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Date: 21 May 2026

To:  
SID Planning  
An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

AN COIMISIÚN PLEANÁLA	
LDG-	088017-26
ACP-	
22 MAY 2026	
Fee: €	50
Type:	PMU
Time:	9:15
By:	Post

**Planning Application Reference Number:** ACP-324165-26

**Applicant:** Maughanaclea Ltd aka Enerco

**Description of Development:** Construction of 14 Industrial Wind Turbines Maughanaclea

**Location:** Maughanaclea, County Cork

Dear Sir / Madam,

After due consideration, I do not believe it has been adequately demonstrated that the proposed development can proceed without causing unacceptable adverse effects to:

- landscape character
- residential amenity
- cumulative noise and visual impacts
- heritage assets and walking routes
- wellbeing and quality of life
- groundwater and private water supplies

I respectfully request that the concerns outlined in detail in the following pages be given full consideration and submit that the proposed Wind Farm application should be refused.

Kind regards,

*Brigitte Baginski*

Brigitte Baginski

## **1. Landscape Character, Value and Sensitivity (LCT 15a) – Conflict with the Cork County Development Plan**

The proposed development is located within Landscape Character Type 15a as defined in the Cork County Development Plan (CCDP). In my view, the EIAR significantly underestimates both the value and sensitivity of this landscape. Its conclusions do not appear consistent with best practice guidance such as GLVIA3 or with the policies in the CCDP.

The CCDP clearly classifies LCT 15a as having:

- **High Landscape Value**
- **High Landscape Sensitivity**

Despite this, the EIAR concludes the landscape is only of **“Medium” value** and **“Medium” sensitivity**. This is a major departure from the Development Plan and is not properly explained.

Instead, the EIAR relies on the fact that the site is:

- outside a “High Value Landscape” designation
- “Open to Consideration” for wind energy

These are planning policy categories, not measures of landscape quality, and in my view they should not be used to reduce the assessed value or sensitivity of the landscape.

### **Sensitivity to change**

The EIAR itself acknowledges:

- long-distance panoramic views
- a remote and sparsely populated character
- a strong sense of wildness

These are normally features of a high-value and highly sensitive upland landscape.

However the EIAR rates sensitivity as “Medium” based on the size of the LCT, low population, and existing forestry and agriculture. It does not adequately consider:

- turbines on exposed ridges and skylines
- wide visibility across surrounding areas
- the strong sense of openness and remoteness

These factors generally increase sensitivity to wind energy development. Large turbines on skylines are particularly difficult to integrate into open upland landscapes.

### **Lack of clarity in final weighting**

Although several indicators are mentioned, the EIAR does not clearly explain how they are weighted. Landscape qualities such as scenic views, remoteness, and recreational use are acknowledged, while downgrading the landscape's sensitivity on the basis that the area is already degraded by agriculture and commercial forestry. However, these are longstanding and characteristic components of the rural landscape, particularly in West Cork where pasture based traditional farming is overwhelmingly dominant and contributes to the rural character and sense of peace. Forestry and farming integrate with the existing visual character. Industrial wind turbines, by contrast, are prominent vertical structures with substantial movement and visibility over wide areas, fundamentally altering the perception and character of the landscape. The overall conclusion therefore appears unbalanced and subjective.

### **Historical context**

In earlier versions of the Cork County Development Plan (2009–2015), LCT 15a was identified as being of County Importance. Although this was later revised, the landscape has consistently been recognised as having high value and sensitivity. This long-standing recognition remains relevant.

### **Conclusion on landscape**

Overall, the EIAR:

- departs from the CCDP classification without adequate justification
- mixes planning policy with landscape assessment
- acknowledges high-value landscape characteristics but does not properly apply them
- underestimates sensitivity to large-scale wind energy development

For these reasons, I do not find the conclusion of “Medium” value and sensitivity convincing.

I therefore ask that:

- limited weight be placed on the submitted LVIA
- a reassessment of landscape value and sensitivity be required.

## **2. Residential Amenity**

Under Irish and EU law, residents have a right to the peaceful enjoyment of their homes. While this can be balanced against public interest, impacts must be properly assessed and clearly justified.

