

Mark Lucey
Rath West
Ballymakeera
Macroom
Co. Cork

Date: 18th November 2022

Re: Wind farm development of 14 turbines with 110kV electrical substation and all related site works and ancillary development.
The townlands of Cahernacaha, Gortnabinna, Derryfineen, Gortyrhilly, Rath West, Derree, Fuhiry, Derreenaculling and other townlands, Co. Cork and Derryreag, Cummeenavrick, Glashacormick, Clydaghroe and Cummeennabuddoge, Co. Kerry.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

A receipt for the fee lodged is enclosed.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Cork County Council and County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

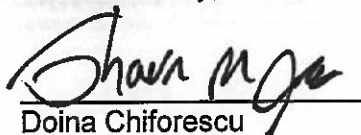
If you have any queries in the meantime, please contact the undersigned officer of the Board.

Tel	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Doina Chiforescu
Executive Officer
Direct Line: 01-8737133

PA04

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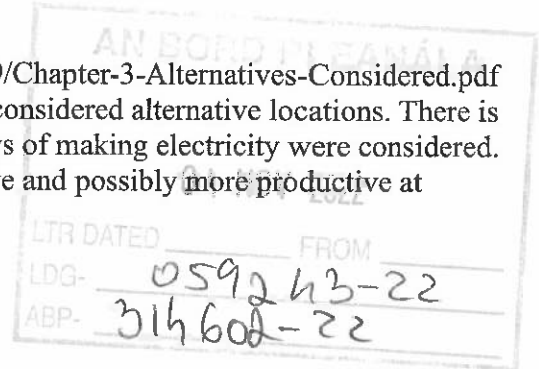
**Observations in relation to Proposed Gortyrahilly Wind Farm,
Ballyvourney, Co. Cork (Ref. No. ABP-313440-22)
Mark Lucey, Rath West, Ballymakeera, Macroom Co. Cork**

Observation 1

Alternatives

<https://gortyrahillyplanning.ie/wp-content/uploads/2022/09/Chapter-3-Alternatives-Considered.pdf> in considering Alternatives Gortyrahilly Wind Farm only considered alternative locations. There is no indication that other types of turbines or alternative ways of making electricity were considered. A quick google gives alternatives that could be less invasive and possibly more productive at energy production.

<https://vortexbladeless.com/>



Observation 2

exert from website.

Ireland has adopted binding agreements to reduce dependency on fossil fuels and increase energy production from sustainable sources, creating a requirement for the nation to transition to a low carbon economy. The binding EU targets have been transposed into Irish National Policy in the 2021 Climate Action Plan which focuses up to 13 GW future electricity production on the wind energy sector. This demonstrates the significance of wind energy in the Irish energy context and highlights the need for the proposed in reaching both EU and national renewable energy targets.

The Irish Government have highlighted wind energy to reduce carbon out put but there dose not seem to be any Government strategy on Wind Farms. This leaves big companies leave to inundate communities with wind mill farms. These Farms are subject to planning permission but only as individual farms of 12 -15 wind mills leaving small communities and individuals objecting to wind Farm after wind farm. There are 33 wind farms in a 20 km radius of all of which impact the natural view and of a picturesc horizon. Government after government have stalled on reducing carbon foot print for Ireland now local communities are suffering due to the large quantity of wind mills being rail roaded in to egsistance due the necessity to meet targets and avoid fines ye there is no national strategy on wind mill impact only restrictions on building wind mills.

Observation 3

3.5.2.3 Wind Speeds

Wind speed was assessed at the Site in order to determine if wind energy development would be feasible. Wind speed analysis through the Irish Wind Atlas produced by Sustainable Energy Authority of Ireland (SEAI) was used to determine average wind speeds Jennings O'Donovan & Partners Limited Consulting Engineers Sligo _ 6225 Gortyrahilly Wind Farm EIAR 13 August 2022 for the country. With the upland nature of the landscape, the Wind Atlas shows that wind speeds on the Site are consistent with a wind farm development (6.5ms -1 at 30m, 7.0ms -1 at 75m, 7.4ms -1 at 100m and 8.10ms -1 at 150m).

