail ná an muileann
a ċur suas in a ḋiaiḋ san. Bíodar go
h-ana boċt ina ḋiaiḋ sin.

Tomás Ó Dunaiġe,
Tiġ-na-Coille,
Beul na Molt.

Fuair sé é seo ó

Tomás Ó h-Annraċáin

Figure 17 Mullinahurca Bridge

My District. 2H: 3:1938.

The name of the townland in which I live is Bahernaleague. It is situated in the Parish of Touraneena and is in the barony of Decies without Drum. There is at least eleven houses in my townland. Ten of these houses have slate roofs while only one house has a thatched roof. The most common surname in Bahernaleague is Kiely. There is at least three families of Kielys in this townland.

Now I am going to inform you of the meaning of the name of my townland. This is how it is written in Irish, Caiseán na léige. These words mean a stronghold. I suppose it was there long ago. This the name of my townland.

There are not very old people of over seventy years of age in Bahernaleague. There are only three people of that age there to my knowledge. The best old Irish speakers in my townland is as I think, Edmond Christopher, Bahernaleague, Ballinamult. It is in his ability to tell many old stories in both Irish and English. He has a great many stories.

There are a few old ruins in this townland

Figure 18 Place names

Names of places, fields etc.

There is a furze field in Lacken and the name of it is "Ray na gowlōg" and this is how it got its name. One day a man was cutting furze on it and a little man appeared to him and the workman caught him and asked him for the gold. The fairy told him that it was in a certain place in the field, the workman stuck the "gowlog" (a stick with a fork on it) in the place the gold was supposed to be and ran home for help to bring home the gold When he came back the field was covered over with "gowlōgs" the same as he had. There is a village near this ray and it is also called "Rē na Gabalogs".

This story was told by
Patrick Halley
Lackin,
Ballinamult
Co. Waterford.

Age. 60 years

Names of places, fields, etc.

There is a field in Boolahalla called "Páirc-na-lice" on account of all the big flagstones that lie down flat on its surface. It is believed that the Tuatha De Dannans had a fort or rath built there and on account of this fort all the stones came to be there.

There is another field there called "Páirce na fir duba" for James Dalton saw a team of black men playing football there one bright night when he was coming from Newcastle very late.

There is another field there called "Páirc-na-crossaire" for there were four paths going through it when people were going to Mass in the Penal Days.

This story was told by
Mrs Mary Halley
Lhonatouke
Ballinamult
Co. Waterford.

Age 55 years.

Names of places, fields etc.

Túr na laidre is the meeting of the Knockmealdown hills in the form of a valley with a bog in between. There is also a bridge crossing over a nice sized stream which makes a queer gurgling noise like the noise of a thresher.
Many people go there to take photographs of Knockmealdown mountains and of this valley which is nice and green in the summer time. This place got the name of Túr na laidre because of the forked road with the valley between. This place is at the right bounds of Co. Waterford and Tipperary.

There is a field in Lacken called "Pairc an crucaill". There was a house at the end of it the ruins of which can still be seen. The house was a carpenter's house where carts and cars and many other things were made. So when the people died the field that the house was in was called "Pairc-a crucaill".
These stories were told by.
Michael Phelan
Age 50 years Lackin, Ballinamult.

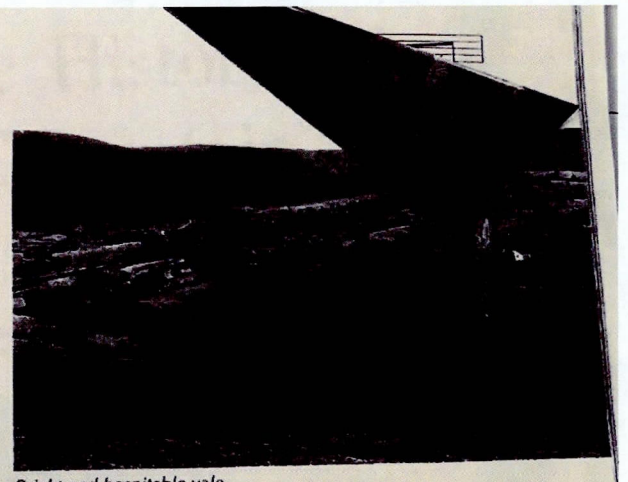
O bright and hospitable Sliabh gCua,
I'm far away from you in exile,
Sitting alone by a harbour
Weakened with sorrow;
With the sea separating me,
From my beloved country,
Bright and hospitable Sliabh gCua
Isn't my plight just too painful?

If I were among my own people
In the green fields of Sceichín of the gentle folk,
When the heat of the sun spreads all over
From a cloudless sky;
Or if I were there under the stars when the
Dew falls on the grass,
O bright Sliabh gCua wouldn't that be a
Great charity for me if it were available.

All my love to the *Decie** country, over there,
To its fields, its glens and mountains,
Since I sailed away across the sea
I am weary and worn;
But if God wills to take me to Himself,
I send my farewells westwards to Ireland,
And to the hospitable mountain,
With all my heart.

(This is an English version of a song only sung in Irish.)

Decie *(pronounced Day-sha) is the Gaelic name for the general area of West Waterford.*



Bright and hospitable vale.

'S é mo léan nach bhfuair mé tógáil le léann is mórchuid eolais,
I nGaeilge uasal cheolmhar ba sheolta mo bhéal,
Ó threabhfainn cuairt thar sáile is bhéarfainn bua thar barr chughat,
Mar, a Shliabh geal gCua, ba bhreá liom thú a ardú faoi réim.
Mo ghrása thall na Déise idir bhánta, ghleannta is shléibhte,
Ó shnámh mé anonn thar tréanmhuir táim céasta gan bhrí;
Ach ó b'áil le Dia mé a ghlaoch as, mo shlánsa siar go hÉirinn,
Agus slán le Sliabh na féile le saorghean ó mo chroí.