I have serious concerns about impacts on residential amenity, including:

- noise (including low-frequency and amplitude modulation)
- visual dominance and constant movement
- loss of rural tranquillity and views
- night-time lighting
- general reduction in quality of life

### **Noise impacts and terrain effects are not properly assessed**

The EIAR relies mainly on standard noise modelling. However, the local landscape is highly complex, with valleys, ridges and slopes that can carry sound over long distances, particularly at night in calm rural conditions.

I am not satisfied that it has been demonstrated with enough certainty that nearby homes will not be affected by night-time noise, low-frequency sound, or cumulative noise from other wind farms in the area.

Standard models are known to be less reliable in complex terrain, yet no meaningful comparison appears to have been provided using real-world measured data from similar landscapes.

I therefore ask that the precautionary principle be applied and that a more detailed, site-specific assessment be carried out.

### **Construction noise understated**

Construction impacts also appear understated. The EIAR relies mainly on average noise levels, which do not reflect the reality of construction activity in a quiet rural area.

Activities such as rock breaking, heavy machinery, and vehicle movements produce sudden and repeated noise events that can be highly disruptive.

Construction is expected to last approximately 18–24 months, 12 hours a day from 7am to 7 pm including Saturdays. Even moderate noise over long periods can become significant in a low-background rural environment and may affect sleep, wellbeing, and daily life.

## **The provided photomontages underestimate the visual impact and the assessment fails to reflect actual residential experience on the ground**

The provided photomontages appear to understate the likely visual impact of the development. In several viewpoints, the turbines appear extremely faint within the image, creating a misleading impression of limited visibility and reduced visual prominence. This does not reflect the likely real-world view of turbines of this scale within an open upland landscape.

- Several homes that are likely to experience an overbearing visual impact due to their close proximity (worst case scenarios) have not been represented in the submitted viewpoints.
- Furthermore, houses along the Mealagh Valley Road L-4717 would have direct and extensive views of turbines T07 – T14 along the ridge line. (See photomontage on page 5.)

While roadside vegetation may partly block views for passing traffic, this does not apply to views from the houses themselves, as they are located above or below road level and their views are not screened by roadside vegetation. **This fact is completely omitted in the visual assessment.** Residents in these properties would likely experience clear and ongoing views of these turbines across a wide stretch of the skyline.

As a result, the visual impact assessment does not appear to provide a fair or complete picture of the likely effects on nearby residents or on the surrounding scenic landscape.

Due to these concerns, I request that the applicant provide additional and more representative viewpoints from affected residential properties, together with a reassessment of residential visual amenity impacts before any decision is made on the application.

VP1 51degree 42'58"N 9 degree 20'59"W



VP2 51degree 43'15"N 9 degree 20'01"W



VP3 51degree 43'11"N 9 degree 18'56"W



VP4 51degree 43'24"N 9 degree 17'11"W



**Method note:** This view is based on the exact GPS location and height of the viewpoints. Turbines are shown to scale using their published dimensions and placed according to the site layout.



**Note:** Turbines T07 to T14 will be in full or partial view from almost all residences across 5 townlands. The road is built on a hillside. While roadside vegetation is screening the views from the road in several places, houses are located either below or above the road level and its vegetation, resulting in unobstructed views of the turbines.

### **3. Cumulative impacts on Residential Amenity and Landscape Character**

#### **The EIAR does not properly assess cumulative impacts from opposite wind turbine clusters**

##### **Cumulative noise impact**

On the Mealagh Valley side, another wind farm proposal, the Dereeenacreenig development, had been granted permission by Cork County Council which is currently appealed (ACP ref. PL88.501234). The EIAR fails to take this proposal into account. If going ahead, many homes in the Mealagh Valley would effectively lie between two turbine clusters:

- turbines T07-T14 of the Maughanaclea proposal
- the Dereeenacreenig wind farm on the opposite ridge

This applies to homes along both the L-4718 and L-4717 roads.

On the Kealkill side, homes would again be located between two turbine clusters, in this case both from the Maughanaclea development: T01 -T06 on one side of Scenic route R585 and T07 - T14 on the other side. While the EIAR briefly mentions this, it largely dismisses it on the basis of low population density.

