Ian Collins
Maulakieve
Bantry
Co.Cork

20.MAY.2026

The Secretary.
Strategic Infrastructure Dev. Dept.
An Coimisiún Pleanála
64, Marlborough Street
Dublin 1.
D01 V902

ACP ref no. **PAX04. 324165**
Council: Cork County Council.
Applicant: Maughanaclea Ltd: Enerco Energy Ltd, A member of the Craydel Group.
Company Directors/Subscribers: Michael Murnane. David Murnane.
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. The surrounding area includes operating windfarms, as well as proposed sites, Curraglass, Gortloughra and Derreenacrinnig, which are currently in the planning process.

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.

A Chara

There is much demonstration of qualifications and experience of the many contributors to this EIAR. So I will detail mine.

I have farmed in the Mealagh Valley, approximately 400metres from proposed T14, for the last 48 years. I have walked extensively over the 'southern' site chasing sheep for that time. I have walked and travelled the wider area constantly for that time so I would claim an experienced appreciation of what is called the 'receiving environment'. I have an active interest in the protection of the environment for all that time, and have been a participant and observer of the social and cultural changes that have occurred. This is all in contrast with a few site visits and much burrowing in front of computer screens. I have no ability to type as such, and my computer skills are rudimentary at best. However, I am qualified and have authority in understanding the Mealagh valley and the Maughanaclea hills down to and beyond the road leading to Kealkill. I would hope that due weight is therefore given to this submission put forward to An Coimisiún Pleanála, as it demonstrates that the proposal materially contravenes multiple planning policies and legal requirements, and documents presented in the application have significant substantive shortcomings.

I have to highlight the very considerable disadvantage any member of public has to contend with: three years of specialists preparing the EIAR and only six weeks for anyone to construct counter arguments. In addition, a decision was announced regarding the Derreenacrinnig application which also intimately affects all the residents in the Mealagh Valley who may wish to appeal that decision. A perfect storm has been created for them. It feels like a David and Goliath situation and it can only be hoped that An Coimisiún Pleanála and/or its inspectors will scrutinise this application with intensive care to ensure every contention and conclusion in the EIAR is valid and demonstrated. Within the EIAR there are many contentious assertions which while sometimes small on their own are presented as cumulatively substantial evidence for the project impacts being as stated. A very cautious approach would be appreciated, in the light of An Coimisiún Pleanála's declared recognition of the *'value and dignity in everyone. We are clear on the right of fair, accessible participation for all in the planning system'.*

There are a number of important points I would like to bring to An Coimisiún Pleanála's attention.

1. The Metrological Mast placed in the Ardrah townland was erected in December 2024, with no public consultation. I can find any documentation in the application to indicate if planning permission or exemption had been granted for this mast. This mast has now been removed but the broken remains of the mast erected by one of the participating landowners in the previous 11/318 application for a wind farm at Ardrah is still present on site.

2. There is no assessment in the EIAR of the existing character of the proposed sites.

3. The conclusions of the archaeological and culture heritage seem at variance with that said before, and Chapter 14 completely ignores the published work and commentary of David Myler.

4. In the EIAR 'Non Technical Summary' and Chapter 15, the cumulative effects of a proposed wind farm closest to the 'Maughanaclea' site are completely ignored.[1] The paperwork for Derreenacrinnig confirms its proposed turbine haul route is also from the port of Ringaskiddy, near Cork. [2]

5. Constantly, in the paperwork, this local area is described as 'sparsely populated'. It is not. Within 2km of the proposed sites are 216 dwellings, of which 69 are within 1Km. The agents

[1] p.15-57, Chapter 15 Material Assets. 15.1.13.7.1. Other Wind Farms.

[2] p.4, 4. 2.3 Jennings O'Donovan: Proposed Turbine Component Haul Route, Appendix11.1 Traffic Management Plan.

declare 279 dwellings as needing assessment as Noise Sensitive Locations.[3] From the EIAR Chapter 5 (5.3.1.3) the number of people per dwelling being *'2.75 per household'*, the number of people affected would be in excess of 750. In such a small area, this is hardly a 'sparse' population.

6. Just how unlikely this development, should it be constructed, would not be a permanent fixture in the receiving environment. It is so costly, there is no realistic prospect of its energy production capacity to ever become redundant or too costly to replace within a time span of >100 years.

7. it is worth here reminding the parameters in the CCDP in areas 'Open to Consideration', where proposals must avoid adverse impacts on a) residential amenity, Particular noise, shadow flicker, and visual impact. b) Architectural and archaeological heritage and c) Visual quality of the landscape and the degree to which impacts are highly visible over wider area. NOTE: In planning such development, consideration should also be given to the cumulative impacts of such proposals.

8. In the face of a very long, detailed, and apparently authoritative, EIAR there are only certain individual chapters that can be covered.

Is mise, le meas

IAN COLLINS

[3] p. A12-3-8 Appendix 12-3 Noise Modelling Parameters.

Ian Collins
324165

PLEASE REFER TO Ch 2 EIAR

EIAR, Chapter 2: Background to the Project.

In Chapter 2, the reiteration of the various policy frameworks and decisions at World, EU, National, Regional, and County Level are all presented with a clear inference that more land based wind developments are clearly required to meet targets, yet this is only a very small part of the case. There are alternatives to just building more and more onshore wind and solar generators. On their own, they are not the answer and planners should acquaint themselves with the total picture before accepting the argument for an overarching necessity for more developments. Government decisions to encourage and allow rapid growth of electrical demand from new data centre developments is causing a large part of our problems as detailed numerously elsewhere. The literature available from authoritative sources is readily accessible and not to be repeated here. The 'Background to the Proposed Project' seeks to overwhelm the planner with reasons to permit without any assessment of the receiving environment at all. So despite 92 pages making an unanswerable case for the necessity of renewable and sustainable energy generation it doesn't show how this particular development would be able to fit into that strategy or when its contribution could be used or how. The grid constraints and the growth in demand mainly on the east side of the country have been known about for ten years or more. In 2020, the ESB rolled out a 10 year plan to strengthen the grid at a cost of 15 billion euros by 2030. Now the Minister claimed on 'Prime Time' on 13.5.2026 that the plan was now to spend 19 billion euro on grid changes by 2030. Unfortunately, something needs to be done but blindly adding more wind and solar generating capacity to a system that cannot absorb it is a nonsense. This scheme is putting the cart before the horse at best. The need for this development is not demonstrated adequately and the 'need for it to be in this area' is not demonstrated at all.

There is a Table 2.3 which confuses the reader by stating the planning history of the last 10 years within the planning application boundary and then all of the applications for wind developments and their associated ancillaries within a 25km boundary. Yet within the site boundary there are very few planning applications for domestic permissions (p.2- 43 - p.2-47). This serves to illustrate

I. Inadequate proof reading of this section
II. That there is no definition of what the table is trying to inform the reader of.
III. That there has been an huge increase in applications mostly successful for wind energy developments within the 25Km radius.

It really only serves at best to confuse and at worst to emphasise that the area around this application is already hugely degraded visually by a plethora of developments, fortunately at present only distantly visible from this area. Next comes a table, also referred to as 2.3, which informs that there are already 218 wind turbines existing within the 25Km radiused area, 19 further permitted and 25 already proposed ,in addition to these (2.7.2) 14 in this application.

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Curraglass Application: for application registered 06/11/2025	Maughanaclea Application: for application registered 30/03/2026.
EIAR Volume 1A: Background to proposed development Chapter 2, p.2-42.	EIAR Volume 1A: Background to proposed development Chapter 2 p.2-43.
Section 2.7.1 reads: A planning search was carried out through the national planning application database and An Coimisiún Pleanála's online planning portal in August 2025. This was undertaken to search for planning applications that have been submitted for planning and that of which fall within the planning application boundary of the Proposed Development.	Section 2.7.1 reads: A planning search was carried out through the national planning application database and An Coimisiún Pleanála's online planning portal in February 2026 for relevant planning applications submitted within the past 10 years that fall within the planning application boundary of this application.
Information provided on the Curraglass site: its full site history, all the planning processes, decisions of permissions and refusals from **12/10/2001** to 27/08/2020 and 15/05/2024.	**Nothing for the Ardrah site.** i.e. No planning history for the Ardrah site is provided, despite three years of going through the planning process, and its ultimate refusal for planning in 2014 by An Bord Pleanála.

[4] p.13 Planning Report 3.3 Planning History reads: 'A planning search was carried out through national planning application database and An Coimisiún Pleanála's (ACP) online planning portal in March 2026 for planning applications that fall within the planning application boundary of the Proposed Project within the past 10 years. The relevant planning applications are outlined in Section 2.7.2 of Chapter 2 of the EIAR and in Table 1 below.' (Table - courtesy of T Colk Lynch -thank you.)