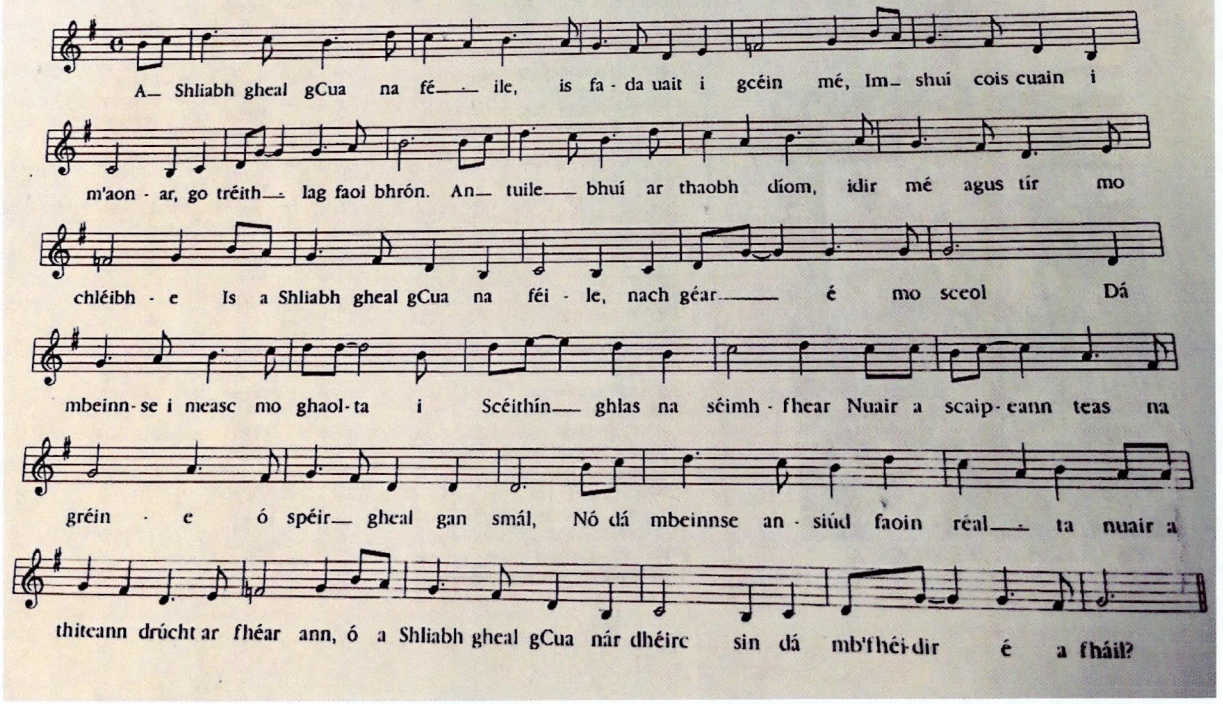


Figure 19 Sliabh Geal gCua na Féile (Irish & Translation)

'S a Shliabh gheal gCua na féile,
Is fada uait i gcéin mé,
Im shuí cois cuain i m'aonar,
Go tréithlag faoi bhrón;
An tuile bhuí ar thaobh díom
Idir mé agus tír mo chléibhe,
'S a Shliabh gheal gCua na féile,
Nach géar é mo sceol?

Dá mbeinnse i measc mo ghaolta
I Sceichín glas na séimhfhear,
Nuair a scaipeann teas na gréine ann
Ó spéir ghil gan smál;
Nó dá mbeinnse ansúd faoi na réalthain
Nuair a thiteann drúcht ar fhéar ann,
'S a Shliabh gheal gCua nár dhéirc sin
Dá mb'fhéidir í dh'fháilt.

Sé mo léan ná fuaireas tógaint
I léann is mórchuid eolais,
I nGaelainn uasal cheolmhar
Ba sheolta mo bhéal;
Is thabharfainn cuairt thar sáile,
Is do bhéarfainn bua thar barr chughat
Mar a Shliabh gheal gCua ba bhreá liom
Tú dh'ardach i réim.

Mo ghrá-sa thall na Déise,
Idir bhánta, ghleannta is sléibhte,
Ó shnámhas anall thar tréanmhuir
Tháim traochta gan bhrí;
Ach ó b'áil le Dia mé glaoch as,
Mo shlánsa siar go hÉirinn,
Agus slán le Sliabh na féile,
Le saorghean ó mo chroí.
Mountain and bright gCua festival,
is You are far from me,
Sitting harbor alone,
weak with sorrow;
the golden tide meIs
Between me and my bosom country,
and Mount bright gCua festival,
not my sceol sharp?

If I was among my relatives
in Sceichín green séimhfhear,
When disseminating solar heat there
from the sky bright spotless;
Or if I were there known about the réalthain
When dew falls on the grass there,
and to Mount bright gCua not dhéirc that
both mb 'it could dh'fháilt.

It got my sorrow than taking
I read a great deal of information,
I noble nGaelainn
was My mouth;
a visit abroad have given,
is to win over the top would give Ruin
Sliabh bright gCua I would
You dh'ardach prevail.

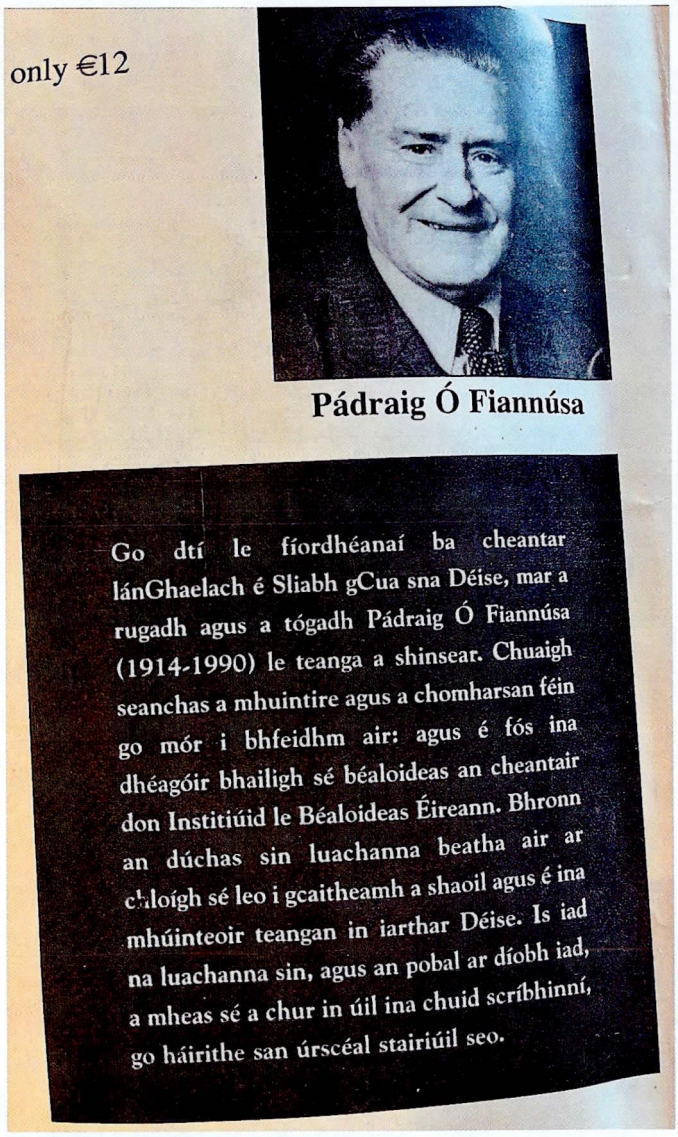
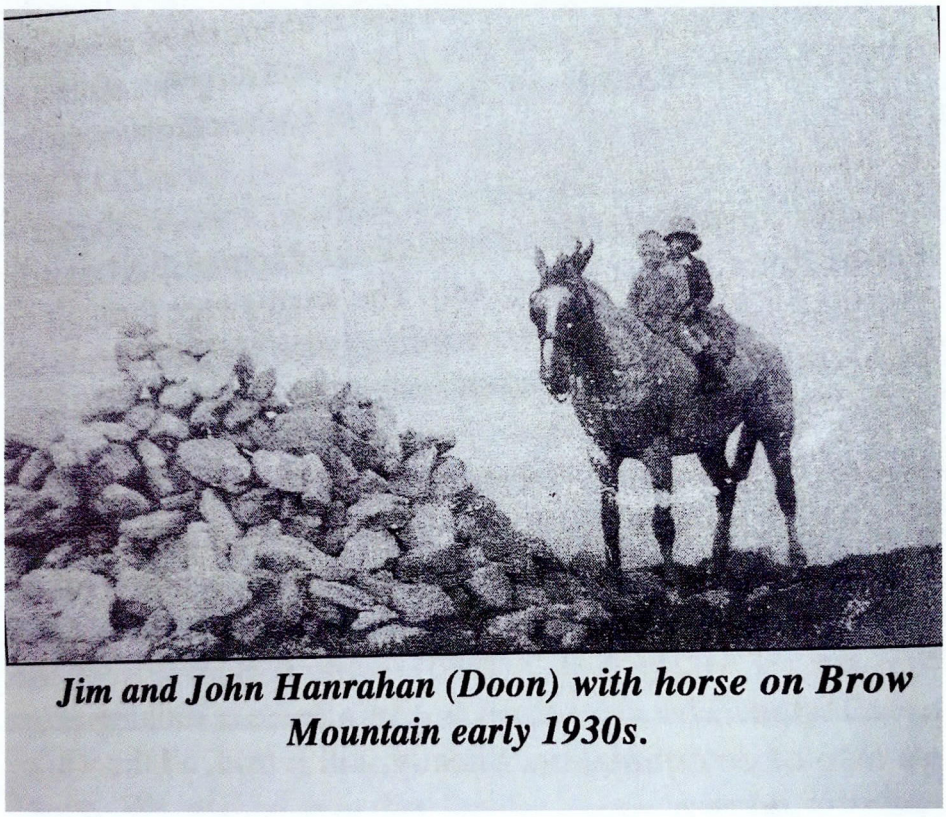