However, turbines on opposing ridgelines mean:

- sound may come from different directions at different times
- there may be no consistently quiet side to dwellings
- due to the hilly terrain and placement of turbines on ridges, noise impacts may be greater than standard distance assumptions suggest

This could significantly affect peace, sleep, and enjoyment of the home.

I therefore ask that cumulative noise impacts be fully assessed, including:

- effects of wind direction and terrain
- worst-case night-time scenarios
- combined impacts from multiple turbine clusters
- impacts on vulnerable dwellings
- independent post-construction monitoring

### **Cumulative visual impact**

The EIAR also does not properly assess the combined visual impact of turbines on both sides of valleys and roads.

This would create a sense of enclosure, with turbines dominating views from homes, roads, and walking routes. It would significantly alter the landscape character from open rural countryside to a more industrial setting.

Updated cumulative photomontages should be provided showing views from:

- homes
- valley floors
- main road corridors
- walking routes

## **4. Human Health and Wellbeing**

The current landscape provides a quiet rural environment that supports general wellbeing and quality of life.

Some people in the affected area live with additional vulnerabilities, including conditions such as epilepsy, ADHD, autism or other neurodivergent conditions, where calm, stable surroundings with low levels of sensory stress can be particularly important. While individual medical cases are not a planning matter, broader environmental health impacts are relevant.

The introduction of large turbines would:

- increase visual movement and environmental activity
- reduce tranquillity
- alter the sensory environment of the valley

There is also reported evidence that a number of residents near wind turbines experience sleep disturbance, which can contribute to stress and other health issues, particularly hypertension, insomnia, stroke recovery, heart conditions of all kinds, etc. The presence of constantly moving turbine blades, noise impacts from construction and operation, shadow flicker and night time lighting are additional factors that could exacerbate health issues.

I ask that these matters be given due consideration as part of residential amenity and environmental health impacts.

## 5. Impact on Sheep's Head Way and St. Finbarr's Pilgrim Path

The proposed development would impact on the eastern part of the Sheep's Head Way, a National Waymarked Walkway and top walking destination of national importance, including its Mullaghmesha and Mealagh Valley Loops.

The Sheep's Head Way is joined by the historic St. Finbarr's Pilgrim Path, which leads from Top of the Rock near Castledonovan to Gougane Barra. It is one of the five major Pilgrim Paths of Ireland, promoted nationally and internationally. <https://www.pilgrimpath.ie/>

People walking these paths enjoy the untouched scenery and tranquility and many are deeply aware of its spiritual meaning. For people following St. Finbarr's steps from Top of the Rock all the way to Gougane Barra, the section affected by the proposed development forms the central part of the Pilgrim Path and turbines would be visible from multiple stretches of the trail. (See pages 11 – 15 for a few examples and page 16 for location of viewpoints. Note: Two of the images depicting the impact on residences along the Mealagh Valley road have been re-used as the Pilgrim Path/Mealagh Valley Loop follows the same stretch of road at those locations.)

### **Contradiction in the EIAR:**

The following two statements appear on the same page, in consecutive paragraphs, in direct contradiction of each other.

**Statement A:** Chapter 5, Section 5.3.2.3, page 5-28: "The TIA concludes it is not considered that the Proposed Project will have an impact on the Sheep's Head Way/St. Finbarr's Way. As a result, it can be considered to also have no impact on its tourism value."

**Statement B:** Chapter 5, Section 5.3.2.3, page 5-28 (immediately following): "According to the TIA it is considered that the Proposed Project will have a negative impact on the local section of the Sheep's Head Way."

### **Cumulative effect on Pilgrim Path is not considered**

Two more wind farm proposals would affect the Sheep's Head Way / St. Finbarr's Pilgrim Path: the Curraglass development, ACP Ref. PL88.500665 and Dereenacreenig development ACP Ref. PL88.501234.

To my knowledge none of the other four Pilgrim Paths in Ireland has any wind farm close by, the closest being Raheenleagh approx. 25Km away from St. Kevin's Pilgrim Path. In contrast St. Finbarr's pilgrim path would have three wind farms in very close proximity. At different parts of the way, two of the proposed wind farms would be visible simultaneously. (See page 16 for a map of the cumulative impact on the Pilgrim Path.)

