

Page 1

The Secretary.

An Coimisiún Pleanála
64, Marlborough Street
Dublin 1. D01 V902

AN COIMISIÚN PLEANÁLA	
LDG-	087934-26
ACP-	
19 MAY 2026	
Fee: €	50
Type:	Chq
Time:	9:15
By:	reg post

15/05/2026

ACP Ref No: PAX04. 324165

Council: Cork County Council.

Applicant: Maughanaclea Ltd: Enerco Energy Ltd, A member of the Craydel Group.

Consultants: MKO Planning and Environmental Consultants., Galway.

Location: Ardrah, Maughanaclea, Ballynamought, Gortloughra, Cousane, Coomclogh, Derragh, Glanycarney, Keenrath, Derrynacaheragh, Shiplough, Coolsnaghtig, Mallabracka, Derrylahan, Derreens, Demesne, Dunmanway North, Milleenanannig, and Ballyhalwick, Co. Cork.

Description: Wind Energy Complex consisting of 14 no. wind turbines with an overall turbine tip height of 169 metres, a rotor blade diameter of 133 metres, and turbine hub height of 102.5 metres, and a meteorological mast with a height of 30 metres, and subsequent decommissioning of the wind turbines and meteorological mast, following a thirty five- year operational period from the date of full commissioning of the wind turbines. Associated wind turbine and meteorological mast foundations and hardstanding areas. A 110kV substation compound, Underground electrical (110kV) and communications cabling from the proposed 110kV substation to the existing Dunmanway 110kV substation and associated works.

Submission by Clive Evans and Teresa Hackett , Ardrah, Mealagh Valley, Bantry, Co: Cork P75 WR26.

A Chara

We very strongly object to this proposed wind farm project. We are astonished to discover that yet again Ardrah (along with associated townlands) is being proposed as a suitable site for a wind farm. The initial wind farm for Ardrah was proposed in 2011 as an appropriate site for **5 turbines of a height 64 metres and was rejected on appeal by An Bord Pleanala in 2014. Please find enclosed a copy of our objections submitted on 10/12/2013 for your reference.**

Page 2

This new proposal is for **14 turbines with a tip height of 169 metres**. The current proposal is far more ambitious in scope than the proposal in 2011. If the Ardrah proposal in 2011 was deemed unsuitable then, when the plan included far less and far smaller turbines, it is clearly still unsuitable now, environmentally and concerning the landscape nothing has changed

Please find below the inspector's report concerning the original application for the Ardrah wind farm.

Background:

Ardrah Townland: Ardrah is the townland immediately to the West of the Maughanaclea Hills.

It is important to note that these lands have now been gathered into the application for Enerco's Maughanaclea Wind Farm.

Original Application timeline:

- **30/05/2011:** An application for a wind farm at Ardrah was made for 5 wind turbines, with a hub height of 64 metres and a rotor diameter of 71 metres. (Tip height is 99.5 metres). It included an electrical tail station compound, a sub station and ancillaries. (these papers are no longer available on the Cork County planning website or An bord Pleanala's.) Pre-planning meetings with CCC had been held on 02/08/2009 and 23/03/2011. After submitting the application the developers were allowed six more months and re-submitted reports containing significant further information on 18/01/2012. Forty (40) objections letters had been received against both applications. Planning permission was granted by CCC on 15/03/2012, subject to 22 conditions. (They included removing the foundations of the turbines if fully or partially decommissioned)
- **10/04/2012:** Third party appeal was made to An Bord Pleanala, to rescind Cork County council's decision to grant permission for a wind farm at Ardrah. **On 13/12/2012** Atkins consultants were informed that they were required to submit the following to An Bord Pleanala by 15/10/2013.
- A revised noise assessment for baseline monitoring to quantify background noise levels.
- A revised Landscape and Visual impact Assessment taking into consideration cumulative impacts of other permitted and potential developments, particularly within The Mealagh Valley.
- Further surveys of habitats, flora and fauna.
- Proposed sub-station should be re-located to achieve sufficient separation from a tributary of the Mealagh River.