[5] Also see Appendix for planning history for the Ardrah part of the site .

Hence Chapter 2, titled Background, and its Assessments, is critically flawed. In fact the site of the proposed development is in the upper ends of two of the valleys which from the landward framing to Bantry Bay and are part of a landscape of National, if not International importance. It has been recognised as such for more than 150 years: the Eccles Hotel in Glengarriff being older than that. Further comment is explored in this submission's section on Chapter 13: Landscape and Visual.

FROM IAN COLLINS RE ~~25/5052~~ ACP PAX04 324165 PART OF APPENDIX

HISTORY OF PLANNING APPLICATIONS FOR WIND FARMS IN THE UPPER HEALACH VALLEY

AT GOULACULLIN:-

97/1802 Erection of 40m Meterological Mast. conditional Permission Granted

97/4390 12 Turbines refused by Cork CC appealed 04.108937 refused by An Bord Pleanála (ABP) Bord decision appended

99/5076 12 Turbines refused by CCC appealed 04.117428 refused by ABP. Inspectors Conclusions and Recommendations appended

02/5124 5 Turbines permitted by CCC not appealed Turbine ht. 76m

08/2119 5 Turbines permitted by CCC repeat of 02/5124

14/143 5 Turbines permitted extension of duration of above 08/2119 no submissions accepted

19/112 5 Turbines as above further extension of duration of 08/2119. Refused as time limit expired.

14/79 Planning Permission for extension to dwelling refused as an example of the planning conundrum of appearance of dwellings as opposed to appearance of Wind Farm immediately adjascent.

AT COOMLEAGH

99/1228 40m 'Wind Pole' (address given as 'Cousane') conditional permission

99/1708 20 Turbines refused by CCC

99/5557 7 Turbines 66m refused by CCC appealed to ABP 04.117606 refused Inspectors Report's conclusions appended

05/5388 50m 'Wind Pole' incompleted application

AT COOMNORE SOUTH /MULLAGHNESHA

98/1166 20 Turbines 70m refused by CCC appealed to ABP and refused ABP 04/108995 Bord Decision & Inspector's conclusions appended

AT DERREENACRINNIG

10/857 7 turbines 81m permitted by CCC appealed to ABP 88.239767 Inspectors recommendation to refuse appended but overturned by Bord

AT AGORAH

11/318 5 Turbines 110m permitted by CCC appealed to ABP 04.240461 refused on appeal Inspectors Recommendation appended

AT CUMMEEN

18/176 4 turbines 125m rejected by CCC

IAN COLLINS ACP 324165

PLANNER'S REPORT

PRIMARY

APPLICATION NO.	14/00079
APPLICANT	Pádraig O'Brien
DESCRIPTION	Construction of a dwelling house attached to an existing dwelling to the north and west elevation of the existing dwelling house
LOCATION	Goulacullin Bantry Co. Cork
DECISION DUE DATE	01/04/2014

***Site notice displayed** 18/03/2014*

THE DEVELOPMENT AND ITS PLANNING CONTEXT

This proposed development comprises of the following: The construction of a new dwelling house of 309sqm to be attached to an existing dwelling measuring 59 sqm on a site located in an isolated rural area between Bantry and Dunmanway. The site is located above the road level within an existing farmyard complex.

In terms of planning designations, the area has no specific designation. The site is located close to the Bandon river sac catchment but is located outside the screening zone.

The primary planning issues in this case would appear to be as follows:

1. **Whether the design and layout of the proposal are satisfactory.**
2. **Whether the proposal accord to the proper planning principals of the area.**

Site is located in an uncontrolled rural area, where proposals are subject to normal proper planning criteria.

Relevant planning policy objectives.

ENV 4-13; Design and Landscaping of new dwelling houses:
(a) It is an objective to encourage new dwelling house design that respect the character, pattern and tradition of existing places, materials and built forms and that fit appropriately into the landscape.

Other Considerations

No Pre-planning discussions have taken place.

A check of the planning history in the area shows no previous history on this site.
Permission was granted in the vicinity of the site for a 5 wind generator turbine development 08/2119. Note that this has not been constructed.
Permission refused for 20 no wind turbines and associated site works. - 99/1708.

To date, no third party submissions / observations have been referred to me:

The key points from the other technical reports on file include:

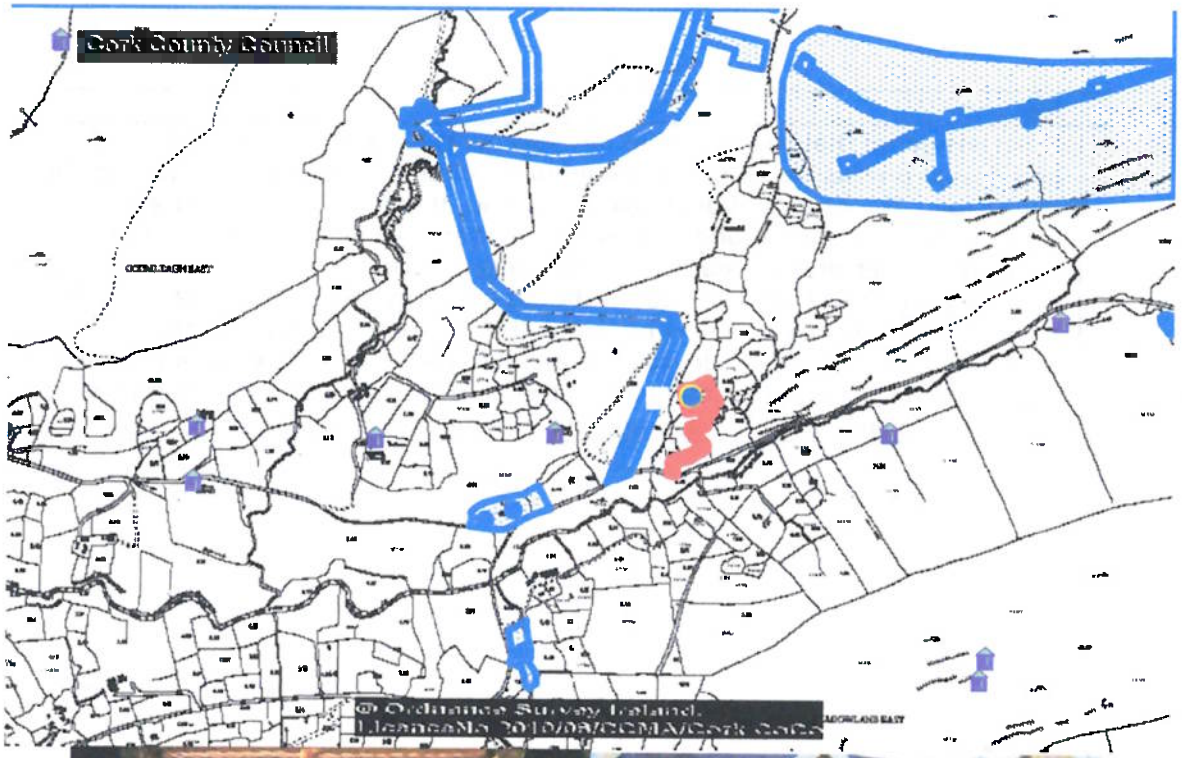
- Area Engineer (report dated10/03/2014): Raises no concerns.

ASSESSMENT & RECOMMENDATION
The site is located in a relatively isolated rural area to the East of the Melagh valley. The area has no specific designation in terms of the listing in the current County development plan. The area is however quite scenic and regardless of the lack of listing warrants some protection. The site which has a small dwelling of 50sqm is located in a traditional farmyard setting located above the road level. There is a new family home located at the bottom of the road and there is a private access track winding up to the existing cottage.
I have serious concerns regarding the scale and design of this proposal and I note that the applicant has not applied for an extension but a new dwelling attached to an existing dwelling. It is mentioned that the applicant cares for an elderly relative and it is not quite clear if this person resides in the existing dwelling on the site.
Regardless of the above I generally find that the new proposal is wholly unsuitable in terms of the overall design proposed. The scale is considered grossly excessive and the variety of design features proposed do not demonstrate any understanding of the rural design guideline brief. I find that it may be difficult to extend this dwelling due to the overall scale proposed . The new dwelling of 309 sqm will be attached to an existing unit of 59sqm. The existing unit is a narrow gabled traditional farmhouse and one may have to question the merits of its retention in this particular case.
I find that it would be very difficult to defer this application for a revised design as there are so many elements which would need alteration I would suggest a complete re-think of the entire project and perhaps a preplanning meeting.
While I have no objection in principal to allowing a new dwelling on this site, this is obviously subject to 'normal proper planning principals' where design would be a general consideration.

