

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

From:

Tim van der Knaap

Knockboy,

Mt Melleray,

Cappoquin,

P51H261

Co Waterford

August 11th 2026

Regarding:

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

REACTIVATED CASE: Old Number 317265

Case reference: PA93.324420

Dyrick Hill Wind Farm Limited (Applicant)

Introduction:

I refer to my original submission to An Bord Pleanála in this matter, now over 3 years ago. There is nothing to withdraw from that, but I would like to add and emphasise a few points.

The Coimisiún has now, due to a judicial review, to review the original case.

It is not the fault of ACP [*from here for An Coimisiún Pleanála*] that Renewable Energy Developments in Ireland are haphazard and chaotic. Planning has developed since the great accomplishment of the Shannon hydroelectric scheme into a increasingly opportunistic and reactive way, led by developers.

That is not planning. Planning is based on vision and foresight. It should not be paving over cracks and filling potholes. Vision does not originate in the mind of an accountant or a quantity surveyor. They come on board in their important roles AFTER the architect has finished her/his vision and designed a plan and got approval for it from the client,

ACP seems restricted to a reactive task, more so due to various and changing political and legal requirements.

While a century ago the young Irish State was able to execute a vision with great enthusiasm and efficiency, the State now shows a fraction of that vision and has fallen victim to an influx of large (mostly foreign) companies who, with huge resources have the capacity to pummel communities into submission, divide them and explore them.

These companies exist NOT for the good of the Irish people, but for the good of their shareholders. They all compete...: I refer to the fact that FuturEnergy Ireland (Developer of the Scart Mountain Wind Farm) objected to the Dyrick Wind Farm – which is adjacent to Scart....

Meanwhile, authoritative studies find that almost a quarter of electricity in Ireland is now consumed by datacentres...: Since when does degrading biodiversity by corporations, in order to feed an increasingly higher number of power-hungry machines owned by other corporations (or are they?) make sense?

Maybe we should work on stopping the leak first, rather than mopping up with the tap still running?

This brings me to my formal points – quickly – because I too, like all objectors have a job that requires my attention and earns me a living.

I would appreciate it if the members of ACP would pay particular attention – but not limit themselves to – my points below. (Not in order of importance)

1. Failure to consider CUMULATIVE EFFECT.

The applicant has not provided a detailed study on the cumulative effect of the planned Scart Mountain Wind Farm. The effect of the current application can simply not be properly assessed without looking at the adjacent application.

2. Ensure there is no Project Splitting

There are a number of Irish High Court rulings — O’Grianna v An Bord Pleanála (2014), Sweetman v An Bord Pleanála (2023) and, most recently, North Westmeath Turbine Action Group & Sweetman v An Bord Pleanála (2025) — all holding that a windfarm and its grid connection form a single project under EU environmental law and must be assessed together, not as two unrelated applications before two different bodies.

3. Consultation with National Parks and Wildlife Service.

The revised Renewable Energy Directive (RED III). RED III aims to speed up and simplify the delivery of renewable energy infrastructure. RED III entered into force on 20 November 2023 and has been transposed into national law in Ireland by the European Union (Planning and

Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025) (“the RED III Regulations”)

4. The obligation of EU member states to implement the Nature Restoration Regulation.

On September 1st, 2026, the Draft National Plan for Ireland must be submitted to the EU. The final plan for National Nature Restoration must be submitted by September 1st, 2027. Failing to consider the Plan in the context of this application for the development of 12 turbines – inserting tons of concrete into mountain soil, peat etc - would certainly contravene the principles proper and sustainable planning. From a more formal view one can wonder if a decision can even be taken in good conscience on this development, knowing that the development may breach the future law on Nature Restoration. This in turn then would lead to further EU fines to Ireland...

5. Limited National Grid Capacity and increasing demand.

Demand from data centres and other new large energy users in Ireland is forecast to account for 31% of all energy demand by 2030. They need security of supply and cannot rely on intermittent sources. Alternative solutions like on (data centre-) site Small Modular Reactors (SMRs) might become a necessity.

A clear overall picture of granted applications for Solar Energy Farms and Wind Energy Farms in County Waterford should also be considered in the planning decision for this application. (A mere “thank you for your efforts, but sorry we are full” – might be the conclusion...)

In other words: The total cumulative impact of all these projects should also be part of the planning decision by ACP.

6. The ramshackle nature of the original application and surveys.

It is extra ordinary that a developer, with pockets deep enough to get consultants to write their (original) application, can submit a piece of such poor quality, that if it was written by a leaving cert student, it would not be given a pass.

Having a reference in the application of “Red Deer” and “Co Cork” – both of which do not appear in County Waterford is at least remarkable and doesn’t bode well for the rest of the “facts” submitted.

I do wonder if ACP considers the actual validity of the reports, which were made in the years *before* the original application. We – local people – *know* for instance that White Tailed Eagles have been sighted in *recent* months at the river Blackwater. A fantastic achievement of nature restoration. I doubt if these feature in any of the “studies” submitted by developer.

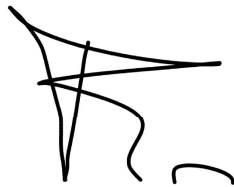
It also leads me to question the validity of some studies/surveys.

The official guidance by the Chartered Institute of Ecology and Environmental Management (representing and supporting ecologists and environmental managers in the UK, Ireland and abroad) indicates that **any surveys over 3 years** are considered out of date; full or partial updates are typically required....

7. Section 15 of the Climate Action and Low Carbon Development Act 2015

I trust that the members of ACP can uphold their original refusal to grant permission in wordings that do show to take account of the “practicability clause” in relation to all relevant EU rules and regulations that are applicable, in particular to Nature Restoration.

Yours,

A handwritten signature in black ink, appearing to be 'Tim van der Knaap', with a stylized, somewhat abstract form.

Tim van der Knaap