Page 3

- Outline, for all stages of development, the purpose and scope of the Ecological Site Management plan., including particular actions to protect water quality.
- Assessment of impact on known alignment of certain monuments, including the stone row (Co-106-008) with the summit of Seen, 29 Km to the northeast.
- In acc. With Article 111(2) of the Planning and Development Regulations 2001-2011, a description of the likely significant effects of the proposed development on air and climate factors
- **08/07/2014 : An Bord Pleanala gave their decision to REFUSE permission for the above, proposed development based on the reasons and considerations set out below.**

1. The Cork County development plan 2009 sets out policies and objectives in relation to wind energy development and identifies areas in broad strategic terms for the location and siting of such development, identifying "Strategic Search Areas " and "Strategically Unsuitable areas." The overall strategic approach as set out in the said development plan Is considered to be reasonable. The proposed development which is not located within a 'Strategic Search Area' , is located immediately adjacent to areas designated as 'Strategically Unsuitable Areas.' which would be unsuitable for wind energy projects and where such projects would normally be discouraged.
2. The proposed development, which by itself be visible over a wide area, would in conjunction with permitted and proposed development in the area, give rise to an undue concentration of wind energy development with significant negative impacts on the landscape character and visual amenities of the area and be contrary to the proper planning and sustainable development of the area. (Decision 08/07/2014, held on A Bord Pleanala website . Ref PL 88.240461.

No appeal was given to/ made by the first party to the High Court regarding this refusal.

I now refer to the Cork County development plan 2022-2028

Gi 14.9 County development Plan objectives : Landscape

- a. **To 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 proactive 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 ridge lines from development.**

Page 4

e. Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows, historic walls and other distinctive boundaries.

The developer's plans to erect wind turbines of a magnitude never seen in this area before, will effectively turn this area into a semi -industrial zone. How does that correspond with the CCDP objectives above?

Landscape Character Assessment –

First written in 2007 and included in all subsequent development plans. The Ardrah section of the proposed wind farm is in (LCT) Landscape Character type LCT15a.

LCT 15a has the following attributes: **High Landscape Value, High Landscape Sensitivity, Local importance.** High Landscape sensitivity areas can be considered for wind farms in restricted circumstances. However this high value landscape will be **significantly** impacted by the presence and sight of the proposed turbines .

At its narrowest points the boundary of the site on Ardrah LCT15a is only 240 and 400 metres from LCT4 also in the Ardrah townland. **Our property and lands are sited in Ardrah LCT4, LCT4 is designated as Very High Landscape value, Very high sensitivity and of national importance.**

Very High Landscape value areas are normally discouraged for windfarm development. However the wind turbines are being considered in LCT15a, which is very close to our property in LCT4.

How close can the developers actually site their turbines to an area designated 'normally discouraged', given that it is normally accepted that houses within 2KM of turbines must be assessed for noise effects, vibrations, shadow flicker and visual impact?

The potential developers have made no attempt to assess our property for any of these issues.

In one tiny area, the Ardrah townland you have two completely contradictory landscape designations. **Wouldn't it be logical for the whole townland to be designated Very High Landscape Value?**

Additionally, there is no distinguishing line between LCT15a and LCT4 , which hugely concerns us. It would be very easy for the developer to overstep from one area to the other should this development go ahead and removing unauthorised development is always harder than not doing it in the first place.

Page 5

The LCT4 area goes all the way down the local peninsulas and is considered to be **our most valuable landscape by** Cork County Council. It is one of the most beautiful parts of Ireland with a significant local community.

Tourism is a massive part of the revenue for many in this area and has the potential to be greatly increased, reflecting the immense rising interest in the natural world, both seascapes and landscapes, dark skies, flowers and fauna and in hiking, cycling, horse riding and other outdoor pursuits. It will massively, negatively impact on Tourism to destroy some of our most valuable landscapes and part of the lungs of the country to build a wind farm. Visual destruction will also include cruise ship tourism as this development will be easily seen from Bantry Bay.

Unlike other countries, Ireland can't provide sun or skiing holidays, nor has many towns or other buildings of historical interest. The landscape and seascape are what tourists come to see and immerse themselves in. Although, most unusually, the Meallagh Valley including Ardrah as well as natural beauty, also has a significant number of bronze age monuments . (Basically a Bronze age Manhattan) It is vital this area is preserved for present and future generations. In the long-term tourism is likely to provide far more income and far less harm, than any potential windfarm.

The concerns about the development of High Sensitivity and Very High Sensitivity Landscapes also confirmed by the following CCDP policies. G14: Green Infrastructure and Recreation Chapter 14: page 315+:

The attributes applicable to LCT15a and LCT4 (the Ardrah townland) are the following.