Figure 20 Pádraig Ó Fiannúsa



Jim and John Hanrahan (Doon) with horse on Brow Mountain early 1930s.

Figure 21 Broe Mountain

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KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Started 24 June 2023
Petition to An Bord pleanala

Why this petition matters



Started by Richard Gorodecky

-Please note that Change.org may suggest that you make a donation. To be clear, that is a donation to them and not us. IF YOU WOULD LIKE TO DONATE TO US, PLEASE DO SO HERE.-

EMPower are attempting to build an industrial-scale wind farm Dyrick Hill Wind Farm in an Environmentally Vulnerable Area* that is home to dozens of Red List species and classified as a WIND EXCLUSION ZONE.

The presence of twelve 185-metre industrial wind turbines in the Knockmealdown Mountains will create serious and far-reaching ENVIRONMENTAL, HEALTH and FINANCIAL CONSEQUENCES.

This petition is not against wind power, green energy or energy independence. This petition demands that the developers PUT THE ENVIRONMENT BEFORE THEIR PROFITS, respect Wind Exclusion Zones as defined by Waterford City & County Development Plan 2022-2028, and to re-site their plans to an area that is not classified as a Wind Exclusion Zone.

On behalf of Knockmealdown Protection Group we thank you for your support.

petition_signatures_jobs_36646314_20230801211513

Name	City	State	Postal Code	Country	Signed On
Richard Gorodecky	Amsterdam			Netherlands	2023-06-24
Noel Reynolds	co WATERFORD			Ireland	2023-06-24
Kathleen Fitzpatrick	Dublin		D02	Ireland	2023-06-24
fintan veale	waterford			Ireland	2023-06-24
Monika Dudekova	Cappoquin			Ireland	2023-06-24
Hilda Nicell	Dungarvan			Ireland	2023-06-24
brian walsh	Waterford, Waterford, Ireland			Ireland	2023-06-24
Clive Banes	Ballymacarbry			Ireland	2023-06-24
Aoife O Brien	Waterford			Ireland	2023-06-24
Dhruv Sandoval				Ireland	2023-06-24
Santiago Sanz Feliu			29140	Spain	2023-06-25
Rachel Windsor Smith	Clonmel			Ireland	2023-06-25
Matthew Miles	Waterford			Ireland	2023-06-25
Ľubica Pražanová	clonmel			Ireland	2023-06-25
Tim van der Knaap	Mount Melleray			Ireland	2023-06-25
Emily O Dowd				Ireland	2023-06-25
Eugenie Foley	Waterford			Ireland	2023-06-25
Rick Foley				Ireland	2023-06-25
James Mason				Ireland	2023-06-25
Laura O Reardon	Waterford		D02	Ireland	2023-06-25
Gaurachandra Barea Goteea	Barcelona		8014	Ireland	2023-06-25
Thomas Okeefe	Chelsea	England	SW10	UK	2023-06-25
Alejandro Caralt	MÃ¡laga		29140	Spain	2023-06-25
Val Vejic				Ireland	2023-06-25
Sarah Fitzpatrick				Ireland	2023-06-25
Richard Harty				Ireland	2023-06-25
Eithne Dee Walsh	waterford			Ireland	2023-06-25
Rebecca Foley	waterford			Ireland	2023-06-25
Mariana Krajcarova				Ireland	2023-06-25
Alice Cullinan	Waterford			Ireland	2023-06-25
Jane Foley	Waterford			Ireland	2023-06-25
Anne L	co Waterford			Ireland	2023-06-25
Emily Bourke	Knocklyon			Ireland	2023-06-25
John O'Riordan				Ireland	2023-06-25
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Lenka Krokovicova	Dublin			Ireland	2023-06-25