Having considered the application visited the site and inspected the documentation submitted I recommend refusal for the following reason.

PROPOSED REFUSAL REASONS

No.	*Reason*
1.	It is considered that the proposed development, by reason of its bulk, scale and design on this elevated site would form an unduly obtrusive feature in the landscape. The proposed development would, therefore be out of character with the pattern of surrounding development and would seriously injure the visual amenities of the area and would materially contravene the provisions of policy objective RCI 13-1 set out in the Cork County Development Plan, 2009, which seeks to encourage new buildings that fit appropriately into the landscape. The proposed development would therefore create an undesirable precedent for similar developments in the area and would thus be contrary to the proper planning and sustainable development in the area.



Existing dwelling on site

Refuse Application

No.	Reason
1	It is considered that the proposed development, by reason of its bulk, scale and design on this elevated site would form an unduly obtrusive feature in the landscape. The proposed development would, therefore be out of character with the pattern of surrounding development and would seriously injure the visual amenities of the area and would materially contravene the provisions of policy objective RCI 13-1 set out in the Cork County Development Plan, 2009, which seeks to encourage new buildings that fit appropriately into the landscape. The proposed development would therefore create an undesirable precedent for similar developments in the area and would thus be contrary to the proper planning and sustainable development in the area.

Sean Taylor
19/03/2014

Offered to illustrate the inherent contradictions in planning decisions
Should wind turbines be permitted.

IAN COLLINS ACP 324 165

CORK COUNTY COUNCIL

ORDER NO. WCP/18/223 **O.S. NO.** CK 106 + 107

SUBJECT: Application Reg. Ref. No. 18/00176

For: 4 no. (four) electricity generating wind turbines with maximum tip height of 125 metres, an Electrical compound, Sub-Station Building, 4 no. (four) car parking spaces and all associated site roads and site works. The planning application is accompanied by an Environmental Impact Statement (EIS)

At: Cummeen, Dunmanway, Co. Cork

ORDER: Permission is hereby **REFUSED** subject to the provisions of Section 34 of the Planning & Development Acts, 2000 - 2010

To: Cummeen Windfarm Developments Limited
c/o William Brennan
Ensen Environmental Ltd
Business Innovation Centre
Institute of Technology, Ballinode
Sligo. F91WFW9

For: 4 no. (four) electricity generating wind turbines with maximum tip height of 125 metres, an Electrical compound, Sub-Station Building, 4 no. (four) car parking spaces and all associated site roads and site works. The planning application is accompanied by an Environmental Impact Statement (EIS)

At: Cummeen, Dunmanway, Co. Cork

in accordance with the plans and particulars submitted by the applicant

On: 04/04/2018

and on the grounds set out on the schedule attached hereto.

SIGNED:

Clodagh Henehan
Divisional Manager

Dated this 28/05/2018

FINAL SCHEDULE

No.	Refusal Reason
1	In the absence of details of the proposed grid connection the proposed development does not comply with the requirements of Article 3 of EIA Directive 2014/52/EU, would constitute "project splitting" and would be premature pending the environmental impact assessment of the whole project which shall include any proposed grid connection to serve the windfarm. The proposed development would be contrary to EIA Directive 2014/52/EU and would, therefore, be contrary to the proper and sustainable development of the area.
2	On the basis of the information submitted the Planning Authority cannot determine that the proposed development would not give rise to significant impacts on residential amenity particularly in respect of noise, shadow flicker, visual impacts and the requirements of the Habitats, Birds, Water Framework, Floods and EIA Directives. The proposed development would, therefore, contravene materially Objective ED 3-4, as set down in the Cork County Development Plan 2014, which seeks to protect areas designated as 'Acceptable in Principle' from adverse impacts arising from commercial wind energy development. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
3	Having regard to the location of the proposed development in an area of intact upland peatland, the Planning Authority considers, based on the information submitted, that the development as proposed may result in the loss and fragmentation of upland habitats at the site some of which correspond to habitats of high conservation value which are listed on Annex 1 of the Habitats Directive. The proposed development would, therefore, contravene materially Objective HE 2-3, as set down in the Cork County Development Plan 2014, which seeks to protect biodiversity outside Protected Areas. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

IAN COLLINS ACP 324165

11/318 Inspectors report ARDRAH

4.4 Air and Climatic Effects

I consider that the submission satisfies the legislative requirements in this regard. No significant impacts are predicted. While I note the third party submissions with regard to SEA of national renewable energy policies, I consider that these matters lie outside the remit of the Board.

I note comments with regard to the adequacy of the assessment of climatic effects, questioning whether there is any net benefit from wind energy development. While the issues to be considered in the assessment of greenhouse gas displacement may be a matter for debate, this matter should be considered in the context of national policy for renewable energy and may be considered to lie beyond the remit of this report. The Strategy for Renewable Energy 2012-2020 states that the development of renewables is at the heart of government energy policy, reducing dependence on fossil fuels and reducing greenhouse gas emissions. In this regard, I note that SEAI publications have quantified the level of CO_2 displacement arising from the use of energy from renewable sources, including wind energy. I do not consider therefore that the issues raised would warrant a refusal of permission in this instance.

5.0 CONCLUSION AND RECOMMENDATION:

I consider, based on the information submitted with the planning application and associated further information responses, and the information subsequently submitted to the Board in October 2013, that there is sufficient information before the Board on which to make a determination in this instance.

I have previously raised concerns with regard to the overall landscape and visual impacts of the proposed development, particularly on the character of the Mealagh Valley, when taken in conjunction with other permitted developments in the area. I do not consider that the submissions received have addressed there concerns and remain of the opinion that permission should be refused on these grounds, as follows:

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

P.T.O.

reasonable. The proposed development, which is not located within a "Strategic Search Area", is located immediately adjacent to areas designated as "Strategically Unsuitable Areas", considered generally to be unsuitable for wind energy projects and where such projects would normally be discouraged

The proposed development, which would 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 in particular the Mealagh Valley, and it's amenity, tourism and recreational potential. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

Conor McGrath
Inspectorate

of these windfarms and separation from Natura sites, cumulative impacts are not considered likely.

12.5 Conclusion Statement:
On the basis of the foregoing, it is concluded that significant effects on the Natura 2000 network are not likely.

13.0 CONCLUSIONS

The lands are not subject to any specific conservation or amenity designations which would preclude their development as proposed. The development plan provides, therefore, that development of the nature proposed is to be assessed on its own merits having regard to normal planning criteria.

The development site straddles different landscape character areas, including an area identified as being of High Landscape Value and High Landscape Sensitivity. There are areas identified as Strategically Unsuitable adjoining the site and there have been refusals of permission in the surrounding area for wind energy developments in the past. The site, comprising an area of a remote and rugged landscape, occupies an important position along part of an identified scenic route, which is is development plan policy to protect / preserve. The proposed development would also detract from the setting of Castledonovan Castle, a national monument, when viewed from the scenic route. The development, along with associated works, roads and compound, would have significant negative impacts on the landscape character of this area.

The appeal site is generally characterised by exposed bedrock, where overlying peat deposits are either thin or absent. Having regard to the results of the site investigations, the characteristics of the site and the proposed mitigation measures, and the reports of the planning authority, I am generally satisfied that the development does not present an unacceptable risk to peat stability. Further investigations may be required in relation excavation works associated with T6, however.

The area drains to two important salmonid rivers, the Mealagh and Ilen Rivers. Having regard to the design of the proposed development and the specific mitigation measures proposed, I do not consider that the development would be likely to give rise to significant negative impacts on ground or surface water quality

The site is not affected by any conservation designations. The nearest designated site is Carriganass Castle pNHA over 7km northwest of the site. Only approx. 10% of the site is overlain by peat, with blanket bog occurring only where peat is more than 0.5m deep. No evidence of either Geyers Whorl Snail or Kerry Slug species were found on the site. An area of 1.7ha at the southern end of the site has been identified for habitat restoration. Having regard to the characteristics of the site, the nature of development proposed and the identified mitigation measures, it is not considered that the proposed development would give rise to unacceptable impacts on habitats or species of conservation interest.

P.T.O.

10/857 Inspectors report

There are no known archaeological features of interest within the development site, however, there are a considerable number of such features in the surrounding area. I have previously oulined my concerns about the significant negative impacts of the development on the setting of Castledonovan castle.

Having regard to separation from residential properties, it is not considered that significant nuisance in the form of noise or shadow flicker impacts will arise.