G14 8.5 High Sensitivity Landscapes are vulnerable landscapes with the ability to accommodate **limited development pressure**. In this **landscape quality is ranked at a very high level, landscape elements, are highly sensitive to certain types of change**. If pressure for development exceeds the landscape's limitations the character of the landscape may change.

Very high sensitivity landscapes are extra vulnerable landscapes (e.g pristine glens and upland areas of national importance.), which are likely to be fragile and susceptible to change.

Logically, this area should be being turned into a National park, not a semi -industrial zone.

We are not aware of any demand for wind farm tourism.

G1 14.8.10 The key role of the draft landscape Strategy of of Cork County is to assist in the achievement of sustainable development, by promoting an approach to Landscape planning and management, which links objectives and recommendations to existing planning policies.

Page 6

To recognise that landscapes are dynamic and continuously evolving , the objectives do not try to prevent new uses or changes but **to manage the change ensuring that the past remains visible for future generations.**

How would building a wind farm on a scale never seen locally comply with those objectives? It is extremely unlikely that future generations will see this as preserving their heritage and they would be correct.

GI 14.8.11. The capacity of each landscape character type to absorb new development will largely depend on the sensitivity of the landscape type. Developments which are likely to create a significant environmental land particularly visual impact will be best absorbed in areas where the landscape is robust. i.e Has the ability to absorb development without significantly changing its character. All developments should be assessed on a site by site basis, **To avoid, minimise any potential environmental impact.**

This is not going to be the case here, If this wind farm is built, this beautiful area will be changed forever. Not just the multiple locations of the wind farm, but much more heavily used local roads, hugely increased noise and vibrations, reduction of birdlife/ flora/ wild animals, inadvertent destruction of historical monuments and ancient hedges and walls. Much will be lost that is irreplaceable. It will be the death of a natural world by ill- conceived progress and the greed of a few at the expense of all citizens of Ireland. .

GI 14.8.12 Seascape assessment is an extension of the landscape character assessment of 1,100 km coastline, seascape is a crucial element of the country's history, identity and culture.

The wind turbines would be sited on the ridge and will be seen for miles, including from Bantry Bay with its developing cruise ship tourism .

ET 13: Energy and Telecommunications Chapter 13 : p292+

ET13.5 County Development Plan Objectives for wind Energy Projects

LCT 15a falls into the 'Open for consideration' for potential wind farms and LCT 4 falls into 'Normally discouraged for wind farms' . These areas with conflicting objectives are cheek by jowl with unclear boundaries.

Surely the only sensible way forward here is to be cautious and effectively treat both areas as normally Discouraged for wind farms.

Page 7

P298 ET 13.7 County Development Plan objective: Open to Consideration

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

- **Residential amenity particular in respect to noise, shadow flicker and visual impact.**
- **Nature 2000 sites, Natural Heritage sites, 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.

As an upland area of immense natural beauty, rare upland/ bog, flora, fauna, Invertebrates and birdlife and an extremely important area of **Archaeological Heritage**, the proposed wind farm is clearly contradicting all of the objectives above.

P299 ET 13.8 County Development Plan Objective: NORMALLY DISCOURAGED

Commercial wind energy developments will be discouraged in these areas which are considered to be sensitive to adverse impacts associated with this form of development (either individually or in combination with other developments) . Only in exceptional circumstances where it is clear that adverse impacts do not arise will proposals be considered.

The high Value and extremely high value landscapes of Ardrah will be significantly impacted by the presence and sight all these turbines, as will other townlands In the Maughanaclea wind farm proposal. For example Cousane on the R585 (often considered the entry to West Cork) and including the Cousane gap is also considered High Value Landscape.

Additionally there are currently other five wind farms being considered in this area of West Cork. They are Curraglass, Gourtoughra, Goulacullin, Derrenacarrig and Maughanaclea (which includes the Ardrah townland).

Page 8


So while **the impact of one wind farm would be significant**, the cumulative effect of all these wind farms if accepted, will cause devastating visual impact , lifestyle disruption and destruction, (noise, vibrations, light flicker, pollution of water table, potential flooding and more). These cumulative adverse impacts will mean that the current fabric and society of the area will be destroyed.

Conclusion

There is no overriding justification or need to allow this proposal in this area of such high sensitivity. Government targets for wind farms do not override in any way the statutory Development Plan Policy requirement to ensure that energy projects do not cause unacceptable environmental or landscape harm.