For these reasons, I believe the precautionary principle should be applied.

## **Tourism potential is underestimated in th EIAR**

While pilgrimage walking is only a developing asset in Ireland, according to experts there is an enormous tourist potential.

Quoted from the Irish Times: *"There's a huge untapped market out there; we're not even scratching the surface of it yet," O'Dwyer says of a booming interest in such trails... This, he credits not only to the popularity of routes like the Camino de Santiago, but to changing attitudes towards religion and spirituality in the 21st century.*

<https://www.independent.ie/life/travel/travel-news/irish-camino-first-fully-guided-pilgrim-walk-launched-in-ireland/35992108.html>

Industrial turbines in clear view from these paths would significantly affect:

- visual quality and experience of tranquillity
- spiritual and cultural value
- tourism potential

## **Conflicts with CCDP tourism and cultural objectives relating to protection of landscape, walking routes, and cultural tourism**

### **Objective TO 10-5: Protection of Natural, Built and Cultural Features**

Protect and conserve those natural, built, and cultural heritage features that form the resources on which the County's tourist industry is based. These features will include **areas of important landscape...**

### **Objective TO 10-6: Cultural Tourism**

Encourage the development of Cultural trails around the County while having regard for the cultural built heritage and environmental impacts...

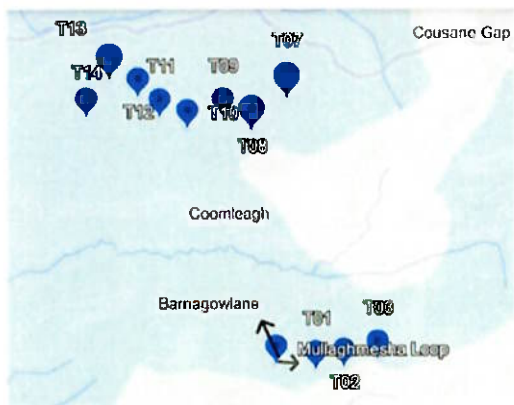
### **Objective TO 10-7: Long Distance Walks**

a) Support and promote the development of long-distance walkways...

### **Objective TO 10-8: Walking/Cycling and Greenways**

Promote the development of greenways, **walking** and cycling **routes** throughout the County as an activity for both international visitors and local tourists in a manner that is compatible with nature conservation and other environmental policies.

**The Wind Energy Development Guidelines (2006, Draft 2019)** require that landscape sensitivity, scenic routes, and tourism assets be safeguarded from inappropriate turbine placement.



Viewpoint coordinates: 51 degree 42'45"N 9 degree 17'51"W

Distance to nearest turbines:  
T08 3355m (Maughanaclea), T01 - 674m (Dereenacrinnig)

**Method note:** This view is based on the exact GPS location and height of the viewpoint. Turbines are shown to scale using their published dimensions and placed according to the site layout. Distances to turbines are measured from these positions.



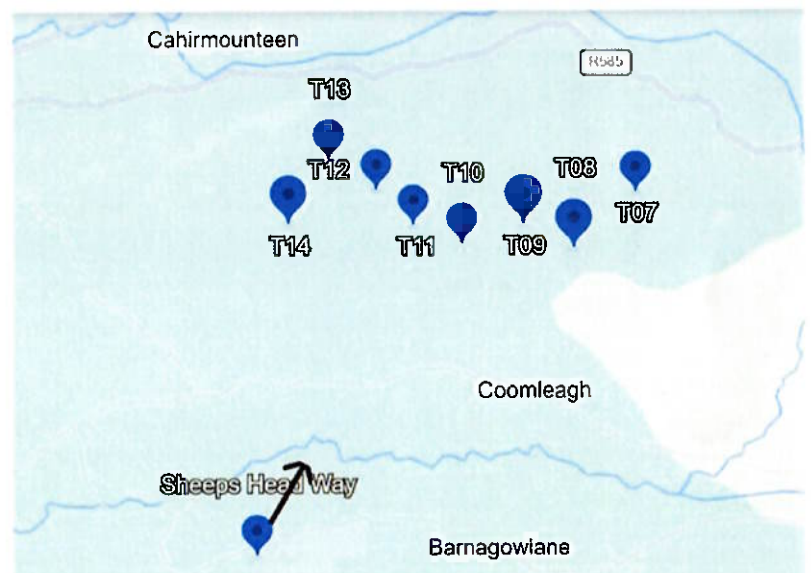
Coordinates:

51 degree 43'04"N 9 degree 20'31"W

Distance to nearest turbine:

T14 2805m

**Method note:** This view is based on the exact GPS location and height of the viewpoint. Turbines are shown to scale using their published dimensions and placed according to the site layout. Distances to turbines are measured from these positions.





Coordinates:

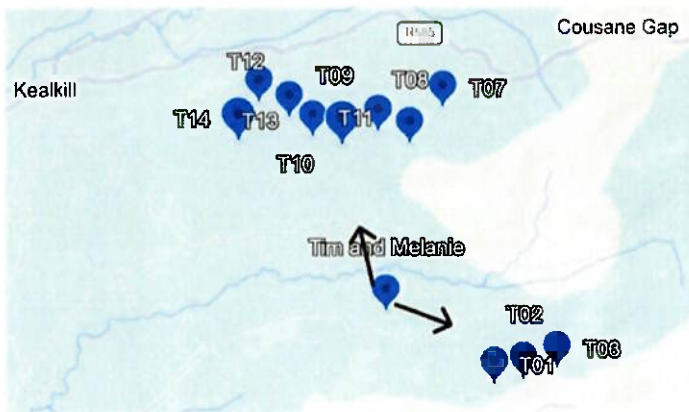
51 degree 53'14"N 9 degree 20'11"W

Distance to nearest turbine:

T14 2454m

**Method note:** This view is based on the exact GPS location and height of the viewpoint. Turbines are shown to scale using their published dimensions and placed according to the site layout. Distances to turbines are measured from these positions.



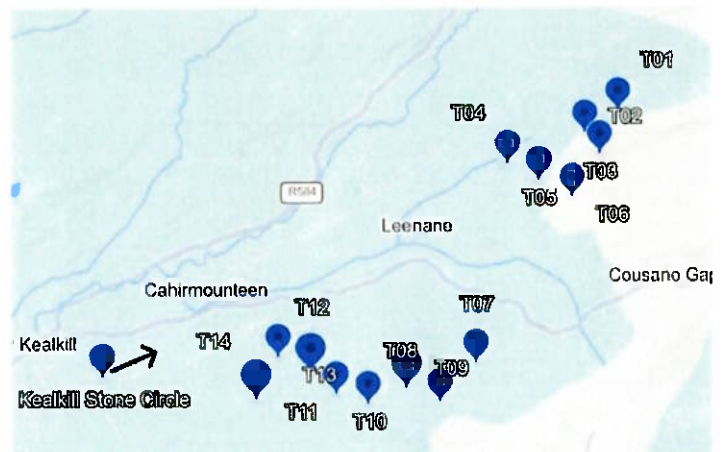


Viewpoint coordinates: 51 degree 43'16"N 9 degree 18'39"W

Distance to nearest turbines:

T08 2375m (Maughanaclea), T01 1860m (Dereenacreenig)

**Method note:** This view is based on the exact GPS location and height of the viewpoint. Turbines are shown to scale using their published dimensions and placed according to the site layout. Distances to turbines are measured from these positions.



Coordinates: 51 degrees 44'45"N 9 degrees 22'08"W

Distance to nearest turbine: T04 6029m

Located within **High Value Landscape HVL**, clearly visible when approaching the stone circle from the side of the gate

**Method note:** This view is based on the exact GPS location and height of the viewpoint. Turbines are shown to scale using their published dimensions and placed according to the site layout. Distances to turbines are measured from these positions.