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Yvonne Connor	Cappoquin			Ireland	2023-06-25
Paul Coffey				Ireland	2023-06-25
Muhammad Junaid	Dublin			Pakistan	2023-06-25
David Hewitt				Ireland	2023-06-25
Sarah Hall	Dublin			Ireland	2023-06-25
breda o sullivan	waterford		12345	Ireland	2023-06-25
Mary O'Donoghue	Waterford			Ireland	2023-06-25
JP Fitzpatrick				Ireland	2023-06-25
Denise O'Brien	Waterford		58	Ireland	2023-06-25
Martin Hallissey	Cork			Ireland	2023-06-25
Rosie McGovern	Redcar	England	TS10 1QD	UK	2023-06-25
Mary Quinn				Ireland	2023-06-25
Doris Reinisch				Ireland	2023-06-25
Liam Lacey				Ireland	2023-06-25
Michelle Murphy	Waterford		0	Ireland	2023-06-25
Teresa McGarry	East Hanover	New Jersey	7936	US	2023-06-26
Eoghanie Quann	Waterford		N/a	Ireland	2023-06-26
Tania Cholat	MontÃ©limar		26200	France	2023-06-26
Tadhg Moloney	Dublin		D02	Ireland	2023-06-26
James Egan	West caldwell		7006	Ireland	2023-06-26
Sharon Williams				Ireland	2023-06-26
Fabian Szlachciński				Ireland	2023-06-26
Luiza Spencer				Ireland	2023-06-26
Mike Moylan				Ireland	2023-06-26
Lucia Lacova	Youghal		93405	Ireland	2023-06-26
Ryan Mason				Ireland	2023-06-26
Joe Byrne	Tipperary			Ireland	2023-06-26
Louise Feeney	Fermoy			Ireland	2023-06-26
Tom Feeney				Ireland	2023-06-26
Hannah O'Sullivan	New York	New York	10004	US	2023-06-26
Shenda Shoa	coolagurtwee, cappoquin			Ireland	2023-06-26
Patrick Walsh				Ireland	2023-06-26
Diarmaid Condon	Clogheen			Ireland	2023-06-26
Elisa Berneburg	Cork			Ireland	2023-06-26
Paul Buckley	Dublin			Ireland	2023-06-26
Helena Moylan	Steamboat Springs	Colorado	80487	US	2023-06-26
Gratian Popa	waterford			Ireland	2023-06-26
Helen Doherty	Lucan		K78	Ireland	2023-06-26
Ann Power	Cavan			Ireland	2023-06-26
Norma Gleeson	Tipperary			Ireland	2023-06-26

Brendan McCarthy	Ballinamult		na	Ireland	2023-06-26
Sebastian Kolodziej				Ireland	2023-06-26
Bernie Kelly	waterford		1346	Ireland	2023-06-26
Roger Narkley	Dunloy		Bt44 9ay	Saudi Arabia	2023-06-27
ellen fitzgerald	Waterford			Ireland	2023-06-27
Aaron O Sullivan	Melbourne		3000	Ireland	2023-06-27
Bill Clear	Dublin			Ireland	2023-06-27
NICOLA WINDSOR SMITH				Ireland	2023-06-27
Anthony Mullally	Summerhill			Ireland	2023-06-27
Michael Shimaoka	Dublin			Ireland	2023-06-27
Kamil J	Naas			Ireland	2023-06-27
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Fern Byrne				Ireland	2023-06-27
Tina Ward Gallagher	Kilcullen			Ireland	2023-06-27
Roisin Carlisle	Tallaght			Ireland	2023-06-27
Lucian Lazar				Ireland	2023-06-27
Tyrone Garvey	Leyton	England	E10	UK	2023-06-27
Nigel Williams				Ireland	2023-06-27
Tina Kavanagh	Bray		Eire	Ireland	2023-06-27
Alvin Doma	Limerick			Ireland	2023-06-27
Caitlin Spencer	Youghal		P36	Ireland	2023-06-27
Cathriona Walsh				Ireland	2023-06-27
Muiris Walsh	Clonmel			Ireland	2023-06-27
Brendan O brien	Ireland			Ireland	2023-06-27
Laura Moore	Dublin			Ireland	2023-06-27
Anna Morton	Edenbridge		TN8	UK	2023-06-27
Stanislav Dudek				Ireland	2023-06-27
Maria Feighery	gort co. galway			Ireland	2023-06-27
Jack Cummins				Ireland	2023-06-27
Bronagh Lonergan				Ireland	2023-06-27
Sean Smith				Ireland	2023-06-27
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Jo Phelan	Clonmel			Ireland	2023-06-28
Elizabeth Townsley				Ireland	2023-06-28
Susan Cahill	Callan			Ireland	2023-06-28
Marie ormonde	Cappoquin		P51	Ireland	2023-06-28
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Deirdre Hussain				Ireland	2023-06-28
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Frank Nolan	Dublin			Ireland	2023-06-28
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Jason Alexander				Ireland	2023-06-28
Anu John				Ireland	2023-06-28
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Bernadette Drohan	dungarvan			Ireland	2023-06-28
Marie Walsh				Ireland	2023-06-28
Onra Cummins	Dungarvan, Co Waterford			Ireland	2023-06-28
Emma Willoughby	Dungarvan			Ireland	2023-06-28
Declan Fitzpatrick				Ireland	2023-06-28
Andrea veale				Ireland	2023-06-28
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Beata Miller				Ireland	2023-06-29
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Emma Kirwan				Ireland	2023-06-30
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Fiona Cameron				Ireland	2023-07-01
Geraldine Lacey				Ireland	2023-07-01
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Vicky Kavanagh	Xxxx			Ireland	2023-07-01
Siobhan Healy Quinn	Waterford			Ireland	2023-07-01
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Neena Baby				Ireland	2023-07-01
Tina Abbey	Dublin			Ireland	2023-07-01
Liz Lee				Ireland	2023-07-01
James Doran	322 Glassdrumman Rd, Annalong, Co Down Bt34 4QN			Ireland	2023-07-02
Olivia Wilkinson	Cork			Ireland	2023-07-02
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Elizabeth Alderton				Ireland	2023-07-02

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Grainne Daly	Ireland		61	Ireland	2023-07-02
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liam collins	Cork			Ireland	2023-07-02
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Indre Lukosiunaite	ennis			Ireland	2023-07-03
Gail Walmsley	Perth		6156	Australia	2023-07-03
DIVAKAR Muniswamappa Jalahalli			560013	India	2023-07-03
Eddie harrington	Cork			Ireland	2023-07-03
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charlotte azzopard				Ireland	2023-07-03
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Magdalena Kozlowska	Castlebar			Ireland	2023-07-03
Tapan Jatakia	Dombivli		421202	India	2023-07-03
Lucy Boland	Cork		N/a	Ireland	2023-07-03
Michael O'Connell				Ireland	2023-07-03
Rob Healy	Limerick			Ireland	2023-07-03
Elvis Akuamoah				Ghana	2023-07-03
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Ardra Poulose				Ireland	2023-07-03
Marie O'Brien	Dublin			Ireland	2023-07-03
Connlaodh O'Hara	Birmingham	Northern Irel	Bt42 0ay	UK	2023-07-03
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Blade Haggarty	Cork		bn2 0gl	Ireland	2023-07-03

