

From: [Alan Clancy](#)
To: [SIDS](#)
Cc: [Niamh Broderick](#)
Subject: An Coimisiún Pleanála - Case reference: PAX04.324165 Maughanaclea Renewable Energy Development (240225)
Date: Tuesday 14 July 2026 16:53:27
Attachments: [image002.png](#)
[image003.png](#)
[PA08 - Letter to Applicant - Circulation of 127 submissions.pdf](#)
[240225 Maughanaclea Response to Submissions -F2-2026.07.14.pdf](#)

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To whom it may concern,

I MKO have been instructed by Maughanaclea Ltd Lissarda Business Park, Lissarda, Co. Cork, to prepare a Response to Observations, having been invited to respond to same by the Commission on the 16th June 2026. The request was made in relation to the SID planning application under Section 37E of the Planning and Development Act 2000, as amended, which is currently before the Commission for consideration (Case Reference: PAX04.324165), concerning the proposed Maughanaclea Renewable Energy Development. The Commission stated that a response must be submitted by 14th July 2026, no later than 5.30pm.

Please find attached the Full Response to Observations together with the accompanying appendices.

For your convenience, a hard copy of the submission has also been issued to the Commission.

If you have any queries, please do not hesitate to get in touch.

Best regards,
Alan

Alan Clancy
Senior Planner

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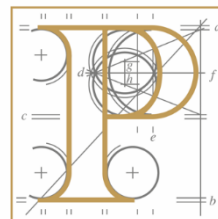
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Our Case Number: ACP-324165-26

Your Reference: Maughanaclea Ltd



An
Coimisiún
Pleanála

MKO
Planning & Environmental Consultants
Tuam Road
Galway
Co. Galway
H91 VW84

Date: 16 June 2026

Re: 10 year planning permission for Maughanaclea Wind Farm consisting of 14 no. wind turbines, a 110kV substation and 110kV underground cabling connection and associated works located in Ardrah, Maughanaclea, Ballynamought, Gortloughra, Cousane, Coomclogh, Derragh, Glanycarney, Keenrath, Derrynacaheragh, Shiplough, Coolsnaghtig and other townlands Co. Cork. (www.maughanacleaplanning.com)

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above mentioned case.

127 submission(s) have been received by the Commission in relation to the above mentioned case. These submissions are available for inspection on the Commission's website at the following link: <https://www.pleanala.ie/en-ie/case/324165>

The Commission hereby considers it appropriate to invite you to make a submission on the observations received in relation to the application. Please be advised that any response to the Commission's invitation should not contain any additional reports or supplementary reports and should be confined to the issues raised in the observations received by the Commission. Any submission in relation to the above must be received by the Commission within 4 weeks from the date of this letter (i.e. not later than Tuesday 14th July 2026).

If you have any queries in relation to the matter please contact the undersigned officer of the Commission.

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

Yours faithfully,

Niamh Hickey
Executive Officer
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Response to Observations

Maughanaclea Renewable
Energy Development, Co.
Cork

An Coimisiún Pleanála Ref. No. PAX04.324165





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EXECUTIVE SUMMARY

MKO have been instructed by Maughanaclea Ltd to prepare this Response to Observations, having been invited to respond to same by An Coimisiún Pleanála (the Commission) on the 16th June 2026. The request was made in relation to the Strategic Infrastructure Development (SID) planning application under Section 37E of the Planning and Development Act 2000, as amended, which is currently before the Commission for consideration (Case Reference: PAX04.324165), concerning the proposed renewable energy development, which will comprise of 14 no. wind turbines and associated infrastructure, located at Maughanaclea and surrounding townlands in Co. Cork. The Commission stated that a response must be submitted by 14th July 2026, no later than 5.30pm.

MKO considers that the EIAR and accompanying documentation provide a comprehensive and robust basis for the Commission to undertake an adequate assessment of the Proposed Project. The Proposed Project has been informed by extensive multi-disciplinary survey work over a number of years, including numerous ground investigations and ecological surveys which have informed both the design and assessment of the Proposed Project and the conclusions of the EIAR. Having reviewed the observations raised, MKO do not consider that there are any clear deficiencies identified in relation to the survey data, methodologies or assessments carried out, which would alter the conclusions presented in the EIAR.

As set out in Section 3 of this Response to Observations document, the observations received from the relevant Local Authority, Cork County Council are addressed first. The main observations raised by Cork County Council relate to Archaeology, Ecology, Shadow Flicker, Noise and Visual Impact. Each of these matters are addressed in detail within the relevant sections of this document.

Section 4 addresses observations received from Statutory Consultees, who were identified as prescribed bodies during the planning process, and notified of the Proposed Project. The matters raised by Statutory Consultees identify a range of topics including construction related impacts, operational impacts cumulative impact, impact on tourism, aviation considerations, archaeology, nature conservation, public consultation, noise and vibration, shadow flicker, Land Soils and Geology, Hydrology and Hydrogeology, and Traffic and Transport. It is not considered that any significant concerns have been raised by Statutory Consultees, that have not already been addressed within the EIAR and accompanying documentation. Many of the observations raised include standard conditions that should be implemented by the Commission, in the event that planning permission is granted, many of which are already reflected within the EIAR.

Section 5 addresses observations from Third-Party Observers. These matters have been categorised under relevant themes including Planning Policy, Guidelines and Site History, Environmental and Ecological Impacts and Landscape, Visual and Tourism. A comprehensive response to each theme raised by Third Party Observers is addressed in full.

The Proposed Project represents a strategically important renewable energy project that will make a substantial contribution to Ireland's energy security, renewable and climate objectives. In exercising its functions under the Climate Act, the Commission is required, insofar as practicable, to perform its functions in a manner consistent with the requirements of Section 15(1) of the Climate Act, including the furtherance of the national climate objective of 9GW of wind energy by 2030 and a renewable electricity share of 80% by 2030.

In addition, the Proposed Project will deliver a range of benefits including, supporting the transition to a low carbon climate resilient society, provide clean renewable energy to the national grid, helping to moderate energy costs over the long term, delivering a long-term positive impact on climate through the displacement of fossil fuel based energy generation and providing a significant positive benefit to the local community through the creation of sustainable local employment and the provision of a local Community Benefit Fund.

1. INTRODUCTION

MKO of Tuam Road, Galway, H91 VW84 have been instructed by Maughanaclea Ltd ('the Applicant') of Lissarda Business Park, Lissarda, Co. Cork, to prepare this Response to Observations, having been invited to respond to same by the Commission on the 16th June 2026. The request was made in relation to the SID planning application under Section 37E of the Planning and Development Act 2000, as amended, which is currently before the Commission for consideration (Case Reference: PAX04.324165), concerning the proposed wind farm development, which will comprise of 14 no. wind turbines and associated infrastructure, located at Maughanaclea and surrounding townlands in Co. Cork, including underground cabling connecting the wind turbines to the proposed onsite 110kV substation. The Commission stated that a response must be submitted by 14th July 2026, no later than 5.30pm.

The planning application, submitted on 30th March 2026 (ACP Ref. PAX04.324165) was accompanied by an Environmental Impact Assessment Report (EIAR), a Natura Impact Statement (NIS), and all necessary documentation.

For ease of reference, the following terminology is used throughout this document, as reproduced from Chapter 1, Section 1.1.1, of the EIAR:

- Where the 'Proposed Project' is referred to, this refers to the entirety of the project (the 'Proposed Wind Farm,' and the 'Proposed Grid Connection,')
- Where the 'Proposed Wind Farm' is referred to, this relates to the 14 no. turbines and associated foundations and hardstanding areas, including site access roads and entrances, underground 33kV internal cabling, meteorological mast, temporary construction compounds, peat and spoil management areas, borrow pits, biodiversity enhancement areas, tree felling and vegetation removal, site drainage, operational stage signage, 110kV onsite substation, and all ancillary works and apparatus.
- Where the 'Proposed Grid Connection' is referred to, this relates to the 110kV underground cabling connection from the proposed 110kV onsite substation to the existing Dunmanway 110kV substation, and all ancillary works and apparatus. The Proposed Grid Connection will facilitate the connection of the Proposed Wind Farm to the national electricity grid.
- The 'Site' refers to the primary study area for the EIAR, as delineated by the EIAR site boundary in green as shown in Figure 1-1 of the EIAR, and encompasses an area of approximately 1,175 hectares.
- The 'Proposed Wind Farm site' refers to the portion of the Site surrounding the Proposed Wind Farm but excluding the portion of the Site surrounding the Proposed Grid Connection underground cabling route.

1.1

Robustness of the Planning Application

MKO wishes to reaffirm that the EIAR and Planning Application submitted to the Commission are both comprehensive and robust and are of a standard which enables the Commission to undertake an adequate assessment of the Proposed Project. MKO note that the Commission, in correspondence dated 30th April 2026, confirmed that the application was complete and contains all the information required to allow the application to be processed, in accordance with section 37JA (a) of the Planning and Development Act 2000, as amended (the Act).

MKO can only comment on the scope, quality and adequacy of the documentation submitted as part of this application. In this regard, MKO considers that the EIAR and supporting documentation provide a strong and robust evidence base for the Commission to undertake a full and adequate assessment of the Proposed Project.

The Site is an extremely well-studied site and has been the subject of extensive multi-disciplinary survey work over a number of years, including numerous ground investigations and ecological surveys, which

have been collected at the Site since 2022. The findings of these surveys have informed both the design and assessment of the Proposed Project present with the planning application documentation.

Based on the evidence collected and assessments carried out, MKO considers the Site to be appropriate for the Proposed Project. MKO acknowledges that observations made on this application express an alternative view. However, from a review of those observations, MKO does not consider that they have identified any clear deficiencies in the survey data, methodologies or assessments carried out which would alter the conclusions reached in the EIAR. Furthermore, it is considered that the observations have not provided an equivalent body of technical analysis, survey data or assessment evidence that supports alternative conclusions to those presented in the EIAR.

Notwithstanding the above, MKO acknowledges that concerns in relation to the Proposed Project have been raised in the observations. MKO are confident that all concerns raised have been appropriately considered and addressed in the EIAR. This Response to Observations document reiterates the relevant findings of the EIAR that address the concerns raised in the observations.

1.2 Response Structure

This Response to Observations comments firstly on observations from the relevant local authority, Cork County Council (CCC). This is followed by individual responses to observations made by statutory consultees. A response to Third-Party observers is also provided.

This response is structured as follows:

- **Section 1** – Introduces the document and its structure,
- **Section 2** – Provide an overview of the Climate Action and Low Carbon Development Act 2015 (As Amended),
- **Section 3** –Response to Local Authority Observations in accordance with the Commission’s request,
- **Section 4** –Response to Statutory Consultee Observations in accordance with the Commission’s request,
- **Section 5** –Response to Third-Party Observations in accordance with the Commission’s request,
- **Section 6** – Concluding Remarks.

Appendix 1 identifies the list of Third-Party Observers and their submission themes. In the interest of brevity, responses that have been addressed are not repeated in the document.

2.

CLIMATE ACTION AND LOW CARBON DEVELOPMENT ACT 2015 (AS AMENDED)

A significant development in Irish planning law in relation to the obligations on public bodies in accordance with Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended (the Climate Act) is directly relevant to the determination of the Proposed Project.

The legal analysis of Section 15 of the Climate Act has arisen from a challenge to a decision of the Commission to refuse planning permission for a wind farm in County Laois. The Supreme Court issued a judgment on this matter on 4th February 2026 in Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5.

The Climate Act establishes a legislative precedent to reduce Ireland's carbon emissions. The Climate Act legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade.

The Climate Act also incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- Strengthens the role of the Climate Change Advisory Council;
- Establishes that the government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations;
- Sets actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Establishes that Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

Section 15(1) below places an obligation on public bodies to perform their functions in a manner which favours climate action, unless it is objectively impracticable to do so.

“A relevant body shall, in so far as practicable, perform its functions in a manner consistent with:

- a) the most recent approved climate action plan,
- b) the most recent approved national long term climate action strategy,
- c) the most recent approved national adaptation framework and approved sectoral adaptation plans,
- d) the furtherance of the national climate objective, and
- e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.”

Significance of the Coolglass Judgment

The Supreme Court establishes that consenting authorities must make decisions ‘in so far as practicable’ in a manner ‘consistent with’ the approved national long term climate action strategy and the approved national long term climate action strategy as set out in Section 15(1) of the Climate Act. This means that

departure from climate objectives is permissible, but only where there are genuine practical difficulties that make full alignment impracticable.

Consenting Authorities, such as the Commission, must therefore meaningfully engage with national climate objectives when exercising their functions, including decision-making and must also demonstrate how those functions have been carried out in a manner consistent with, in so far as practicable, national climate objectives.

Taking these legal duties into account, the Commission is required to attribute significant weight to national climate policy and the delivery of renewable energy infrastructure, such as the Proposed Project, even where they materially contravene a statutory development plan, particularly when that plan is out of step with national policy.

The significance of the judgment is that Consenting Authorities, including the Commission are now under clear, legal duty to give meaningful consideration of the contribution made to the achievement of national climate targets by renewable energy developments, such as the Proposed Project. This is of particular importance where a development would advance decarbonisation targets.

Relevance of the Proposed Project

The Proposed Project comprises of a renewable energy development, which will make a meaningful contribution to the fulfilment of national climate objectives, including those set out in the Climate Action Plan 2025 (CAP25), which sets out targets to achieve an 80% electricity share as well as 9GW of renewable energy by 2030.

Considering the Coolglass Supreme Court Judgment, the Commission is required to attribute a significant weight to the following benefits in their assessment of the Proposed Project:

- The Proposed Project will contribute to compliance with Ireland's sectoral ceilings and Ireland's carbon budgets,
- It will generate renewable electricity and help to displace fossil-fuel based generation,
- It will further national climate objectives, including the CAP25 target of an 80% renewable electricity share as well as 9GW of renewable energy by 2030,
- It will support Ireland's legally binding commitments under national, European and International climate law.

Therefore, a decision to grant permission for the Proposed Project would represent the performance of the Commission's functions in a manner that is consistent with Section 15(1) of the Climate Act.

Compliance with Section 15(1) of the Climate Act

Having regard to these functions, **Table 1** demonstrates how, in determining the applications for the Proposed Project, the Commission would be performing its functions in a manner consistent with Section 15(1) of the Climate Act.

Table 1 Compliance of Proposed Project with Section 15(1) of the Climate Act

Section 15(1) Requirement	Proposed Project Compliance	Conclusion
a) Most recent approved climate action plan	The Proposed Project, will contribute directly towards the CAP25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030. Onshore wind is identified as being critical in the decarbonisation of the electricity, and as such the Proposed Project should be considered in that regard. The Proposed Project will have an estimated installed capacity of approximately 67.2 MW. On this assumption, the Proposed Project will result in the net displacement of approximately 44,498 tonnes of carbon dioxide (CO₂) per annum, including accounting for back-up generation.	A grant of permission would constitute the performance of the Commission's functions in a manner consistent with CAP 25, insofar as is practicable.
b) Most recent approved national long term climate action strategy,	The Proposed Project will support the national long term climate action strategy as the development represents critical renewable energy infrastructure, that will make a meaningful contribution to achieving the State's reduced emissions targets and the transition towards a climate resilient society.	A grant of permission would constitute the performance of the Commission's functions in a manner consistent with the most recent approved national long term climate action strategy, insofar as is practicable.
c) Most recent approved national adaptation framework and approved sectoral adaptation plans	The Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. The electricity sector failed to remain within the designated sectoral ceiling of 20 Mt CO₂ eq for the first carbon budget period from 2020 to 2025. The delivery of renewable energy infrastructure such as the Proposed Project, which will result in the net displacement of approximately 44,498 tonnes of carbon dioxide (CO₂) per annum, is integral to the reduction of emissions from electricity generation and the transition towards a low carbon, climate resilient society.	A grant of permission would constitute the performance of the Commission's functions in a manner consistent with the most recent approved national adaptation framework and approved sectoral adaptation plans, insofar as is practicable.

Section 15(1) Requirement	Proposed Project Compliance	Conclusion
	The national renewable energy targets and the carbon budgets are integral to the government's response to the climate crisis.	
d) the furtherance of the national climate objective	The Proposed Project, consisting of 14 no. wind turbines and associated infrastructure aligns with national climate policy objectives. The Proposed Project, with an estimated installed capacity of approximately 67.2 MW, will make a significant contribution (approximately 1%) to achieving the CAP 25 target of 9GW of onshore wind energy by the year 2030.	A grant of permission would constitute the performance of the Commission's functions in a manner consistent with the furtherance of the national climate objective insofar as is practicable.
e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State	The Proposed Project will support the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State through the generation of wind energy and displacing electricity that would otherwise be produced from fossil fuel sources.	A grant of permission would constitute the performance of the Commission's functions in a manner consistent with the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

Conclusion

The decision of the Supreme Court in *Coolglass Wind Farm Limited v An Coimisiún Pleanála* [2026] IESC 5 confirms that Section 15 of the Climate Act imposes a binding obligation on consenting authorities, including the Commission, to determine planning applications, insofar as practicable in a manner that is consistent with the fulfilment of national climate objectives and to give adequate reasons demonstrating that consistency.

The Proposed Project is supported by local, regional and national policy and has been designed in accordance with the latest national guidance and best practice. It is located in a favourable area for wind energy development, and it has also been demonstrated, in the EIAR and NIS, that the Proposed Project will not give rise to any significant adverse effect on the environment or on the integrity of European Sites.

Crucially, the Proposed Project will have an estimated installed capacity of 67.2 MW with the potential to displace approximately 44,498 tonnes of carbon dioxide (CO₂) per annum, including accounting for back-up generation, making a significant contribution towards the CAP25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030.

Accordingly, the Commission can lawfully exercise its planning judgement to grant permission for the Proposed Project in a manner consistent with its statutory duty under Section 15 of the Climate Act and the principles clarified in the *Coolglass Judgment*, whilst also aligning with EU and national policy objectives

3. RESPONSE TO LOCAL AUTHORITY OBSERVATIONS

3.1 Cork County Council

In accordance with the requirements of Section 37E(4) of the Act, Cork County Council (CCC) submitted a report on the application setting out the views of the authority on the effects of the Proposed Project on the environment and the proper planning and sustainable development of the area.

For ease of reference, the observations contained in the report can be grouped under the following headings:

- > Archaeology,
- > Ecology,
- > Shadow Flicker,
- > Noise,
- > Visual Impact and Population.

Each of these items are addressed in detail below.

3.1.1 Archaeology

CCC, in their submission, note several points in relation to Archaeology and Cultural Heritage. Each point has been responded to below. This section has been prepared by IAC Archaeology.

Impacts to a Field Boundary

The submission notes that a c. 12m section of a drystone wall field boundary (CO092-089 and CO092-094) that measures over 200m in length is proposed for removal to accommodate construction of a new road.

This monument is considered in Chapter 14: Cultural Heritage of the EIAR, as AH58, and a direct impact has been identified. The impact to the site was assessed by applying the methodology outlined in Section 14.2 of Chapter 14 of the EIAR. AH58 was assessed as having a High sensitivity, due to being listed in the Record of Monuments and Places (RMP). As the proposed new road will cross the boundary, the impact was assessed as Direct. The magnitude of impact was assessed as Medium, as at least 94% of the monument will remain upstanding. Chapter 14 defines a medium impact as *“a change to a site/monument is proposed which though noticeable, is not such that the archaeological or cultural heritage integrity of the site is compromised”*. It is assessed that the loss of less than 6% of the feature will not alter the ability to interpret it as a linear field boundary. It is noted in section 14.3.12 that AH58 was not visible at the intersection with the road during the field inspection. The combination of a High sensitivity and Medium magnitude of impact lead to a Moderate Negative significance of effect.

Proposed mitigation measures at AH58 comprise archaeological monitoring and recording of the field boundary, which will preserve the impacted section of the wall by record. Archaeological investigation may reveal more information about this ephemeral feature that has little surface expression. Following the application of the recommended mitigation, it is assessed that the residual effect will be Slight, due to the preservation of at least 94% of the monument in situ, and the preservation by record of the lost section (less than 6% of the total length of the monument).

Impacts to a Previously Unrecorded Site

The submission notes that a previously unrecorded site, comprising an enclosure and lazy beds, will be directly impacted by the Proposed Project.

This potential monument is considered in Chapter 14 of the EIAR as CH55, and a direct impact has been identified. The impact to the site was assessed by applying the methodology outlined in Section 14.2. CH55 was assessed as having a medium sensitivity, as it represents an unrecorded cultural heritage site, although it is acknowledged in Chapter 14 of the EIAR that it may possibly relate to nearby monuments AH59 (a hut site with associated stone wall) and AH60 (field boundaries). As the proposed turbine T03 and associated hardstand will be located at CH55, the impact was assessed as Direct. The magnitude of impact was assessed as Very High, as the majority of the monument will be affected by the development. The combination of a Medium sensitivity and Very High magnitude of impact leads to a Significant Negative significance of effect (prior to the application of mitigation), as outlined in Chapter 14.