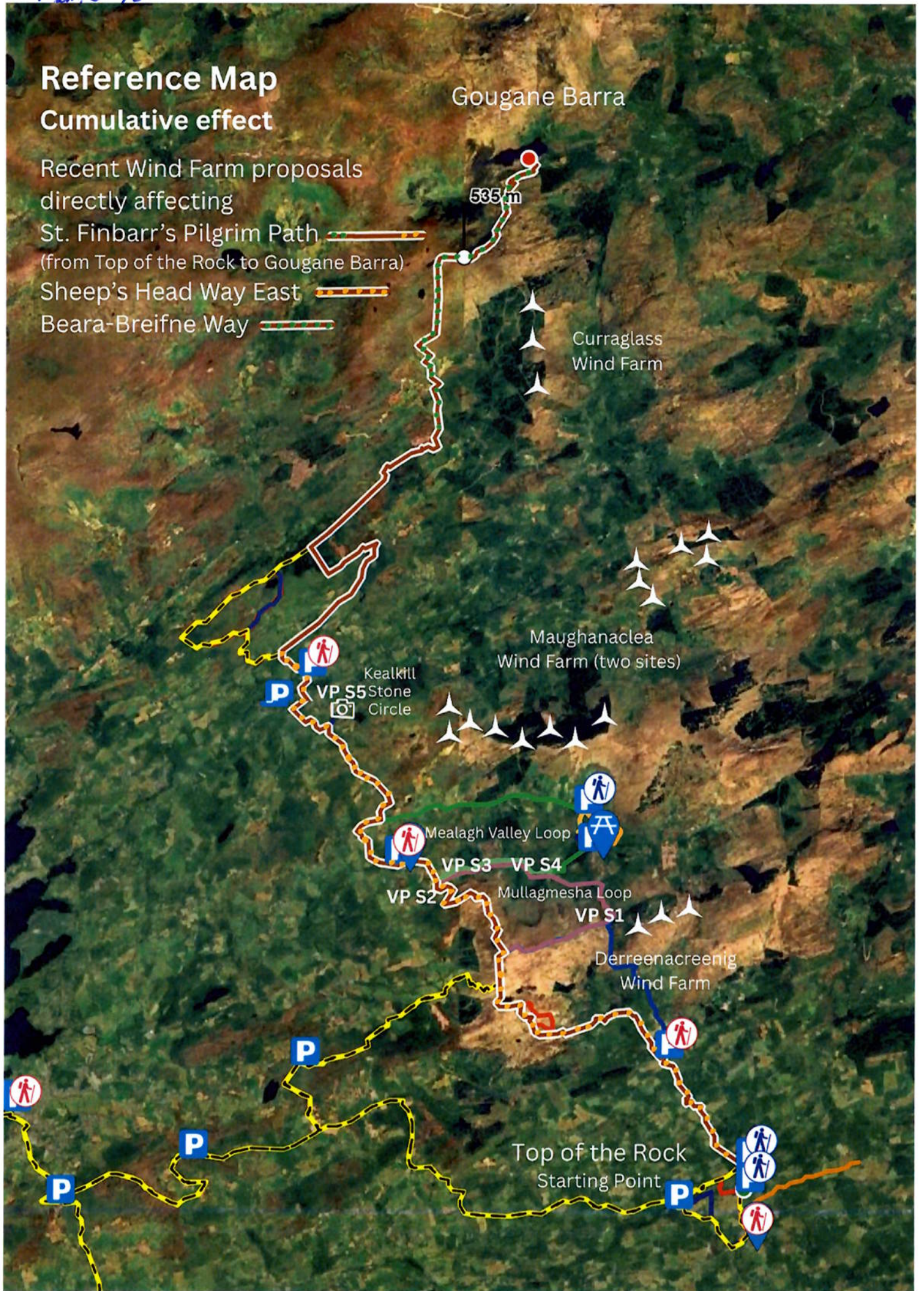
# Reference Map

## Cumulative effect

Recent Wind Farm proposals directly affecting St. Finbarr's Pilgrim Path (from Top of the Rock to Gougane Barra)

Sheep's Head Way East

Beara-Breifne Way



## **6. Impact on the historical, cultural and scenic value of the Mealagh Valley and surrounding uplands**

Living in the Mealagh Valley, I am particularly concerned about the impact the development would have on this unique place with its strong historical, cultural and scenic assets.