Bernadette O Connor	Kerry		0	Ireland	2023-07-03
Derek O Dwyer				Ireland	2023-07-03
Tony Bergin	Dublin			Ireland	2023-07-03
Tricia O Sullivan				Ireland	2023-07-03
Helen Karasiewicz				Ireland	2023-07-03
TJ Blackwell				Ireland	2023-07-03
Guisseppe Davey				Ireland	2023-07-03
Tony Hickey				Ireland	2023-07-03
Anne Maguire	Belfast		BT7	UK	2023-07-03
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Mark Carter	cahir			Ireland	2023-07-04
Grainne Keeshan	14			Ireland	2023-07-04
Patrick Carew	Tipperary			Ireland	2023-07-04
Maria George	Delhi		110054	India	2023-07-04
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Gillian Slevin	Dublin			Ireland	2023-07-04
Kieran Morrissey				Ireland	2023-07-04
Catherine Murphy	Dublin 22			Ireland	2023-07-04
Maria Doherty				Ireland	2023-07-04
Ian Collins	Kildare			Ireland	2023-07-04
Tom Gallagher	Dublin			Ireland	2023-07-04
Milan Fernandes			1075 vn	Netherlands	2023-07-04
daan vries			1019xc	Netherlands	2023-07-04
Engla Helena Tapper	London		E14LJ	UK	2023-07-04
lean lawalata	Central District			Netherlands	2023-07-04
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Gráinne O'Connell	Waterford			Ireland	2023-07-04
Ángel Manuel Arias Navas	Ciudad Real		13001	Spain	2023-07-04
Orla Grehan	Dublin			Ireland	2023-07-04
Brigie Stokes	Dublin			Ireland	2023-07-04
Milan Kr Khati	Gangtok		737101	India	2023-07-04
Michelle Kelly	Abu dhabi			Ireland	2023-07-04
Alan O'Neill	Waterford			Ireland	2023-07-04
Martha Cahill	Waterford			Ireland	2023-07-04
Bernie Kenneally				Ireland	2023-07-05
Sabina Manafli	Tullamore			Ireland	2023-07-05
Toni Veale	Canberra		2914	Ireland	2023-07-05
Aine Farrell	Dublin			Ireland	2023-07-05
Teodora Macavei				Ireland	2023-07-05
Pieter Ploeg	Lismore			Ireland	2023-07-05

Merijn de Jong	Amsterdam			Ireland	2023-07-05
Zohra Mountasser	Dublin		D02	Ireland	2023-07-05
Kevin Conroy				Ireland	2023-07-05
rosie x	Dublin		D02	Ireland	2023-07-05
Mees de Graaf	Amsterdam		1091	Netherlands	2023-07-05
Richard Blackburn				Ireland	2023-07-05
Oliver Green				Ireland	2023-07-05
Tiffany Dowson	Naas			Ireland	2023-07-05
Omar Faruque				Ireland	2023-07-05
Nakyta Grimm	North Vancouver		v7h 1n8	Ireland	2023-07-05
Caitriona Lyons	Abbeyfeale			Ireland	2023-07-05
Anthony Maher				Ireland	2023-07-05
Matthew Finney	Stoke-on-trent		ST3	UK	2023-07-05
Fiona Byrne				Ireland	2023-07-05
Aoibhinn Raethorne	Dublin			Ireland	2023-07-05
Rebecca McEleavey	Birkenhead		CH43	UK	2023-07-06
Crowley, Kathleen	Dublin			Ireland	2023-07-06
Hilary Harvey	Kilkenny		Roi	Ireland	2023-07-06
Kiera Landers	Dublin			Ireland	2023-07-06
Olive Condron	Carlow			Ireland	2023-07-06
Marie Landers				Ireland	2023-07-06
Edith Harty.	Waterford.			Ireland	2023-07-06
Bernadette Landers	co waterford			Ireland	2023-07-06
STEVEN BARRY				Ireland	2023-07-06
Ewout van der Knaap				Netherlands	2023-07-06
Brian Windsor				Ireland	2023-07-06
Me-sharon Warren				Ireland	2023-07-06
Fred van Nes				Netherlands	2023-07-06
Brian Cameron			34000	Ireland	2023-07-06
M Malone				Ireland	2023-07-06
Ómaí Ransome	Cork			Singapore	2023-07-06
Dominic Comerford	Tiel		4001	Singapore	2023-07-06
Caoimhe Scully	Luimneach			Ireland	2023-07-06
Robyn Davis				Netherlands	2023-07-06
John J Cahill	Dungarvan			Ireland	2023-07-06
Casarina FINN	Youghal, Cork			Ireland	2023-07-06
Marilena Manakou				Netherlands	2023-07-06
Gerry Lennox				Ireland	2023-07-06
Jimmy Comerford	Tiel		4001	Netherlands	2023-07-06
alla lobkova	Дублин			Ireland	2023-07-06
Bozena Moore	Dungarvan			Ireland	2023-07-06

Carmel Dudley	Dublin			Ireland	2023-07-06
Ell B				Ireland	2023-07-06
Sean O C	Dublin			Ireland	2023-07-06
Sinead Desmond				Ireland	2023-07-06
Helen Murphy	Cork			Ireland	2023-07-06
Sharon Hawkins				Ireland	2023-07-06
Simon Fraser				Ireland	2023-07-06
Gemma Kelly				Ireland	2023-07-06
Aisling Bardsley	Cork			Ireland	2023-07-06
Mary Cahill				Ireland	2023-07-06
lorraine dickinson	waterfotd			Ireland	2023-07-06
Eithne O Shea	Co. Waterford		0	Ireland	2023-07-06
Stefan Reynolds	Lismore		SW139JS	Ireland	2023-07-06
Gillian Coffey	Waterford			Ireland	2023-07-06
Christine Coffey	Dungarvan			Ireland	2023-07-06
Jack Coffey				Ireland	2023-07-06
FLORINA COSMA				Ireland	2023-07-06
Eirn Lyons	Kerry			Ireland	2023-07-06
Alice Cunneen	Dublin			Ireland	2023-07-06
Margaret Corr	Waterford			Ireland	2023-07-06
William Radford	Dublin			Ireland	2023-07-07
nick robley	Manchester		M43	UK	2023-07-07
Elena Horvat	Dublin			Ireland	2023-07-07
Olivia Lennox				Ireland	2023-07-07
Monica O Brien				Ireland	2023-07-07
nikki parle	Sligo		Se5 7Af	Ireland	2023-07-07
Bartosz Dembowski	Leeds		LS9 8PD	UK	2023-07-07
Aoibhe O' Donoghue	waterford			Ireland	2023-07-07
éabha Sullivan	Cork			Ireland	2023-07-07
Katriona O'Donoghue	Dungarvan			Ireland	2023-07-07
Diane G.	Clonmel			Ireland	2023-07-07
Bram van der Knaap				Netherlands	2023-07-07
rachel veale	Waterforx			Ireland	2023-07-07
Anne Cunningham	Midleton			Ireland	2023-07-07
Larissa Nascimento	Dublin			Ireland	2023-07-07
Olena Liudzhenska				Ireland	2023-07-07
Natalia Makuch				Ireland	2023-07-07
Alex johns	Cork			Ireland	2023-07-07
Sheila Gaughan				Ireland	2023-07-07
Sarah Lacey	Waterford			Ireland	2023-07-07
Patrick Dalton	Waterford			Ireland	2023-07-07