Mitigation measures at CH55 comprise a pre-construction survey of CH55, resulting in the compilation of a detailed photographic and written record of the existing condition of the site. A programme of pre-construction test trenching at the location of CH55 will also be carried out, to determine the nature and date of the site, and potential relationships with nearby monuments AH59 and AH60. Monitoring of all construction phase activity at CH55 will be undertaken, under licence to the National Monuments Service (NMS) of the DoHLGH. Mitigation states that if archaeological remains are identified during the course of these works further mitigation may be required, such as preservation by record or in-situ. Any further mitigation will require agreement from the DoHLGH.

Following the application of the mitigation measures it is assessed that the residual effect will be Slight, due to the record of the pre-construction condition of the site and the preservation, by record or in situ, of potential sub-surface remains.

Sub-Surface Archaeology

The submission notes that potential sub-surface archaeological features have not been addressed.

Appropriate mitigation measures have been proposed to ensure that any potential sub-surface archaeological features are identified and recorded/preserved. The mitigation strategy of test trenching prior to construction, as well as monitoring of ground disturbances, is appropriate for the development. As noted in the chapter, further mitigation may be required, such as preservation by record or in-situ and/or archaeological monitoring. Any further mitigation will require agreement from the DoHLGH. These mitigation measures are typically applied to multiple large-scale developments in the country, including other wind farm developments, and the applicant has committed to the mitigation.

It is also important to note that in the response from the NMS of the DoHLGH, that they are in agreement with the mitigation as laid out in the chapter.

Furthermore, it is noted that policies relating to the assessment of archaeological heritage and previously unrecorded archaeological sites, as set out in policies HE16-9 and HE16-13 of the Cork County Development Plan 2022-2028 (CCDP) confirm that there is no requirement for archaeological test trenching to be carried out within a site at pre-planning stage. This is acknowledged by the Inspector in an appeal relating to case ACP-323402-25.

Visual Impact Assessment

The submission notes that there are inconsistencies in the Visual Impact Assessment between Chapter 13 and Chapter 14, particularly considering Kealkill Stone Circle (CO106-006001 – 3) and Carrignass Castle (CO106-001; CO106-001001). The impact assessment of operational impacts of the Proposed Project on the cultural heritage resource, detailed in Chapter 14 was carried out by applying the methodology

outlined in Section 14.2, which involved the utilisation of Zone of Theoretical Visibility (ZTV) mapping and photomontages, where available. The results of the operational effects on cultural heritage site are outlined in Appendix 14-2. Chapter 13 of the EIAR details Landscape and Visual effects, the assessment of which is in accordance with the methodology outlined in that chapter.

Kealkill Stone Circle (CO106-006001 – 3) has been considered in the EIAR as AH157. AH157, comprising a stone circle, a stone pair and a radial cairn, has been assessed as having a Very High sensitivity due to the protection of the site under Preservation Order. AH157 is located c. 2.1km to the northwest of T14, and as shown on the ZTV mapping has full theoretical visibility. As such, it was determined that AH157 may be subject to Indirect impacts. The magnitude of impact was assessed as Low, following consultation of photomontages from Viewpoint 4 (no photomontages were available at the site itself), and as the turbines are visible over the crest of the hills, this changes the character of the monuments setting. The combination of a Low indirect impact to a site of Very High sensitivity results in a Moderate Negative significance of effect.

Carrignass Castle (CO106-001; CO106-001001) has been considered in the EIAR as AH144. AH144, comprises a tower house and bawn, and has been assessed as having a High sensitivity, due to being included in the RMP. AH144 is located c. 2.9km to the northwest of T14, and as shown on the ZTV mapping has theoretical visibility of 12–14 turbines. As such, it was determined that AH144 may be subject to Indirect impacts. The magnitude of impact was assessed as Low, following consultation of photomontages from Viewpoint 15 (located c. 600m to the southeast of AH144). The combination of a Low indirect impact to a site of Very High sensitivity results in a Moderate Negative significance of effect.

Overall, the Archaeological, Architectural and Cultural Heritage assessment carried out in Chapter 14 of the EIAR provides a proportionate and robust assessment of the potential impacts of the Proposed Project on archaeological resources in the surrounding area. Direct and indirect impacts of the Proposed Project have been identified using a clearly defined methodology and appropriate mitigation measures have been proposed to minimise or avoid any adverse effects on archaeological resources.

Conclusion

Accordingly, it is considered that the Archaeological, Architectural and Cultural Heritage impacts of the Proposed Project have been comprehensively assessed and all concerns raised in the CCC report have been adequately addressed.

3.1.2 Ecology

The concerns raised by Cork County Council in relation to the Proposed Project include the following:

1. The proposed loss of Annex I blanket bog and wet heath habitat contravenes the objectives of the Development Plan, including in relation to Biodiversity Net Gain. Specifically it would contravene Objective BE 15-2 – ‘*Protect sites, habitats and species*’. It is recommended to change the proposed turbines T4 and T14 areas to areas to be used for habitat enhancement. While it is not mapped Article 17 Annex I habitat, the CCDP listed Wet Heath (HH3) as a Habitat Conservation Importance in County Cork and its removal would be contrary to Objective 15-2 of the Plan. As no distinction between intact or degraded has been made, the proposed removal of habitat to accommodate Turbines 4 and 14 would contravene the aforementioned objective.
2. It is recommended that an alternative location for habitat enhancement should be sought due to the loss of habitat and impacts associated with proposed turbine T6. As the road and turbine T06 will hinder the enhancement proposal, an alternative location is required.
3. It is highlighted that there is a maternity lesser horseshoe bat roost along the Proposed Grid Connection Route which may be impacted. The commission may wish to request an assessment

of potential impacts the construction stage of the proposed grid connection route may have on this important maternity roosting site.

4. Concern is highlighted in relation to the proximity of proposed turbine T2 to Article 17 mapped habitat and it is requested that distance and potential impact is clarified.

Response

1. Loss of Annex I Habitats

The potential loss of Annex I habitats has been assessed in Chapter 6 of the EIAR. The Proposed Project will result in the loss of approximately 1.6ha of degraded wet heath and 0.2ha of blanket bog habitat. However, these losses are considered within the wider context of the proposed Biodiversity Management and Enhancement Plan (BMEP), which includes the restoration and enhancement of approximately 5.3ha of previously afforested peatland habitat. Details of the proposed enhancement measures and their ecological benefits are outlined below.

2. Impacts on proposed enhancement area from construction of Turbine T06

The Ecology Officer notes that the *Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems* (SEPA, August 2024) recommends specific stand-off distances to avoid impacts on groundwater-dependent terrestrial ecosystems (GWDTEs). In this instance, the habitat proposed for enhancement comprises upland wet heath, which is predominantly ombrotrophic in nature. The proposed enhancement area comprises two separate areas which will be bisected by the proposed access road, which does not form part of the enhancement area. The existing area has been significantly modified by forestry drainage channels, having been recently afforested. As part of the BMEP, it is proposed to restore hydrological function within the enhancement area through the blocking of existing forestry drains using excavated peat turves and/or felled timber. These measures are specifically designed to reverse the effects of forestry drainage, raise local water levels and improve habitat condition. The proposed enhancement measures are therefore expected to result in a net ecological benefit to the area.

3. Lesser Horseshoe Bat Roost along the Proposed Grid Connection Route

The Ecology Officer notes the presence of a known lesser horseshoe bat maternity roost in proximity to the Proposed Grid Connection and requests consideration of potential construction-stage effects on this roost.

The potential for impacts on lesser horseshoe bats, including effects on roosting habitat, was assessed within the EIAR and supporting bat assessments (EIAR Appendix 6-2 Bat Report – Sections 4.1.2 and 5.3). A review of the National Parks and Wildlife Service (NPWS) Lesser Horseshoe Bat Database confirmed the presence of recorded lesser horseshoe bat roosts within the wider landscape. However, no confirmed lesser horseshoe bat roosts occur within the Proposed Project footprint. The roost referenced in the submission is understood to be located approximately 2km from the Proposed Grid Connection route and approximately 5.5km from the nearest proposed turbine, based on available NPWS records.

The precise location of the maternity roost referenced in the submission has not been made available to the Applicant. Nevertheless, the Proposed Grid Connection cable is confined to existing road corridors and does not require the removal of trees, hedgerows, buildings or other features that could function as bat roosting habitat. Watercourse crossing structures along the route were inspected and assessed as having no (*None*) to *Moderate*¹ roosting potential, and no bat roosts or evidence of bat use were identified. Furthermore, no modifications to these structures are proposed as part of the development.

Lesser horseshoe bats are known to utilise sheltered linear features and dark commuting routes within the landscape. The Proposed Grid Connection cabling route comprises temporary construction activity

¹ Collins (2023) – Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Conservation Trust, London

within existing road infrastructure corridors and will not result in the permanent loss, fragmentation or degradation of suitable commuting or foraging habitat. No works are proposed at or adjacent to any known lesser horseshoe bat roost structure.

Having regard to:

- the separation distance between the known roost and the Proposed Grid Connection;
- the absence of any works at the roost itself or within its immediate vicinity;
- the lack of tree removal, roost loss or alteration of suitable roosting features along the Grid Connection route; and
- the temporary and localised nature of the construction works,

It is concluded that the construction of the Proposed Grid Connection is not likely to result in significant effects on the identified lesser horseshoe bat maternity roost or on the conservation status of lesser horseshoe bats in the area. No loss of roosting habitat, damage to roosts, or significant disturbance of lesser horseshoe bats is predicted as a result of the Proposed Grid Connection cable construction works.

4. Impacts of construction of Turbine T02 on Article 17 mapped habitat

The distance between the construction footprint of proposed turbine T02 and Article 17 mapped peatland is approx. 20m. As discussed in the paragraphs above, upland peatland habitats are primarily rain-fed (ombrotrophic) rather than being dependent on groundwater and rely on precipitation, poor surface drainage and a shallow, waterlogged peat layer. The proposed Turbine T02 is located within forestry adjacent to the mapped area. The forestry is already bordered by perimeter and internal forestry drains. The construction of the turbine foundation and hardstand within the forestry will require excavation, within which water seepage may occur. There is potential for temporary lowering of groundwater levels during construction, however this would rebound post-construction. No significant impact on adjacent Article 17 habitat is predicted as a result of lowering of groundwater levels.

Conclusion

Accordingly, it is considered that the Ecology related impacts of the Proposed Project have been comprehensively assessed and all concerns raised in the CCC report have been adequately addressed.

3.1.3 Shadow Flicker

Concerns have been raised regarding the application of the 2006 Wind Energy Development Guidelines (DoEHLG, 2006) (the Guidelines (DoEHLG, 2006)) in the assessment, as 8 no. sensitive receptors would exceed annual thresholds for shadow flicker, and the 2019 Draft Wind Energy Guidelines (DOHPL, 2019) (the Draft Guidelines (DoHPLG, 2019)), which require that no existing dwelling or other affected property should experience shadow flicker as a result of a wind energy development. CCC recommends a review of the site design with a view to establishing whether shadow flicker can be eliminated, with a redesign encouraged to ensure that no dwelling experiences cumulative shadow flicker than both the Proposed Project and the Gortloughra Wind Farm which is currently on appeal with the Commission.

The Commission is reminded that the Guidelines (DoEHLG, 2006) are still the current, adopted guidance that must be adhered to by both developers and planning authorities. Thus, the inclusion of a condition arising from guidance that is still in draft format would not be desirable. Notwithstanding this, as outlined in the EIAR and above, it is noted that the Proposed Project can be brought in line with the requirements of the Draft Guidelines (DoHPLG, 2019), should they be adopted while this application is in the planning system, through the stricter implementation of the mitigation measures outlined in Section 5.4.3.2.7 of Chapter 5.

Table 5-11 of Chapter 5 outlines the maximum potential daily and annual shadow flicker for dwellings within the shadow flicker study area. Dwellings in the east (H17, H18, H19, H20) do experience a higher

maximum potential for daily and annual shadow flicker however, no dwelling exceeds 30 minutes per day or 30 hours per year as set out in the Guidelines (DoEHLG, 2006).

As detailed in Section 5.4.3.2.7 of Chapter 5 of the EIAR, the Applicant has committed to a robust shadow flicker mitigation protocol to ensure the effectiveness of the proposed mitigation measures. This approach reflects established best practice and has been proven at operational wind farms in Ireland and internationally, providing a robust and reliable mechanism to ensure shadow flicker impacts remain within accepted guideline limits.

It is therefore considered that a robust and comprehensive mitigation strategy for the Proposed Wind Farm has been provided, which is capable of addressing any identified shadow flicker effects.

Conclusion

Accordingly, it is considered that shadow flicker related impacts of the Proposed Project have been comprehensively assessed and all concerns raised in the CCC report have been adequately addressed.

3.1.4

Noise

The Environmental Officer from Cork County Council requested the submission of details regarding the respective number and distances of all noise sensitive receptors within 500m, 1000m, 1500m and 2000m of the proposed turbines. Further details are also required regarding the identification of the referenced noise sensitive receptors that each selected background noise monitoring location is considered to be representative of. It was also noted by the Environmental Officer pointed out specific numbers, querying day-time and night-time levels for corresponding wind speeds.

AWN has undertaken a review and responded to all noise-related matters raised by Cork County Council, through the preparation a technical note, which is detailed below.

The request has been broken down into the following items that are addressed in this report:

- Item 1 – Identification of referenced noise sensitive receptors and background noise monitoring locations.
- Item 2 – Confirmation of background noise levels at NML4 and turbine noise limits.

Response to Item 1

This section responds to the following part of the Request for Information:

“Further details are also required regarding the identification of the referenced noise sensitive receptors that each selected background noise monitoring location is considered to be representative of. This information should also be mapped.”

In the first instance Section 12.4.2.1 of the EIAR provides the methodology for the selection of Noise Monitoring Locations. It states that:

“...in line with current best practice guidance outlined in the IOA GPG. The selection of the noise monitoring locations (NMLs) was informed by a site visit and supplemented by reviewing aerial images of the study area and other online sources of information (e.g., Google Earth and OSI Maps).”

This methodology was applied to ensure that the noise monitoring location selections were representative of sensitive receptors in the area. The selection of monitoring locations was undertaken in line with the guidance presented in the Institute of Acoustics (IOA) A Good Practice Guide to the Application of ETSU R-97 for the Assessment and Rating of Wind Turbine Noise (IOA GPG).

In terms of the selection of representative background noise locations for each references noise sensitive receptor Section 12.3.2.4.1 of the EIAR states:

“The ETSU-R-97 guidance allows for a higher level of turbine noise operation at properties that have an involvement in the Proposed Project, both as a higher fixed level of 45 dB LA90 and/or a higher level above the prevailing background noise level.”

Section 12.5.3.1 of the EIAR states the following with regards to referenced noise sensitive receptors and selected background noise monitoring locations:

“For the purpose of this assessment, a conservative ‘envelope review’ will be applied to all non-surveyed locations. The envelope review is a conservative approach that adopts the lowest noise criteria derived from the measured background noise levels and applies it to all non surveyed locations. This is not to say that this is the actual background noise at these locations.”

Hence, the most conservative background noise levels at each wind speed have been referenced for each noise sensitive receptor where monitoring was not undertaken, unless they were involved with the project where a higher criterion of 45 dB or 5 dB above background, whichever is greater, was selected. It should be noted that the selection of criteria in this instance has not impacted on the outcome of the assessment. The most conservative ‘envelope’ is not exceeded by predicted turbine noise levels at any location.

Figure 1 below presents a map of the referenced background noise assignment at each noise sensitive location (NSL).

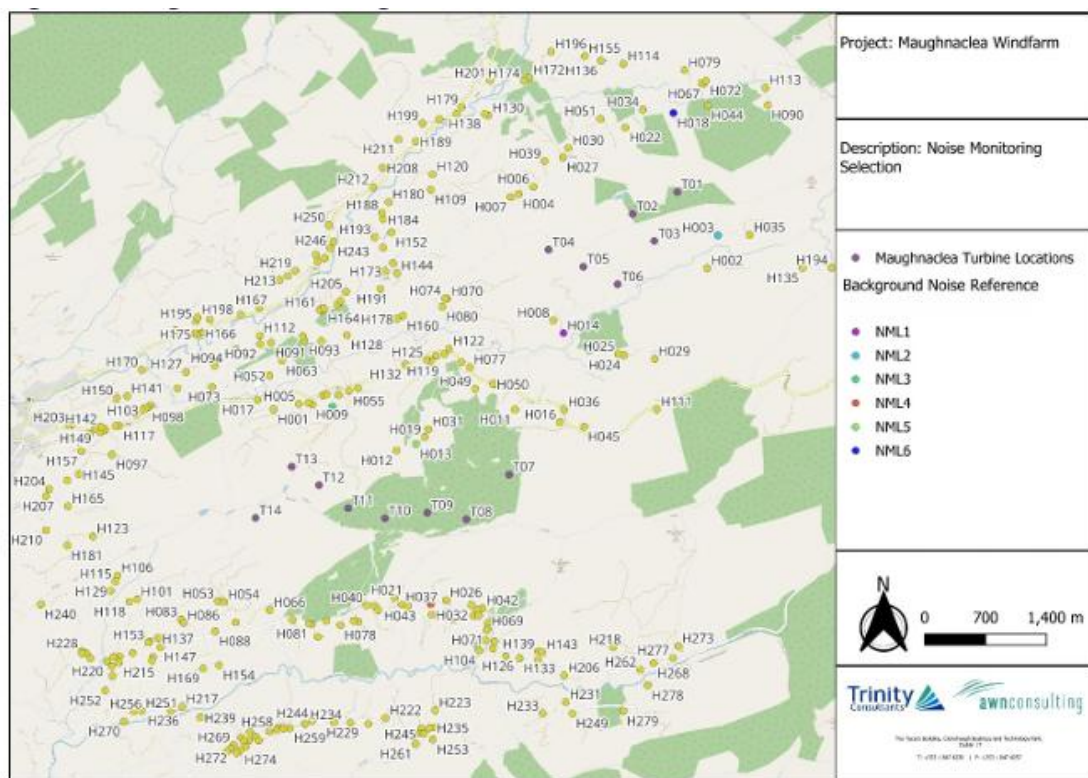


Figure 1 Background Noise Assignment at NSLs

Response to Item 2

This section responds to the following part of the Request for Information:

“In terms of the derived background noise levels set out in Tables 12.17 and Table 12.18, it is noted specifically in respect of NML4 (H041) that the derived night-time noise levels for wind

speeds 7m/s, 8m/s and 9m/s are higher than the daytime noise levels for the corresponding wind speeds. The applicant should be asked to comment on this having regard to any site observations or notes from the analysis of the background datasets.”

No atypical noise sources were observed at this location. The noise environment was noted in Section 12.4.2.1.4 of the EIAR as chiefly comprising infrequent road traffic and bird song.

It is noted that there is an increase in background noise level during the night over the day of 1 to 2 dB for wind speeds of 7 m/s, 8 m/s and 9 m/s. These differences in derived background noise levels are not considered to represent a significant variation. In practical terms, a change of this magnitude in background noise would not be perceptible.

The background noise values measured at NML4 have only been used at the location they were measured at. The background noise envelope (i.e. the lowest background noise levels measure at any location in each windspeed bin) has not been influenced by the background noise levels measured at NML04 as the levels measured at other locations were lower. As discussed previously, review of the predicted noise levels at each location indicates that the most conservative ‘envelope’ is not exceeded by predicted turbine noise levels at any location.

Conclusion

Accordingly, it is considered that noise related impacts of the Proposed Project have been comprehensively assessed and all concerns raised in the CCC report have been adequately addressed.

3.1.5 Visual Impact and Population

This section responds to the landscape and visual impact matters which were raised in the Report by Cork County Council including their reasons for recommendation of refusal. For ease of reference, the response is structured under the following subheadings:

- Lack of Assessment of Archaeological or National Monument Receptors;
- Visibility and Visual Effects from Designated Scenic Routes;
- Siting, Scale and Turbine Height,
- Compliance with the CCDP.

These topics are dealt with separately below.

3.1.5.1 Lack of Assessment of archaeological or national monument receptors

The Archaeological Officer notes that the Landscape and Visual Impact Assessment (LVIA) Chapter does not include an assessment of archaeological or national monument receptors, nor were such receptors included in the viewpoint selection process, and notes discrepancies between Chapter 14 of the EIAR (Cultural Heritage) and Chapter 13 (Landscape and Visual) (e.g. sensitivity on Kealkill Stone Circle – See Section 3.1.1)

CCC’s suggestion that the LVIA of the EIAR should assess cultural heritage monuments that are not visited by the public extends the assessment beyond its established remit. As per industry best practice guidance, the purpose of an LVIA is to assess effects on the landscape resource and on people’s views and visual amenity. As the Guidelines for Landscape and Visual Impact Assessment Third Edition (hereafter referred to as the GLVIA3), published by Landscape Institute & Institute of Environmental Management and Assessment (2013) and Clarifications in LI TGN 24/01 (LI, 2024) makes clear, visual receptors “are all people” (LI & IEMA, 2013, para 6.31). The susceptibility of receptors is judged with reference to visitors to heritage assets where views of the surroundings contribute to their experience

(para 6.32) - that is, the receptor is the person experiencing the view, not the monument itself. Where a monument is not visited, there is no visual receptor for the LVIA to assess.