Wind speeds for present and past have been considered but going forward with climate change, the Lack of wind in summer months and high storm winds in winter consideration needs to be taken as to weather wind mills are the way for ward. I ask that wind speed and wind availability be considered for the future.

Observation 4

3.6 WIND FARM DESIGN AND LAYOUT

The design of the Development has been informed by the designers, Developers, engineers, landowners, environmental, hydrological and geotechnical, archaeological specialists, telecommunication specialists, and traffic consultants.

I object to the lack of involvement of local people and the general Public in the early stage of design. Consultation is at the end when all plans are in place. A large scale project like this should have pre consultation in order to address local concerns and local community should be part of the process rather than an after thought that allows for objections.

Criteria	First Layout	Second Layout	Third and Final Layout
	link traversing the Site.	to avoid interference with the telecoms link.	
Landscape & Visual	Neutral	Neutral	Neutral
Cultural Heritage	Potential impact due to the presence of an archaeological site within 20m of the substation. Larger development footprint would increase the potential for impacts on unrecorded, subsurface archaeology.	Neutral – the substation location was moved to maintain a 40m buffer from the archaeological site following advice from the Project archaeologist.	Neutral
Traffic and Transport	Neutral	Neutral	Neutral

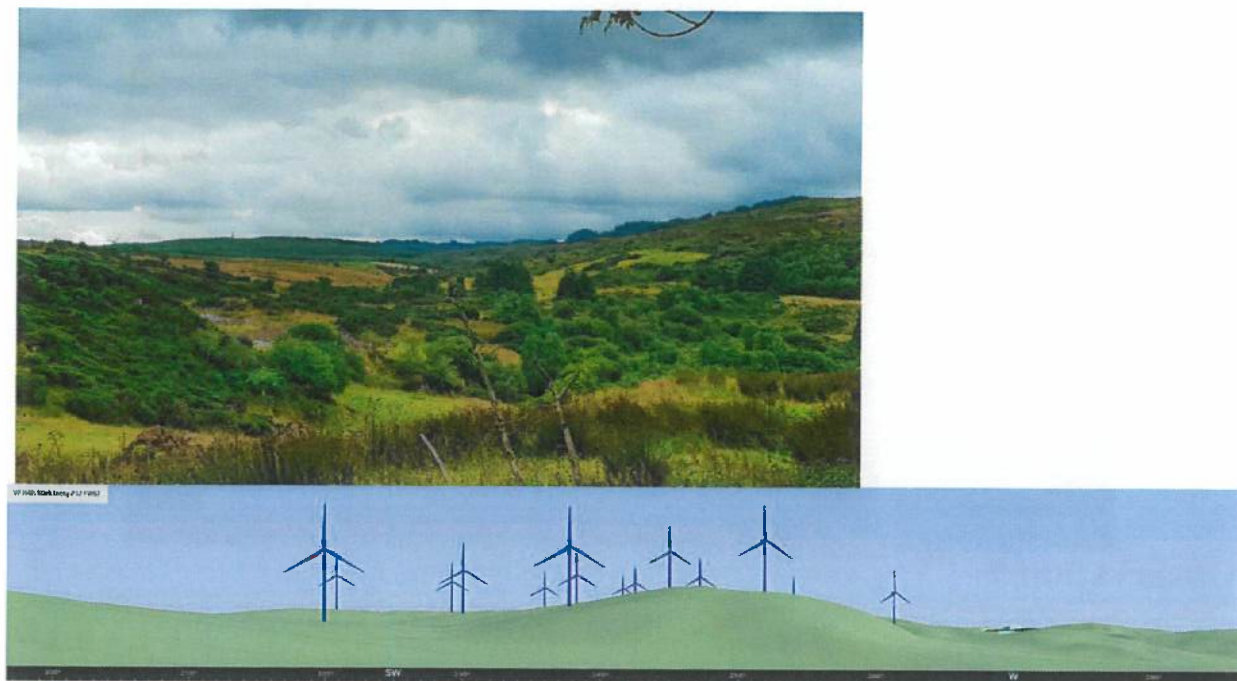
Table 3.2: Environmental effects from first and second layout iteration compared to the final layout. How can there be a neutral landscape and visual effect on 14 wind mills being erected on top of pristine hill side.