Mike Lacey	Cork			Ireland	2023-07-07
Jamed Lacey				Ireland	2023-07-07
Shauna Cullen	Dublin			Ireland	2023-07-08
Paul Lacey	Waterford			Ireland	2023-07-08
Deborah Chellar				Ireland	2023-07-08
Caitlin Windsor Smith				Ireland	2023-07-08
Maureen O Donoghue	Coatbridge		Ml5 1pn	Ireland	2023-07-08
Oscar van der Knaap				Netherlands	2023-07-08
Ewelina Bialecka				Ireland	2023-07-08
Paul Shields				Ireland	2023-07-08
Emilie Kuiper	Apeldoorn		7321	Singapore	2023-07-09
Emer McGonigle				New Zealand	2023-07-09
Stephen McCarthy	Aberdeen		AB11 7WG	Ireland	2023-07-09
Mylou Eggermont	Apeldoorn		7311	Netherlands	2023-07-09
Margaret O'Brien				Ireland	2023-07-09
Feena Lacey				Ireland	2023-07-09
peter T Simmonds				Ireland	2023-07-10
Sijan Ghomas	Muscat			Oman	2023-07-10
Louise lyons				Ireland	2023-07-10
Diarmuid I riordan	London	England	Sw208bl	UK	2023-07-10
Ben Wade				Ireland	2023-07-10
Sharon Mangan	Carlow			Ireland	2023-07-10
Frances Ronayne	Dungarvan			Ireland	2023-07-10
Declan Whelan	Dundalk			Ireland	2023-07-10
Brid Roantree	Dublin			Ireland	2023-07-10
Kristina Nikitina	Tralee			Ireland	2023-07-10
Breda Cunningham				Ireland	2023-07-10
Emily Whittle	Chiswick		W4	UK	2023-07-10
Esther Barron	Cappoquin			Ireland	2023-07-10
Lynne Percy	Portlaoise			Ireland	2023-07-10
Gillian Cussen				Ireland	2023-07-10
eimear omeara				Ireland	2023-07-10
kayla ionkova	Dublin			Ireland	2023-07-10
Zbigniew Gurgul				Ireland	2023-07-10
Daniel Bray				Ireland	2023-07-11
Frank McNamee	Wexford			Ireland	2023-07-11
declan conway	Dublin			Ireland	2023-07-11
Carol Kane				Ireland	2023-07-11
Eileen Hallissey				Ireland	2023-07-11
Paul Dowd	Dublin			Ireland	2023-07-12
jamie kennedy	Nenagh			Ireland	2023-07-12

Fiona Cummins	Tullamore			Ireland	2023-07-12
Emer Barry	Lismore			Ireland	2023-07-12
Aileen Mc kay				Ireland	2023-07-12
Roisin Moore				Ireland	2023-07-12
Dean Stacey				Ireland	2023-07-12
Pamela Hanrahan				Ireland	2023-07-12
Emma Lally	Tullamore			Ireland	2023-07-12
Julie Rodgers	Hove		BN31FH	Ireland	2023-07-13
Michelle Hickey				Ireland	2023-07-13
Norah O'Dwyer	Clare			Ireland	2023-07-14
Rosa Cabrerizo	Hospitalet de Llobregat		8905	Spain	2023-07-14
Patrick Manahan				Ireland	2023-07-14
Jill McGrath	Waterford		Waterford	Ireland	2023-07-15
Helen Leddy				Ireland	2023-07-15
clodagh mcwalter	Cork			Ireland	2023-07-15
John Gorodecky	Santo Domingo Este		WC2n6aa	Dominican R	2023-07-15
Gerry Mulreany	Dublin			Ireland	2023-07-16
Jenny Power	Waterford			Ireland	2023-07-16
Geraldine O Keeffe	Waterford			Ireland	2023-07-16
Terrie Burke	Tipperary			Ireland	2023-07-16
Bela Kelemen	Dublin			Ireland	2023-07-17
Jenny Sheridan	Delgany			Ireland	2023-07-17
Donna Troy	waterford			Ireland	2023-07-17
Elaine Farrell	Crumlin Dublin			Ireland	2023-07-17
Tom Spelman	Galway			Ireland	2023-07-18
lauren mccarthy	carlow			Ireland	2023-07-18
shane stapleton	Dublin			Ireland	2023-07-18
Jeff Wallace	Shannon			Ireland	2023-07-19
Jacqueline Stewart	Cork			Ireland	2023-07-19
Kristen Worth	Dublin		D02	Ireland	2023-07-19
Mag Mason	Waterford			Ireland	2023-07-19
Áine Whelan	Dublin			Ireland	2023-07-19
Alannah Carey Bates	Tetbury		GL8	Ireland	2023-07-20
Jacqui Quinn				Ireland	2023-07-20
Tara O' Donnell	Bundoran			Ireland	2023-07-20
shirley swan	Birmingham		b14 7sr	UK	2023-07-20
Marie Cronin	Cork			Ireland	2023-07-20
John Moloney	Cork			Ireland	2023-07-20
Sheila de Courcy	Dublin			Ireland	2023-07-21
Christina Douglas	Co. Cork			Ireland	2023-07-21
Carol smith				Ireland	2023-07-22

Margaret Reen	Killarney			Ireland	2023-07-22
Aileen Buckley	Waterford			Ireland	2023-07-22
Trevor Power				Ireland	2023-07-23
Lucrezia Salvadego Molin Ugoni				Ireland	2023-07-23
John Walsh				Ireland	2023-07-23
M M	Newry			Ireland	2023-07-23
Stephen Mooney				Ireland	2023-07-24
Michael Kelly	Dublin			Ireland	2023-07-24
Luana Fontes				Ireland	2023-07-24
William Bumster				Ireland	2023-07-24
Cathal Mcnamara	Dublin			Ireland	2023-07-25
Deborah Cashell	Luimneach			Ireland	2023-07-25
Vaida Fredrick	Cork			Ireland	2023-07-25
Steve Bumster	Waterford			Ireland	2023-07-25
Mark Mc Cabe				Ireland	2023-07-25
Alan Murphy				Ireland	2023-07-25
Ann Prendergast	Ballinasloe		H53	Ireland	2023-07-25
Luke R	Brisbane		4064	Australia	2023-07-25
Kathleen Mulcahy	Waterford			Ireland	2023-07-25
Louise Mason	Dungarvan			Ireland	2023-07-28
Michael Wall				Ireland	2023-07-28
Mike Bumster	Dungarvan			Ireland	2023-07-29
Marti Healy	Dublin		Dublin 3	Ireland	2023-07-29
Sharon McCarthy	Cork			Ireland	2023-07-29
Kevin Tuohy	Cork			Ireland	2023-07-29
Humaira Haniff	Johannesburg			South Africa	2023-07-30
Annabelle Jennings	Dublin			Ireland	2023-07-30
Judy Alderton				Ireland	2023-07-30
K.N Adams				Ireland	2023-07-30
Cheikh Malick Ba				Ireland	2023-07-30
Rach Monahan	ireland		none	Ireland	2023-07-30
Edel Kelly	Kilcock			Ireland	2023-07-30
Anna O' Driscoll				Ireland	2023-07-30
Carmel Power				Ireland	2023-07-30
Elaine Whyte	Kildare			Ireland	2023-07-30
April Kling Meyer	Cross, County Cavan		78751	Ireland	2023-07-30
Anne Baily				Ireland	2023-07-30
Maria Ronayne				Ireland	2023-07-31
Oisin Boyd	Ennis			Ireland	2023-07-31
Angela Collender				Ireland	2023-07-31
Fufus Notmyactuallastname				Ireland	2023-08-01