The cultural heritage significance of a monument, and any effect of the Proposed Project on its setting, is a separate specialist matter. GLVIA3 recognises that historic features *are “important in their own right as well as features of the landscape”* (para 5.9) and expressly cautions that landscape and cultural heritage baselines should not be conflated, *“or there will be a danger of both double handling and inappropriate judgements by non-experts”* (para 5.11). The Landscape Institute has confirmed the same position, noting that *“assessing the effects on the historic environment is a separate specialist topic in ELA,”* and that the terms *“visual impact”* and *“setting”* carry different meanings for the landscape and heritage disciplines (LI, 2021, Technical Note 01/21).

Accordingly, the LVIA contained in Chapter 13 of the EIAR assesses monuments (such as Kealkill Stone Circle) as features of the landscape and assesses the visual amenity of people who experience views of and from them. The assessment of effects on the cultural heritage significance and setting of these assets, including any monuments that are not publicly accessible or are not experienced by the public (i.e. visual receptors) are properly addressed within the Cultural Heritage chapter (Chapter 14) of the EIAR.

3.1.5.2 Visibility and Visual Effects from Designated Scenic Routes

This section addresses the following extract from CCC’s recommendation of refusal:

‘The proposed wind farm site, [...] would be visible from scenic routes S29 and S28. [...] having regard to the siting, excessive height and number of turbines proposed, it is considered that the proposed development would seriously detract from the views and prospects from parts of the S29 Scenic Route...’

The CCC Planner’s Report (p.62) additionally states:

‘The Planning Authority recognises that Scenic Routes R585 to Kealkill via the Cousane Gap and the R548 north of Kealkill through the Pass of Keimaneigh to Gougane Barra are important ‘gateways’ to West Cork and are synonymous with the scenic values of this landscape and the identity of Kealkill, Bantry, Cousane Gap and the Shey Mountains’.

‘The Planning Authority is of the opinion that views from the adjoining Scenic Routes, the S29 and S28, would be significant and would not represent long distance views. The magnitude of the visual impact on Scenic Route 29 (R585) would be higher and more pronounced than that illustrated in VP10 when travelling westbound. The visual impact along the R585 would be significant and unlikely to be reasonably screened, given the scale and number of turbines proposed.’

[...]

The scale and quantum of turbines proposed is considered to be excessive for this visually sensitive location, particularly given its proximity to the Cousane Gap, which offers open panoramic views to Bantry Bay when travelling westwards. Views from the Cousane Gap are open across the adjacent landscape.’

Scenic Route 29 (C-SR29)

The impact of the Proposed Project on C-SR29 Scenic Route along the R585 Regional Road was a key focus in the LVIA Chapter. Key sections in the LVIA Chapter discussing the R585/C-SR29 include:

- **13.1.3 Mitigation by Best Practice Wind Farm Design** - discussion of strategic siting of the proposed 110kV onsite substation to ensure no visibility will occur from C-SR29.

- **13.3.3.1 RSA Summary and Visibility Appraisal** – discussion of visibility of the proposed turbines along the C-SR29.
- **13.7.3.4.1 Designated Scenic Route SR29 (Map. Ref. C SR29)** – visual effects arising on the C-SR29, including assessment of effects on:
 - Westbound receptors (travelling east to west)
 - Centre of scenic route
 - Eastbound receptors (travelling west to east)
 - Policy Considerations
- **13.7.3.7.1 Cumulative Visual Effects (Other Wind Farms)** – discussion of cumulative effects that may occur during a journey scenario along the C-SR29.
- **13.7.3.7.2 Cumulative Visual Effects of Two Turbine Clusters – Northern and southern turbine clusters** – discussion of cumulative effects arising from the 2 no. turbine clusters, including a discussion on:
 - Views of both turbine clusters in opposing directions,
 - Views of both turbine clusters in the same field of view,
 - Sequential cumulative visual effects – journey scenario.
- **EIAR Volume 2 Photomontage Booklet**, see VP10, VP11, VP12, and VP15;
- **Appendix 13-3: Photomontage Visual Impact Assessment Tables**, see VP10, VP11, VP12, and VP15.

CCC's recommendation for refusal states that *"it is considered that the proposed development would seriously detract from the views and prospects from parts of the S29 Scenic Route"*, while the CCC Planner's Report (p.62) states that *"visual impact along the R585 would be significant and unlikely to be reasonably screened"*.

While the LVIA Chapter acknowledges that 'Significant' residual visual effects will occur (at VP11 and VP12), the detailed assessment demonstrates that such effects are localised and confined to limited section of Scenic Route C-SR29, experienced momentarily and are not representative of overall experience afforded by the route as a whole as experienced by visual receptors.

The comprehensive assessment of visual effects along the C-SR-29 scenic route (as detailed in 13.7.3.4 of the LVIA Chapter) states that the:

"potential visibility of the proposed turbines will only occur within the valley between the two clusters from the Cousane Gap in the east to Kealkill in the west (approx. 12km in total from VP10 to VP15)".

Within this stretch, the greatest visual effects are represented by VP11 and VP12 (residual 'Significant' visual effects), which were selected to represent:

"the most open views of the proposed turbines when travelling this route through the valley".

It is emphasised that the LVIA Chapter notes that while localised 'Significant' effects do occur, the proposed turbines are (emphasis made in bold):

*"mostly seen in the periphery of views (southern turbine cluster) or grouped on the upland, set back on the other side of the valley (northern turbine cluster). **The proposed turbines do not obscure or impact any long-ranging views of the "remote mountainous landscape" in HVL LCT 4 to the west**"*

The LVIA Chapter also notes that (emphasis in bold):

*"the **proposed turbines have a significant visual impact but do not significantly impact the key scenic attributes of the designated scenic route, as described in the CCDP**"*

Therefore, the occurrence of localised ‘Significant’ visual effects should not be conflated with adverse visual effects on the route as a whole, and it is considered that the CCC’s conclusion that the Proposed Project would “*seriously detract*” from the views and prospects from C-SR-29 overstates the extent and nature of the effects identified in the LVIA Chapter. This is further demonstrated in Section 13.7.3.4, where the LVIA Chapter states that (emphasis in bold):

- For **westbound receptors**, “visual effects only occur for approx. 2.8 km stretch of the scenic route between VP10 and VP12”. At VP10, representing views from the Cousane Gap, a **residual visual effect of ‘Slight’** was identified, with “the central views through the valley, comprising open views towards the dramatic undulating landscape, remain unobstructed, preserving the principal scenic focus of the view”.
- For **eastbound receptors**, visibility of the southern turbine cluster is limited due to “the steep landform to the south”, while VP15 demonstrates that “even where both clusters are seen within the same field of view, one cluster (the southern one) is perceived far more prominently than the other (northern turbine cluster)”, resulting in a **residual visual effect of ‘Moderate’**.

Furthermore, Section 13.7.3.4.1 of the LVIA Chapter refers back to the policies set out in the CCDP and acknowledges compliance with Policy Objectives GL14-12 and GL14-14. The LVIA Chapter states that:

“In relation to policy set out in the CCDP, the Proposed Project is consistent and in line with all the policies and objectives relating to Scenic Routes. While Policy GL14-12 seeks to “preserve the character of all important views and prospects... views of unspoilt mountains, upland... landscapes,” the proposed turbines are located within a landscape area designated as ‘Open to Consideration’ for wind energy development.

Policy GL14-12 also notes to preserving “views of natural beauty.” While the proposed turbines inevitably introduce new elements into the scenic views from this scenic route, they are primarily perceived on the periphery of such views, and the key scenic attributes of the dramatic West Cork landscape (HVL LCT 4) remain largely unobstructed, as demonstrated in VP10, VP11, and VP12 above. Accordingly, the Proposed Project aligns with Policy GL14-14, as it avoids “obstruction” or “degradation” of protected views through careful “design”, “site layout”, and the incorporation of “mitigation” measures, as outlined by the CCDP. Furthermore, as noted previously in Section 13.4.4, the Proposed Wind Farm adheres to guidance set out in the Guidelines (DoEHLG, 2006) and Draft Guidelines (DoHPLG, 2019) for Mountain Moorland.”

CCC also notes that “the Cousane Gap... are important ‘gateways’ to West Cork”. As discussed in the LVIA Chapter and reiterated throughout the preceding sections of this response, the Cousane Gap is recognised as one of the key sensitive locations along the route. However, there is very limited visibility of the proposed turbines from the gap itself. The LVIA Chapter notes that (emphasis in bold):

*“From this viewpoint, westbound travellers **emerge from the narrow pass at the Cousane Gap**, where the landscape opens up, with **views focused through the V-shaped Maughanaclea Valley** from an elevated vantage point. The valley frames long-ranging dramatic views to the west. From this location, a **small number of the proposed turbines** are visible on the high ground in the **periphery of views**. The **central views through the valley**, comprising open views towards the **dramatic undulating landscape remains unobstructed, preserving the principal scenic focus of the view.**”*



Figure 2 Extract from LVIA Chapter: Plate 13-9 Extract from EIAR Volume 2: Photomontage Booklet; VP10 90-degree FOV

Accordingly, while CCC is correct to identify the Cousane Gap as a sensitive “gateway”, the LVIA Chapter demonstrates that the key scenic experience of emerging from the gap and looking west through the Maughanaclea Valley is retained, with only a small number of turbines visible in peripheral views.

Overall, the LVIA Chapter concludes that “*residual visual effects on Designated Scenic Route C-SR29 range from ‘Imperceptible’ (where no visibility occurs) to ‘Significant’ (occurs for a very short duration and comprise a very small portion of the overall scenic route)*”. Therefore, while the LVIA recognises that ‘Significant’ visual effects arise for a short section of C-SR29, the assessment demonstrates that these effects are localised and short in duration, and do not detract from the key scenic and sensitive attributes of the scenic route.

It is further emphasised that, while some localised ‘Significant’ effects are acknowledged and cannot be fully mitigated, such effects are confined to a small proportion of the overall receptor experience on the scenic route. It is considered that these effects, should not, in themselves be considered sufficient to warrant a refusal of planning permission and should be weighed against the overall benefits of the Proposed Project, having the urgent need to accelerate the deployment of renewable energy infrastructure, including onshore wind energy, and the need to reduce greenhouse gas emissions.

As outlined in Section 13.2.5 of the LVIA Chapter, the outcome of the visual impact assessment is undertaken in the context of emerging baseline trends and the acceptability of wind turbines within views as a result of national policy, recognising that the visibility of wind turbines does not, in itself, equate to an unacceptable visual effect. Rather, the assessment focuses on the scale, arrangement, composition and overall visual coherency of turbines within the view, acknowledging that wind turbines will increasingly form an accepted component of Ireland’s landscapes, particularly in working rural contexts as the State progresses towards its renewable energy targets.

Scenic Route 28 (C-SR28)

CCC’s recommendation for refusal notes that “*‘The proposed wind farm site, [...] would be visible from scenic routes S29 and S28’*; CCC (pg. 62) also notes that “*The Planning Authority is of the opinion that views from the adjoining Scenic Routes, the S29 and S28, would be significant and would not represent long distance views*”.

Designated Scenic Route 28 (C-SR28) is comprehensively assessed in Section 13.7.3.4.2 of the LVIA Chapter, supported by photomontage viewpoints VP7 and VP14, which were selected to represent the limited instances along the C-SR28 where open views of the proposed turbines occur.

Section 13.3.3 of the LVIA Chapter (Route Screening Analysis), and re-iterated again in Section 13.7.3.4.2 of the LVIA Chapter (visual effects on C-SR28) demonstrates that the route is predominantly characterised by ‘Dense/Full’ and ‘Partial/Intermittent’ roadside screening, with very limited instances of ‘Little/No’ visual screening. Furthermore, as detailed in the LVIA Chapter, site surveys determined that within the enclosed ‘Pass of Keimaneigh’ (the “*important ‘gateways’ to West Cork*” as per the CCC’s Planner’s Report) - visibility of the proposed turbines will not occur due to the enclosing topography and elevated embankments on either side of the valley.

At VP7 (at the point where the enclosed valley first emerges and opens out to the broader landscape), residual visual effects were deemed to be ‘Moderate’. The turbines are seen within a marginal upland landscape comprised of commercial forestry and moorland where they adopt a degree of irregular spacing and layout, which responds to the natural landform.

At VP14 (a break further along the lower valley, where a break in an otherwise densely vegetated road occurs), residual visual effects were also deemed to be ‘Moderate’, where both turbine clusters appear visually connected from this location and form a coherent array across the undulating landscape in the background of the view. Furthermore, it is noted in the LVIA Chapter that “*such views and visual effects are momentary for visual receptors on the scenic route, as the majority of the route further south from this location remains heavily vegetated and very little visibility of the proposed turbines occur*”.

The LVIA Chapter concludes that residual visual effects on the designated scenic route C-SR28 range from ‘Imperceptible’ (where no visibility occurs (i.e. at Keimaneigh Pass)) to ‘Moderate’. No ‘Significant’ visual effects were identified. It is therefore suggested that the Planning Authority’s conclusion that effects would be ‘Significant’ indicates that the visual effects on Scenic Route SR28 within the LVIA Chapter have not been consulted or were dismissed.

3.1.5.3 Landscape Character and Sensitivity

This section addresses the following extract from CCC’s recommendation of refusal:

‘The proposed windfarm development would be located within a Landscape Character Type of Ridged and Peaked Upland, within an area of open unspoilt landscape and within an area where commercial wind energy developments are ‘Open to Consideration’, [...] The proposed wind farm site would also be sited in an area of High Landscape Sensitivity and Local Landscape Importance’. [...] On the basis of the information submitted [...] having regard to the siting, excessive height and number of turbines proposed, it is considered that the proposed development [...], would seriously detract from the visual quality of the landscape and visual amenities of the area and would be visually obtrusive when viewed from therein.

CCC additionally states:

‘Notwithstanding the location of the proposed windfarm in an area where windfarms are open to consideration, the proposal would be located very close to the adjoining designated High Value where windfarms are normally discouraged.’

CCC also states:

‘The Environmental Impact Assessment Report does not address the overlap of landscape forms close to the wind strategy boundaries which is indicative of the visual sensitivity of this area. It is noted that the Environmental Impact Assessment Report identifies the windfarm as being located in a Landscape Character Type ‘Ridged and Peak Upland’ and having a ‘Landscape Value’ and a ‘Landscape Sensitivity’ of High. Given the site’s location so close to the High Value Landscape and the open scenic views, the landscape value of the area is significantly higher than assessed in the Environmental Impact Assessment Report.’

The following sub-sections addresses each of these issues in turn.

Overlap of Landscape Forms and Proximity to Wind Strategy Boundaries

It is important to emphasise that the adopted Wind Energy Strategy (hereafter referred to as the WES), which as part of the CCDP, has followed best and adopted practice in its methodology of identifying areas where the provision of wind farm infrastructure is considered to be inappropriate on the basis of all identified sensitive assets within the County. Furthermore, the LVIA Chapter (and other relevant chapters) have demonstrated that the design process for the Proposed Project has taken consideration of all constraints within the site, with specific consideration to those provisions set out under Objective ET13-7, including:

- “Residential amenity particularly in respect of noise, shadow flicker and visual impact;
- Urban areas and Metropolitan/Town Green Belts;
- Natura 2000 Sites (SPA’s and SAC’s), Natural Heritage Areas (NHA’s), proposed Natural Heritage Areas and other sites and locations of significant ecological value.
- Architectural and archaeological heritage;
- Visual quality of the landscape and the degree to which impacts are highly visible over wider areas
- In planning such development, consideration should also be given to the cumulative impacts of such proposals”

The Proposed Wind Farm is located entirely within lands designated ‘Open to Consideration’. Other than the WES designations, the LVIA Chapter indicates that the land itself, despite being in close proximity to an area ‘Normally Discouraged’ has the capacity to accommodate a wind energy development of this scale:

- The Proposed Wind Farm site is located in a remote upland, marginal landscape. Commercial forestry is the dominant landcover and land-use within the Proposed Wind Farm site.
- The site itself does not comprise of any unique or distinctive features of national or international renown.
- The proposed turbines are located within an area surrounded by large landforms and defined ridgelines which provide visual containment, obscuring open views of the proposed turbines from a vast proportion of the LVIA Study Area (including that of the sensitive HVL landscapes).
- The Proposed Wind Farm site is located within LCT 15a – an LCT of local importance, particularly when compared to other LCTs in County Cork.
- The large scale, sparse population and land use characteristics such as commercial forestry make this LCT a highly suitable landscape for accommodating wind energy development, giving it a low susceptibility to change, as evidenced by the acceptability of wind energy development in marginal upland landscapes in Ireland, such as those in this LCT.
- All of the proposed turbines are located within an area classified as ‘Open to Consideration’, as is the majority of this LCT in the *Wind Energy Strategy of County Cork*.
- The proposed turbines follow the siting and design guidance for Mountain Moorland Landscape Types as set out in the Guidelines (DoEHLG, 2006) and Draft Guidelines (DoHPLG, 2019).

Sensitivity of the Wind Farm Site - Proximity of the Proposed Wind Farm site to HVL's

CCC notes that *“Given the site’s location so close to the High Value Landscape and the open scenic views, the landscape value of the area is significantly higher than assessed in the Environmental Impact Assessment Report”*.

It is emphasised that the proximity of the Site to lands classified as ‘Normally to be Discouraged’, or proximity of a HVL does not, in itself, alter the WES designation of the Proposed Wind Farm site as set out by the CCDP, or imply that the characteristics of adjoining HVL’s extend into the receiving landscape. The WES, as set out by the CCDP has expressly designated the Proposed Wind Farm site as ‘Open to Consideration’, reflecting the CCC’s strategic assessment of the landscapes capacity to accommodate wind energy development in this area.

The methodology used to determine the landscape sensitivity of the Proposed Wind Farm site, and the rationale for the resulting ‘Medium’ sensitivity rating in the LVIA Chapter, are discussed below.

The LVIA Chapter identifies LCT 15a (in which the Proposed Wind Farm site is located in) as having a ‘High’ Landscape Value and a ‘High’ Landscape Sensitivity, and notes that it is of ‘Local Importance’ as per the CCDP designations.

Sensitivity of LCT15a to Wind Farm Development

It is important to note that, as detailed in Section 1.7.3 of Appendix 13-1 *Methodology*, the sensitivity classification used for the LVIA is specifically focussed on sensitivity to wind energy development. Whilst local LCT sensitivity designations are reported and given due consideration, the assessment considers *“the specific landscape characteristics, values, qualities and susceptibility to change and importantly how sensitive the specific LCT is within a regional and national context”*. Accordingly, the sensitivity classification assigned to each LCT takes into account county development plan designations together with relevant wind energy capacity designations and policy.

Section 13.4.1.1.3 of the LVIA Chapter further notes (emphasis in bold):

*“LCT 15a is noted as being at the lower end, recognised as being of ‘Local Importance’, and **it is not identified as one of the most highly valued landscapes within the county.**”*

Appendix 13-2 *LCA Assessment* also notes that (emphasis in bold):

*“all of the **proposed turbines are located within an area classified as ‘Open to Consideration’, as is the majority of this LCT** in the Wind Energy Strategy of County Cork.”*

Appendix 13-2 concludes that in consideration of the *“classifications, designations and landscape characteristics, the sensitivity of this LCT to wind farm development is deemed to be **Medium.**”*

Sensitivity of the Proposed Wind Farm site itself

Section 13.4.3 ‘Sensitivity of the Proposed Wind Farm site: Landscape Value & Susceptibility to Change’ assesses the sensitivity of the Proposed Wind Farm site itself, in accordance with GLVIA3 and Notes and Clarifications (2023), through consideration of landscape value and susceptibility to change. The Landscape Institute 2013 Guidelines for Landscape and Visual Impact Assessment defines susceptibility to change as the *“ability of the landscape to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies”*. The more susceptible the receptor is to the type of change proposed, the greater is its sensitivity to the Proposed Project. Susceptibility of the landscape within the Proposed Wind Farm site to change has been assessed in consideration of the criteria set out in Table 13-2 of Chapter 13 of the EIAR:

- Landscape designations (LCT, setting, Scenic Routes and Views, amenity areas, etc.);
- Quality/condition of landscape elements;
- Scenic/aesthetic qualities;
- Rarity/conversation status;
- Wildness/naturalness;
- Recreational value;
- Cultural meaning/associations.

As detailed in Section 13.4.3, whilst there are some *“scenic views from within the Proposed Wind Farm site itself”*, the site is predominantly a marginal, working upland landscape which has undergone a degree of human modification due to current and historic land uses such as commercial forestry and agricultural fields. It is also a large-scale and sparsely settled landscape located within an area designated ‘Open to Consideration’ for wind energy development. On balance, the sensitivity of the Proposed Wind Farm site itself was deemed to be ‘Medium’.

The proximity of adjoining HVL’s and the presence of open scenic views were fully considered in the assessment of the Proposed Wind Farm site’s landscape sensitivity. These factors did not, however, justify a higher sensitivity rating when assessed in accordance with the LVIA methodology, which considers landscape value of the site itself alongside its susceptibility to wind energy development.

The assessment of landscape and visual effects on the adjoining HVL’s themselves, including both direct effects and indirect effects on views ‘of’ and ‘towards’ these landscapes, is addressed separately within the LVIA Chapter and is discussed further in the following section.

High Value Landscapes

In relation to the HVLs, it is demonstrated throughout the LVIA Chapter that the proposed turbines are not located within any designated HVLs and will not result in any ‘Significant’ landscape effects on these landscape receptors.