In the interests of the proper planning and sustainable development of the area, this proposal should be dismissed and planning permission refused.

Mise le Meas



Clive Evans and Teresa Hackett (Evans)

Ardrah, Mealagh Valley, Bantry Co. Cork P75 WR26

15/05/2026

Please find enclosed the necessary fee of 50 euros.

SUBMITTED BY EMAIL

Bord@pleanala.ie and a.matthews@pleanala.ie

10 December 2013

PD/KH/11 020

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1

For attn of Aisling Matthews, Executive Officer

Dear Sir/Madam,



Town Planning &
Development Consultants
Highway House
Lower Froyle
Hants GU34 4NB

Tel 01420 520000
Fax 01420 521111
Email pda@ic24.net

FIVE NO. ELECTRICITY GENERATING WIND TURBINES WITH A HUB HEIGHT OF 64 METRES AND A ROTOR DIAMETER OF 71 METRES, AN ELECTRICAL TAIL STATION COMPOUND AND SUB-STATION BUILDING, CAR PARKING SPACE, ACCESS ROADWAY AND A TEMPORARY ROADWAY TO BE USED DURING THE CONSTRUCTION PROCESS, BORROW PIT, PEAT STORAGE AREAS AND ALL ASSOCIATED SITE WORKS

ARDRAH, KEALKIL, BANTRY, CO. CORK

ABP REF PL 88.240461

Thank you for your letter dated 13 November 2013.

I am writing on behalf of Clive and Theresa Evans of Ardrah, Mealagh Valley, Bantry, Co Cork to provide further objections in response to the additional information in the 'Proposed Ardrah Wind Farm Development, Co. Cork – Further Information Document' dated 14 October 2013 produced by Atkins for the appellants.

My clients are the owners of one of the residential properties closest to the Appeal Site and therefore most likely to be affected by the proposed development. These further objections concentrate on the landscape and visual and noise impacts of the proposed development.

Landscape and Visual Impact

The Atkins document contains a landscape and visual impact assessment undertaken by MosArt Architecture, Landscape and Urban Design. This seeks to assess the cumulative impacts of the proposed development with other permitted and proposed wind energy developments particularly those within the Mealagh Valley at Barrboy and Dereenacrinnig West.

The report is flawed and cannot be relied upon because it is incomplete in two fundamental respects. Firstly, the text preceding Table 1.2 refers to eleven existing and five permitted wind farms within the study area but the table only includes two existing wind farms. Figure 7.4 showing cumulative visibility only includes two existing and five permitted wind farms

and the report does not include any assessment of the other existing wind farms within the study area. Secondly, no assessment is given in Table 1.3 or the text for visual reference points VP15, VP16 and VP17 shown on Figure 7.4.

Even with these shortcomings and omissions the assessment acknowledges and accepts that the proposed development will have impacts. I draw to the Inspector's attention to the following:

1. The assessment acknowledges that the cumulative impacts of wind farms tend to be adverse rather than positive as they relate to the addition of moving manmade structures into a landscape and viewing context that already contains such development.
2. The assessment acknowledges that adverse cumulative impacts can arise by an increased sense of proliferation; a sense of being surrounded by turbines with little relief from the view of them; and visual conflict and disharmony caused by disparate extent, scale or layout compared to neighbouring developments.
3. Table 1.2 notes that 5 of the 7 wind farms considered by the assessment are permitted so there is no actual impact from these 5 farms at the present. The Inspector is asked to consider most carefully the likely cumulative impact once all 5 of the permitted farms are constructed.
4. The assessment considers that the appeal site is within a landscape context of 'mountain moorland' and 'transitional marginal' landscape types. The assessment notes the aesthetic effect of wind farms in mountain moorland landscapes is acceptable where each one is discrete standing in relative isolation. The assessment acknowledges that great caution should be exercised in transitional marginal landscapes as a critically adverse effect might result where two or more wind energy developments are visible within a confined setting.
5. The assessment accepts that there are combined views (two or more wind farms within a single viewing arc), succession views (within a series of viewing arcs from the same location) and/or sequential views (view of different developments moving along a linear receptor) from a number of viewpoints: VP2, VP5, VP6, VP7, VP8, VP9, VP10, VP11, VP13 and VP14.
6. The assessment acknowledges that given the elevated and expansive views afforded from the southwest of the study area, particularly above Bantry (VP7 and VP9) the proposal is clearly visible in conjunction with other wind energy developments on the skyline and that cumulatively the proposal contributes to a greater sense of 'skylining' in conjunction with these other wind farms, namely the Goulacullin (Barrboy) and Derrenacrinnig wind farm developments
7. The assessment acknowledges that from both VP8 and VP9 it would be possible to see the proposed development and the combined developments of the and Glanta Commons and Dromoureen Wind Farms a short distance to the southeast and it accepts together these contribute to wind energy developments becoming a characteristic feature of the wider study area.
8. The assessment acknowledges that from the immediate south and southeast (VP13 and VP14) the proposed turbines will be visible in conjunction with the closer permitted developments of Goulacullin (Barrboy) and Derrenacrinnig both within 5km of the proposed development.
9. The assessment acknowledges that from a short distance to the northeast (VP1 and VP2) the proposed turbines will be visible in conjunction with several turbines from the permitted Goulacullin (Barrboy) wind farm which rises above the saddle of the