14.0 RECOMMENDATION

Having regard to the foregoing I recommend that the decision of the Planning Authority be overturned in this instance and that permission be refused for the proposed development for the reasons and considerations set out below:

Reasons and Considerations:

The site is located in a remote, rugged and exposed upland area in a rural scenic landscape of amenity, tourism and recreational potential, and visible from a public road which is designated as scenic route (S30) in the current Development Plan for the area. It is an objective of the development plan to preserve the character of all important views and prospects, including views of unspoilt mountains, upland landscapes, views of historical or cultural significance (including buildings and townscapes). Furthermore, it is an objective to preserve the character of those views and prospects obtainable from scenic routes and protect the character and quality of those particular stretches of scenic routes that have very special views and prospects. These objectives are considered to be reasonable.

The proposed windfarm development and its associated infrastructure and site works would comprise an obtrusive feature in the landscape, and would have a negative impact on the landscape character and visual amenities of the area. The proposed development would be detrimental to the preservation of views obtainable from the scenic route, including views toward the castle at Castledonovan. The proposed development, which is not located within a Strategic Search Area for wind energy development, as designated in the County Development Plan, would be contrary to the above objectives of the development plan, and would, therefore, be contrary to the proper planning and sustainable development of the area.

Conor McGrath
Inspectorate

IAN COLLINS. ACP 324 165

INSPECTORS RECOMMENDATION CCC. W/98/1166 Mullaghmesha.

also appear to exhibit certain characteristics of a semi-wilderness area, in particular, the Barnagowlane West to Derreenacrinig West area to the north-east of the appeal site (see photographs 4 and 5 in Appendix B).

I have also considered the Guidelines to Planning Authorities and the Development Plan provisions relating to wind farms, including visibility from Scenic Routes. I note that the Guidelines do allow planning authorities to consider the "cumulative effects of (wind farm) developments."

I do not consider that locating the proposed development on the skyline would 'reduce visual impact', as suggested in the appeal grounds. I note public consultations undertaken with local residents by the applicant, but I also note the contrasting opinions stated in the appeal observations received from the group Meelagh Valley Residents and from local County Councillors (Cllr. Tom O'Neill and Others). It is obvious that the proposed wind farm development at Mullaghmesha has resulted in varying responses from local people.

I would not concur with the first party appellant that Mullaghmesha is 'not unspoilt', as on site inspection I considered Mullaghmesha to be of a particularly attractive scenic character. I fully concur with the planning authority that the proposed development should be refused by reason of visual obtrusiveness in this open unspoilt mountainous area of high scenic amenity, and that the area landscape is incapable of assimilating the proposed development without 'severe' adverse visual impact.

In conclusion, though noting the Guidelines promotion of wind farm as an alternative energy source, on balance, I consider that the proposed large scale wind farm development at Mullaghmesha should be refused permission by reason of visual obtrusiveness in a scenic landscape area, noting the provisions in the Development Plan re 'Renewable Energy' and 'Amenity and Preservation' (in particular re Scenic Route A86), and also the provisions of the Guidelines for Planning Authorities re 'Visual Impact'.

10. CONCLUSIONS AND RECOMMENDATION

In conclusion, further to the above assessment of matters pertaining to this appeal, including consideration of the submissions of each party to the appeal, and including the site inspections, I consider that the proposed development would be contrary to the proper planning and development of the area, having regard to the relevant provisions of the Development Plan, and to the Guidelines for Planning Authorities re Wind Farm Development, which are considered reasonable. Accordingly I recommend that permission be refused for the following reasons:

PTO

1. Having regard to the location of the site in a very elevated and unspoilt exposed upland location in a rural scenic landscape of amenity/tourism/recreational potential and highly visible from a public road which is a designated Scenic Route in the current Cork County Development Plan, it is considered that the proposed large scale wind farm development would be visually obtrusive and out of character in the rural scenic landscape, and would seriously injure the visual amenities and natural beauty of the area. It is considered that the proposed development would be contrary to the objective of the planning authority as set out in the current Development Plan to preserve the views from such roads and would be visually obtrusive and conflict with this objective, which is considered to be reasonable. The proposed development would, therefore, be contrary to the proper planning and development of the area.

APPENDIX A - LOCATION MAP

APPENDIX B - PHOTOGRAPHS (INCL. KEY PLAN)

APPENDIX C - DEVELOPMENT PLAN

Dermot Kelly

DERMOT KELLY
INSPECTORATE

13 May **1999.**

RMcN/SR

IAN COLLINS ABP 329165

BORD DECISION CCCW97/4390

AN BORD PLEANÁLA

LOCAL GOVERNMENT (PLANNING AND DEVELOPMENT) ACTS, 1963 TO 1998

County Cork

Planning Register Reference Number: W/97/4390

APPEAL by George O'Mahony care of Brian Meehan and Associates of 13 Fitzwilliam Square, Dublin against the decision made on the 1st day of October, 1998 by the Council of the County of Cork to refuse permission for development comprising the erection of 12 wind turbines with control building and ancillary equipment for generation of electricity at Goulacullin, Dunmanway, County Cork:

DECISION: Pursuant to the Local Government (Planning and Development) Acts, 1963 to 1998, permission is hereby refused for the said development for the reason set out in the Schedule hereto.

SCHEDULE

Having regard to the Guidelines for Wind Farm Development as issued by the Department of the Environment and the location of the site in a remote, elevated and unspoilt exposed upland area in a rural scenic landscape of amenity, tourism and recreational potential and visible from a public road which is a designated Scenic Route in the current Cork County Development Plan, it is considered that the proposed large scale wind farm development would be visually obtrusive and out of character in the rural scenic landscape, and would seriously injure the visual amenities and natural beauty of the area. It is considered that the proposed development would be contrary to the objective of the planning authority as set out in the current Development Plan for the area to preserve the views from such roads and would be visually obtrusive and conflict with this objective, which objective is considered to be reasonable. The proposed development would, therefore, be contrary to the proper planning and development of the area.

Brian Hunt

Member of An Bord Pleanála duly authorised to authenticate the seal of the Board.

Dated this 25th **day of** May **1999.**

IAN COLLINS ACP 324165

INSPECTORS REPORT CCC W/99/5076

whereas the proposed wind farm turbines - with moving parts - would represent "man-made" industrial type structures with vertical elements of significantly increased height (68.5 metres or 220 feet) in a static landscape with blade tip height ranging up to 483.5 mAOD above the summits of Barrboy (453m) and Coomleigh (450m).

Noting the provisions in the Development Plan (Para 2.38) re further tourism potential in areas such as the Meelagh Valley area beneath the site, I consider that the proposed wind farm development by reason of visual obtrusiveness would seriously detract from such tourism potential in the Meelagh Valley area (and the two proposed wind farms would occupy one site in terms of landscape), and particularly noting that the proposed wind farm would be widely visible from houses and public roads in the Meelagh Valley area, and particularly visible across the Meelagh Valley from the far side of the valley in the Barnagowlane area (see Photos in Appendix B); and in this regard I note that movements at great distances in the natural static landscape can be detected; and that wind farms form highly visible elements in the landscape. I note that the case is often made that such levels of visibility of wind turbines within the landscape may be regarded as "positive", though I would not accept this argument by reason of the scale and elevated location of the proposed twelve turbines with moving parts within the static landscape, and the subsequent extent of visual impact. Nor would I accept that such a "negative" assessment of the visual impact of the proposed wind farm is "subjective" but rather a matter of objective fact by reason of the scale and elevated location of the proposed wind farm development within the natural landscape, and the subsequent extent of visual impact of such large scale wind farm development in the landscape. Any required fitting of aircraft navigation safety lights on the proposed tall turbines (which if fitted as close to the top as possible would be on the moving blade tips) would result in a visual impact from the proposed wind farm even at night-time within the Meelagh Valley area below.

In conclusion, though noting the Guidelines promotion of wind farms as an alternative energy source, on balance, I consider that the proposed large scale wind farm development at Barrboy should be refused permission by reason of visual obtrusiveness in a scenic landscape area, noting that blade tip heights of the proposed wind turbines range up to 483.5 mAOD and that "the sites are located at the eastern end of the Meelagh Valley and are part of the Maughanaclea Hills, which separate the Meelagh Valley from the Cousane Gap to the north. This is largely unspoilt mountain range. The ridge levels vary between 440 and 453 MOD" as stated in the Area Planner's Report dated 9th November 1999; and noting the provisions of the Cork County Development Plan re "Renewable Energy" (in particular re stated reluctance to sanction large scale commercial wind farms) and "Amenity and Preservation" (in particular re Scenic Route A80 and Scenic Area B20); and noting also the provisions of the Guidelines for Planning Authorities re "Visual Impact", which include stating that "the visual impact is among the more important considerations to be taken into account in arriving at a decision on a particular application" (Para 4.8).