Observations 5

Chapter-4-Population-and-Human-Health.pd

4.4.7 Property Value Based on the available published studies the operation of a wind farm at the Site will not significantly impact on property values in the area. The Development will have a long-term imperceptible impact on property values.

This may be true for House holds further away from the wind Farm or house holds with limited elevation. Our house hold how ever will be significantly impacted by the wind farm. Our household will have full view of all 14 wind mills the closest being just over 1km away as well as the substation.



Observation 6

gortyrahillyplanning.ie/wp-content/uploads/2022/09/Chapter-5-Terrestrial-Ecology.pdf

Chapter-5-Terrestrial-Ecology.pdf 47 / 87 100%

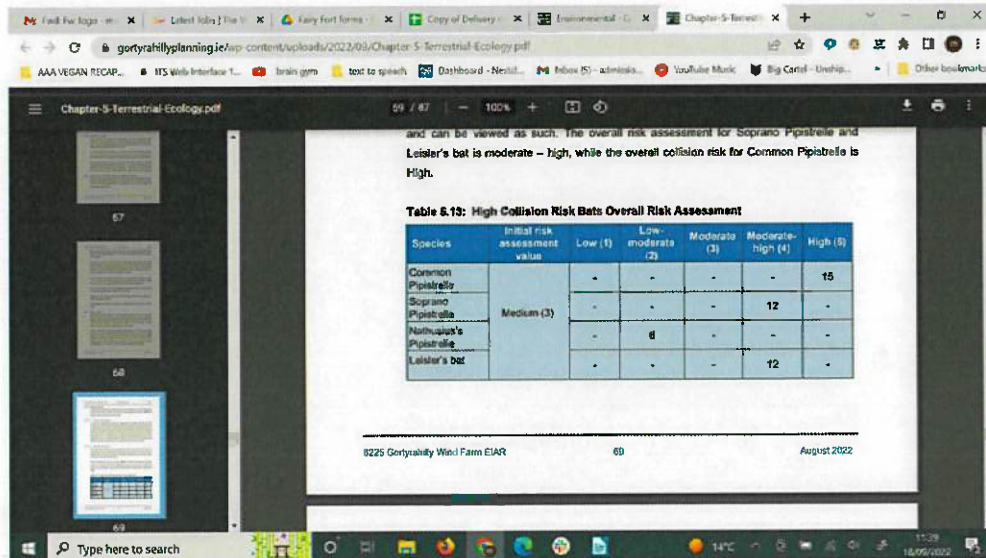
site, but this species is very quiet and sometimes hunts without echolocating, so it may be under-recorded by the static detectors.