skyline to the southeast. It therefore accepts there would be successional and sequential views of the developments within a wide viewing angle.

10. The assessment acknowledges that from the vast elevated vistas from the southeast the proposed turbines would be viewed in conjunction with the Grousemount, Carran and Cappaboybeg wind farm developments to the north.

The assessment concludes that the additional cumulative impact of the proposed development in the context of other existing and permitted wind farms in the vicinity is medium. The assessment acknowledges that the proposed development would contribute to a sense of wind farm accumulation and dissemination within the surrounding landscape.

It is important to consider these recognized and acknowledged impacts against the policy context of the appeal site and its vicinity.

In this regard I make the following representations:

1. The appeal site is located within an elevated and unspoilt mountainous landscape area with high amenity, tourism and recreational importance and interest. It is considered an area of high scenic and landscape sensitivity.
2. It lies within an 'area of high landscape value and moderate scenic value' identified in the Cork County Landscape Strategy. It is highly visible from an 'area of high scenic and visual importance' listed as a Scenic Landscape in the Cork County Development Plan 2009 (Cousane Gap and Environs), and prominently visible from Scenic Routes S29 and S30. The proposed location is highly visible from an 'area of high scenic and visual importance' listed as a 'Scenic Landscape' in the Cork County Development Plan 2009 (Cousane Gap and Environs).
3. The surrounding landscape is therefore considered to be of high sensitivity and inherently inappropriate for wind energy projects.
4. Plan Objective ENV 2-9 of the Cork County Development Plan seeks to preserve the character of all important views and prospects, including views of unspoilt mountains, upland landscapes and views of natural beauty as recognised in the Landscape Strategy. Plan Objectives ENV 2-11 and ENV 2-12 seek to preserve the character of protected views and prospects of Scenic Routes identified in the Plan.
5. Cork County Development Plan Objective INF 7-4 sets out relevant policy tests for wind energy projects. Criterion (i) states that potential wind farm developers should focus on the identified Strategic Search Areas (SSA) identified in the Plan and generally avoid wind energy projects in the Strategically Unsuitable Areas (SUA) wherein there is a presumption against new wind farm developments. (Note: The Plan para 6.7.12 states these areas have been identified on a broad level and in broad strategic terms and the precise boundaries shown in the Plan should not be treated in absolute terms.
6. The appeal site does not lie within a Strategic Search Area. The nearest Strategic Search Area (see Figure 6.3 to the Cork County Development Plan 2009) is some distance to the north. The appeal site lies immediately adjacent to an SUA. It is evident that in strategic terms this part of the County is an area of higher landscape sensitivity which is unsuitable for wind energy projects.
7. The original Environmental Impact Statement prepared by Atkins and accompanying the appealed application acknowledges there has been no formal site selection process or consideration of alternative site options. Any landscape and visual impact assessment therefore has to retrospectively justify a pre-selected location. Such an approach is not in the interests of the proper planning of the area and

ignores the approved Development Plan policy approach to identifying SSAs and SUAs.

The MosArt assessment recognizes that the proposed development will result in additional cumulative impact in the context of other existing and permitted wind farms in the vicinity. The assessment acknowledges that the proposed development would contribute to a sense of wind farm accumulation and dissemination within the surrounding landscape.

The cumulative landscape and visual impact assessment therefore fails to demonstrate that the proposed development satisfies the Council's Development Plan policies for wind energy projects and protecting countryside areas of high sensitivity. My clients maintain their strong objections to the proposed development.