Section 13.7.3.1.3 contains a detailed assessment of landscape effects on LCTs and adjoining HVL's including effects on both HVL LCT 4 and HVL LCT 16a. A summary is reproduced below:

- **HVL LCT 16a Glaciated and Forested Cradle Valley** (residual landscape effect of 'Slight'):
 - The proposed turbines and the ancillary infrastructure are not located within this HVL, and as such will not materially alter the physical fabric of this landscape type.
 - 48% of the overall LCT exhibit no theoretical visibility of the proposed turbines.
 - No visibility of the proposed turbines will occur at the Gougane Barra (the key sensitive receptor within this HVL).
- **HVL LCT 4 – Rugged Ridge Peninsulas** (residual landscape effect of 'Moderate'):
 - In terms of changes to the landscape character of this LCT, the greatest effects will only occur within a small area at the easternmost extent of the LCT, where it borders LCT 15a. This area is localised to the east of Bantry Bay, on the very periphery of this LCT where the landscape transitions to marginal uplands of lower sensitivity where it connects to LCT 15a.
 - Effects on the character of the wider landscape within the LCT is largely restricted due to visual screening from surrounding landforms and ridgelines – only approx. 35% of the entire LCT within the entire 25km LVIA Study Area has any theoretical visibility of the proposed turbines.
 - Whilst the proposed turbines can be seen from areas in this LCT, they are mostly observed within the distant background of views in the marginal upland of the Proposed Wind Farm site. The proposed turbines will not significantly impact the key characteristics, qualities and sensitivities of this LCT which are the rugged coastline, and the dramatic mountainous landscape – All viewpoints within this LCT were assigned a magnitude of change of either 'Slight' or 'Negligible'.
 - While the proposed turbines will introduce some degree of change on this sensitive landscape, particularly in close proximity (within 5km of the proposed turbines) resulting in a 'Slight' change in character to the landscape, the proposed turbines will not materially alter the key characteristics of the landscape, nor cause significant effects on its key sensitivities and special landscape qualities which are coastal environment and the rugged mountains to the west.

Contrary to CCC's findings, the LVIA Chapter acknowledges that the Proposed Wind Farm site is located within a transitional area between two LCTs (see Section 13.7.3.1.3): *"This area is localised to the east of Bantry Bay, on the very periphery of this LCT where the landscape transitions to marginal uplands of lower sensitivity where it connects to LCT 15a"*. Through the investigations in the LVIA Chapter, informed by multiple site visits (conducted in 2022, 2024, and 2025), 18 no. photomontages, 5 no. photowires, and ZTV mapping; the transitional area on the eastern periphery of HVL LCT4 does not represent one of the defining or most sensitive parts of the HVL. Therefore, arguably, it is not a critically unique or sensitive aspect of the landscape considering its historic and current land use of commercial forestry and agricultural fields within the marginal, working upland landscape.

Overall, based on the evidence and assessment presented throughout the LVIA Chapter, the proposed turbines do not significantly impact the key unique special landscape qualities and characteristics of HVL LCT 4.

3.1.5.4 Siting, Scale and Turbine Height

In its recommendation for refusal CCC notes that due to its *"siting, excessive height and number of turbines proposed"* the Proposed Project would *"seriously detract"* from the visual quality of the landscape and the visual amenities of the area.

CCC also notes that:

“While the Environmental Impact Assessment Report asserts that the landscape can accommodate the proposed windfarm, it is not accepted that the surrounding landscape would have the capacity to absorb a 14-turbine windfarm and provide visual containment of the proposal. The proposed turbines would be prominently visible and the Landscape and Visual Impact Assessment has not demonstrated that the landscape can absorb the scale of development proposed.”

As detailed in Section 13.1.3 of the LVIA Chapter, the capacity of the receiving landscape to accommodate the Proposed Wind Farm was a key consideration throughout the iterative design process, therefore, the final design resulted in the omission of turbines and the careful micro-siting of turbines to minimise landscape and visual effects. Furthermore, in regard to visibility, as part of the iterative design process, the proposed turbine layout has been developed to respond directly to the receiving landform. The southern turbine cluster is located on the Maughanaclea Hills, whilst the northern turbine cluster is located on the foothills of the Shehy Beg Mountains. Both turbine clusters are contained within a horseshoe-shaped series of mountainous peaks and landforms which provide substantial enclosure and visual containment. This topographic containment significantly limits theoretical visibility (as seen in Figure 13-1, Figure 13-2, and Figure 13-3 of the LVIA Chapter of the EIAR), visually screening the proposed turbines from vast areas within the LVIA Study Area, restricting visibility beyond approximately 5km to the north, east and south (except localised mountain peaks). The extent of actual visibility as reported in the chapter was validated through extensive site surveys and production of photomontages.

Overall, the large scale and unpopulated nature of the receiving landscape, makes it capable of accommodating all 14 proposed turbines of the Proposed Project.

High Theoretical Visibility within 5km

CCC Planner's Report (p.62) notes that the Proposed Wind Farm:

“raises a number of significant concerns regarding visual impact considerations. Most of the potential visual impact effects would arise within 5km/ in close proximity to the proposed windfarm” and that “The ‘Zone of Theoretical Visibility’ indicates there would be high theoretical visibility within 5km of the proposed turbines.”

As detailed in Section 13.3.1 of the LVIA Chapter of the EIAR, the ZTV is a bare-earth, worst-case scenario of potential visibility. In reality, actual visibility on the ground is significantly less than predicted by the ZTV mapping due to intervening factors such as on-site screening from natural and man-made features, atmospheric weather, and/or localised topography.

As demonstrated throughout the LVIA Chapter of the EIAR, the Route Screening Analysis (Section 13.3.3) where 43% of the roads experienced either ‘Intermittent/Partial’ or ‘Dense/Full’ visual screening, field survey and verified photomontages confirm that actual visibility is substantially more limited than shown in the ZTV Map. Consequently, visual effects within 5km vary considerably by receptor and location and are not directly represented by the ZTV alone.

Cumulative Impact assessment

CCC Planner's Report (p.62) references Gortloughra Wind Farm (CCC Ref. 25142 and ACP Ref. 322743) which is currently the subject of an appeal with the Commission and discusses the potential inter-visibility between the proposed turbines and the Gortloughra proposal.

Potential cumulative landscape and visual effects with other wind energy developments (existing, permitted, and proposed) are discussed in Section 13.7.3.7 of the LVIA Chapter of the EIAR. However,

cumulative effects associated with other proposed developments, including the Gortloughra Wind Farm, are inherently uncertain as they remain subject to the outcome of the planning and consent process. As such, the nature and extent of any cumulative effects cannot be determined with certainty at this stage.

In line with best practice, Gortloughra Wind Farm was included in the cumulative assessment, appended to Chapter 2 of the EIAR, using the most up-to-date and available information at the time of submission.

3.1.5.5 Compliance with the Cork County Development Plan 2022-2028

This section addresses the following extract from CCC's recommendation of refusal :

'proposed development would, thus, materially contravene Objectives ET 13-7, GI 14-9, GI 14-12 and GI 14-13'.

For ease, these objectives have been reproduced below, accompanied by a discussion.

"ET 13-7: Open to Consideration:

"Commercial wind energy development is open to consideration in these areas where proposals can avoid adverse impacts on:

- *Residential amenity particularly in respect of noise, shadow flicker and visual impact;*
- *Urban areas and Metropolitan/Town Green Belts;*
- *Natura 2000 Sites (SPA's and SAC's), Natural Heritage Areas (NHA's), proposed Natural Heritage Areas and other sites and locations of significant ecological value.*
- *Architectural and archaeological heritage;*
- *Visual quality of the landscape and the degree to which impacts are highly visible over wider areas*
- *In planning such development, consideration should also be given to the cumulative impacts of such proposals."*

From an LVIA perspective, Objective ET13-7 has **not been contravened** as the Proposed Wind Farm is located within an area 'Open to Consideration', within an LCT of local importance (particularly when compared to other LCTs in County Cork), and, aligning with point 5 of this Policy Objective, the LVIA Chapter demonstrates that the proposed turbines are visually contained by the surrounding landform and are visually screened from vast areas within the LVIA Study Area by the horseshoe-shaped series of mountainous peaks and landforms to the north, east and south, thereby substantially limiting visibility across the wider landscape.

"GL 14-9 Landscape:

- a) *Protect the visual and scenic amenities of County Cork's built and natural environment.*
- b) *Landscape issues will be an important factor in all land-use proposals, ensuring that a pro-active view of development is undertaken while protecting the environment and heritage generally in line with the principle of sustainability.*
- c) *Ensure that new development meets high standards of siting and design.*
- d) *Protect skylines and ridgelines from development.*
- e) *Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments."*

“GI 14-12: General Views and Prospects

Preserve the character of all important views and prospects, particularly sea views, river or lake views, views of unspoilt mountains, upland or coastal landscapes, views of historical or cultural significance (including buildings and townscapes) and views of natural beauty as recognized in the Draft Landscape Strategy.

GI 14-13: Scenic Routes

Protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that have very special views and prospects identified in this Plan. The scenic routes identified in this Plan are shown on the scenic amenity maps in the CDP Map Browser and are listed in Volume 2 Heritage and Amenity Chapter 5 Scenic Routes of this Plan.”

In regard to Policy Objectives mentioned above, these have **not been contravened**. The iterative design process of the Proposed Wind Farm, as demonstrated throughout the LVIA Chapter and the preceding sections demonstrate that:

- The visual amenities of County Cork’s natural environment is protected through the iterative design process, where even when seen from a scenic route (C-SR29), the proposed turbines do not obscure or impact any long-ranging views of the “*remote mountainous landscape*” in HVL LCT 4 to the west, therefore, do not significantly impact the key scenic attributes as designated by the scenic route in the CCDP.
- The proposed turbines are not located within a HVL and are located within an area ‘Open to Consideration’, within an LCT of local importance.
- The proposed turbines follow and adhere to the siting and design guidance as set out by the Guidelines (DoEHLG, 2006) and Draft Guidelines (DoHPLG, 2019).
- The Proposed project does not propose any removal of extensive amounts of trees, hedgerows and historic walls.

It is emphasised that these policies should be considered in the context of the urgent need to accelerate the deployment of renewable energy infrastructure (including onshore wind energy) and the need to reduce greenhouse gas emissions. Policies such as GL 14-9 (*“Protect skylines and ridgelines from development”*) are general landscape policies intended to apply across all forms of development. Their application to onshore wind energy development must recognise that wind turbines, by their functional nature, require elevated, exposed locations to harness the wind resource efficiently.

The height, scale and siting of the proposed turbines is functionally appropriate for good wind farm design and consequently meets all guidance outlined for the appropriate landscape type in which it is sited (Mountain Moorland landscape) as set out the Guidelines (DoEHLG, 2006) and Draft Guidelines (DoHPLG, 2019).

Further, several key attributes and factors make upland landscapes highly suitable in general for accommodating wind energy developments from an LVIA perspective, for example:

- Upland landscapes are generally well suited to accommodating commercial-scale wind energy development from an LVIA perspective. Upland landscapes (such as the Proposed Wind Farm site) are typically large-scale, open and sparsely populated landscapes, allowing commercial-scale wind farms to be effectively absorbed whilst providing sufficient space to achieve appropriate setbacks from residential receptors. This is the case with the Proposed Wind Farm, where the nearest residential receptor is located approximately 682 m from the nearest turbine, exceeding the recommended four-times tip-height setback distance;
- Marginal upland landscapes, such as the Proposed Wind Farm site, commonly comprise environments that are highly modified by commercial activities such as commercial forestry and agricultural land uses. Such landscapes are large unpopulated areas of relatively low

landscape sensitivity (e.g. due to human intervention), typically well suited to accommodating the physical infrastructure associated with wind energy development (compared with other upland environments such as pristine peatland);

- Upland landscapes are typically areas of low population density with open expanses of unsettled land which provide adequate space for wind farms enabling appropriate set-back distance (e.g. 4-times-tip-height in the Draft Guidelines (DoHPLG, 2019)) from residential receptors and large population centres;
- Strategic geographic siting of turbines in relation to well-defined landforms and topographical features existent within upland landscapes (i.e. the topographical enclosure and visual containment of the proposed turbines from the horseshoe-shaped series of mountainous peaks and landforms) can substantially reduce the visual exposure of a wind farm development in its wider landscape setting and therefore eliminate visual effects on larger number of receptors.

Conclusion

Accordingly, it is considered that Visual Impact impacts of the Proposed Project have been comprehensively assessed and all concerns raised in the CCC report have been adequately addressed.

3.1.6

Summary of Response to Local Authority Observations

This response has been prepared to address and carefully consider the issues raised within CCC's submission, it is considered that the Proposed Project has appropriately addressed the matters identified through the design process and supporting assessments. The information constitutes a full and robust response to the matters raised and the information provided here will directly assist the Commission in their ongoing consideration of this planning application.

4.

STATUTORY CONSULTEES

A total of 6 submissions were submitted to the Commission from Statutory Consultees. **Table 2** below identifies the Statutory Consultees who lodged a submission to the Commission in relation to the Proposed Project and who in the project team is responsible for the corresponding response.

Table 2 Statutory Consultees Submissions and Themes

Statutory Consultee	Themes Included	Lead Author for Response
Fáilte Ireland	- Construction related impacts; - Impacts arising from the operational stage of the development; - Cumulative Impact; and, - Tourism Impact Assessment	MKO Environment
Department of Defence	- Obstacle Lighting - Impact on Radar Systems	MKO Environment
Development Applications Unit	- Archaeology, - Nature Conservation	MKO Environment
Health Service Executive	- Public Consultation, - Noise and Vibration, - Shadow Flicker, - Land Soils and Geology, - Hydrology and Hydrogeology, - Traffic and Access, - CEMP Food Safety and Recommendations	MKO Environment
Irish Aviation Authority	Aviation Impacts	MKO Environment
Transport Infrastructure Ireland	Traffic and Transport	MKO Environment

4.1

Fáilte Ireland

Fáilte Ireland made a submission on the planning application for the Proposed Project under the following four following headings;

- Construction related impacts,
- Impacts arising from the operational stage of the development,
- Cumulative Impact; and,
- Tourism Impact Assessment.

4.1.1

Construction-related Impacts

Fáilte Ireland raises observations regarding traffic movements and the need for appropriate construction management strategies. These matters have been comprehensively addressed in the EIAR including

Chapter 15 (Material Assets), Appendix 4-3 (Construction and Environmental Management Plan) and Appendix 15-2 (Traffic Management Plan).

Chapter 15 concludes that, due to the short-term nature of the construction phase, there will be no significant traffic-related impacts due to the Proposed Project.

The Applicant has also committed to the implementation of a detailed Traffic Management Plan (TMP) and Construction and Environmental Management Plan (CEMP) which include measures to manage construction phase traffic, protect the surrounding environment and minimise disruption during the construction phase.

Furthermore, the TMP will be updated and agreed with the local authority and An Garda Síochána prior to construction works commencing on Site and contact will be maintained with the Road Department throughout the construction phase to ensure that the provisions of the TMP will be implemented and managed appropriately.

Accordingly, all matters raised by Fáilte Ireland have already been considered in detail in the EIAR and appropriate mitigation measures have been identified to minimise construction related impacts.

4.1.2

Impacts arising from operational stage of the development

Fáilte Ireland raised concerns over operational stage visual impacts that may affect tourism. Their response outlines that the Proposed Project sits within LCT15a (classified as part of the Landscape Character Assessment which forms part of the CCDP). Their responses notes impacts on cycling and walking trails due to the increased use of the upland landscape for leisure and recreational use and also notes impacts on a West Cork Initiative, “Dark Skies Community” due to aviation lighting required on turbines.

In relation to LCT15a, we would refer the Commission to Section 3.1.5.3 above, which provides a comprehensive assessment of the landscape character type in which the Proposed Project is located

In relation to comments regarding the continued and increasing use of the upland landscape for leisure and recreational use, the Commission is also referred to Section 3.1.5.3 above.

With regards to concerns in relation to potential impacts on dark skies, it is noted that any aviation lighting associated with wind turbines is typically located at nacelle level, while the LVIA contained within Chapter 13 of the EIAR assesses the visual impact of the proposed turbines to the half blade height, which is higher than the nacelle. As demonstrated by the ZTV mapping located in the EIAR, the proposed turbines are not visible from a significant area of the LVIA Study Area, and visibility of nacelle-level aviation lighting would therefore be notably even more limited than that indicated by the ZTV mapping.

It is anticipated that any visibility of aviation lightning from the proposed turbines will primarily be confined to the immediate vicinity of the Proposed Project. Typically, concerns relating to aviation lighting are most relevant in relation to developments located within or adjacent to dark or protected night-sky landscapes; however, the Proposed Project, is **not** located within an area subject to night-sky designations or recognised dark landscape sensitivities. Other visual receptors present within the landscape at night, including recreational receptors, commuters travelling along the local road network as well as nearby residents, have been considered as part of the LVIA. Reference is made to NatureScot Guidance on Aviation Lightning 2024, which notes that sensitivity for such receptors is generally reduced at night due to baseline lighting within homes, towns and villages, with higher sensitivity associated with designated Dark Sky areas. While it is acknowledged that some individuals may seek to appreciate the night sky within the surrounding rural landscape, the area is **not** currently designated as a Dark Sky landscape and, having regard to the limited scale of the Proposed Project and the presence of existing wind energy

development and existing lighting from nearby settlements and roads, aviation lighting would not result in a material change to existing night-time lighting.

As noted in Section 5.3.4.5 of the EIAR, the provision of aviation lighting on permitted turbines is a standard and accepted part of any wind farm development and is a safety requirement of the Irish Aviation Authority (IAA). The standard lighting required by the IAA are medium intensity lights. Such lighting is designed specifically for aviation safety and is not intended to be overbearing or dominant when viewed from the ground thus striking a reasonable balance between aviation safety and visual effect.

The IAA generally only confirm lighting arrangements required for wind farm developments once a consent is in place. This requirement for engagement with IAA in relation to aviation lighting requirements has become commonplace in planning conditions accompanying any grant of permission for a wind farm.

4.1.3 Cumulative Impact

Fáilte Ireland raises concerns over cumulative impacts as a result of the number of proposed and permitted wind farm projects in the area.

The potential for cumulative impacts arising from other projects has been fully considered within the EIAR, as outlined in Section 2.9 of Chapter 2. The potential cumulative impact of the Proposed Project combined with the potential impact of other projects was carried out with the purpose of identifying what influence the Proposed Project will have on the surrounding environment when considered collectively with approved and existing projects, projects pending a decision from the planning authority, projects in the public domain such as those SID at pre-consultation with the Commission, and land-uses in the vicinity of the Site location. To gather a comprehensive view of cumulative impacts within the cumulative study area and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate and within the context of their identified cumulative study area. Table 2-7 of Chapter 2 of the EIAR outlines the cumulative considerations for each EIAR chapter.

In regard to the potential for landscape and visual cumulative impacts, addressed in the Fáilte Ireland Submission, Section 13.6 of Chapter 13 of the EIAR assess the likely landscape and visual impacts of the Proposed Project within the LVIA Study Area, both independently, as well as cumulatively with all other existing, permitted and proposed wind farms developments with project specifications in the public domain.

4.1.4 Tourism Impact Assessment

Fáilte Ireland acknowledged and welcomed the Tourism Impact Assessment (TIA) (Appendix 5-3) included as part of the EIAR. While they acknowledged that the TIA notes that the surrounding area in which the Proposed Project is located has low tourism assets, they noted concern regarding potential impacts to local sections of the Sheep's Head Way. This matter has been comprehensively addressed in Chapter 13 Landscape and Visual of the EIAR, which provides an assessment of the visual impacts on recreational routes. In particular, Table 13-11 considered all sections of the Sheep's Head Way and looks to scope in sections in which visibility is predicted. The impact assessment concluded that no significant effects are anticipated on recreational routes.

It has been clearly demonstrated that the concerns raised by Fáilte Ireland have been comprehensively addressed with the original application documentation, and further articulated in this Response to Observations, and the Proposed Project will not cause significant impacts on tourism during the construction or operational phases of the Proposed Project.

4.2 Department of Defence

The Department of Defence (DoD) in its submission noted that the Air Corps were consulted in preparation of its response.

The DoD sets out the following conditions in the event that the Proposed Project is granted:

- All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting may be incandescent. If LED or other lighting types are used, should be a type visible to Night Vision equipment. Obstacle lighting must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light insensitively to be of similar value to that emitted in the visible spectrum of light.
- In the event of negative impacts on future military radar systems, the owner will engage with the Department of Defence and will provide suitable mitigations as soon as practical.

The Applicant acknowledges the aviation safeguarding conditions set out by the DoD and confirms that they are agreeable to these conditions, in the event that the Proposed Project is granted planning permission.

4.3 Development Applications Unit

The Development Applications Unit (DAU) made a submission on the planning application for the Proposed Project in relation to both Archaeology and Nature Conservation. These matters are addressed separately below.

4.3.1 Archaeology

The DAU note that previously unknown sub-surface archaeological features or deposits may be present within the Site and recommends that appropriate conditions relating to archaeological investigation, monitoring and mitigation are implemented by the Commission, in the event that planning permission is granted.