10. CONCLUSIONS AND RECOMMENDATION

In conclusion, further to the above assessment of matters pertaining to this appeal, including consideration of the submissions of each party to the appeal, and including the site inspection, I consider that the proposed development would be contrary to the proper planning and development of the area, having regard to the relevant provisions of the Cork County Development Plan, and to the Guidelines for Planning Authorities re Wind Farm Development, which are considered reasonable. Accordingly I recommend that permission be refused for the following reasons:

1. Having regard to the Guidelines relating to Wind Farm Development which were issued by the Department of the Environment to planning authorities in September 1996, it is considered that the proposed development by reason of its scale and prominent elevated location and visual impact on the scenic exposed upland slopes of Barrboy Mountain above the Meelagh Valley, would constitute a visually dominant and prominent obtrusive feature within a sensitive scenic rural landscape of amenity, tourism and recreational potential and would seriously injure the amenities and natural beauty of the area, particularly when seen against the elevated skyline background from public roads in the area, and as such would be contrary to the Guidelines and contrary to the proper planning and development of the area.

2. The proposed wind farm does not conform to the small local based project (of less than 1MW) which the Cork County Development Plan (Para 6.24) considers may be acceptable on carefully selected sites, but is rather a large scale commercial wind farm on an exposed uplands site which site is not considered to be secluded or capable of minimising the visual impact of the proposed wind farm development (and in this context noting also the designated Scenic Routes and Scenic Areas to the north and east from which scenic routes views are designated in the Cork County Development Plan as views to be preserved) and, would be contrary to the stated Renewable Energy policy (Para 6.26) in the Cork County Development Plan re wind farm developments in the County, which policy is considered reasonable, and as such would be contrary to the proper planning and development of the area.

APPENDIX A - LOCATION MAP
APPENDIX B - PHOTOGRAPHS (incl. KEY PLAN)
APPENDIX C - DEVELOPMENT PLAN

Dermot Kelly

DERMOT KELLY
INSPECTORATE

11 April, 2000.
et

IAN COLLINS, 1708524 165

INSPECTORS RECOMMENDATION CCC W/99/5557 COOMLEAGH EAST.

of the scale and elevated location of the proposed seven turbines with moving parts within the static landscape, and the subsequent extent of visual impact. Nor would I accept that such a "negative" assessment of the visual impact of the proposed wind farm is "subjective" but rather a matter of objective fact by reason of the scale and elevated location of the proposed wind farm development within the natural landscape, and the subsequent extent of visual impact of such large scale wind farm development in the landscape. Any required fitting of aircraft navigation safety lights on the proposed tall turbines (which if fitted as close to the top as possible would be on the moving blade tips) would result in a visual impact from the proposed wind farm even at night-time within the Meelagh Valley area below. In this regard it is noted that Para 8.5.8 in the Environmental Statement noted that "the site will not be illuminated at night (apart from a low-intensity flashing light)".

In conclusion, though noting the Guidelines promotion of wind farms as an alternative energy source, on balance, I consider that the proposed large scale wind farm development at Coomleagh should be refused permission by reason of visual obtrusiveness in a scenic landscape area, noting that blade tip heights of the proposed wind turbines range up to 470 m AOD and that "the sites are located at the eastern end of the Meelagh Valley and are part of the Maughanaclea Hills, which separate the Meelagh Valley from the Cousane Gap to the north. This is largely unspoilt mountain range. The ridge levels vary between 440 and 453 MOD" as stated in the Area Planner's Report dated 9th November 1999; and noting the provisions of the Cork County Development Plan re "Renewable Energy" (in particular re stated reluctance to sanction large scale commercial wind farms) and re "Amenity and Preservation" (in particular re Scenic Route A80 and Scenic Area B20); and noting also the provisions of the Guidelines for Planning Authorities re "Visual Impact", which include stating that "the visual impact is among the more important considerations to be taken into account in arriving at a decision on a particular application" (Para 4.8).

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1. Having regard to the Guidelines relating to Wind Farm Development which were issued by the Department of the Environment to planning authorities in September 1996, it is considered that the proposed development by reason of its scale and prominent elevated location and visual impact on the scenic exposed upland slopes of Coomleagh Mountain above the Meelagh Valley, would constitute a visually dominant and prominent obtrusive feature within a sensitive scenic rural landscape of amenity, tourism and recreational potential and would seriously injure the amenities and natural beauty of the area, particularly when seen against the elevated skyline background from public roads in the area, and as such would be contrary to the Guidelines and contrary to the proper planning and development of the area.

2. The proposed wind farm does not conform to the small local based project (of less than 1MW) which the Cork County Development Plan (Para 6.24) considers may be acceptable on carefully selected sites, but is rather a large scale commercial wind farm on an exposed uplands site which site is not considered to be a secluded area where the visual impact of the proposed wind farm development could be minimised (and in this context noting also the designated Scenic Routes and Scenic Areas to the north and east from which scenic routes views are designated in the Cork County Development Plan as views to be preserved), and would be contrary to the stated Renewable Energy policy (Para 6.26) in the Cork County Development Plan re wind farm developments in the County, which policy is considered reasonable, and as such would be contrary to the proper planning and development of the area.

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APPENDIX B - PHOTOGRAPHS (incl. KEY PLAN)
APPENDIX C - DEVELOPMENT PLAN

Dermot Kelly

DERMOT KELLY
INSPECTORATE

17 **April, 2000.**

et

Ian Collins
324165

PLEASE REFER TO Ch 3 EIAR

EIAR, Chapter 3: Site Selection and Reasonable Alternatives.

3.2.3.1.1. At this notation is a discussion where the designation of the site is described as a location that may have potential for wind farm developments but there are also some environmental issues to be considered. *'and conformance with... the proper planning and sustainable development of the area'.* It then expands that the site was deemed to have a favourable potential to support wind energy development from a panning policy perspective. That is clearly not the case it is merely 'Open to Consideration' which is materially different from 'Acceptable in Principle' which would have justified 'favourable potential'.

3.2.3.1.4. Population density sought be the developers is stated to be 12.9 persons per sq. kilometre lower (considerably) than the population of County Cork as a whole 18.7 persons per square kilometre. How relevant this is, is glossed over by re-iterating that the recommended setbacks have been achieved. Since the site within 2Km of sensitive receptors is about 45 sq. Kilometres that translates as 45X12.9 =580.5 people within the study area. This figure is close to the 600-750 people likely to be impacted, as argued elsewhere, and since very few of them will receive any benefit one can assume it is a deleterious effect to most of them. Hardly, a small population.

3.2.4.2. This actually makes a very good case for a solar farm on the same site. Even though its advantages are understated and its drawbacks exaggerated i.e.glare, it would hardly be a problem from such an elevated site. It is stated that transport would be greater but this is not demonstrated. That comparison seems incorrect when one considers the 151,702 tons of stone, sand and concrete that are admitted in the EIAR as necessitated by the current proposal. That is without the turbines, blades, towers and steel that is also required. There are lighter components in a solar farm, and far less disturbance to flora and fauna which are thought to happily co-exist with solar panels. Obviously on inspection table 3.2 is erroneous in many respects understating the positive benefits and understating the negatives in. Thoroughly unprofessional manner. It would seem that this 'alternative' would be chosen in the developer was involved in solar farm development! Panels could be sited such that they would in no way compromised the views and prospects from the Bantry Bay Area.

FROM ENGINEERS IRELAND
'POWERING IRELAND' FROM 2023

FROM IAN COLLINS
324 165

OFFSHORE WIND ENERGY

Advantages

- Produces low-cost affordable energy.
- Directly produces electrical energy.
- Zero-carbon electricity production (excluding carbon expended in manufacture).
- High potential for electricity creation due to abundant space.

Disadvantages

- Electricity production is not dispatchable.
- Electricity production is based on wind availability.
- Landfall infrastructure must be developed to support offshore installations.

Recommendations

- Ireland has the potential to become a net exporter of renewable energy, and to become a leader in the EU Energy Strategy, to ensure that secure EU-based energy production is feasible in a carbon-constrained future. We must accelerate the route to market for innovative energy solutions such as offshore wind with support from Government policy around procurement, planning and execution.
- Develop hybrid grid connections to provide a near term solution to adding additional capability to the grid using the existing underused infrastructure.
- Support innovative solutions in the development of floating offshore wind turbine platforms, to position Ireland in taking a leading role in developing this technology.
- Coastal communities, industry and our Government must all work together to build and agree on new installations of offshore wind.