The proposal is considered to have a detrimental impact on views from designated Scenic Routes, adverse impacts on unspoilt areas of amenity, tourism and recreational importance; visually and unduly obtrusive and out of character; harmful to the natural beauty of an area; adverse impact when considered cumulatively with other existing or approved wind farm developments.

It is important that there is consistency of decision-making in the application process. Previous proposals for wind farms in this part of the Mealagh Valley – one immediately south at Ardrah and one 2-3 kms east at Coomleigh – have been refused principally on the grounds of visual impact on the Valley.

The Environmental Statement submitted with the application (and particularly the photomontages) clearly show that from a number of important public viewpoints the proposal will be visually very prominent and harmful to the unspoilt character of the area. The Environmental Statement also demonstrate that the scale of the proposed development would be overbearing and dominant compared to the scale of existing properties in the area, particularly my clients' residential property.

Noise

A review of the noise impact assessment in the original Environmental Statement undertaken by Damian Brosnan MIOA MIES MIEI of DixonBrosnan Environmental Consultants dated 22 June 2011 which was appended to the grounds of appeal submitted by Mr Tony Cohu on behalf of local residents highlighted a number of flaws in the methodology of the assessment.

The revised noise assessment fails to address these criticisms:

1. The assessment does not include a baseline study of ambient noise levels at all sensitive (residential) receptors within a 2 -3 km radius of the application site. Instead it uses data from three field locations LT1, LT2 and LT3 rather than from the noise sensitive receptors. It cannot be certain that the use of these field locations provides a robust assessment of background noise levels at each of the receptors.
2. My client's property (R6) lies between field locations LT1 and LT3 but is closest to LT1. The assessment uses LT3 as the background 'comparator' site for R6 without explanation or justification.
3. Table 2.3 indicates predicted noise levels of 33.3 dB(A) (6 m/s wind speed) and 39.0 dB(A) (10 m/s wind speed) at my client's property (R6). These are lower than the existing measured background noise levels at both LT1 and LT3. No explanation is provided as to how it is expected that the introduction of the wind farm will result in reductions to existing background noise levels. These figures cannot be relied on with any confidence.

4. The assessment, para 2.55, suggests the Ardrah area is a low noise environment and therefore the DoEHLG 2006 guidance on fixed limits of 35 dB(A) during amenity hours and 45 db(A) for night hours can apply. This is incorrect. The DoEHLG guidelines state that a 'low noise environment' is one where background noise is less than 30 dB(A), in this case, measured levels at both L1 (33.7 dB(A)) and L3 (35.4 db(A)) were above this level. The chosen noise criteria in Table 2.2 are therefore incorrect.
5. The DoEHLG 2006 guidelines were prepared prior to the World Health Organisation adopting a European target limit in 2009 for outdoor night noise levels of 40 dB(A) which it advises is necessary to protect the public, including the most vulnerable groups such as children, the chronically ill and the elderly. Table 2.3 shows that several of the noise sensitive receptors will exceed this limit.

The other representations previously made on behalf of my clients remain relevant and material to the Inspector's determination of the appeal.

Conclusions

There is no overriding justification or need to allow this proposal in an area of such high sensitivity. Government targets for wind farms do not override in any way the statutory Development Plan policy requirement to ensure that energy projects do not cause unacceptable environmental or landscape harm.

In the interests of the proper planning and sustainable development of the area, the appeal should be dismissed and planning permission refused. The proposal is considered contrary to the following Development Plan policies:

ENV 1-9 - Features of Natural Interest

ENV 2-6 - General Visual and Scenic Amenities

ENV 2-7 - Scenic Landscape

ENV 2-9 - General views and Prospects

ENV 2-11 - Scenic Routes

ENV 2-12 - Details of Scenic Routes

ENV 2-13 - Development on Scenic Routes

INF 7-1 - Protection of areas of recognised landscape importance

INF 7-4 - Criteria for assessing wind energy projects

My Clients previously requested an oral hearing and submitted payment of €50 in accordance with the Regulations. We maintain the view that an oral hearing is necessary in this case given the significant national and local issues raised (as set out in our previous grounds of appeal and those submitted by Mr Tony Cohu on behalf of local residents) and the proper application of EU law in relation to impacts of the proposed development.

Yours sincerely,



PAUL DICKINSON
BA (Hons) T&CP MRTPI MRICS MCMI