michelle kenrick	Cork			Ireland	2023-08-01
Shane Kenrick				Ireland	2023-08-01
Sylwia Zaleska	Newbridge			Ireland	2023-08-01
Karen Green	Waterford, Waterford, Ireland			Ireland	2023-08-01

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Declan Fitzpatrick, of Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Declan Fitzpatrick

Date: 1/08/23

Submission Petitioner Record

I, Ray Cummins, of Kilkeany Ballymacmague

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Ray Cummins

Date: 27 - 7 - 2023

Submission Petitioner Record

I, Lisa Carrigan, of Kilkeany, Ballymacarbry

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Lisa Carrigan

Date: 27/7/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, DORIS REINISCH, of KILKEANY, BALLYMACARBRY confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Doris Reinisch

Date: 30/07/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, NOËL PEILOW, of REANADAMPAUN, BALLYMACARBRY.

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed:

Date: 28/07/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, BRIAN WALSH, of KILLCANN, BALLYNAGUILKEE

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: [signature]

Date: 28 July 2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, ..Dhruv Sandoval Buldawo....., of ..Lyre East, Ballymacarbry, Waterford..... confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed:

Date: 29/07/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Aoife O' Brien ....., of Lyre East, Ballymacarbry, Waterford .....

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed:

Date: 29/07/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Regina Reinisch, of Dernjacgasse 21/8/21, Vienna, Austria confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Regina Reinisch

Date: 28/7/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Jerry DAHILL, of DORRYGRATH CAHIR

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Jerry Dahill

Date: 1. 8. 22

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Maura Buckley of main st., Clogheen

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Maura Buckley

Date: 1/8/23.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, BRIAN O GORMAN, of KILCASH

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: BOG

Date: 01/08/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Joseph Hogan, of ballymacarbry upper eq1 H22

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Joseph Hogan

Date: 1/8/23

KNOCKMEALDOWN PROTECTION GROUP
PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Anita O'Mahony, of Ballymacarbry Upper eq1 H228

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Anita O'Mahony

Date: 1/8/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Jacqueline Walsh of Convent Road, Cahir, Co. Tipperary confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

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I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: J Walsh

Date: 30/7/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, MARGARET WALSH, of THE ELMS CONVENT RD, CAHIR, Co. Tipp confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Margaret Walsh

Date: 1/8/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Clive Banes, of Kilkeany Ballymacarbry...
confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: C Banes

Date: 31.07.23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Patrick Phelan, of OF Shanlaguna Ballymacm

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Patrick Phelan P.C

Date: 30 July 2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Josephine Phelan, of Shanballyanne Nire Valley confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Josephine Phelan.

Date: 29/7/2023.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Eddie Phelan, of Shanballyane Nire Valley.
confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Eddie phela.

Date: 29/7/2023.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Patrick Phelan., of Shanballyanne Nire Valley confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Patrick Phelan.

Date: 29/7/2023.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, MARY FENTON, of SILLAHEEN, BALLYMACARBRY

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Mary Fenton

Date: 26th July 2023.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, MARTINA MULLINS, of KILKEANY, BALLYMACARBRY, Co Waterford confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: M. Mullins

Date: 26/07/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, STEPHEN MULLINS, of ICILICEANY, BALLYMACARBRY, WATER

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed:

Date: 26/7/23

KNOCKMEALDOWN PROTECTION GROUP

Submission Petitioner Record

I, Eoin Kearns, of Corradoon

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Eoin Kearns

Date: 30/07/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

We Sean & Karen Kearns, of Ballinaguilkee Ballinamult.

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Sean Kearns & Karen Kearns

Date: 30/7/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Mike Keams, of Ballinaguilkee, Ballinamult confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Mike Keams

Date: 30-07-23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Clodagh Kearns, of Ballynamult, Ballynaguilkee,
confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Clodagh Kearns

Date: 30/07/23.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Nicholas Dalton, of Curradoon, Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Nicholas Dalton

Date: 30/7/23

KNOCKMEALDOWN PROTECTION GROUP

Submission Petitioner Record

I, Tina O'Grady, of Corradoon, Ballymacmult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Tina O'Grady

Date: 30/07/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Sandra Mulcahy, of Ballynagulkee, Ballinamult
confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Sandra Mulcahy

Date: 30/07/2023

KNOCKMEALDOWN PROTECTION GROUP
PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Trevor Power, of Ballinagulkee Lower, Ballinamult confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: T Power

Date: 29/07/23

KNOCKMEALDOWN PROTECTION GROUP

Submission Petitioner Record

I, ...MARY POWER..., of ...BALLINAGULKEE.....
confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Mary Power

Date: 30th July 2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

We, Gerard Ann Commins, of Dean, Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Gerard Commins, Ann Commins

Date: 29/7/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES.

Submission Petitioner Record

I, Catherine Walsh, of 3 Deerpark View, Ballymacarbry confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: C Walsh.

Date: 01 Aug 2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Roisin Walsh, of Ballymacmagun West, Cahir

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: R Walsh

Date: 1/8/23.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, KEVIN WALSH, of BALLYMACADAM WEST, CAPPOQUIN

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: K. Walsh.

