The Planning Department

Waterford City & County Council

Menapia Building

The Mall

Waterford

11th December 2020

**Re. Proposed windfarm at Knocknaglogh Lower/Barranastook Upper/, Knocknamona/ Woodhouse or Tinakilly/, Monageela/Killatoor townlands, Dungarvan, Co Waterford**

**Ref. 20/845**

To whom it may concern,

This planning application proposes the construction of eight wind turbines standing up to 155 meters in height and of a mast up to 99m in height on a site in the Drum Hills, overlooking the Blackwater River Valley in west County Waterford. The Irish Georgian Society wishes to object to this proposal due to the significant negative impact it would have on the setting of protected structures and on views from designated scenic routes along the Blackwater River Valley. The Society is of the view that the application runs contrary to the provisions of the Waterford County Development Plan 2011-2017 and so respectfully urges that permission be refused.

**BLACKWATER RIVER VALLEY**

The Blackwater River Valley comprises one of Ireland’s most picturesque landscapes yet is one whose distinct character is under threat from the construction of these proposed wind turbines. The valley has long been celebrated for its scenic qualities with the antiquarian and artist Daniel Grose noting in the 1790s that “too much cannot be said of those picturesque scenes [it] affords which multiply as you proceed up the stream”. He observed that:

… the banks of this beautiful river throughout its whole course, is romantically ornamented with hanging woods, sloping lawns, and broken rocky cliffs, wild and majestic, often enriched with the elegant embellishments of art, handsome seats, picturesque ruins… Stalley, *Daniel Groose*, 1991

Some decades later William Makepeace Thackeray enthused about a journey west along the banks of the Blackwater from Cappoquin:

... the beautiful Blackwater river suddenly opened before us, and driving along it for three miles through some of the most beautiful, rich country ever seen, we came to Lismore. Nothing can be certainly more magnificent than this drive. Parks and rocks

covered with the grandest foliage; rich, handsome seats of gentlemen in the midst of fair lawns, and beautiful bright plantations and shrubberies; and at the end, the graceful spire of Lismore church, the prettiest I have seen in, or, I think, out of Ireland.

Thackeray, *The Irish Sketch Book,* 1842

The landscape of the Blackwater River continues to be celebrated today with scenic routes and sites along its banks promoted through Ireland’s Ancient East, and with castles, houses and churches forming a backdrop for the Blackwater Valley Opera Festival. One wonders how permission could be granted for a major development that would only undermine the area’s special interest and squander the potential to draw more visitors to enjoy its outstanding scenery.

**WATERFORD COUNTY DEVELOPMENT PLAN 2011-2017**

**Protected structures**

The *EIAR Landscape Illustration Pack* accompanying this planning application provides an essential tool in assessing the impact of the proposed development on protected structures in the vicinity. Of note are the views from Strancally Castle, Tourin House and especially Headborough House, all protected structures identified by the National Inventory of Architectural Heritage as being of either Regional or National importance. These clearly indicate how the 155m high wind turbines would feature prominently in the landscape and diminish the landscape setting of these houses and of views from their gardens and parklands.

It is a stated objective of the Waterford County Development Plan to “conserve and protect elements of the architectural heritage” which, it states, includes “gardens, demesnes and landscapes” (8.30 Conservation of the Architectural Heritage). Given the detrimental impact of the proposed wind turbines on the setting of the aforementioned protected structures, the Irish Georgian Society is of the view that this planning application would not comply with the conservation objectives of the Development plan and so should be refused permission.

**Scenic routes**

The Irish Georgian Society is of the view that the planning application has not adequately addressed the impact of the wind turbines on scenic routes identified in the County Development Plan. This states that applicants must “demonstrate that any proposed development shall not negatively impact on the character of a scenic route and that there shall be no obstruction or degradation of views towards visually vulnerable features or sensitive areas” (8.1 Landscape).

It is evident from the ZTV map (*EIAR Landscape Illustration Pack*) that two such scenic routes run through areas that would be directly impacted by the proposed development: Scenic Route 6 would be notably affected as it runs just to the south of the site, while views along extensive sections of Scenic Route 4 would be equally impacted upon and diminished.

In considering these scenic routes, the IGS notes that the Development Plan highlights how Waterford offers:

…an attractive tourist product that builds on the natural beauty of the County… [and] attracts discerning tourists who seek a quality product and experience.

6.11 Sustainable Tourism

It identifies the Blackwater Valley as one of the County’s principal draws and in Policy ECD 18 aims to:

continue building on the strengths of the County, giving priority to sustainably developing the tourism product etc… 6.11 Sustainable Tourism

Furthermore, the Plan states that:

Many of the top visitor attractions in the County, such as… the River Blackwater … owe their attraction to their spectacular beauty and setting. It is important to enhance these areas for their continued development in the tourism industry, while at the same time protecting and conserving the qualities that make these areas attractive in the first instance. Waterford County Council will promote a sustainable approach to the development of the tourism sector while protecting the built and cultural heritage which forms the resources on which the County’s tourism industry is built upon.

6.12 Sustainable Tourism and Recreation

Given the detrimental impact the proposed wind turbines would have on designated Scenic Routes and the consequent affect this would have on the tourism offering, it would seem evident that their construction would be contrary to the stated objectives of the County Development Plan and so they should not be granted planning permission.

**SUMMARY**

In conclusion, this planning application, proposing eight wind turbines standing up to 155 meters in height and a mast up to 99m in height, would have a considerable detrimental impact on the character and settings of protected structures of Regional and National interest in the Blackwater Valley, would compromise views along designated Scenic Routes, and would also compromise the tourism potential of the area. As such, the Irish Georgian Society is of the view that the proposals are be contrary to the conservation, landscape and tourism objectives of the Waterford County Development Plan and so should not be granted planning permission.

Yours sincerely,

Donough Cahill

Executive Director IGS