The valley is actively used for walking and heritage tourism through routes like the Sheep's Head Way/St. Finbarr's Pilgrim Path/Mealagh Valley Loop and Mealagh Forest Loop. These depend on the area's quiet, unspoilt rural character and open views to provide a meaningful experience. The appeal of these routes is closely tied to the feeling of being in a largely natural, peaceful landscape with a strong sense of history.

The valley has a long record of human settlement, with many archaeological sites such as ringforts, standing stones, stone rows and burial sites. This heritage has been documented in *An Archaeological Survey of the Mealagh Valley* by David Myler (1998), which **identified around 90 sites in the valley.**

The Sheep's Head Way website depicts the Valley as a whole as a heritage site.  
[https://thesheepsheadway.com/heritage-history/heritage\\_sites/](https://thesheepsheadway.com/heritage-history/heritage_sites/)

The Maughanaclea ridge forms an important backdrop to the valley, and because the valley is fairly enclosed, anything built on the higher ground is very visible from within it. Large wind turbines on Maughanaclea would therefore be a dominant feature in many views from the valley floor and from walking routes, changing the character of the landscape and reducing its sense of calm and remoteness.

This concern is made worse by cumulative impacts in the same area. The Dreenacreenig development on the opposite ridge at Mulaghmesha would already introduce large turbines into views from parts of the valley. If further turbines are added on Maughanaclea, the valley would be affected on both sides by wind energy development, creating a much more industrialised skyline. This would significantly change the experience living and walking in the valley.

Overall, the Mealagh Valley is a sensitive landscape where archaeology, walking routes, and scenic value are closely linked. Additional large-scale wind development in the Maughanaclea area would risk seriously reducing the visual quality, tranquillity, and cultural experience of the landscape,

### **Planning precedent**

The valley has already been recognised in a previous planning decision, where An Bord Pleanála refused permission in 2014 for a wind farm at Ardrah (Ardrah Windfarm Ltd),

overlooking the Mealagh Valley, as it “would seriously injure the visual amenities of the area” and lead to “undue concentration of wind farms” in the landscape. That decision remains relevant today, as the character of the landscape has not changed and it is still highly sensitive to large-scale development.

The new proposals at Maughanaclea and Dereenacreenig would only increase the same issue through much larger turbines and cumulative impact.

Overall, the Mealagh Valley is a sensitive and highly valued landscape where scenery, heritage, and walking routes all come together.

### **Conclusion**

The Mealagh Valley is already recognised as a highly sensitive landscape that is not suitable for wind farm development due to its visual intrusion. This proposals would introduce much larger turbines, increase visibility across the valley, and add to existing wind farm development in the area. The result would be a significant change to the character of this highly valued and culturally significant landscape, with a clear and permanent impact. For these reasons, the development is not appropriate for this location and should be refused.

## **7. Concerns about groundwater and private wells**

Almost all homes in the Mealagh Valley and many on the Kealkill side rely on private wells, including my own.

The EIAR states there will be no significant impact on groundwater, but this conclusion does not appear to be supported by sufficient site-specific evidence.

### **Key concerns**

- The area is classed as having “Extreme” groundwater vulnerability
- Bedrock is close to the surface in many locations
- Groundwater is understood to move through fractures and cracks
- No baseline testing of private wells appears to have been carried out
- The well database is acknowledged as incomplete

Despite this, strong conclusions are made about safety distances and impacts.

### **Lack of data**

The report states there is no site-specific groundwater quality data and that sampling was not considered necessary. This is difficult to understand given the reliance on private wells for drinking water.

### **Excavation and drainage changes**

Borrow pits and excavations of up to 8 metres may affect groundwater flow, particularly where bedrock is shallow. This could potentially affect springs, wells, and local water supplies.

### **Conclusion on groundwater**

Overall, the conclusions appear too confident given the limited data. A more detailed and precautionary approach should be taken before any decision is made.

## **Overall conclusion**

### **I would like to repeat what I had said initially:**

After due consideration, I do not believe it has been adequately demonstrated that the proposed development can proceed without causing unacceptable adverse effects to:

- landscape character
- residential amenity
- cumulative noise and visual impacts
- heritage assets and walking routes
- wellbeing and quality of life
- groundwater and private water supplies

I respectfully request that the concerns outlined in the previous pages be given full consideration and submit that the proposed Wind Farm application should be refused.