The Applicant acknowledges the conditions set out by the DAU with respect to Archaeology, which are consistent with the archaeological mitigation strategy set out in Chapter 14 of the EIAR and is agreeable to appropriate conditions being imposed by the Commission, in the event that the Proposed Project is granted planning permission.

4.3.2 Nature Conservation

4.3.2.1 White Tailed Eagle

The DAU note that white-tailed sea eagle were recorded near the Wind Farm Site and note several casualties along the Kerry/Cork border. The DAU note concern that the Proposed Wind Farm may give further rise to the risk of collision for the species.

Response

While it is acknowledged that white-tailed eagle collisions have occurred in the State and that the species may be more susceptible than some other species to collisions, site-specific factors are likely to be more pertinent (e.g. occurrence locally and suitability of habitats) in the consideration of likely significant effects.

In the present case, there was a very low rate of occurrence throughout surveying, and the commercial forestry of the Site is of only limited value to the species (the species roost in commercial forestry on occasion, although there was no evidence of that here).

The risk of colliding with a turbine decreases/increases with the amount of time spent in the air within the rotor swept area of a turbine. White-tailed eagle was not recorded with any regularity at the Site. As outlined in Section 7.5.5.4 of the EIAR, in the 3 years of surveys that informed this planning application (April 2022 to March 2025), there were only 2 no. observations of white-tailed eagle. Both observations were greater than 500m from the proposed turbines, one flying approximately 750m and one soaring high approximately 3.2km from the Proposed Wind Farm site. Because of the absence of flights within the Proposed Wind Farm site, it was not possible to calculate a formal estimate of predicted collisions, however, White-tailed eagles were not found to be utilising the Proposed Wind Farm site and no suitable breeding sites are present.

In summary, throughout the comprehensive suite of bird surveys undertaken, spanning April 2022 to March 2025, there is no evidence of white-tailed eagle flight activity that would suggest that collisions are likely to pose a significant risk to this species resulting from the Proposed Project, or that the area in which the Proposed Wind Farm site is located provides attractive thermals or corridors for travelling and hunting.

No significant effects are predicted.

4.3.2.2 **Annex I and Article 17 Habitats**

The Department highlighted that proposed turbines and supporting infrastructure occur within annexed habitats under the EU Habitats Directive (HD). It is highlighted that the State has responsibilities under Article 17 of the HD to report details of losses and degradation to Article 17 mapped habitat.

Response

Impacts on Article 17 Habitats

The potential for impacts on habitats mapped and reported to the European Commission by the State under Article 17 of the HD has been fully assessed in the EIAR. There are Article 17-mapped habitats within the EIAR site boundary as shown in Figure 6-3 of the EIAR. An area of alpine/subalpine heath 4060 is mapped within the vicinity of T7 and T8 within the south of the site. However, as demonstrated in Section 6.3.1.2, Chapter 6, of the EIAR, this area actually comprises a conifer plantation and does not conform to Annex I habitat. The Proposed Wind Farm completely avoids all other mapped areas of Article 17 habitat and as such there is no potential for loss of or degradation of Annex I habitats reported by the State to the European Commission.

Impacts on other Annex I Habitats

The potential for impacts on other Annex I habitats not reported on under Article 17 as a result of the Proposed Project has been fully assessed in the EIAR. The potential impact as a result of direct loss of 1.6ha of Annex I wet heath and 0.2ha of Annex I blanket bog has been fully assessed in Table 6-12 of the EIAR. As reported, there will be loss of 1.6ha of degraded wet heath which will be offset through the implementation of the Biodiversity Management and Enhancement Plan (BMEP), Appendix 6-4 of the EIAR. There will be a residual loss of 0.2ha of unmapped blanket bog habitat which has not been mapped or reported under Article 17. This assessment has also included the potential for impacts due to proposed spoil management areas which will be located at proposed turbines T10, T09, T08, T07 and T01 within what is currently conifer plantation forestry, and which will not result in the loss of Annex I habitat.

The potential for indirect impacts on Annex I wet heath and blanket bog habitat (unreported under Article 17) as a result of indirect drainage impacts (eg from construction and upgrade of new roads) as well as impacts from construction phase dust has also been assessed in Table 6-12 (Chapter 6) of the EIAR, with mitigation prescribed to ensure there is no potential for residual significant indirect effects on these habitats. The potential for impacts on peatland habitats due to peat slippage has been fully assessed in Chapter 8 ‘Land, Soils and Geology’ of the EIAR with a Geotechnical and Peat Stability Assessment Report included as Appendix 8-1.

Annex I Bird Species and Red-Listed Bird Species

The DAU raises concern over several Annex I and Red Listed Species that were identified during the surveying period for the Proposed Wind Farm site, including Chough, Golden Plover, Kestrel, Common Snipe, Breeding Woodcock, Wintering Merlin, Curlew, Hen Harrier, Ring Ouzel, Whooper Swan, Goshawk, Goldeneye, Grey Wagtail, Redwing, Swift, Peregrine Falcon and Stock Dove

In response, and as outlined in Section 7.2.4.3 of the EIAR, the key potential sources of impacts from this type of development are summarised as follows. Wind farms present three potential risks to birds (Drewitt and Langston 2006, 2008; *Band et al.*, 2007):

- **Direct habitat loss** due to wind farm infrastructure.
- **Disturbance/displacement** (sometimes called indirect habitat loss) if birds avoid the wind farm and its surrounding area due to construction works or turbine operation. Displacement may also include barrier effects in which birds are deterred from using normal routes to feeding or roosting grounds.
- Death through **collision** or interaction with turbine blades and other infrastructure.

For each of these three risks, the detailed knowledge of bird distribution and flight activity within and surrounding the Project has been used to predict potential impacts of the Proposed Project on birds. These impacts are also assessed cumulatively with other projects.

A comprehensive suite of bird surveys was undertaken at the Proposed Wind Farm Site between April 2022 and March 2025. Results derived from a continuous 2 years and 11 months of surveying at the Site and hinterland, undertaken in line with best practise, i.e. NatureScot guidance², were analysed to inform this assessment. As such, the surveys undertaken provide the information necessary to allow a complete, comprehensive and robust assessment of the potential impacts of the Proposed Project on avian receptors. These best practice surveys are the scientific basis for the impact assessment that followed.

EIAR Section 7.5.2 provides an outline of the rationale for identifying the key ornithological receptor (KOR) of the Proposed Wind Farm site for detailed impact assessment. Whether the species was listed on Annex I of the Birds Directive and/or Red-listed (BoCCI) was a key consideration in this regard. The impact assessment that follows in EIAR Section 7.5.5 provides a detailed species-specific impact assessment of the construction, operation and decommissioning phases. This includes consideration of direct (physical) and indirect (e.g. disturbance and displacement) habitat loss and collision risk effects associated with the Proposed Project. Key considerations included:

- Large sections of the Proposed Wind Farm site is characterised primarily by commercial forestry. Commercial forestry is typically considered to be of low ecological value;
- The rate of occurrence of the receptor (informed by a comprehensive suite of surveys);
- Context: The suitability and abundance of habitat on site relative to the wider surroundings;

² As outlined in Section 7.2.6.1 of the EIAR, surveys were undertaken in line with the NatureScot Guidance of the time (SNH, 2017). Following the completion of these surveys, updated survey Guidance was published by NatureScot (i.e. SNH, 2017; revised in NatureScot, 2025). The surveys are also in accordance with the revised Guidance (NatureScot, 2025).

- The pathway for impacts;
- Conservation status of the population; and
- Population importance.

The balance of this evidence informed a comprehensive and robust impact assessment. As outlined in Section 7.6.3 of the EIAR and reiterated herein, no significant effects were identified for any KOR.

In summary, the comprehensive suite of surveys provided the scientific basis to undertake a meaningful examination of likely significant effects. This impact assessment included consideration of habitat loss (direct and indirect) and collision risk for the avian community of the Site and wider surroundings. No significant effects were identified.

4.3.2.3 Cumulative Effects

The DAU raises concern over the level of detail provided on in-combination effects and cumulative impacts from the other wind farms in the cumulative assessment. The below provides additional species-specific detail and assessment of cumulative effects for each of the Key Ornithological Receptors, including information on collision risk estimates for other wind farms where it is available.

Chough

At a national level, the main pressures and threats for chough listed in Article 12 reporting are: conversion from mixed farming and agroforestry systems to specialised production, conversion from one type of agricultural land use to another, and abandonment of grassland management; as well as use of plant protection chemicals in agriculture. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for chough. All of the pressures/threats listed were ranked as of medium importance.

The extent of commercial forestry in the landscape influences the availability and distribution of open habitat for chough. Afforestation reduces the extent of open foraging habitat. Ballybane, Carrigarierk Extension, Carrigarierk, Cleanrath, Cummeenabuddoge, Curraglass, Derragh, Gortyrhilly, Inchamore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlachy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for chough (e.g., through changes in grazing pressure, vegetation structure and levels of human disturbance). Barnadivane, Coomatallin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all located within, or partially within, agricultural grassland habitats.

Upland open habitats are of value to chough. Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomatallin, Dreenacreenig West, Gortloughra, Gortyrhilly, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlachy II are located within, or partially within, upland habitats (bog/wet grassland).

Information on collision risk at other wind farms was available for Gortyrhilly, which predicted 0.23 collisions per year, and Gortloughra, which predicted 0.06. Combined with the Proposed Project, this is a cumulative 0.392 birds per annum. If 0.392 were to occur per annum, this would increase the annual mortality of the county population by 1.37%. The magnitude of the effect is assessed as low, which corresponds to a Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on chough are anticipated at the county, national or international scale.

Hen Harrier

At a national level, the main pressures and threats for hen harrier listed in Article 12 reporting are: conversion to forest from other land uses, or afforestation; replanting with or introducing non-native or non-typical species; wood transport; removal of small landscape features for agricultural land parcel consolidation; reseedling of grasslands and other semi-natural habitats; conversion from one type of agricultural land use to another; burning for agriculture; abandonment of management/use of other agricultural and agroforestry systems; and wind, wave and tidal power, including infrastructure; as well as problematic native species. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for hen harrier. The pressures/threats of wind, wave and tidal power and agricultural are ranked as of medium importance. Conversion to forest from other land uses, or afforestation, and replanting with or introducing non-native or non-typical species were ranked as of high importance, with the remaining pressures/threats relating to forestry and agricultural practices ranked as of medium importance.

Commercial forestry habitats are of limited value to hen harrier except during the pre-thicket stage (approximately the first ten years of growth) when they can be used by hunting and nesting birds. Some areas of forestry in the landscape may naturally become unsuitable for this species over the lifetime of the Proposed Project due to the maturation of commercial forestry. However, due to the regular cycles of commercial forestry, additional areas are likely to also be felled within the landscape, and as such new potential suitable habitat would become available. Ballybane, Carrigarierk Extension, Carrigarierk, Cleanrath, Cummeenabuddoge, Curraglass, Derragh, Gortyrhilly, Inchamore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlachy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for hen harrier (e.g., through changes in prey availability, grazing pressure, vegetation structure and levels of human disturbance). For example, drainage, reseedling and improvement may reduce habitat suitability in some areas, while low-intensity grazing systems may maintain suitable foraging habitat. Barnadivane, Coomatallin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all located within, or partially within, agricultural grassland habitats.

Open upland habitats are of value to hen harrier. Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomatallin, Dreenacreenig West, Gortloughra, Gortyrhilly, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlachy II are located within, or partially within, upland habitats (bog/wet grassland).

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 0.001 at Cummeenabuddoge, 0.003 for Gortyrhilly, 0.004 for Gortloughra, 0.00171 for Cleanrath and 0.001 for Carrigarierk Extension. Predicted values were not calculated for Knocknamork and Shehy More due to the low level of flight activity. Combined with the Proposed Project, this is a cumulative 0.012 birds per annum. If 0.392 were to occur per annum, this would increase the annual mortality of the wintering county population (estimated to be 3 birds) by 2.11%. The magnitude of the effect is assessed as low, which corresponds to a Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on hen harrier are anticipated at the county, national or international scale.

Peregrine Falcon

At a national level, the main pressure/threats for peregrine falcon listed in Article 12 reporting are: wind, wave and tidal power, including infrastructure; agricultural activities (which relates to changes in habitat extent and quality due to agricultural management); and use of plant protection chemicals in agriculture; as well as poisoning of animals, illegal harvesting, and other human intrusions and disturbance not mentioned above (which relates to checking nests and taking chicks for the purposes of falconry). The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which also have the potential to influence habitat availability and quality for peregrine falcon. Overall, the pressure from wind, wave and tidal power is not considered to currently be having a negative impact on the national/regional populations.

The maturation and management of commercial forestry in the landscape influences the availability and distribution of habitat for peregrine falcon. Afforestation may reduce the extent of open foraging habitat, while forest maturation further reduces habitat suitability over time. Conversely, felling and restructuring operations may periodically create temporary open habitat conditions in some areas that could be suitable for foraging. The suitability of the landscape for peregrine falcon is therefore influenced by the age structure, composition and management cycle of commercial forestry. Ballybane, Carrigariel Extension, Carrigariel, Cleanrath, Cummeenabuddoge, Curraghglass, Derragh, Gortyrally, Inchamore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlachy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for peregrine falcon (e.g., through changes in prey availability, grazing pressure, vegetation structure and levels of human disturbance). For example, drainage, reseeding and improvement may reduce habitat suitability in some areas, while low-intensity grazing systems may maintain suitable foraging habitat. Barnadivane, Coomatalin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all located within, or partially within, agricultural grassland habitats.

Open upland habitats are of value to peregrine falcon: this species needs open area with a plentiful supply of birds to hunt and secure sites for breeding (Ratcliffe, 1993). Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomatalin, Dreenacreenig West, Gortloughra, Gortyrally, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlachy II are located within, or partially within, upland habitats (bog/wet grassland).

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 0.0006 for Gortrally, 0.221 for Curraghglass, 0.03 for Gortloughra and 0.0235 for Cleanrath. Combined with the Proposed Project, this is a cumulative 0.299 birds per annum. If 0.299 collisions were to occur per annum, this would increase the annual mortality of the county population by 1.25%. The magnitude of the effect is assessed as low, which corresponds to a Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on peregrine falcon are anticipated at the county, national or international scale.

White-tailed Eagle

At a national level, the main pressures and threats for white-tailed eagle listed in Article 12 reporting are: wood transport; transmission of electricity and communications; agricultural activities generating diffuse pollution to surface or ground waters; and wind, wave and tidal power, including infrastructure; as well as sports, tourism and leisure activities, plant and animal diseases, pathogens and pests, and increases in precipitation due to climate change. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a

combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for white-tailed eagle. Of the pressures/threats listed, wind, wave and tidal power is ranked as of high importance, while those relating to commercial forestry or agriculture are of medium importance.

The extent of commercial forestry in the landscape influences the availability and distribution of open habitat for white-tailed eagle. Afforestation reduces the extent of open foraging habitat, although this species also forages over water. Ballybane, Carrigariark Extension, Carrigariark, Cleanrath, Cummeenabuddoge, Curraglass, Derragh, Gortyrhilly, Inchamore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlachy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for white-tailed eagle (e.g., through changes in prey availability, grazing pressure, vegetation structure and levels of human disturbance, as well as carrion availability). For example, drainage, reseeding and improvement may reduce habitat suitability in some areas, while low-intensity grazing systems may maintain suitable foraging habitat, although this species also forages over water. Barnadivane, Coomatalin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all located within, or partially within, agricultural grassland habitats.

Upland open habitats are of value to white-tailed eagle. Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomatalin, Dreenacreenig West, Gortloughra, Gortyrhilly, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlachy II are located within, or partially within, upland habitats (bog/wet grassland).

Information on collision risk at other wind farms was available for Gortyrhilly, which predicted 0.05 collisions per year. The level of flight activity at Curraghglass was too low to calculate a collision risk value.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on white-tailed eagle are anticipated at the county, national or international scale.

Kestrel

At a national level, the main pressures and threats for kestrel listed in Article 12 reporting are: use of plant protection chemicals in agriculture; conversion from mixed farming and agroforestry systems to specialised production; and removal of small landscape features for agricultural land parcel consolidation; as well as interspecific relations. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for kestrel. The threats/pressures listed that relate to agriculture were ranked as of medium importance.

Kestrel is a habitat generalist that may use commercial forestry, agricultural and upland environments. Curraglass, and Shehy More are all located within, or partially within, commercial forestry. Dreenacreenig West and Gortloughra are located within, or partially within, upland habitats (bog/wet grassland). However forestry and open upland habitats are widespread and abundant in the landscape. Extensive areas of suitable habitat will persist after construction. Given that kestrel at the Proposed Wind Farm site was determined to be a population of Local Importance (Higher Value), this further reduces the likelihood of significant cumulative impacts at the landscape scale.

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 1.013 for Knocknamork, 0.87 for Gortyrhilly, 0.28 for Curraghglass, 2.4 for Gortloughra and 0.28 for Carrigariark Extension. Combined with the Proposed Project, this is a cumulative 5.393 birds

per annum. If 5.393 collisions were to occur per annum, this would increase the annual mortality of the county population by 1.08%. The magnitude of the effect is assessed as low, which corresponds to a Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on kestrel are anticipated at the county, national or international scale.

Red Grouse

The main pressures and threats for red grouse listed in Article 12 reporting are: conversion to forest from other land uses, or afforestation; intensive grazing or overgrazing by livestock; burning for agriculture, drainage for use as agricultural land; and peat extraction; as well as change of habitat location, size, and/or quality due to climate change, other invasive alien species, and problematic native species. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for red grouse. All the threats/pressures listed are ranked as of medium importance.

The extent of commercial forestry in the landscape influences the availability and distribution of open habitat for red grouse. Afforestation reduces the extent of open habitat. Ballybane, Carrigariel Extension, Carrigariel, Cleanrath, Cummeenabuddoge, Curraglass, Derragh, Gortyrally, Inchmore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlachy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for red grouse (e.g., through changes in grazing pressure, vegetation structure and levels of human disturbance). For example, drainage, reseeding and improvement may reduce habitat suitability for foraging, roosting and nesting, while low-intensity grazing systems may maintain suitable habitat. Barnadivane, Coomatalin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all located within, or partially within, agricultural grassland habitats.

Upland open habitats are of value to red grouse. Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomatalin, Dreenacreenig West, Gortloughra, Gortyrally, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlachy II are located within, or partially within, upland habitats (bog/wet grassland).

The impact assessment for two other wind farms (Cummeenabuddoge and Knocknamourk) did not calculate a collision risk prediction due to low levels of flight activity, therefore no cumulative effects are predicted.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on red grouse are anticipated at the county, national or international scale.

Snipe

At a national level, the main pressures and threats for snipe listed in Article 12 reporting are: conversion to forest from other land uses, or afforestation; mowing or cutting of grasslands; intensive grazing or overgrazing by livestock; conversion from one type of agricultural land use to another; abandonment of grassland management; drainage for use as agricultural land; wind, wave and tidal power, including infrastructure; and peat extraction; as well as other invasive alien species, and problematic native species.

The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for snipe. Some of the threats/pressures relating to forestry and agriculture were ranked as of high importance (mowing or cutting of grasslands; intensive grazing or overgrazing by livestock; conversion from one type of agricultural land use to another), while the remained were ranked as of medium importance. Peat extraction, and wind, wave and tidal power were ranked as of medium importance.

The extent of commercial forestry in the landscape influences the availability and distribution of open habitat for snipe. Afforestation reduces the extent of open foraging habitat. Ballybane, Carrigariark Extension, Carrigariark, Cleanrath, Cummeenabuddoge, Curraglass, Derragh, Gortyrhilly, Inchamore, Killaveenoge, Knocknamork, Shehy More and Sillahertane-Coomagearlaghy II are all located within, or partially within, commercial forestry.

The intensity and type of agricultural activity can affect habitat suitability for snipe (e.g., through changes in grazing pressure, vegetation structure and levels of human disturbance). For example, drainage, reseeding and improvement may reduce habitat suitability for foraging, roosting and nesting, while low-intensity grazing systems may maintain suitable habitat. Barnadivane, Coomatalin, Garranereagh, Kilvinane, Lahanaght Hill, and Reenascreena are all location within, or partially within, agricultural grassland habitats.

Open upland habitats are of value to snipe. Ballybane, Barnadivane, Cleanrath, Clydraghroe, Coomatalin, Dreenacreenig West, Gortloughra, Gortyrhilly, Grousemount, Kilgarvan II, Kilgarvan Repowering, Kilgarvan, Knocknamork, Midas, Milane Hill, Shehy More and Sillahertane-Coomagearlaghy II are located within, or partially within, upland habitats (bog/wet grassland).

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 0.006 for Curraghglass and 0.001 for Carrigariark Extension. A specific value was not provided for Gortloughra, but collision risk here was assessed to be negligible. Combined with the Proposed Project, this is a cumulative 0.009 birds per annum. If 0.009 collisions were to occur per annum, this would increase the annual mortality of the county population by 0.01%. The magnitude of the effect is assessed as negligible, which corresponds to a Very Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on snipe are anticipated at the county, national or international scale.

Buzzard

At a national level, the main pressures and threats for buzzard listed in Article 12 reporting are: abandonment of grassland management; as well as poisoning of animals, and illegal shooting/killing. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for buzzard. Threats/pressures relating to agriculture were ranked as of medium importance.