Date: 01-08-2023.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, DANIEL BRAY, of KNOCKNAFALLA, CAPPOQUIN, CO. WATERFORD.
confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Daniel Bray

Date: 30/07/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Kate Fitzpatrick, of Knockmeal, Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Kate Fitzpatrick

Date: 1 / 08 / 23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Scott Graham, of Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Scott Graham

Date: 1/08/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Sarah Fitzpatrick, of Knockmeal, Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: S. Fitzpatrick

Date: 1/8/23

KNOCKMEALDOWN PROTECTION GROUP

Submission Petitioner Record

I, Rachel Keogh ....., of Doon, Ballinamult Waterford.
confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Rachel Keogh

Date: 30.11.23.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Kieran Keogh, of Doon, Ballinamult Waterford confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Kieran Keogh

Date: 30 July 23

KNOCKMEALDOWN PROTECTION GROUP

Submission Petitioner Record

I, Ken Burke, of Doon, Ballinamult, Co. Waterford confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed:

Date: 29/03/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Nollaig Burke, of Doon, Ballinamult, Co. Waterford.
confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Nollaig Burke

Date: 29 - 07 - 2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, THOMAS KEANE, of Ballinagulkee Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Thomas Keane

Date: 27/7/2023

KNOCKMEALDOWN PROTECTION GROUP
PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Mary Kearns, of Curradoon Ballinamult
confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Mary Kearns

Date: 29/7/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, JOHN KEARNS, of CURRADOON, BALLINAMULT confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: John Kearns

Date: 29/07/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Aoife Fitzpatrick, of Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Aoife Fitzpatrick

Date: 1/08/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Kathleen Fitzpatrick, of Ballynamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Kathleen Fitzpatrick

Date: 1/08/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT FOR HEALTHY LIVELIHOODS

Submission Petitioner Record

I, Declan Fitzpatrick, of Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Declan Fitzpatrick

Date: 1/02/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I Sean Fitzpatrick, of Knockmeal, Ballymacmague N

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Fitzpatrick

Date: 01/08/23

KNOCKMEALDOWN PROTECTION GROUP

Submission Petitioner Record

I, Lorraine Kearns, of Melleray

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: L Kearns

Date: 01/08/23.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, JACK CUMMINS, of FARNANE UPPER

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Jack Cummins

Date: 31/07/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Fiona Cummins, of Farnane Upper

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Fiona Cummins

Date: 31/07/2023

KNOCKMEALDOWN PROTECTION GROUP

Submission Petitioner Record

I, Marie Walsh Cummins of Farnane Upper

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Marie Walsh Cummins

Date: 30th July, '23

KNOCKMEALDOWN PROTECTION GROUP
PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Onra Cummins, of Farnane Upper

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Onra Cummins

Date: 30/07/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Mary Cummins of Farnane Upper

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Mary Cummins

Date: 30 July 2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Michael Wall, of Ballynaguilkee Upper, Ballynamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Michael Wall

Date: 30 July 2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Grainne Wall, of Ballinagulkee Upper, Ballinamult confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Grainne Wall

Date: 30/07/2023.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Maureen Dalton., of Curradoon, Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Maureen Dalton

Date: 28.07.2023.

KNOCKMEALDOWN PROTECTION GROUP

Submission Petitioner Record

I, Mary McCarthy, of Deelish, Dungarvan

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: M. McCarthy.

Date: 29th July 2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, fiona cummins, of farnane upper

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: fiona cummins

Date: 31/07/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, JACK CUMMINS, of FARNANE UPPER

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Jack Cummins

Date: 31/07/2023

KNOCKMEALDOWN PROTECTION GROUP

Submission Petitioner Record

I, Anthony Summers ..... of Dromore, AGLISH, CAPPOQUIN, CO. WATERFORD ..... confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Anthony Summers

Date: 29/7/2023

KNOCKMEALDOWN PROTECTION GROUP

Submission Petitioner Record

I, Robbyn Swan, of STILL POINT, DROMORE, AGLISH, CAPPOQUIN confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed:

Date: 28/7/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, ANNE MCCARTHY LEBAUPAIN of DOON, BALLINAMULT, CO WATERFORD E91 YD93 confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: A Lebaupain McCarthy

Date: 24/07/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, BRENDAN MCCARTHY of DOON, BALLINAMULT, CO. WATERFORD E91 YD9

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: B. M

Date: 24 - JUL - 2023

KNOCKMEALDOWN PROTECTION GROUP

Submission Petitioner Record

I, SHARON MCARTHY, of KNOCKANANG, FERMOY, CORK confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Sharon McCarthy

Date: 29 July 2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Áine Gallagher, of Tonkaneena Ballinamult Co Waterford confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Áine Gallagher

Date: 21 - July - 2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Catherine Archbold, of Curradoon, Ballinvamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Catherine Archbold.

Date: 28th July 2023.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, PATRICK DALTON, of CURRADOON, BALLINAMULT.....
confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed:

Date: 28/7/23.

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, K. Moore, of Bawnfaun

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Kathleen Moore

Date: 27-07-2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Willie O Donoghue, of Crowhill Cappoquin

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Willie O Donoghue

Date: 29-7-'23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, [signature], of [signature]

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: [signature]

Date: 29/7/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Clodagh Troy, of Shrough, Lismore Co. Waterford confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: C. Troy

Date: 29.07.23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, WAYNE MCNULTY, of BALLYDUFF UPPER

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed:

Date: 30-7-23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Saoirse Nicell, of Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Saoirse Nicell

Date: 29/07/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Tara Ledingham, of Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Tara Leyhe

Date: 29/7/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Hilda Nicell, of Clonegegale, Ballinamult

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Hilda Nicell.

Date: 29/07/2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, ANN O FARRELL, of CAPPOQUIN

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: ANN O FARRELL

Date: 29 July 2023

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

We, LIAM + RACHEL O'BRIEN, of FEDDAUN, MOUNT MELLERAY, CAPPOQUIN

WE ARE
~~I am~~ confirm that against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

WE ARE OUR
~~I am~~ lodging ~~my~~ objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: LIAM O'Brien RACHEL O'Brien

Date: 29/07/2023

KNOCKMEALDOWN PROTECTION GROUP
PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

Pat Q Eileen Halliday

I, ..., of ....Melleman.....

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Eileen Halliday

Date: 29/7/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, Colette Wallace, of Abbeyside

confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Colette Wallace

Date: 29/1/23

KNOCKMEALDOWN PROTECTION GROUP
PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, LUIZA SPENCER, of MARLPIT FARM, COOLAGORTBOY, CAPPOQUIN P51 XOE9 confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Luiza Spencer

Date: 31/07/23

KNOCKMEALDOWN PROTECTION GROUP

PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, DANIEL BRAY, of KNOCKNAFALLA, CAPPAQUIN, CO. WATERFORD.
confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed: Daniel Bray

Date: 30/07/2023

KNOCKMEALDOWN PROTECTION GROUP
PROTECTING OUR ENVIRONMENT, HEALTH AND HOMES

Submission Petitioner Record

I, ANTHONY SPENCER, of MARLPIT LODGE, KEEREN LOWER, CAPPOQUIN confirm that I am against the development of the proposed Dyrick Hill Wind Farm in the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield), Castlequarter, Clooncogaile, 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.

The Project is currently lodged with An Bord Pleanála by Jennings O'Donovan and Partners Ltd on behalf of the wind farm Developer, Dyrick Hill Wind Farm Ltd (part of the EMPower group), under Case Ref: 317265.

I am lodging my objection as part of this overall submission provided by the Knockmealdown Protection Group.

Signed:

Date: 31/07/23