Table 5.10: Results from static detector recordings

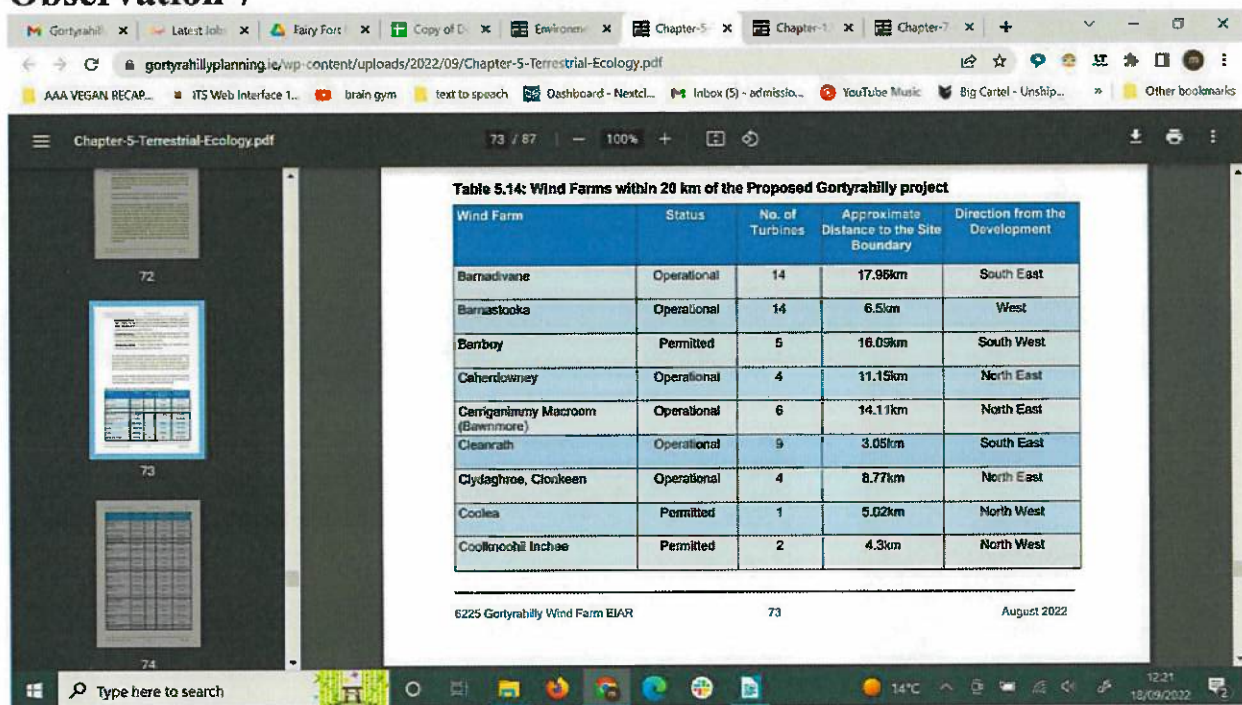
Common Name	Species	No. of recordings 2019	No. of recordings 2021
Brown long-eared bat	<i>Plecotus auritus</i>	269	99
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	20,331	6,923
Daubenton's bat	<i>Myotis daubentonii</i>	737	-
Leisler's bat	<i>Nyctalus leisleri</i>	1,661	1,167
Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>	51	1
Nathusius' pipistrelle	<i>Pipistrellus nathusii</i>	2,176	4
Natterer's bat	<i>Myotis nattereri</i>	174	50
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	3,354	3,257
Whiskered bat	<i>Myotis mystacinus</i>	190	-
40 kHz Pipistrelle	-	-	66
Myotis sp	<i>Myotis sp</i>	-	196
Whiskered / Daubenton's bat	<i>Myotis nattereri</i> / <i>Myotis daubentonii</i>	-	27
Total		28,953	11,790

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You might note from this exert that Common pipistrelle Bats have decreased in population from 20,331 top 6,923. You might also note in the exert below that this type of bat is high risk of impact. You might also note that the adjacent wind farm Cleanrath Wind Farm was constructed in the same time period which may account for the extreme drop in population of the Common pipistrelle Bat over this time period. Even though the over all risk is of medium value Common pipistrelle Bat is at high risk in this area and if it is the close by wind farm is the cause there is the potential to obliterate the population in this area with an new wind farm.



Observation 7



There is a saturation of wind mills in a 20KM radius of Gortyrahilly wind farm. 21 operational wind mill farm with a total of 182 wind mills and 9 Farms permitted with a further 50 wind mills to come and another 46 wind mills in the pre planning stage not including the 14 in ertyrahilly wind farm. That is a potential 292 Wind mills in a 20km radius. Our pristine mountain range looks like one big wind farm however on paper it looks like a collection of individual wind farms. The individual cannot decipher the different wind farms as they run into each other and our views are becoming obstructed the the mass of wind mills.

Chapter-5-Terrestrial-Ecology.pdf 74 / 87 100%

Wind Farm	Status	No. of Turbines	Approximate Distance to the Site Boundary	Direction from the Development
Coolincoohil Kilgarvan (Everwind)	Operational	11	3.5km	North West
Coomachao	Operational	15	11.74km	North East
Coomagearahy Kilgarvan	Operational	15	5.91km	North West
Cummeennabuddoge	Pre-Planning	17	8.03km	North East
Cummeennabuddoge, Chydaghroo, Cloonkeen	Operational	2	9.55km	North East
Curnaglass	Permitted	7	8.62km	South West
Derragh	Operational	6	189m	South
Derreenacrinning	Permitted	7	18.51km	South West
Drishane Millstreet (Curragh Mountain/Coomachao 2)	Operational	8	11.82km	North East
Dromleena	Permitted	9	17.98km	South
Garranareagh	Operational	4	19.33km	South East
Glenties (Midas)	Operational	6	6.4km	North West
Gneevies	Operational	11	11.68km	North East