2.3.3 Onshore wind energy

Ireland currently has the 3rd largest percentage of onshore wind turbines in the EU, following Denmark and Lithuania. Ireland has approximately 5500 MW[33] of onshore wind energy capacity currently across the island as the majority source of wind energy. There are targets to increase this to ~8 GW by 2030.[34] Action 102 of the CAP 2021 has been created to ensure a supportive spatial planning framework for onshore renewable electricity generation development.[35]

Over the last three decades, wind turbine technology has advanced in terms of scale, output, reliability and sophistication. Wind energy is competitive economically. There are several companies engaged in project development, both Irish and international. The Government has put in place the 'Renewable Energy Support Scheme' (RESS) to create a stable route to market for new generation capacity whilst still stimulating competition and value for money.

Nevertheless, achieving a further 3-4 GW of installed capacity by 2030 represents a significant challenge. This includes the technical challenge of strengthening the grid to accommodate further non-synchronous generation, but also the planning and societal challenge of finding room for more wind farms. Among the solutions required to meet the challenge include:

- Innovative approaches to co-location of energy generation and energy demand, for example, energy parks, data centres and other industries with high energy demand.

33 Facts & Stats (windenergyireland.com)
34 gov.ie - Climate Action Plan 2021 (www.gov.ie)
35 gov.ie - Climate Action Plan 2021 (www.gov.ie)

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- Advancing our ability to integrate the electricity system with the gas network – for example using green hydrogen – to create more flexibility and resilience.
- Developing more energy storage capacity, and more interconnection with international grids.
- Exploring new possibilities for delivering wind farms closer to existing populations and energy users, as opposed to remote peatland sites.

Plans are currently in place to meet this goal and are likely to be achieved in the 2030s.

Onshore wind energy is limited in potential due to challenges. These challenges include finding suitable locations to install turbines which are geographically suitable with strong winds. The locations need to be acceptable to local communities as they will be visible, and also compliant with planning restrictions limiting them to a distance no less than 500 metres from a domestic dwelling.

Advantages

- Familiar, safe and low-risk technology – proven in the Irish context.
- Produces low-cost affordable energy.
- Zero-carbon energy production.

Disadvantages

- Electricity production is not dispatchable.
- Electricity production is based on wind availability.
- Continues to meet local opposition, although acceptance levels are high amongst wider public.
- Further electricity grid development is required.

Recommendations

- Onshore wind energy should continue to grow, but the majority of investment in wind should be focused on offshore wind.
- Onshore wind energy will be essential in meeting 2030 targets for decarbonisation.
- Embrace fresh approaches to land use, energy parks, energy storage and energy systems integration in order to maximise benefits.

> “Onshore wind energy should continue to grow, but the majority of investment in wind should be focused on offshore wind.”

2.3.4 Solar

There are two types of technologies which generate electricity from light, and these are solar photovoltaics (PV) and concentrated solar power (CSP).

CSP uses solar furnace principles of focusing sunlight to a specific point to drive a generator. This technology requires high levels of sunshine year-round.

Solar PV technologies are therefore best suited for use in Ireland's climate. Ireland has similar solar energy as other European nations such as the Netherlands, UK and Germany. Solar PV is the most common solar technology worldwide. The PV panels use semiconductor technology to generate electricity directly from exposure to visible light. On a clear day in Ireland, it is expected that one square meter of PV panel will generate approximately 150W of electrical power. An average house installation can have 20 square meters generating about 3 kW of electrical energy on a good day.

Large-scale ground-mounted solar farms currently are not prevalent in Ireland with the first one becoming operational in 2022 in Co. Wicklow.[36] These solar farms use PV panels secured to the ground of multiple hectares of land. Many of these solar farms are planned and will need to be brought online to provide the targeted 8GW of solar energy by 2030.[37]

Solar 16 PV panels installed on a domestic home

36 https://www.rte.ie/news/ireland/2022/0429/1295115-solar-farm/

37 Climate Action Plan 2023

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Please refer to Ch 5 EIAR

EIAR, Chapter 5: Population & Human Health.

5.1 INTRODUCTION: *'One of the principal concerns during the development process is that human beings, as individuals or communities, should experience no significant diminution of their quality of life from the direct, indirect or cumulative effects from the construction, operation or decommissioning of a development'.*

5.1.3. 'Directive 2014/52/EU has an enhanced requirement to asses likely significant impacts on Population and Human Health. It is the experience of the Environmental Health Service (EHS) that impacts on human health are often inadequately assessed in EIA's in Ireland'. [6] A fine example here; since throughout this EIAR all the effects are more or less always assessed as *'not significant'*, and that there is really nothing to worry about in relation to human health or quality of life!

The World Health Organisation (WHO)' s definition of health is helpfully included for more reassurance: *'A state of complete physical, mental and social well-being and not merely the absence of disease or infirmity'.*

5.3.1. The number of third party inhabited sensitive receptors within 1.330metres of the proposed project is 79+ 1 derelict+ 21 involved parties = 57 x 2.72 (from Table 5.4) = 155 persons living within 1.33km of a 550ft high wind turbine. Leaving out noise and shadow flicker as potential sources of annoyance or more serious health effects, the over-bearing presence would change their perception their environment perhaps catastrophically.

5.3.1.5.3. The presentation of the 'Employment and Investment Potential' in the Irish Wind Energy Industry is so unrelated to reality that it would have reflected better on MKO if it were omitted. It show remarkable well how little consultants projections are grounded in actuality.

5.3.3.4 University College Cork Study 2024. Fig 5-7. (referred to an the text as fig 5.5. below) does not show what it claimed at all in the following text. Possibly, what it does show is that nearly a third of persons living within 2Km would be unwilling to accept further wind developments and around 18% of the residents within the 2-10Km distance from a wind energy development would be willing to accept more development. This should be construed as an un-acceptance, and it can be translated into figures that of 600 people living within 2Km of the proposal, very nearly 200 would say (should it be construed) 'No More'! Why? Because they feel adversely impacted, obviously. Clearly, it is perceived by a very large number of residents as a 'significant' diminution of their quality of life. The recognition of a problem of global

[6] from WWW.publichealth.ie

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warming and consequent climate change doesn't translate into finding it acceptable to live within a wind powered generating plant. There are other solutions and other less sensitive areas to site wind turbines.

5.3.4. The 'Health effects of Wind Farms' rubbishes any suggestion that people who live near wind farms experience negative health effects. Describing the lack of peer-reviewed evidence to illustrate their point and describing people's real experience as purely 'anecdotal'. The proven nuisance established in the two High Court cases detailed elsewhere could hardly be called anecdotal and I have met a number of wind farm near-neighbours who would hotly dispute that there were no adverse effects. The lack of evidence to study may well be as a result of resignations to the inevitable lack of action should they have complaints and to their unfamiliarity with the process by which they could register a complaint. There abounds a 'fatalism' that any recourse might result in a greater consequence financially that they could afford and the expectation that any action would be futile in the face of institutional indifference and commercial avoidance of responsibility.

5.3.4.2. The WHO 2018 Guidelines recommends that the noise form wind turbines to be reduced to below 45dB LA10. This translates to 43dB LA10 which is the upper limit permitted in the draft WEDG 2019. However WHO recognises the potential for increased levels of annoyance at levels below this value but cannot determine whether this increase can impact health. It goes on to suggest that wind turbine noise above this level is associated with adverse health effects. Furthermore, it recommends the implementation of suitable measures to reduce noise exposure but says there is no evidence available to recommend one intervention over another. This means the WHO is saying the threshold between mere annoyance and possible demonstrable negative health impacts is 43dB LA10. It doesn't anywhere pretend that noise up to that limit is compatible with its stated definition of health: *'A state of complete physical, mental and social well-being'.* I suggest that annoyance becomes a nuisance somewhere below this threshold and increasingly this will be established by jurisprudence. It will not go without notice that those charged with ensuring the protection of the environment by the application of appropriate safeguards have been found wanting in this regard.

There is a whole other area of human health that is omitted here, but should be considered. The planning history of the area where various landowners and developers have looked for planning permission for wind development since 1997, as detailed in the appendix here and very substantially elsewhere, has resulted in an increasing pressure on the local inhabitants who do not wish to live in close proximity of a wind farm. The march of wind farm developments towards this area has caused increasing levels of anxiety and stress to many residents. The ups and downs of some permissions being granted and other turned down without much predictable consistency has lead to grave uncertainty throughout the area. A very sizeable

cohort have dreaded this time of concurrent multiple applications for wind farms and it is time to recognise that this is an unacceptable level of threat for an area. To many, it has had a deleterious health consequence and that is before any turbine has been erected. To suggest as is done in Chapter 5 of the EIAR that this will precondition annoyance at a later date should any development by constructed is very accurate, but certainly not a sufficient reason to discount consequential annoyance as an insignificant effect as seems to be suggested in the studies quoted.