Buzzard is a habitat generalist that may use commercial forestry, agricultural and upland environments. Curraglass, and Shehy More are all located within, or partially within, commercial forestry. Dreenacreenig West and Gortloughra are located within, or partially within, upland habitats (bog/wet grassland). However forestry and open upland habitats are widespread and abundant in the landscape. Extensive areas of suitable habitat will persist after construction. Given that buzzard at the Proposed Wind Farm

site was determined to be a population of Local Importance (Higher Value), this further reduces the likelihood of significant cumulative impacts at the landscape scale.

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 0.038 for Curraghglass, 0.12 for Gortloughra and 0.28 for Carrigariark Extension. Combined with the Proposed Project, this is a cumulative 0.51 birds per annum. If 0.51 collisions were to occur per annum, this would increase the annual mortality of the county population by 3.4%. The magnitude of the effect is assessed as low, which corresponds to a Very Low effect significance.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on buzzard are anticipated at the county, national or international scale.

Sparrowhawk

At a national level, the main pressures and threats for sparrowhawk listed in Article 12 reporting are: removal of small landscape features for agricultural land parcel consolidation; conversion from mixed farming and agroforestry systems to specialised; and use of plant protection chemicals in agriculture. The following provides an assessment of the threats/pressures that are relevant at the regional level. The landscape within this cumulative assessment is influenced by a combination of commercial forestry, agricultural land use and other wind farm developments, all of which have the potential to influence habitat availability and quality for sparrowhawk. The threats/pressures relating to agriculture and forestry are ranked as of medium importance.

Snipe is a habitat generalist that may use commercial forestry, agricultural and upland environments. Curraglass, and Shehy More are all located within, or partially within, commercial forestry. Dreenacreenig West and Gortloughra are located within, or partially within, upland habitats (bog/wet grassland). However forestry and open upland habitats are widespread and abundant in the landscape. Extensive areas of suitable habitat will persist after construction. Given that sparrowhawk at the Proposed Wind Farm site was determined to be a population of Local Importance (Higher Value), this further reduces the likelihood of significant cumulative impacts at the landscape scale.

Information on collision risk at other wind farms was available. The predicted number of collisions per annum were: 0.015 for Knocknamourk and 0.004 for Curraghglass. A specific value was not provided for Gortahilly or Gortloughra, but collision risk here was assessed to be negligible for Gortloughra. Combined with the Proposed Project, this is a cumulative 0.024 birds per annum. If 0.024 collisions were to occur per annum, this would increase the annual mortality of the county population by 0.2%. The magnitude of the effect is assessed as negligible.

No significant residual effects of habitat loss, displacement or collision risk were reported for any of the other wind farms. Taking into consideration the above reported effects and the predicted effects with the Proposed Project, no residual additive, antagonistic or synergistic effects have been identified with regard to habitat loss or displacement/barrier effects. No significant impacts on sparrowhawk are anticipated at the county, national or international scale.

4.3.2.3.1 Increased Anthropomorphic Activity

The DAU raises concern over disturbance from increased anthropomorphic activity at the Proposed Wind Farm site. Disturbance during the construction phase is assessed in full in Section 7.5.5 of the EIAR and reiterated herein. No significant effects were identified for any KOR.

Management and servicing of the wind farm will not add significantly to the background levels of disturbance currently occurring in the area. The temporary disturbance of birds is possible throughout the Proposed Wind Farm site during the operational phase by maintenance vehicles and personnel visits,

particularly in the vicinity of the proposed turbines, access roads and the onsite V substation. This may result in temporary avoidance by birds, however the volume and frequency of such visits is considered to be very low and is likely to be minor in scale and short in duration when it occurs.

4.3.2.3.2 **Special Protection Areas for Chough**

The DAU expresses concern that breeding chough recorded during field surveys are associated with Special Protection Areas. The Proposed Wind Farm site is outside the chough foraging range of any Special Protection Area. Therefore it is unlikely that foraging birds observed during the breeding season originated from a Special Protection Area. The breeding chough recorded during field surveys were nesting within and in proximity to the Proposed Wind Farm site and foraging close to their nest sites, therefore are not dependent on the Special Protection Areas for breeding. As calculated in the cumulative collision risk assessment above, from the best available data, cumulative collisions would increase the annual mortality of the county population by 1.37%. The magnitude of the effect is assessed as low, which corresponds to a Low effect significance.

4.3.2.3.3 **Impacts on Prey Species**

The DAU raises concern over impacts to species such as meadow pipit, which are a prey resource for raptors such as merlin and hen harrier. Meadow pipit are abundant within the Proposed Wind Farm site and surrounds. As outlined in Section 7.5.2 of the EIAR, meadow pipit were found to be breeding on the Proposed Wind Farm site. However, as per NatureScot guidance, it is generally considered that passerine bird species are not significantly impacted by wind farms due to their ecology. As such, the potential for direct habitat loss, disturbance/displacement and collision risk are limited and there is no evidence to suggest that the development will significantly impact this species.

4.4 **Health Service Executive**

The National Environmental Health Service (NEHS), a section within the Health Service Executive (HSE), made a submission with observations and recommendations in relation to the following:

- Public Consultation,
- Noise and Vibration,
- Shadow Flicker,
- Land, Soils and Geology,
- Hydrology and Hydrogeology,
- Traffic and Access,
- Other - CEMP, Food Safety and Environmental Compliance, Recommendations.

4.4.1 **Public Consultation**

The NEHS note that a Community Liaison Strategy was implemented to facilitate engagement with local residents as part of the Proposed Project, which included door-to-door distribution of information packs to households within approximately 2km of the Proposed Wind Farm site, a project website and dedicated contact channels, direct liaison with residents regarding queries and concerns, and 2 no. public information events in April and November 2025. The NEHS considers it important that regular communication and engagement with the local community be maintained throughout the construction and operational phases of the Proposed Project. The Applicant is committed to continuing this regular communication and engagement with the local community in the event that the Proposed Project is granted planning permission.

4.4.2 Noise and Vibration

The NEHS make a number of observations on the noise and vibration assessment pertaining to use of guidance, and assessment methodology.

Chapter 12 of the EIAR: Noise & Vibration describes the comprehensive assessment undertaken by AWN Consulting of the potential noise and vibration impacts associated with the Proposed Project and its component parts.

The assessment undertaken of the potential noise and vibration impacts associated with the Proposed Project is comprehensive and robust. The assessment of construction noise and vibration has been conducted in accordance with best practice guidance and will not cause any significant effects. Based on detailed information on the proposed turbine locations, turbine noise emission levels and turbine height, the predicted noise levels associated with the Proposed Project will be within best practice noise limits recommended in the Guidelines (DoEHLG, 2006) and will be capable of adhering to the Draft Guidelines (DoHPLG, 2019), if necessary. Therefore, no significant noise effect is associated with the Proposed Project.

The Applicant acknowledges the recommendations set out by the NEHS with respect to noise. Any conditions attached to a grant of planning permission will be considered by the Applicant following the Commission's determination.

4.4.3 Shadow Flicker

The NEHS acknowledges that mitigation measures have been proposed in Chapter 5 of the EIAR to ensure compliance with the daily and annual shadow flicker duration thresholds set out in the Guidelines (DoEHLG, 2006)) and that it has been stated in Section 5.4.3.2.7 of the EIAR that the same mitigation measures (with stricter implementation of shadow flicker controls) also demonstrate that the proposed turbines can be operated in accordance with the shadow flicker requirements of the Draft Guidelines (DoHPLG, 2019)), should they be adopted as currently proposed, while the planning application is being determined.

The NEHS then recommends that the planning authority attaches a condition to any grant of planning permission which specifies that the Proposed Project must comply with the shadow flicker threshold set out in the Draft Guidelines (DoHPLG, 2019).

The Commission is reminded that the Guidelines (DoEHLG, 2006) are still the current, adopted guidance that must be adhered to by both developers and planning authorities. Thus, the inclusion of a condition arising from guidance that is still in draft format would not be desirable. Notwithstanding this, as outlined in the EIAR and above, the Proposed Project will be capable of achieving the stricter requirements of the Draft Guidelines (DoHPLG, 2019), should they be adopted as currently proposed, while the planning application is being determined.

4.4.4 Land, Soils and Geology

The NEHS make a number of observations on the Land, Soils and Geology assessment and notes that should consent be granted for the Proposed Project, mitigation measures identified in Chapter 8: Land Soils and Geology of the EIAR and the CEMP (Appendix 4-3) should be implemented throughout the construction and operational phases of the Proposed Project. The Applicant acknowledges the recommendations set out by the NEHS with respect to Land, Soils and Geology and remains agreeable to follow the mitigation detailed in Chapter 8, Land, Soils and Geology and the CEMP in the event that the Proposed Project is granted planning permission.

4.4.5 Hydrology and Hydrogeology

With regards to Hydrology and Hydrogeology, the NEHS recommends that, should consent be granted for the Proposed Project, the mitigation measures set out in Chapter 9: Hydrology and Hydrogeology and the CEMP be implemented throughout the construction, operational and decommissioning phases of the Proposed Project.

The Applicant acknowledges the recommendations set out by the NEHS with respect to Hydrology and Hydrogeology and confirms its commitments to implementing the mitigation measures, as detailed in Chapter 9, Hydrology and Hydrogeology of the EIAR and the accompanying Construction and Environmental Plan (CEMP), in the event that the Proposed Project is granted planning permission.

4.4.6 Traffic and Access

The NEHS recommends that a TMP be prepared and implemented in the event that the Proposed Project is granted planning permission. A detailed TMP is provided as Appendix 15-2 of the EIAR specifying details relating to traffic management. These measures are also included in the CEMP and will be implemented prior to the commencement of the construction phase of the Proposed Project. The TMP will be updated and agreed with the local authority and An Garda Síochána prior to construction works commencing on Site. The final detailed TMP will include the following:

- Appointment of Traffic Management Coordinator
- Delivery Programme
- Information to locals
- A Pre and Post Construction Condition Survey
- Liaison with the relevant local authority
- Implementation of temporary alterations to road network at critical junctions
- Identification of delivery routes
- Delivery times of large turbine components
- Travel plan for construction workers
- Additional measures (Wheel washing, sweeping, cleaning etc)
- Re-instatement works

It is confirmed that details for the TMP for the Proposed Project will be agreed with TII and the Road Sections of Cork County Council prior to construction and contact will be maintained with the Road and Traffic Section throughout the construction phase to ensure that the provisions of the TMP will be implemented and managed appropriately.

4.4.7 CEMP, Food Safety and Recommendations

The NEHS has acknowledged the CEMP provided as part of the EIAR and notes the mitigation measures to be satisfactory. The NEHS recommends that all mitigation measures within the CEMP be adhered to in the event that the Proposed Project is granted. The NEHS also recommends other mitigation in the interest of the protection of public health.

The Applicant acknowledges the recommendations set out by the NEHS with respect to noise. Any conditions attached to a grant of planning permission will be considered by the Applicant following the Commission's determination.

4.5 Irish Aviation Authority

The Irish Aviation Authority (IAA) raised no objections to the Proposed Project and requested that the Applicant should be conditioned to contact the IAA in relation to agreeing an aeronautical obstacle warning light scheme and providing as-constructed turbine coordinates, should planning permission be

granted. It is also requested that the IAA are notified of intentions to commence crane operations with at least 30 days prior notification of their erection.

IAA provided a list of standard proposed conditions which should be attached to any grant of permission. These conditions do not differ from what was identified by IAA in their scoping response included in Appendix 2-2 of the EIAR, which are identified as mitigation measures in Section 15.2.5.3.2 in Chapter 15 of the EIAR.

The Applicant confirms its agreement to these conditions, should the Commission grant planning permission for the Proposed Project.

4.6

Transport Infrastructure Ireland

Transport Infrastructure Ireland (TII) acknowledges that proposals such as the Proposed Project can contribute to the national target of renewable energy generation and reduction in greenhouse gas emissions and are supportive of proposals that are aimed at achieving the transition to a low carbon and climate resilient economy.

TII's submission recommends that, in the event that planning permission is granted, appropriate conditions should be implemented by the Commission to ensure the protection of the National Road network, the safe transport of abnormal loads and compliance with relevant TII procedures and standards during the construction phase.

The Applicant confirms its agreement to these conditions, should the Commission grant planning permission for the Proposed Project, and confirms that all works relating to the Proposed Project will be undertaken in accordance with the relevant TII standards and publications. It is noted that some of the above conditions were already provided by TII in their response to the scoping exercise undertaken for the Proposed Project and the Applicant has already indicated their agreement to these conditions, as set out in Table 15-1a of Chapter 15 of the EIAR.

5.

THIRD-PARTY OBSERVERS

There were 121 no. submissions received on the application from Third-Party Observers as listed in Appendix 1. **Table 3** below outlines common themes identified within the Third-Party submissions and the relevant areas of expertise within the project team assigned to address each theme. In the interest of brevity, where topics have been discussed in Section 3 and Section 4 above, reference is made back to the relevant section rather than repeating that discussion.

Table 3 Common themes Raised in Third -Party Submissions and Corresponding Response Sections

Themes Identified	Section Discussed
<i>Planning Policy, Guidelines and Site History</i>	Section 5.1
<i>Planning Policy and Guidelines</i>	Section 5.1.1
<i>Cork County Development Plan 2022-2028</i>	Section 5.1.2
<i>Wind Energy Guidelines</i>	Section 5.1.3
<i>Environmental and Ecological Impacts</i>	Section 5.2
<i>Biodiversity</i>	Section 5.2.1
<i>Ornithology</i>	Section 5.2.2
<i>Hydrology</i>	Section 5.2.3
<i>Peat Management</i>	Section 5.2.4
<i>Archaeology and Cultural Heritage</i>	Section 5.2.5
<i>Health</i>	Section 5.2.6
<i>Shadow Flicker</i>	Section 5.2.7
<i>Noise</i>	Section 5.2.8
<i>Impact on Property Prices</i>	Section 5.2.9
<i>Traffic</i>	Section 5.2.10
<i>Community Engagement</i>	Section 5.2.11
<i>Landscape, Visual and Tourism</i>	Section 5.3
<i>Landscape and Visual</i>	Section 5.3.1
<i>Aviation Lighting and Dark Skies</i>	Section 5.3.2
<i>Tourism</i>	Section 5.3.3
<i>Cumulative Impacts</i>	Section 5.3.4

5.1

Planning Policy, Guidelines and Site History

A number of submissions raise concerns in relation to the applicable planning policy context for the Proposed Project including compliance with local, regional and national planning policy, the applicable Wind Energy Development Guidelines and the planning history of the site. These matters are addressed below.

5.1.1

Planning Policy Framework

Several submissions query the compliance of the Proposed Project with the relevant local, regional and national planning policy framework, including broader principles of proper planning and sustainable development.

Response

The relevant planning policy framework for the Proposed Project is comprehensively set out in the Planning Report and Chapter 2 of the EIAR submitted with this planning application.

At an International and National Level, the Proposed Project will make a meaningful contribution towards achieving the transition to a low-carbon economy and climate resiliency, increasing renewable energy generation, and enhancing energy security. It will contribute directly towards the CAP25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030.

At a Regional Level, the Proposed Project will strengthen the role of the Southern Region as a leader in the renewable energy generation and in doing so, will support the transition to a climate resilient society.

Locally, it is evident that there is strong support at local level for the development of renewable energy projects in County Cork in accordance with the CCDP. Objective 13-4 is particularly relevant to the Proposed Project as it offers clear support for the development of onshore wind energy projects, including the siting of such developments at locations that utilise existing infrastructure, as is the case with the Proposed Project. The Proposed Project is also designated as wholly ‘Open to Consideration’ under the CCDP Wind Energy Strategy

In summary, the Proposed Project is a type of development which is specifically required to aid the State to meet our binding climate targets and obligations at a National and International level. It is demonstrably supported at all levels of planning policy and is located within an area identified at a local level as the most appropriate location within the County for the development of renewable energy. The Proposed Project provides the opportunity to realise the valuable renewable energy resource. If the Proposed Project were not to proceed the opportunity to capture this additional part of Co. Cork’s valuable renewable energy resource would be lost, as would the opportunity to contribute to meeting Government and EU targets for the production and consumption of electricity from renewable resource and the reduction of greenhouse gas emissions.

5.1.2

Cork County Development Plan 2022-2028

Several submissions reference the CCDP stating that the Proposed Project is in contravention of specific policies and objectives relating to protecting high-value landscapes and scenic routes with specific reference to Objective ET13-7.

The Applicant acknowledges these concerns which have been comprehensively addressed in Section 3.1.5.5 above, to which the Commission is respectfully referred.

5.1.3

Wind Energy Guidelines

Concern was raised in third-party observations in relation to the use of the Guidelines (DoEHLG, 2006) throughout the planning application for the Proposed Project.

Response

As set out in Section 1.2.2 of Chapter 1 (Introduction) the design and layout of the Proposed Project follows the recommendations and guidance set out in the Guidelines (DoEHLG, 2006) which remain the relevant guidelines for the purposes of Section 28 of the Planning and Development Act 2000, as amended. The Guidelines (DoEHLG, 2006) were the subject of a targeted review and the proposed changes to the assessment of impacts associated with onshore wind energy developments were outlined in the Draft Guidelines (DoEHLG, 2019). At time of writing, the Draft Guidelines (DoHPLG, 2019) have not yet been adopted, however, due to the timelines associated with the planning process for renewable energy projects and the commitment within the CAP25 to publish new wind energy guidelines for onshore wind in Q1 2025 it is possible that the Draft Guidelines (DoHPLG, 2019) may be adopted during the consideration period for the current planning application. Should the Draft Guidelines (DoHPLG, 2019) be adopted in advance of a decision being made on this planning application, the Proposed Project will be capable of achieving the requirements of the Draft Guidelines (DoHPLG, 2019) as currently proposed, as set out in Section 2.6 of Chapter 2 of the EIAR.

There is no confirmed date for the publication of final guidance at the time of writing.

5.1.3.2 Site History/ Precedent

Several third-party observations make reference to the Proposed Project's site history, stating that the landscape is deemed unsuitable for wind farm development, citing the refusal of Ardrah Wind Farm by the Commission in 2014 on nearby lands.

Response

While the planning history of the wider site is acknowledged, each planning application should be assessed based on their own merits and regarded as a separate standalone application. The current Proposed Project differs materially from the refused development from 2014 in terms of scale, design, turbine technology and the planning policy by which the Proposed Project was assessed against. Accordingly, the previous refusal of a separate wind farm development should not be determinative of the suitability of the Proposed Project.

5.2 Environmental and Ecological Impacts

5.2.1 Biodiversity

Third-Party submissions raised the following issues relating to biodiversity, arranged by topic:

- Impacts on Heath and Bog Habitats,
- Impacts on Lake Habitats,
- Impacts on Fauna.

The following sections address the above-listed topics in the context of the submissions raised.

Impacts on Heath and Bog Habitats

It is stated in submissions that there will be a loss of dry heath habitat due to the construction footprint. As described in Section 6.3.2.1.8, Chapter 6 of the EIAR, **Dry Siliceous Heath (HH1)** was recorded to the northwestern margin of the southern cluster of the Site, on steeply sloping and undulating land. The area was dominated by western gorse (*Ulex gallii*), ling heather, bell heather (*Erica cinerea*), purple moor grass, bracken, glaucous sedge (*Carex flacca*) tormentil, jointed rush, bent grass, and sweet vernal grass. This habitat has links to the Annex I habitat 'European dry heaths (4030)'. No Wind Farm infrastructure is proposed for this area, therefore there will be no loss of this area of habitat as a result of the Proposed Project.

Infrastructure associated with T13 is located within a habitat dominated by improved agricultural grassland (GA1) with a mosaic of fragmented dry heath in the south of the Proposed Wind Farm site. This area of dry heath has been fragmented and degraded due to intensive land reclamation in the surrounding area, and intensive grassland management. Overall, there will be a loss of approximately 0.1ha of fragmented, degraded dry heath in the vicinity of T13 and the loss of this is not considered significant as outlined in Table 6-9 of the EIAR.

As discussed in Section 6.4.2.1, Chapter 6 of the EIAR, the construction footprint of the Proposed Project will result in the loss of wet heath and upland blanket bog which are considered Key Ecological Receptors and are fully assessed in the EIAR. The loss of blanket bog habitat is restricted to 0.2ha to be lost to the proposed floating road required for access to the proposed turbine T14. The habitat within the footprint of T14, as demonstrated in Appendix 6-1 to the EIAR, comprises wet heath (as evidenced by peat probing of approx. 0.4m to 0.1m of peat and heath vegetation), which is evidently impacted by overgrazing. A

total of 1.6ha of wet heath will be lost to the Proposed Project. However, as outlined above, it is proposed to restore an area of 5.3ha of wet heath, resulting in an overall net gain of this habitat type.

Impacts on Lake Habitats

It is stated that there will be impacts on Gortloughra Lake due to construction of proposed Turbine T02, however all infrastructure has been set back from surface watercourses, and the proposed turbine is over 150m from the lake. The potential to impact several other lakes in the locality is also highlighted. However, as outlined in Chapter 6 'Biodiversity' and Chapter 9 'Hydrology and Hydrogeology', a range of bespoke mitigation measures have been prescribed to prevent significant impacts to water quality of nearby watercourses and waterbodies, and it has been concluded that there is no potential for residual significant effect in this regard.