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Chapter-5-Terrestrial-Ecology.pdf 74 / 87 100%

Gneevies	Operational	11	11.68km	North East
Gneevies Millstreet	Permitted	7	11.81km	North East
Gornakilla, Cloonkeen Kiltaney	Permitted	4	6.76km	North West
Grousemount	Operational	24	4.50km	West
Inchamore	Pre-Planning	6	4.7km	North-West
Inches, Poulbatha & Folgreana (Midas)	Operational	8	5.44km	North West
Inchincrosh Kilgarvan	Operational	6	8.12km	North West
Knocknamork	Permitted	7	7.28km	North East
Rosseightragh, Lettercannon, Kilgarvan	Operational	7	7.56km	North West
Shelby More	Operational	11	8.31km	South
Silahertane Kilgarvan	Operational	10	3.89km	East

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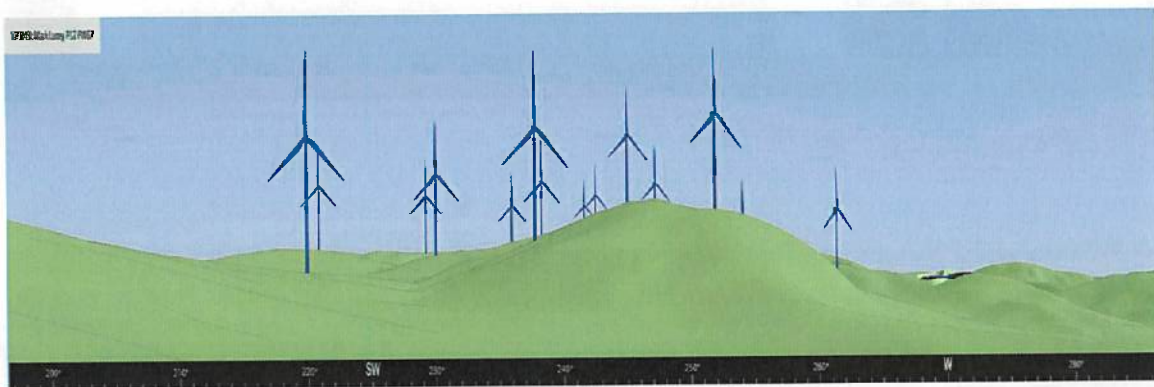
12.2.5.2 Visual Impact Magnitude

Exert

It should be noted that as a result of this two-sided analysis, a high order visual presence can be moderated by a low level of effect on visual amenity and vice versa. Given that wind turbines do not represent significant bulk, visual impacts result almost entirely from visual 'intrusion' rather than visual 'obstruction' (the blocking of a view). The magnitude of visual impacts classified in Table 12.4 derived from the Guidelines for Landscape and Visual Impact Assessment:

I propose that by the sheer volume of wind mills in the area it has now become an obstruction and is no longer an intrusion.

I also propose that Gortyrahilly wind farm is an obstruction of our view as you can see in the pictures below. 14 wind mills and a substation is far from an intrusion it will block the whole view and change the landscape.



Chapter-12-Landscape-Visual-Amenity.pdf 11 / 67 125%

Sensitivity	Description
Low	The proposal intrudes to a minor extent into the available vista and may not be noticed by a casual observer and/or the proposal would not have a marked effect on the visual amenity of the scene
Negligible	The proposal would be barely discernible within the available vista and/or it would not detract from, and may even enhance, the visual amenity of the scene

12.2.6 Visual Impact Significance

As stated above, the significance of visual impacts is a function of visual receptor sensitivity and visual impact magnitude. This relationship is expressed in the same significance matrix included for Landscape Impact Significance at Error! Reference source not found.

Visual impact significance cannot be verified or validated as there is an error the reference is not available. This to me is an incomplete document and should be denied planning permission.