5.3.5.1. PROPERTY VALUES. It is not particularly a planning issue directly, but it is a contribution to the likely deleterious health effect, in that it makes it very uncertain what will happen, should any development take place, and the annoyance or health effect be unsustainable by nearby residents. Would their property be saleable and at what price? They understandably worry. The study quoted by CERIS whilst with certain caveats, suggest up to a 14.7% drop in property values for receptors within 1Km of a wind turbine, and in this case especially given the cumulative effects of the other proposed/permitted but appealed developments there is a large number of residents who will be adversely impacted.

The EIAR then goes on to quote studied of completely non-analogous situations to try to minimise the potential for the very effects acknowledged here.

5.4.2.1.4. This concludes that there is insufficient evidence from the studies conducted to determine that there is a significant effect on property values as a result of the proposed wind farm. There is insufficient evidence if one does not look for it would be close to the truth.

The evaluation of so many obvious effects as being 'Not Significant' (their capitals for emphasis) in the end shows this is not a serious piece of environmental impacts assessment and hence does not satisfy the requirements under the EIA.

Please Refer to Ch 6 EIAR 324165

EIAR, Chapter 6: Biodiversity.

It is interesting to record just how much the consideration of an area like Maughanaclea and Coomleigh has changed on the last 50 years. In the late 1970s upland areas such as these were considered of very low value grazing mainly for sheep. Their only value other than that was for coniferous forestry. Both these practices were encouraged at the time by various government policies. This results in a forestation and an increase in the national herd as ways to increase farm income and improve the rural economy. Hills were burned to 'improve' grassland and remove gorse and heather and bracken. Drainage was undertaken to make bogland more productive. Now the results are clearly seen to have been monumental errors. Overgrazing be sheep and cattle, forestry proliferation and drainage (all encouraged by government grants) resulted in habitat destruction, acidification of waterways and bogs drying out and releasing their stored carbon.

All mistakes have since been recognised. Now the latest exploitation being undertaken may well be seen in fifty years time as equally damaging. It is an activity which will undoubtably result in some unwanted and undesirable consequences. There is little if any research on the effects of wind farms noise and vibration on the wild life which is resident or visiting this upland. As we struggle to understand the causes and consequences of species decline we may very well be contributing further, albeit unwittingly. An incautious rush headlong to solve one problem will almost certainly result in unforeseen consequences.

Reading the plans to mitigate the construction and operational effects, there is obvious disjunct between a huge construction projects such as this and the attempts to control and mitigate its effects by a series of 'planning conditions'. The momentum that is engendered once it commences in an extensive area swuchas this makes its oversight by 'appointees' unimaginably difficult - possibly to the point of incredulity. It makes lovely reading but it is an unrecognisable version of a reality which is pure fiction. The only way protection can be offered is to 'leave it alone.' For better to manage without the energy produced, and avoid further harms. Instead of the consequences of not proceeding with this development being viewed as a last opportunity to harness the available wind, it should be seen as a positive opportunity to preserve the area to find its own regenerative balance after our last attempt at exploitation of it.

This is not fanciful eco-warrior imaginings: it is the lessons of history (always never learnt!). Mankind's history is of exploitation of an environment to enable us to live and of course that will necessarily continue, what has change is that there is a growing recognition that there is a finite limit to what can be taken sustainably. As that limit is appreciated, a 'slowing down' rather than an acceleration to rush into alternatives is what is required. Combing the ground to remove the 'Kerry Slugs before the bulldozers squash them is not really an adequate response. The 'Leave it alone' and manage 'without' is the wisdom of ages.

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Being less fanciful and more realistic about monitoring progress and reports back to An Coimisiún Pleanála serves only to demand an increase in workload for an already stretched organisation. Dedicated monitors need to be engaged preferably employed independently by a dedicated Government department with real on-the-ground power ro control a development of this scale and extent. Whilst not wishing to judge the attitude of local workers or contractors, my experience of construction sites (quote extensive) would lead me to conclude that at very least an education in environmental awareness and protection would be a pre-requisite to be allowed on site. The site is so extensive that it is unlikely that there will be anything other than a sporadic public oversight and it is most likely that the site will exclude any visitors for the duration of construction so a dedicated 'oversight independent' team is a fundamental requirement to ensure compliance with the various imposed conditions.

Chapter 9: Hydrology & Hydrogeology

I record for Met Éireann Station 0101250 Cork (house location H118) and have done so since 2015. On September 14 2024 there was 75.3mm recorded rainfall in 24 hours. In addition on Oct. 25 2013, on an unofficial gauge, I recorded 75mm of rainfall. Given the location of this station, I would guess that I record lower rainfall than would occur at most of the proposed site. On dates I can't be sure of but approx. Sept 1999, March 1980, and I think sometime in 1988 we experienced severe short term rainfall that had almost catastrophic effects. The earliest event saw our house flooded and I estimate that over 75mm of rain fell in less than two hours.

The 1988 or thereabouts event was more severe at Coomleigh East and resulted in huge damage to the boreens of several farms and houses there which brought down so much debris onto the public road that it took several days to clear the road, at great inconvenience and expense to the affected parties. One boreen up to Hagel Farm had a chasm 2.1 metres deep gouged out of it. In Sept 1999, a one hour rainfall event washed my own boreen into the stream which forms the boundary between Maulakieve and Maularaha. Approx. 50 x 5 tonne trailer loads had to be dug out of the stream and put back on the boreen. I only offer this to show that the Return Rainfall Period Table, I think, is a significant underestimate of the potential for severe short term inundation that can occur, and which should that happen during the construction phase of the proposed project could have extremely significant effects not foreseen in the calculations supplied. I would suggest the 100 year return period is a more realistic assessment. The consequential potential damage to the Mealagh river and the Ouvane would be highly significant. There is too much reliance on 'desktop' investigations and no local consultation evidenced here. This is, by developers own costings, at €100 million or so, project. It would be appropriate for there to be continuous, independent, insured oversight of the approx. 100 workers so greatly a very sensitive ecological environment, over a two year period. The consequences of a lack of supervision could be calamitous to the natural environment. Although Met Éireann's point rainfall model is excellent, it doesn't predict chances of extreme rainfall events very accurately. There is a failure here to take adequate cognisance of local history. Hence, there is a serious deficiency in this section of the EIAR.

EIAR Chapter 10: Air Quality / Appendix 11-2: Carbon Calculations.

Exactly the same argument as detailed in the next section on EIAR CH.11 Climate, applies to the implication that Air Quality will be improved as a result of building this 'Maughanaclea' wind farm. It is likely the construction phase might have an overall slight to moderate deleterious effect, as being bathed in an Atlantic airflow ensures that (at present) we are spared the pollution that it might create, but the growth of fossil fuel plant, necessitated by the growing demand for Electricity, clearly offsets significantly any advantage that might accrue.

It is vital that ACP Inspector(s) carefully assess Appendix 11-2 and its carbon calculations, critically evaluate the notes and entries to the table on page 2. The Capacity Factor is pretty well overstated at 37 % and is reduced further when curtailment is factored in: i.e. times when there is oversupply from the wind turbine fleet. As the level of contribution of renewables increases the law of diminishing returns has an effect.

The carbon calculator used is old and many factors that will effect the result have not been included. The most significant is the current 11.3% of all renewable electricity available to the grid cannot be used (2025 figure). Therefore the capacity factor should be reduced commensurately from 37% to 26%. There are two main factors contributing to this i) the transmission networks from Cork and Kerry are too small to carry all the power available to areas of high demand around Dublin; and ii) when there is a surplus of renewable energy available to the grid it cannot take more than 75% of demand as grid stability would be adversely affected if the spinning reserve were to be disconnected further.

The Coimisiún must satisfy itself and demonstrate unequivocally that this wind farm will result in lowering our CO_2 emissions. There is much authoritative work available from the Irish Academy of Engineering and Engineers Ireland, together with the report on Data Centre expansion and the use being made of the expansion of renewable energy supplies by Prof. Hannah Daly of UCC for Friends of the Earth, that additional wind farms may not be reducing our carbon emissions. In fact the latter report indicates that they very well may have a negative effect. It would be imperative should this proposed development proceed that its production should not be sold as a direct supply to Data Centres. That must be a planning condition. To sacrifice an area of outstanding natural beauty to allow an increase in energy supply rather than replace existing fossil fuel use would be an unconscionable tragedy.

Further more in the carbon calculator, apart from there being many unentered fields that might contribute negatively to the result, there is no carbon costing of the necessary grid changes that will have to be undertaken. These changes are required to ensure that bottlenecks that exist as present, which are causing curtailment of available existing wind and solar power and causing significant grid loss, are resolved.

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Please refer to Ch 11 EIAR

EIAR Chapter 11: Climate.