Impacts on Fauna

The submission discusses impacts on pine marten, frogs, and devils-bit scabious/marsh fritillary habitat. As stated in Section 6.3.3.3, Chapter 6 of the EIAR, regarding marsh fritillary, no significant areas of Devil's-Bit Scabious (*Succisa pratensis*), the food plant for this species, were recorded within the footprint or impact zone of the Proposed Project. Therefore, no potential for significant effect on the species is predicted.

Habitats within the footprint of the proposed substation comprise conifer plantation (WD4) and associated forestry drainage ditches, which offer some potential suitable habitat for breeding frog. However, as summarised in Table 6-9 of the EIAR, given the highly modified nature of conifer plantation and associated drainage systems and given the common and widespread availability of suitable habitat for amphibians in the in the local area, the Proposed Project will not result in a significant loss of suitable habitat for amphibians.

It is known that pine marten and red squirrel use the Site, as acknowledged in Chapter 6. The potential for impacts on this species has been fully assessed in Section 6.4.2.2.5 of the EIAR. No red squirrel dreys or pine marten dens were found within the impact zone of the construction footprint and no significant effects to these species are predicted. However, taking a precautionary approach, the potential for disturbance to these species during construction works was considered, and mitigation to prevent impacts to these species is set out in the same section of the EIAR. Following this, there is no potential for likely residual significant effect to these species.

5.2.2 Ornithology

A number of submissions raise concerns that the Proposed Project will have an impact on bird species (e.g. white-tailed eagle, hen harrier and other birds of prey) which have been recorded within the vicinity of the Proposed Wind Farm.

Response

We would refer the Commission to Section 4.3.2 above where a comprehensive response to any concerns in relation to Ornithology is provided.

5.2.3 Hydrology

Several submissions raised concerns surrounding water, hydrology and flood risk concerns, stating the potential for increased runoff and flooding impacting the Owngar and Owvane rivers and risk of groundwater contamination from construction activities affecting springs and drinking water within the vicinity of the Proposed Project.

Response

Chapter 9 of the EIAR (Hydrology and Hydrogeology) describes the comprehensive robust assessment undertaken by Hydro-Environmental Services (HES) of the potential hydrology and hydrogeology impacts associated with the Proposed Project and its component parts. In addition, a Water Framework Directive (WFD) Compliance Assessment (Appendix 9-3) has been completed for all waterbodies (surface water and groundwater bodies) with the potential to be impacted by the Proposed Project, and a site-specific Flood Risk Assessment (Appendix 9-1) has been prepared to identify existing potential flood risks associated with the Proposed Project.

The Commission is also respectfully reminded that the Environment Officer within Cork County Council has assessed the proposal, and as stated in the Council's submission, "is satisfied that the predicted effects on hydrology and hydrogeology would be acceptable."

Accordingly, it is considered that the hydrogeological and hydrogeological impacts of the Proposed Project have been comprehensively assessed in the EIAR, and all concerns raised in submissions have been adequately addressed.

5.2.4

Peat Management

Several concerns were raised relating to peatland management and carbon losses associated with peat disturbance.

Response

A Geotechnical and Peat Stability Report is provided as Appendix 8-1 to Chapter 8 (Land, Soils & Geology) of the EIAR and is further detailed in Section 8.2.15 of Chapter 8 of the EIAR. Hydrological, hydrogeological and ecological factors were also assessed in the Geotechnical and Peat Stability Report and interaction between Fehily Timoney (FT), Hydro-Environmental Services (HES), and MKO were undertaken throughout the iterative design process. The assessment was undertaken in accordance with Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (PLHRAG, Scottish Government, 2017) and with Eurocode 7: Geotechnical Design (EN 1997). Sufficient peat depth data has been recorded during the site walkovers to enable the characterisation of the peat depth across the Site, with additional detail at infrastructure locations provided in Section 6 of the Geotechnical and Peat Stability Report.

The Proposed Wind Farm site is typically covered in blanket peat with undulating terrain of open peatland and forestry. Peat thicknesses recorded during the site walkovers, gathered from 640 probing locations, ranged from 0.0 to 4.5m with an average depth of 0.65m. 70% of the probes recorded peat depths of less than 1.0m, with 90% of peat depth probes recorded peat depths of less than 1.5m. The average peat depth at the proposed turbine locations is 0.8m. The findings of the peat assessment, which included a stability analysis of 209 locations, demonstrate that the Proposed Wind Farm site has a low risk of peat failure, and acceptable margin of safety, and is suitable for the Proposed Project. The findings within the Geotechnical and Peat Stability Report include recommendations and control measures for construction work in peatlands, all of which will be implemented in full to ensure that all works adhere to an acceptable standard of safety.

Enforceable mitigation measures are clearly set in Sections 8.6.2 and 8.6.3 of Chapter 8 of the EIAR, covering both construction and operational phases. These include peat handling protocols, drainage controls, construction method statements and monitoring requirements. The mitigation framework follows the EPA's '*Guidelines on the information to be contained in Environmental Impact Assessment Reports*' (EPA, 2022), including Sections 2.4 and 3.8, by clearly identifying pre-mitigation effects, mitigation measures, residual effects and significance.

A Peat and Spoil Management Plan is also provided as Appendix 4-2 to Chapter 4. The report describes how peat and spoil which will be excavated from infrastructure locations such as turbine bases and roads will be handled and placed/reinstated onsite. This Peat and Spoil Management Plan also include a monitoring programme which will be implemented during the construction phase of the Proposed Project, and a contingency plan should peat instability/failure occur during construction.

No significant residual effects on land, soils or geology are predicted, and the Proposed Project is consistent with the relevant environmental protection objectives and peatland conservation policies.

In terms of carbon losses associated with peatland disturbance and as outlined in Chapter 11 Climate of the EIAR, the Macauley Institute model was used to assess potential carbon losses arising from drainage, habitat improvement, forestry felling and site restoration, with site-specific data applied where available and default values used otherwise. The outputs of the Macauley Institute web-based carbon calculator are included in Appendix 11-2 of the EIAR. Chapter 11 of the EIAR quantified losses from soil organic matter and due to leaching of dissolved and particulate organic carbon, i.e. carbon losses associated with disturbed soils and subsoils, at 13,334 tonnes CO₂ equivalent expected and 78,484 tonnes CO₂ equivalent maximum, and these figures were included within the total carbon loss assessment for the Proposed Project.

Chapter 11 of the EIAR further notes that the ground-activity calculations were undertaken on a precautionary basis, assuming the entire development footprint to be in "Acid Bog" because this is one of the limited habitat categories available in the calculator, notwithstanding that the actual affected lands comprise a mix of peatland, coniferous forestry and pastoral agriculture. The assessment further notes that this assumption is likely to overstate, rather than understate, actual losses, and that additional restoration, habitat enhancement and decommissioning measures are expected to reduce real carbon losses below the values presented. Accordingly, peat disturbance and its associated carbon implications have been specifically assessed, quantified and considered on a conservative basis within the EIAR.

The operation of the Proposed Project will displace carbon dioxide from fossil fuel-based electricity generation, over the proposed 35-year operational lifespan due to the provision of clean, renewable energy to the national grid. Therefore, while there will be greenhouse gas emissions associated with the operation of the Proposed Project, this will be offset by the operation of the Proposed Project within the 35-year operational life. This will have a Long-term Moderate Positive Effect on Climate as a result of reduced greenhouse gas emissions.

5.2.5 Archaeology and Cultural Heritage

There were several submissions relating to archaeology and cultural heritage, primarily relating to the proximity of the Proposed Wind Farm to archaeological monuments.

Response

We refer the Commission to Section 3.1.1 of this report, which is supported by text provided by IAC Archaeology. A comprehensive response to archaeological concerns has been provided within this section.

Overall, the Archaeological, Architectural and Cultural Heritage assessment carried out in Chapter 14 of the EIAR provides a proportionate and robust assessment of the potential impacts of the Proposed Project on archaeological resources in the surrounding area. Direct and indirect impacts of the Proposed Project have been identified using a clearly defined methodology and appropriate mitigation measures have been proposed to minimise or avoid any adverse effects on archaeological resources.

It is also noteworthy that the National Monuments Service are in agreement with the mitigation measures outlined in the EIAR Chapter.

Accordingly, it is considered that the Archaeological, Architectural and Cultural Heritage impacts of the Proposed Project have been comprehensively assessed in the EIAR, and all concerns raised in submissions have been adequately addressed.

5.2.6 Health

Some third-party submissions raise concerns in relation to the potential of negative health effects associated with the Proposed Project due to the scale of the turbines proposed and proximity to local residents and local communities. Concern was raised regarding potential for noise pollution, infrasound, shadow flicker and health effects (including impacts on mental health).

Response

Section 5.3.4 and Section 5.4 of Chapter 5 of the EIAR specifically address concerns regarding health effects of wind farms.

While there are anecdotal reports of negative health effects on people who live very close to wind turbines, peer-reviewed research has not supported these statements. There is currently no published credible scientific evidence to positively link wind turbines with adverse health effects.

Extensive research has been carried out in the US, Canada, UK, Australia, and by the World Health Organisation (2018). All studies conclude that that exposure to wind farms does not trigger adverse health effects.

None of the submissions received in relation to this topic area have set out any clear and credible evidence which in any way alters the findings of the EIAR in this regard. As such, it is concluded that the information contained within the EIAR remains valid and robust.

Noise and Vibration has been separately assessed in Chapter 12 of the EIAR, where noise pollution and infrasound are comprehensively addressed.

5.2.7 Shadow Flicker

A number of submissions identify concerns with regard to the shadow flicker effects on residents and the proposed mitigation measures.

Response

In the first instance, we would refer the Commission to Section 4.4.3 above where a comprehensive response to any concerns in relation to shadow flicker is provided.

The Commission is again reminded that the Guidelines (DoEHLG, 2006) are still the current, adopted guidance that must be adhered to by both developers and planning authorities. Thus, the inclusion of any conditions arising from guidance that is still in draft format would not be desirable. Notwithstanding this, as outlined in the EIAR and above, it is noted that the Proposed Project can be brought in line with the requirements of the Draft Guidelines (DoHPLG, 2019), should they be adopted while this application is in the planning system, through the stricter implementation of the mitigation measures outlined in Section 5.4.3.2.7 of Chapter 5.

Table 5-11 of Chapter 5 outlines the maximum potential daily and annual shadow flicker for dwellings within the shadow flicker study area. Dwellings in the east (H17, H18, H19, H20) do experience a higher maximum potential for daily and annual shadow flicker however, no dwelling exceeds 30 minutes per day or 30 hours per year as set out in the Guidelines (DoEHLG, 2006).

As detailed in Section 5.4.3.2.7 of Chapter 5 of the EIAR, the Applicant has committed to a robust shadow flicker mitigation protocol to ensure the effectiveness of the proposed mitigation measures. This approach reflects established best practice and has been proven at operational wind farms in Ireland and internationally, providing a robust and reliable mechanism to ensure shadow flicker impacts remain within accepted guideline limits.

It is therefore considered that a robust and comprehensive mitigation strategy for the Proposed Wind Farm has been provided, which is capable of addressing any identified shadow flicker effects.

Accordingly, it is considered that shadow flicker related impacts of the Proposed Project have been comprehensively assessed and all concerns have been adequately addressed.

5.2.8 Noise

Concerns are raised with regard to potential noise effects on residents. In the first instance, we would refer the Commission to Section 3.1.4 above where a comprehensive response to noise concerns arising from CCC is provided. Additional responses in relation to noise are provided below.

5.2.8.1 Assessment Methodology and Guidelines

A number of submissions claim that the noise impact assessment in the EIAR relied on inadequate and outdated guidance, and also contend that decibel only noise limits do not protect residential amenity.

The methodology adopted for the assessment of wind turbine noise in the EIAR is in accordance with the applicable guidelines contained in the Guidelines (DoEHLG, 2006), and supported by best practice guidance for the assessment of wind turbine noise, namely, A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Turbine Noise (2013) and its Supplementary Guidance Notes (2014) (IOA GPG). Full details of guidance documents referenced for the assessment of operational wind turbine noise are presented in Section 12.3.2 of the EIAR.

Section 12.3.2.4.7 of the EIAR presents a statement that was submitted by the Minister for Housing, Local Government and Heritage during a Dail Eireann Debate on 13 June 2023. A more recent statement was submitted by the Minister for Housing, Local Government and Heritage during a Dail Eireann Debate on 19 June 2025 which similarly confirmed that the “current 2006 Wind Energy Development Guidelines remain in force.”

The Draft Guidelines (DoHPLG, 2019) were not ignored and are considered in the context of the noise assessment in Section 12.3.2.4 of the EIAR. As described in the EIAR, the Draft Guidelines (DoHPLG, 2019) have not been applied in the noise assessment; the following statement is included in the EIAR:

“The assessment of wind turbine noise presented in this EIAR is based on the guidance outlined in the Guidelines (DoEHLG, 2006) and has been supplemented with best practice guidance from ETSU-R-97 (ETSU, 1996) and the IOAGPG (IOA, 2013). If updated Wind Energy Guidelines are published during the application process for the Proposed Development, it is anticipated that any relevant changes affecting the noise will be addressed through an appropriate planning condition, or where a supplementary assessment is necessary, through provision of additional information.”

It is recognised that since the preparation of the EIAR chapter, an update to ETSU-R-97, Assessment and Rating of Wind Turbine Noise, was published by the UK Department for Energy Security and Net Zero on 19th June 2026. The updated guidance retains the core methodology of the original ETSU-R-97 for the assessment of noise from wind farm developments. The references to ETSU-R-97 within the EIAR chapter remain applicable and consistent with current best practice guidance. Baseline noise data collected in accordance with the IOA GPG are unaffected and remain valid for the purposes of the assessment. The Guidelines (DoEHLG, 2006) continue to set the noise criteria applicable at receptors for proposed wind

farms in Ireland. On this basis, the updated UK guidance has no material impact on the methodology, baseline data, or conclusions of the noise assessment presented in the EIAR chapter.

AWN is aware of, and has reviewed, the court judgments cited within the GOA documents. While certain clarifications in this document have been informed indirectly by those judgments, the content of the judgments does not alter the assessment presented in the submitted EIAR. It is confirmed that the most up to date applicable guidelines, best practice guidance and standards have been applied to the assessment of wind turbine noise in the EIAR.

The operational turbine noise limits proposed in Section 12.5.3 of the EIAR are expressed in decibels (LA90,10min). This approach is consistent with the applicable assessment framework described in Section 12.3.2.4 of the EIAR and provides a practical, enforceable basis for compliance assessment. However, the EIAR does not rely on “decibels alone” as alleged in the appeal; The EIAR addresses the potential for special audible characteristics associated with wind turbine noise (amplitude modulation, low frequency noise and infrasound) and these matters are addressed further below.

5.2.8.2 Low Frequency Noise and Infrasound

A number of submissions allege inadequate treatment of low-frequency noise and cite infrasound as a broader concern. Section 12.3.2.4.9 of the EIAR presents a discussion on the evidence for low-frequency noise and infrasound associated with the operation of wind turbines. The statement from the EIAR of relevance is reiterated here (emphasis added in bold text):

“An IOA statement in Respect of Wind Farm Noise Assessment dated December 2024 and published on the IOA website³ stated the following in relation to Infrasound and Low Frequency noise:

*“The IOA is aware that there is some information presented at planning inquiries suggesting the potential for physiological health effects from infrasound from wind turbines. It is current advice to members that there is no need to assess **infrasound** as part of the noise impact assessment process, as the absolute levels are well below those reported to trigger physiological health effects based on peer reviewed research to date.”*

*“In conclusion, low frequency noise and infrasound associated with wind turbines is expected to be below perceptibility thresholds and are not likely to result in any significant effects at NSLs. There are no criteria proposed for assessing **low-frequency noise** or infrasound as part of the EIAR; this approach is standard practice in Ireland when assessing wind turbine noise at planning stage.”*

5.2.8.3 Amplitude Modulation

A number of submissions argue that amplitude modulation (AM) has not been adequately assessed in the EIAR. Section 12.3.2.4.10 of the EIAR presents a detailed discussion of AM from the operation of wind turbines. This discussion reviews notable recent publications with respect to AM research and guidance. The following statements from the EIAR are highlighted in the context of the claims that AM was not properly addressed in the EIAR and that the proposed mitigation was unclear or unknown;

Section 12.3.2.4.10 of the EIAR states:

“It is not possible to predict an occurrence of AM at the planning stage.”

and,

³ <https://www.ioa.org.uk/sites/default/files/IOA%20Statement%20-%20Wind%20Farm%20Noise%20Assessment%20Dec%202024.pdf>

To date there is no clear industry consensus on how AM should be regulated or managed through the planning stage. In the absence of an accepted and robust planning conditions to control AM from wind turbines, the commitments outlined in the Section 12.7.4.2 are considered to represent best practice to control AM and will be adopted in the event that an complaint relating to excessive AM being reported from the Proposed Wind Farm.”

Section 12.7.4.2 of the EIAR sets out a clear process for investigating complaints relating to AM, including application of an objective, published assessment methodology and an outline mitigation strategy implemented through engineering methods and/or curtailment of specific turbines. This provides a measurable basis for determining whether AM is present (and, where relevant, excessive) and whether mitigation is required, by committing to a recognised objective rating method, namely the Institute of Acoustics (IOA) AMWG ‘Reference Method’ and defined operational control measures.

The following statement is reiterated from the EIAR:

“The measurement method outlined in the IOA AMWG document, known as the ‘Reference Method’, will provide a robust and reliable indicator of AM and yield important objective information on the frequency and duration of occurrence, which can be used to evaluate different operational conditions including methods to mitigate any excessive AM. These mitigation measures, if required, will consist of the implementation of operational controls for the relevant turbine type, which will include turbine curtailment under specific operational conditions and may in very unlikely circumstance require turning specific turbine off under certain conditions.”

“If the complaints suggest the potential occurrence of clearly audible tonality in the wind turbine noise, the audibility of the tones will be investigated from measured data with a robust, objective method such as that included in ISO 1996-2:2017 with modifications in IEC 61400-11-2. If the rated level of the wind farm is above the limit, then the operator would liaise with the turbine manufacturer to investigate and implement measures to reduce the rated level to below the limit. This may involve engineering methods, operational changes and/or (in very unlikely circumstance) curtailment of specific turbines.

“The commitment outlined to control amplitude modulation (AM) from wind turbines are considered best practice. The proposed approach will ensure that any adverse impacts from excessive amplitude modulation (AM) associated with the operation of the Proposed Project are effectively managed by the operator.”

It is confirmed that the EIAR addresses the potential for AM arising from the Proposed Project in line with recognised guidance, and it provides a mitigation framework by setting out how any potential AM will be investigated and objectively evaluated, and how mitigation, if necessary, will be implemented.

5.2.8.4 Effect of Land Contours on Noise Propagation

A number of submissions refer to the effect of land contours and the topography of the Site and surrounding area on noise propagation. To address this point, the following additional clarifications is provided:

The noise prediction calculations were undertaken using OSI ground topography data to account for noise propagation effects in line with the ISO 9613-2 Standard as per Appendix 12-3 which states:

“Propagation Effects: The effect of any barrier between the noise source and the receiver position is that noise will be reduced according to the relative heights of the source, receiver and barrier and the frequency spectrum of the noise. For calculation of wind turbine noise, barrier and ground corrections have been applied in accordance with of ISO 9613-2 Annex D Calculation of sound pressure levels caused by wind turbines, sections D.3 and D.4”

The noise prediction software, iNoise, described in Section 12.4.5.1 of the EIAR, incorporates the appropriate corrections for valley propagation effects and terrain screening, when predicting turbine noise levels at NSLs this is applied in the calculations and assessment of the proposed project presented in Chapter 12 of the EIAR.

5.2.9 Impact on Property Prices

Concerns have been raised about the potential for the Proposed Project to have adverse effects on the value of properties in the vicinity of the Proposed Wind Farm.

Response

Section 5.4 of Chapter 5 of the EIAR addresses the potential for impacts on property values, identifying that there is insufficient evidence from the scientific literature and studies conducted to determine that there is the potential for a significant effect on property values as a result of the Proposed Wind Farm. The impact assessment on property values outlined below takes a precautionary approach and assumes that based on the inconclusive evidence summarised in Section 5.3.5 of the EIAR, there is the potential for long-term slight effects on property values located within 1km of the proposed turbines during the early operational phase of the Proposed Wind Farm. This effect is not considered to be significant.

5.2.10 Traffic

Several submissions raise concerns in relation to traffic, particularly during the construction phase of the Proposed Project and associated disruptions to the local road network.

Response

Sections 15.1.6.4 and 15.1.13.2.1 of Chapter 15 of the EIAR provides a comprehensive and robust assessment of the effects on roads, traffic and transport of the traffic movement that will be generated during construction of the Proposed Project. This assessment was prepared by Alan Lipscombe Traffic & Transport Consultants. The assessment concludes that there will be no significant travel related effects during the construction phase of the Proposed Project. Furthermore, Section 15.1.9 of the EIAR outlines the abnormal load route assessment for delivery of large turbine components to the Proposed Wind Farm site.

