

Dyrick Hill Wind Farm – Further Observation

I wish to make a further observation on the Dyrick Hill Wind Farm application following its reactivation.

I accept that Ireland needs to increase renewable energy generation and meet its climate targets and am not opposed to wind energy. My concern is whether those targets justify this particular development, at this scale and in this location, given the landscape and environmental impacts already identified.

Climate targets and the Development Plan

I understand that following the Supreme Court decision in *Coolglass Wind Farm Ltd v An Bord Pleanála* [2026] IESC 5, the Commission must properly consider whether the climate benefits of this development require or justify the exercise of its power under section 37G(6) to depart from the Development Plan.

I also understand that *Coolglass* does not mean that renewable energy developments must automatically be granted permission. The Supreme Court described section 15 as a “climate sense check” and made clear that it does not dictate a single result. It also stated that section 15 cannot be the main determinant of whether planning permission is granted or refused and that proper planning and sustainable development considerations must also be taken into account.

The previous Inspector already accepted the importance of renewable energy and that Dyrick Hill would contribute towards national and European renewable-energy targets.

I therefore believe the question is not simply whether Ireland needs more renewable energy. It is whether the climate benefits of this particular development justify departing from the Development Plan, when the previous refusal also identified separate concerns about landscape, habitat loss and protected species.

Dry heath and biodiversity

In her report the Inspector listed three reasons for refusal. I am concerned about the third reason, relating to dry heath, biodiversity and protected birds.

The proposed development would result in the direct loss of approximately 3.5 hectares of dry heath, an Annex I habitat. The Habitat Management Plan (HMP) proposes managing and improving other areas of habitat in response to this loss.

The Inspector was not satisfied that this was sufficient, concluding:

August 2026

“I am not satisfied that the Habitat Management Plan will sufficiently address the direct and residual impacts of this development.”

Existing established habitat and habitat which it is hoped will improve through management in the future are not necessarily the same thing.

The HMP relies on long-term measures including grazing and vegetation management and provides for monitoring over a period of up to 40 years.

The HMP contains provisions for monitoring and reporting, but I remain concerned about how this will work in practice over such a long period. Who will ultimately be responsible for ensuring that the promised ecological outcome is achieved throughout the lifetime of the project?

My concern is about relying on a future ecological outcome to compensate for habitat which already exists and will be permanently lost. While the HMP predicts a quantitative net gain of dry heath, a net gain in hectares does not necessarily mean an ecological net gain. The consequences of that permanent loss may not be fully predictable.

Furthermore, golden plover were recorded using the Broemountain area during the applicant's surveys, and the applicant's own ornithological assessment acknowledged that “the placement of turbines in the commonage area poses a significant risk of displacing Annex-I protected golden plover.”

Hen harrier were also recorded in the wider upland area. The Inspector considered that the implications of habitat loss and disturbance for hen harrier had not been sufficiently examined.

For these reasons, I do not think the loss of 3.5 hectares of existing dry heath can simply be balanced against a larger number of hectares proposed for future habitat management.

Climate change and biodiversity

I do not believe climate change and biodiversity should be treated as competing environmental concerns where addressing one automatically overrides the other.

Ireland urgently needs renewable energy. It also has obligations to protect habitats, biodiversity and protected species.

The fact that a development produces renewable electricity does not make the loss of Annex I habitat or the displacement of protected birds environmentally insignificant.

The previous Inspector had already accepted the renewable-energy benefits of Dyrick Hill when she reached her conclusions about the dry heath, hen harrier and golden plover.

August 2026

I therefore ask the Commission to consider whether anything has changed which would justify departing from those previous ecological findings.

Landscape and sense of place

The second reason for refusal concerned the effect of the scale and layout of the development on a “Most Sensitive” upland landscape.

This was not simply a consequence of the Wind Energy Exclusion Zone. The Inspector visited the area, considered the applicant's photomontages and concluded that the proposed development would adversely affect the character and integrity of the landscape.

There is also a personal aspect to landscape which is difficult to capture in a technical assessment.

Broemountain is an important part of my sense of place. When I see the Knockmealdowns in the distance, I automatically look for the ridge of Broemountain in the skyline. I know that home is at the bottom of that mountain. Turbines of the scale proposed would fundamentally change the appearance of that ridge and the landscape that we know as home.

We have tried to engage constructively with EMPower because we wanted to understand how we could continue to live well here if the development went ahead. Noise, particularly at night, is one of our main concerns. We asked whether baseline noise monitoring could be undertaken at our home to provide an objective record of the existing noise environment. This request was declined. We also tried to discuss practical measures which might reduce the impact on our home. We were told that “we all have to do our bit” and that “you will get used to the noise.”

I understand that we all have a responsibility to address climate change. However, I do not think concerns about noise, sleep, people's homes and their quality of life should be dismissed on the assumption that residents will eventually become accustomed to the effects.

We have lived here for 20 years and our home represents a large part of what we have worked for and part of our security for the future. We are not asking to be insulated from the changes necessary to address climate change. We are asking that the people who will live beside this infrastructure are also taken seriously. To me, that is part of what a just transition should mean.

Conclusion

I accept that *Coolglass* requires the Commission to reconsider the climate aspects of this application. However, the previous refusal was not based on the Wind Energy Exclusion zone in the County Development Plan alone.

August 2026

There were separate findings concerning the landscape, the direct loss of Annex I dry heath and the implications for protected bird species. Those findings were made while recognising the renewable-energy benefits of the development.

I therefore ask the Commission not to exercise its power under section 37G(6) unless it is satisfied that the landscape and biodiversity concerns which contributed to the previous refusal have been properly resolved.

Ireland needs more renewable energy. But I do not believe that means the location and scale of individual developments, their effects on biodiversity and landscape, or the people who already live there should cease to matter.

My name and postal address are below;

Ann Morris

Priestown,

Ballinamult,

Clonmel,

Co. Tipperary