

3rd May 2018,
The Planning Officer, Waterford City and County,
The Mall, Waterford

Re: Variation to Waterford City and County Development Plan Wind Energy Map

1 Proposal

1.1 We hereby request that the Waterford City and County Development Plan Wind Energy Map be amended so that the area centred on Tallow in West Waterford and currently shown in the Wind Energy Map of the Development Plan as Blue, (that is a preferred area) and the area north of this area coloured green and south of Lismore be amended so that both these areas are changed to red and included in the No Go area. (See attached map)

1.2 The requested change in the development plan is from a preferred area as follows:

Preferred Areas (Areas coloured in Blue on the attached map)

These areas are suitable for wind farm development and should normally be granted planning permission unless specific local planning circumstances would support a decision to refuse permission in the context of the development plan.

And

Areas Open for Consideration (Areas coloured in green on the attached map)

Applications for planning permission will be treated on their merits with the developer having a clear responsibility to demonstrate as to why the development should be granted permission.

To

No-Go Areas (Areas coloured in Red on the attached map)

These are areas that are particularly unsuitable for wind farm development. While these areas are considered primarily unsuitable for wind farm development, there may be pockets of land within these "no-go areas" which, due to specific criteria such as significantly high wind speeds, distance from populated areas and screening by natural topography from scenic views and prospects, may be considered for wind farm developments subject to applicants providing appropriate submissions including wire frame analysis, zones of visual influence and digital terrain models.

2. The rationale for this change is that the area is unsuitable for wind farm development based on the following grounds:

2.1 Visual amenity :There are inherent conflicts between the wind energy policies and the policies relating to landscape and scenic routes which need to be resolved in favour of landscape protection and conservation. Wind farm development would give rise to potential significant adverse visual impact in this area,the designated scenic route R634 generally bounds this area to the west and the designated scenic route local road L2002 bounds it to the east while the river Bride bounds it to the north and the designated visually vulnerable landscape of Kilwatermoy mountain and Killeenagh mountain lies to the west and to the east.

A cursory review of the adverse visual impact of an existing unauthorised mast erected at Currandromaun highlights the potential extent of adverse visual impact on this wider area.

2.2 Density of existing residential habitation and schools: There is extensive residential settlement in this rural area; in the vicinity of the unauthorised mast there is c.80 dwellings, estimated population in excess of 200 persons. There are two schools in the vicinity of the mast. This is characteristic of the density of settlement pattern in the area and highlights significant potential for adverse impacts on humans in terms of noise, shadow flicker, disturbance, nuisance and visual impact giving rise to profound residential disamenity. Over 204 local community groups from across Waterford and Ireland have come together to highlight their direct opposition to wind farm development because of adverse impacts arising in terms of noise and impact on health when wind developments are too close to human habitation. Monitoring of existing wind farms impact on residential amenity has been inadequate.

2.3 Proximity to the Blackwater SAC: The Blackwater SAC ref 002170 is included in this area. Large areas drain to the SAC, which contains extensive protected species list under the Habitats Directive.

2.4 Camphire Bog: The Camphire Bog contains a flock of c. 200 Whooper Swans which form part of a larger flock that overwinter up and down the Blackwater Valley that are one of the defining interest of the two SPAs on the River Blackwater. There is an inherent conflict of wind turbines and bird life in the area.

2.5 The demesne landscape along the Blackwater River: which forms a unique historical landscape including Ballynatray Demesne, Strancally Castle, Headborough, Camphire, Dromana, and Tourin, would be significantly adversely impacted and the landscape context and setting of the demesne landscape character of this area severely eroded.

2.6 Sean Kelly Cycle route: the cycle route bounds this area to the east and is an unique tourist and amenity recreational asset which use would be compromised by wind farm development.

2.7 Avoidance of further cumulative impact in the area:recent development at Woodhouse and planning permission for development at Knocknamona show the extent of the impact of wind farm development in the area. This is particularly evident from the Dromore Ridge Viewing point where the view overlooks the Blackwater showing the confluence of the Bride and the Blackwater, the small field networks and ancient hedgerows and provides an understanding of the reading of the landscape character with views in the distance of the Comeraghs, Knockmealdowns and the Galtees. Potential wind farm development to the west would encircle and enclose the west Waterford landscape producing a bowl like effect imposing wind turbines on views in all directions. The Zone of Theoretical Visual Impact would encompass an excessively vast area extending possibly 30 to 50km depending on turbine height.

2.8 There are significant land use and economic implications of dispersed wind energy strategy throughout west Waterford. The land use implications are wide-ranging and profound in terms of impacts on the equine industry, agriculture, residential amenity, landscape and heritage character and ecology and habitats. There is a need for a more urban-centric, coherent and integrated energy and land use approach, which avoids dispersed wind farm development throughout west Waterford.

2.9 Waterford Renewable Energy Strategy: recognises that offshore, solar and ocean renewable technology could play a greater role in addressing Waterford's energy needs up to 2030. The Wind Energy Strategy will be reviewed as part of the Waterford City & County Development Plan (post 2017) and this variation should form an important input to that plan.

2.10 Waterford Energy Demand: has decreased since 2008 and is only forecast to attain 2010 demand levels by 2030.

2.11 Supply of wind energy nationally greatly exceeds demand and capacity of the grid network: This results in payments of the order of €580m pa to turn wind turbines off.

2.12 National Guidelines on Wind Energy are no longer fit for purpose as they predated the current large-scale turbines currently being developed and installed.

2.13 The existing unauthorised mast at Currandromaun and the wind farm grid application for Knockanore for 24 wind turbines with 60MW power output as set out in the Appendix 3 to the Waterford Renewable Energy Strategy would suggest a scale of future potential wind farm development that poses a significant threat to the area.

SIGNED:.....

ADDRESS:

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