The traffic generation during the construction phase will be minimised with the implementation of the mitigation measures set out in Chapter 15 of the EIAR, as well as the TMP included as Appendix 15-2 of the EIAR. The TMP sets out the traffic management measures that the Applicant will commit to providing during the construction stage of the Proposed Project. The successful completion of the Proposed Project will require significant coordination and planning, and a comprehensive set of mitigation measures, as outlined in the TMP, will be put in place before and during the construction stage in order to minimise the effects of the additional traffic generated on the surrounding road network. This includes delivery of abnormally sized loads transporting turbine components, delivery routes for general construction traffic, access junctions to the Proposed Wind Farm site, traffic management measures during construction of the Proposed Grid Connection, and general traffic management measures that will be implemented before, during and on completion of the construction of the Proposed Project. The TMP will be agreed with the Roads Section all relevant Local Authorities prior to construction.

Accordingly, it is considered that the traffic and transport impacts of the Proposed Project have been comprehensively assessed in the EIAR, and all concerns raised in submissions have been adequately addressed.

5.2.11 Public Consultation

Concerns have been raised about the lack of community consultation with local residents in relation to the Proposed Project.

Response

The Applicant has engaged with the wider communities with regards to the Proposed Project. Public consultation began in December 2024, through engagement with near neighbours, local representatives, and local community groups. This included door-to-door engagement with near neighbours within a c.2 km radius of the developable area. A Community Liaison Officer was also appointed and a dedicated project website (<https://maughanacleainfo.com/>) with the relevant project information went live.

On the 29th of April, the first Public Information Event was held in the Westlodge Hotel, Bantry. The objective of the consultations was to ensure that the views and concerns of all were considered as part of the Proposed Project design and Environmental Impact Assessment (EIA) process. Appendix 2-1 of the EIAR contains a full and detailed community engagement report. The report was prepared to record the consultation carried out with the local community in respect of the Proposed Project.

On the 24th of November 2025, a second public Information Event was held in Westlodge Hotel, Bantry. The objective of the second consultation was to update the public on the progress of the Proposed Project, following surveys and consultation.

The Proposed Project has the potential to have significant benefits for the local economy, by means of job creation, landowner payments and commercial rate payments. An important part of any renewable energy development, which the Applicant has been at the forefront of developing, is its Community Benefit Fund. The concept of directing benefits from wind farms to the local community is promoted by the National Economic and Social Council (NESC) and the Wind Energy Ireland (WEI) among others. While it may be simpler and easier to put a total fund aside for a wider community area, the Applicant is endeavouring to develop new ways to direct increased gain towards the local community with particular focus on those living closest to the Proposed Project.

Please refer to Appendix 201 of the EIAR for further details.

5.3 Landscape, Visual and Tourism

5.3.1 Landscape and Visual

Concerns have been made in relation to the visual impact the Proposed Project will have on the current landscape, loss of scenic views and a highly visible ridgeline siting, which may be difficult to mitigate an overall loss in rural character. Several submissions also refer to the impact that the Proposed Project will have on current 'dark-sky reserves,' which may be negatively impacted by fitted red aviation lighting.

Response

The LVIA is set out in Chapter 13 of the EIAR and is supported by the following suite of documents:

- EIAR Volume 2: Photomontage Booklet, A1 Banner Photomontage Booklet including verified photomontage visualisations from 18 No. representative viewpoints;
- Appendix 13-1: LVIA Methodology, outlining the detailed methodology and guidance used for the assessments reported in this Chapter;
- Appendix 13-2: LCA Assessment Tables, assessment of effects on designated Landscape Character Areas (LCAs);

- Appendix 13-3: Photomontage Visual Impact Assessment Tables, a visual impact assessment of the 18 No. representative viewpoints presented in the Photomontage Booklet;
- Appendix 13-4: A0 LVIA Baseline Map, an A0 scale map showing all baseline landscape and visual receptors, ZTV mapping and viewpoints;
- Appendix 13-5: Photowire Visualisation Booklet, draft photomontage visualisations from 18 No. viewpoint locations which were not selected for the final Photomontage Booklet;

Landscape and Visual concerns from the Proposed Project have been discussed in Section 3.1.5 of this Response to Observations, in response to Cork County Council's Report.

5.3.2 Aviation Lighting and Dark Skies

A number of submissions raise concerns regarding the requirement for aviation lighting on the proposed turbines, and the potential effects on the area's dark skies and on nighttime visual amenity.

The Applicant acknowledges these concerns which have been comprehensively addressed in Section 4.1.2 above, to which the Commission is respectfully referred.

5.3.3 Tourism

A number of submissions raise concerns regarding negative impacts that the Proposed Project could have on tourism.

The Applicant acknowledges these concerns which have been comprehensively addressed in Section 4.1.4 above, to which the Commission is respectfully referred. A Tourism Impact Assessment is included in Appendix 5-3 of the EIAR, which concludes that the Proposed Project will not have a significant negative impact on tourism in the area nor on the value of tourism assets.

5.3.4 Cumulative Impact

A large number of submissions express concerns over the cumulative impact of the Proposed Project when considered in conjunction with other existing, permitted and proposed turbines in the landscape.

Response

The potential for cumulative impacts arising from other projects has been fully considered within the EIAR, as outlined in Section 2.9 of Chapter 2. A planning search was carried out in March 2026 to establish permitted, operational and proposed wind energy developments within 25km of the proposed turbines for the purpose of informing potential cumulative effects. In total, 41 applications relating to wind energy were identified within 25km of the proposed turbines. The potential cumulative impact of the Proposed Project combined with the potential impact of other projects was carried out with the purpose of identifying what influence the Proposed Project will have on the surrounding environment when considered collectively with other projects that are proposed, pending a decision, approved, or existing, as well as land-uses in the defined cumulative study area. Throughout the EIAR, each chapter has comprehensively considered the potential for cumulative impacts arising from the Proposed Project in combination with other existing, permitted and proposed wind farm projects within the study area, in accordance with best practice and current guidance.

6.

SUMMARY

MKO considers that the EIAR and accompanying documentation provide a comprehensive and robust basis for the Commission to undertake an adequate assessment of the Proposed Project. The Proposed Project has been informed by extensive multi-disciplinary survey work over a number of years, including numerous ground investigations and ecological surveys which have informed both the design and assessment of the Proposed Project and the conclusions of the EIAR. MKO remain satisfied that the observations raised in respect of this application do not identify any clear deficiencies in the survey data, methodologies or assessments carried out which would alter the conclusions reached in the EIAR.

This Response to Observations has addressed the observations made by the Planning Authority, Statutory Consultees and Third-Party Observers and demonstrates that the Proposed Project has been adequately assessed and that any adverse effects have been comprehensively considered and mitigated, where necessary.

The Proposed Project is a strategically important renewable energy project that will make a substantial contribution to Ireland's energy security, renewable and climate objectives. In exercising its functions under the Climate Act, the Commission is required, insofar as practicable, to perform its functions in a manner consistent with the requirements of Section 15(1) of the Climate Act, including the furtherance of the national climate objective of 9GW of wind energy by 2030 and a renewable electricity share of 80% by 2030.

Furthermore, the Proposed Project will deliver a range of benefits including, but not limited to, supporting the transition to a low carbon climate resilient society, provide clean renewable energy to the national grid, helping to moderate energy costs over the long term, delivering a long-term positive impact on climate by offsetting of approximately 44,498 tonnes of carbon dioxide (CO₂) per annum and providing a significant positive benefit to the local community through the creation of sustainable local employment and the provision of a local Community Benefit Fund.

Having regard to the key points set out in this Response to Observations, it is respectfully requested that the Commission give appropriate weight to the significant contribution that the Proposed Project will make towards Ireland's National Climate Objective and, having regard to the relevant international, European, national, regional and planning context that applies to the Proposed Project, grant permission for the application as proposed.



APPENDIX 1

LIST OF OBSERVERS AND SUBMISSION THEMES

Appendix 1: Third-Party Submissions Received

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
Aine Ni Ealaithe	Coomleigh West, Bantry, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Alan and Elva O'Sullivan	Glencreagh, Bantry, Cork, P75 YA72	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Amalia Gomez	Barnagowlane West, Goulanes Bantry, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Amy Carter-O'Sullivan	Moonlands, Laharnshermeeen, Bantry, Co. Cork, P75 P599	Planning Policy, Guidelines and Site History	Section 5.1
		Landscape, Visual and Tourism	Section 5.3
Andrew Campbell	An Cleite Ban, Coomleagh West, P75 R277	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Andrew Carling		Planning Policy, Guidelines and Site History	Section 5.1

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
	Coomleagh East, Bantry, Co. Cork, P75 RX44	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Annabel Seymour	Maughanclea, Kealkill, Co. Cork, P75 E0623	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Annika Ahles	Faraway Place, Ards More, Bantry, Cork, P75 Y895	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Barbara Rawston	Maulakieve, Bantry, Co. Cork	Landscape, Visual and Tourism	Section 5.3
Brid Collins	The Honeypoint, Cousane, Kealkill, Bantry, Co. Cork, P75 YF78	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Brigitte Baginski	Coomleagh West, Bantry, Co. Cork, P75 HK07	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
Carla Collins	Maulakieve, Bantry, Co. Cork	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Carole Neiertz	Gortnacowly, Mealagh Valley, Bantry, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Caroline Morgan	Droumsullivan, Bantry, Co. Cork, P75 V968	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Cathy Martucci	Niniane's Wood, Droumsullivan South, Bantry, Co. Cork, P75 V573	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Christian Ahles	Faraway Place, Ards More, Bantry, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
Christina Keawwantha	Millbig, Coomhola, Bantry, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
		Landscape, Visual and Tourism	Section 5.3
Christina O'Sullivan	Goulanes, Bantry, Co. Cork, P75 XN61	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Christine O'Leary	Lackareagh, Kealkil, Bantry, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Ciara O'Leary	Glencreagh, Bantry, Co. Cork, P75 AW86	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Ciara Strange	Lackavane, Kealkill, Bantry, Co. Cork, P75 F297	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
Clive Evans and Teresa Hackett	Ardrah, Mealagh Valley, Bantry, Co. Cork, P75 WR26	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
Colleen Dilley	The Granexe, Ards More, Bantry, Cork, P75 Y895	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Collette Foster	Stoneridge House, Dromclogh East, Bantry, Co. Cork, P75 R206	Environmental and Ecological Impacts	Section 5.2
Daniel and Dolores Healy	An Beal Ban, Ballinglanna, Glanmire, Co. Cork, T454 CD37	Landscape, Visual and Tourism	Section 5.3
Danny Manning	Cariganass, Kealkill, Bantry, Co. Cork, P75 CC84	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
David Aller Ontalba	Brook Lodge, Gortnacowly, Bantry, Co. Cork, P75 NY88	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
David Butler	Coomleagh East, Bantry, Bantry, CO. Cork, P75 H903	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
David Griffiths	Maughanaclea, Kealkill, West Cork, P75 V215	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
David Mendez	Laharanshermeen, Mealagah Valley, Bantry, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
David Myler	Bantry, Co. Cork	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
David Richards	Gortloughra, Kealkill, Co. Cork, P75 AC84	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
David Shires	Hagal Farm, Coomleagh West, Bantry, P75 K773	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Dylan Owens	Ahil Beg, Kealkill, Cork, P75 K079	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Eileen O'Mahony		Planning Policy, Guidelines and Site History	Section 5.1

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
	13 Slip Grow, Bantry, Co. Cork, P75 AP92	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Eileen O'Sullivan	Glencreagh, Bantry, Co. Cork, P75 FW63	Planning Policy, Guidelines and Site History	Section 5.1.
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Ella Barkans	Coomleagh East, Bantry, Cork, P75 XK00	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Emma Ahles	Faraway Place, Ards More, Bantry, Cork, P75	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Emma Dragt and Lafred Buis	Tooreen, Dunmanway, P47 TX46	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Esther O'Hehir		Planning Policy, Guidelines and Site History	Section 5.1

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
	Tig na Mara, Ballylickey, Co. Cork	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Eva Meade Barnes'	Laharanshermeen, Mealagh Valley, Bantry, CO. Cork, P75 TY49	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Finbarr O'Sullivan	Lahanshermeen, Mealagh Valley, Bantry, Co. Cork, P75 WK40	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Fiona Ashley	Coolcaha, Ballydehob, Co. Cork, P81 Y138	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Flora Wieler	Coomleagh West, The Mealagh Valley, Bantry, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
George O'Mahony		Planning Policy, Guidelines and Site History	Section 5.1

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
	Maughanaclea, Kealkill, Bantry, CO. Cork, P75 D660	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Harold Hurenkamp and Femke Peterse Hurenkamp	Gael's Lap, Coomleagh West, Bantry, P75 DK84, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Ian Collins	Maulakieve, Bantry, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Irish Peatland Conservation Council	Lullymore, Rathanagan, Co. Kildare, Ireland, R51 V293	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
Isabella Estie	Ardrah East, Mealagh Valley, Bantry, Co. Cork, P75 W958	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Janny Wieler		Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
	Coomleagh West, The Mealagh Valley, Bantry, Co. Cork	Landscape, Visual and Tourism	Section 5.3
Joan O'Sullivan	Glencreagh East, Mealagah Valley, Bantry, Co. Cork, P75 HK19	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Jocelyn Estie	Ardrah East, Mealagh Valley, Co. Cork, P75 W958	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
John Albrow	Niniane's Wood, Dromsullivan South, Bantry, Co. Cork, P75 V573	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
John Baker	Earth Restore, Old Creamery, Dromclogh East, Mealagh Valley, Bantry	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
John O'Brien		Planning Policy, Guidelines and Site History	Section 5.1

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
	Goulanes, Bantry, Co. Cork, P75 PX73	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
John O'Leary	Glencreagh, Bantry, Co. Cork, P75 AW86	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
John O'Sullivan	Moonlands, Laharanshermeen, bantry, CO. Cork, P75 P599	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Joy Jones-Lane	Ards Beg, Bantry, Co. Cork, P75 R280	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Joyce Russell and Others	Cullenagh, Kealkill, Bantry, Co. Cork, P75 X985	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Kaitlin Husmann	Coomleagh East Bantry, Bantry, Co. Cork, P75 PC93	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
		Landscape, Visual and Tourism	Section 5.3
Kate & Tim Baker	Knockduff, Dunmanway, P47 WR24	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Kate O'Sullivan	Laharanshermeen, Mealagh Valley, Bantry, Co. Cork, P75 WK40	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Keira O'Sullivan	Goulanes, Bantry, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Kevin McDonnell	The Cabin, Maughanclea, Kealkill, Co. Cork, P75 DN34	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Laura Orsevska	Goulanes, Bantry, Co. Cork, P75 PX73	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
		Landscape, Visual and Tourism	Section 5.3
Lauren Carter-O'Sullivan	Moonlands, Laharanshermeen, Bantry, Co. Cork, P75 P599	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Leemore Butler	Coomleagh East Bantry, Co. Cork, P75 H903	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Liam Estie	Ardrah East, Mealagh Valley, Co. Cork, P75 WP958	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Lorna Mauney-Brodek	Inchiroe, Kealkill, Co. Cork, P75 Y765	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Lukas Ahles	Faraway Place, Ards More, Bantry, Cork, P75 Y895	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
		Landscape, Visual and Tourism	Section 5.3
Margaux Banderier	Glencreagh, Mealagah Valley, Bantry, P75 PW21	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Maria Lynch	Maughanaclea, Kealkill, Bantry, Co. Cork	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Marie O'Leary	Chestnut Grove, kealkil, Bantry, Co. Cork	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Markus Husmann	Coomleagh East, Bantry, Bantry, Co. Cork, P75 PC93	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Martin Collins	The Honeypot, Cousane, Kealkill, Bantry, Co. Cork, P75 YF78	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Mary & Liam Minihane	Glencreagh, Bantry, Co. Cork, P75 D934	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
		Landscape, Visual and Tourism	Section 5.3
Mary Kearney	Mardyke Street, Skibbereen, Co. Cork, P81 XW15	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Meghan Keith-Hynes	5 Knocknaveagh Close, Seskin, Bantry, Co. Cork, P75 FF97	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Melanie O'Sullivan	Goulanes, Bantry, Co. Cork, P75 XN61	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Michael Heep and Anna Droste-Heep	Ards Beg, Ardrah, Mealagah Valley, Bantry, Co. Cork, P75 NV61	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Michael Collins	Leinster House, Dail Eireann, Dublin	Planning Policy, Guidelines and Site History	Section 5.1
Michael O'Mahony		Environmental and Ecological Impacts	Section 5.2

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
	Maughanaclea, Kealkill, Co. Cork, P75 Y504	Landscape, Visual and Tourism	Section 5.3
Michael Thomas Colk	The Gathering, Gortnacowly, Bantry, P75 V065	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Michaella Carling	Coomleagh East, Bantry, Co. Cork, P75 RX44	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Myrthe Wieler	Coomleagh West, Bantry, Co. Cork, P75 YK38	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Natasha Edmondson	Carriganass, Kealkill, Bantry, Co. Cork, P75 CC84	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Natasha Estie		Planning Policy, Guidelines and Site History	Section 5.1

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
	Ardrah East, Mealagh Valley, Co. Cork, P75 WP958	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Nina Burke	Maulikeeve, Bantry, Co. Cork, P75 EV12	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Noel Burke	Maulikeeve, Bantry, Co. Cork, P75 EV12	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Noelle Aller Ontalba	Brook Lodge, Gortnacowley, Bantry, Co. Cork, P75 NY8	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Nora and Michael Bishop	Glencreagh, Bantry, Co. Cork, P75 KV76	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Nuala O'Mahony		Planning Policy, Guidelines and Site History	Section 5.1

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
	Maughanaclea, Kealkill, Bantry, Co. Cork, P75 D660	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Patrick Kearney	Droumsullivan, Bantry, Co. Cork, P75 V968	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Patrick Keith-Hynes	5 Knocknaveagh Close, Seskin, Bantry, CO. Cork, P75 FF97	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Patrick O'Mahony	Maughanaclea, Kealkill, Bantry, Co. Cork, P75 XA39	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Patrick O'Sullivan 088268	Goulanes, Bantry, Co. Cork, P75 XN61	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
		Environmental and Ecological Impacts	Section 5.2

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
Patrick O'Sullivan 005091	Goulanes, Bantry, CO. Cork, P75 XN61	Landscape, Visual and Tourism	Section 5.3
Paul Dix & Elaine Mulryan	9 Slí na Scoile Kealkill Co. Cork P75 FW14	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Paula Blackmore	The Mealagh Valley, Bantry, Co. Cork, P75 PF80	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Peter Dilley	The Granexe Ards More, Bantry, Cork, P75Y895	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Peter O'Connor	Deelish, Drimoleague, Co. Cork, Ireland, P47 FT28	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Rachel O'Leary	Lackareagh, Kealkil, Bantry, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
		Landscape, Visual and Tourism	Section 5.3
Roger & Vivian Proudfoot	Maughanaclea, Kealkill, Bantry, Co. Cork, P75 Y935	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Sandie Grey	Hollowtree Dromlickac Rue, kealkill, CO. Cork, P75 WT72	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Sara Ramsden-Hallett	Maulakieve, Bantry, Co. Cork, P75 ET71	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Sarah Barkans	Hagal Farm, Coomleagh West, Bantry, Co. Cork, P75 K773	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Sean Worboys	Maughanaclea, Kealkill, Cork, P75 E062	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
Sinead Guilfoyle	Ahil Beg, Kealkill, Cork, P75 K079	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Sioned Jones BS	Maughanlea, Kealkil, Bantry, CO. Cork, P75 V215	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Sophie Milner	95 Glentrammon Rd, Orpington, kent, BR6 6DQ, United Kingdom	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Sophie Seymour	The Cabin, Maughanlea, Kelakill, Cork, P75 E062	Environmental and Ecological Impacts	Section 5.2
Teresa Colk Lynch	The Gathering, Bantry, P75 V065, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Teresa O'Mahony		Planning Policy, Guidelines and Site History	Section 5.1

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
	Maughanaclea, Kealkill, Co. Cork, P75 Y504	Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Tim Murnane	37 Bayview Lawns, Killiney Hill Road, Killiney, Co. Dublin	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
Timothy Foster	Stoneridge House, Dromclogh East, Bantry, Co. Cork, P75 R206	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Timothy O'Sullivan	Moonlands, Laharnshermeen, Bantry, Co. Cork, P75 P599	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Timothy O'Sullivan	Goulanes, Bantry, Co. Cork, P75 XN62	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Tony Miller & Kristin Laubach	Tooreen, Dunmanway, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2

Name of Observer	Address	Themes/Themes Raised	Section Responding to Themes Raised
		Landscape, Visual and Tourism	Section 5.3
Valley View House	Droumsullivan, Bantry, Co. Cork, P75 E289	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Virgine Laveau	Maughanaclea, kealkill, Co. Cork, P75 AX81	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3
Wild Hideaways Eco Spa Retreat	Wild Hideaways, Mealagh Valley, Co. Cork	Planning Policy, Guidelines and Site History	Section 5.1
		Environmental and Ecological Impacts	Section 5.2
		Landscape, Visual and Tourism	Section 5.3