The contribution to greenhouse gas reduction although considerable is rather overstated. Quite simply, as the available wind turbine fleet increases in capacity the amount of usable electricity contributed to the grid does not increase linearly. For instance on very windy days the available electricity to the grid exceeds demand and turbines have to be curtailed. The more installed capacity there is the more often curtailment occurs. Therefore the predicted capacity factor is unlikely to be that suggested of 37%. This can only go down as more turbines are added to the national fleet. As demand is rising there will have to be a commensurate rise in either energy storage to offset times of low wind speeds or more likely the addition of more fossil fuelled capacity, in reality mostly gas-fired. Part of Prof. Hannah Daly's report (of UCC) details how this occurs. This is without factoring in the carbon cost of the necessary infrastructure changes that are required. It is disingenuous to overstate the positive case and devalues the assessment here and elsewhere. Prof. Daly also shows how the increase in available 'green' energy is fuelling and increase in overall energy consumption by encouraging multinationals to build more and more data-centres rather than replacing current fossil-fuel use in domestic consumption and transport so the benefits may turn out to be very much less than is implied, or very probably negative if correct trends continue.

At p.33, Chapter 11, 11.5.3.1 under: Greenhouse Gas Emissions, there is an assessment which states:

> *'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.* [Unbelievably below this, it states] *'Based on the assessment above there will be no significant effects..*

It is surprising to find a bit of reality and unfortunately a true assessment! It seems that throughout the EIAR, the phrase of *'no significant effects'* has been repeated so many times that it has become a mantra for MKO, or it is a modicum of realisation of reality that has slipped past the 'proof-reading' by AI.

EIAR Chapter 12: Noise and Vibration.

There are endless arguments over Noise that have been put before County Council Planners and An Coimisiún Pleanála or previously An Bord Pleanála. None have had any effect on the granting or otherwise of permission but nevertheless Noise is a major worry to both potential neighbours and afflicted ones. It is demonstrable countless times that the guidelines and calculations are deficient in predicting the deleterious effects wind turbine noise has had on neighbour of various projects. The Guidelines have been stalwartly defended by the wind energy promoters and it is due to their efforts that there hasn't been any meaningful move to change the guidelines. Many people will tolerate either willingly or unwillingly the noise nuisance that undoubtably often occurs. The imposition of conditions to try and identify and minimise noise nuisance has had little effect. Attempts by some County Councils to impose greater separation distances has been overcome by central Government who obviously respond to the 'Wind Lobby' rather than the disparate affected victims. There has been a number of cases where compensation arrangements have been won from various wind farm operators but have ben relatively unpublicised by the use of non-disclosure agreements. There have ben two successful cases for the tort of nuisance in the High Court where substantial damages were awarded and turbines were either shut down or considerably curtailed: none of this has been reflected in the attitude of planners who continue to be bound by Government direction.

It is obvious that a considerable cohort of near neighbours to the proposed development will be somewhere on the spectrum, of slightly annoyed to being driven demented by the disturbance to their previous quiet enjoyment of a very low noise environment. Many have deliberately chosen to live in such particular places. I haven't the skill or the knowledge required to accurately estimate the number of residents who will be affected, or quantify their degree of annoyance but looking at the maps supplied I would estimate a considerable number will be affected. How this will impact on their physical or mental health can only be guessed, but it is a considerable cost. It cannot affect the granting of otherwise of permission, as outlined above, but it is just plain wrong and should be part of the cost-benefit analysis. It is a very significant effect and not a small part of the adverse health reaction to even the proposal for a wind farm in the near vicinity. There is something fundamentally inequitable to having so many people's 'peace and quiet' taken away from them. There are further effects perhaps that are not quite so tangible where the perception of an area as a rural haven is adversely impacted, and renders the immediate environs of a wind farm unattractive an a tourist destination. When all is said and done a peaceful retreat is a desirable quality for a large cohort of tourists. Best practice noise limits may be more significant to planners and developers but will not satisfy near neighbours who experience the nuisance repeatedly and probably forever. There will be somewhere between 100-200 people made very unhappy by this development at least, and for what real gain? It is not appropriate here to examine Government Policy with regard to trying to avoid

PTO

fines at EU level for breaching our carbon reduction targets and at the same time encouraging the construction of Data Centres which are responsible for rapid growth in energy demand and the increase in carbon emissions (already established). What is evident, however, is the beneficiaries of all this. The developers of wind and solar farms, together with Big Tech companies and both their shareholders will benefit while taxpayers and electricity consumers pay for the improvements to the National Grid and very high prices for the energy they consume.

A point of view widely held is that Ireland is being taken advantage of by vast corporations for their, nit our, benefit. Be that as it may, but the 'Three Valleys' could be protected for a future that none of us can foretell. There is not a 'pressing need' to condemn this beautiful area to become an extensive power station: it is a 'manufactured' need generated by PR campaigns to fuel further growth at all our expense.

EIAR, Chapter 13: Landscape & Visual.

Please consider alongside EIAR Chapter 13 section by section:

13.3.3. Inadequate checking of assertions of p13 ch13 where the claim is carelessly made that

> Given that there is at least some level of visual screening present along the majority (43% = Intermittent + Dense screening combined) [of the major routes appraised]... within 3km and those extending to 5km, this demonstrates that the widespread [admitted] theoretical visibility indicated on the ZTV in close proximity to the proposed turbines is not fully representative of the actual on-the-ground visibility .'

All this serves to illustrate that in MKO's eyes 43% constitutes a 'majority' when it really means that over 57% of the public road network, the turbines will be prominent and these roads are classed as 'scenic' in the CCDP 2022-28.

Then the map Fig 13-4 helps to underline that virtually all of the R585 will have full visibility of the turbines and this is classed as an important scenic route and is probably seen as the most important route into the Bantry Bay area, being especially magical as the Ouvane Valley opens out from the Cousane Gap westwards. SR.29 as specifically mentioned in the CCDP as being of very high importance.(p.248. CCDP Volume 2; of character to be protected.)

13.4.111. helpfully references section 14.8 of the CCDP. Compare Fig 13.1 with the areas delineated as (not suitable) Fig 13.5. It is clearly apparent that from the area given High Value Landscape (HVL) the turbines are clearly visible, so the views from the HVL are of the proposed turbines! (See Fig 13.6). Surely part of the High Value Landscape is the views of the hills surrounding It.

P21. The reduction of the proposed site to being *'of only local importance'* despite it being of LCT15a 'High Landscape Value' and 'High Landscape Sensitivity' is very mysterious given its overbearing of the LCT and Rugged Ridge Peninsulas forming their landward containment which is an acknowledged HVL.

13.4.2 Landscape Character of the site is described as being of remote sparsely populated marginal upland landscape. It could equally be said to by its very nature to be viewed as an exceptionally beautiful landform enclosing a vibrant farming and residential area of fertile valleys and providing a backdrop to a (only locally?) landscape

of very high value and sensitivity. Despite multiple visits in 2022, 2024 and 2025 the assessment seems not to appreciate the connectedness of the 'backdrop' to the Very High Value Scenery it encloses. The sheer scale of 554ft high turbines located along the ridgelines ensures their prominence from a great part of the Wild Atlantic Way and their movement and huge swept area of blade revolution ensure that they become the most eye catching features of the views which presumably at least some of the tourists travelling along its way have come to see and enjoy. It is that very 'unspoilt wild wilderness' that gives context to the landforms. It is described as a 'very green infrastructure asset.(see 14.7.1 CCDP2022-28.)

13.4.3. The arguments advanced to conclude that the landscape sensitivity of the proposed site is medium is neither comprehensive nor accurate, choosing to ignore the recreational value of the walking routes to the North, South and West of the sites. The value of the local road network to encourage touring is not mentioned. The rest of table 13.2 is extremely contentious denying its scenic qualities, suggesting that it is amenable to further degradation because of forestry/agricultural land use. It is now a rare landscape because of extensive wind turbine developments in similar landscapes elsewhere. To suggest that its 'naturalness' is detracted by human interventions is to suggest that just about every landscape in the country is degraded and then to propose further extreme degradation by the erection of 14 wind turbines will not make a perceptible difference in inconceivable.

13.4.4. The turbines are to be *'strategically sited on or near elevated peaks of mountain moorland and are clearly separated visually from the complexity of lower ground'*. It could be summarised as saying that they are sited on tops of ridgelines to ensure maximum visibility. To say that they are sited at a 'reasonable distance from dwellings' being 4 times tip height away might not find favour with anyone with the misfortune to the be residents of those dwellings.

13.4.5. It is simply not accurate to suggest that the land to the south of the proposed turbines is sparsely populated as the Mealagh Valley is a vibrant and socially active community who, once the creamery and shop in the valley was closed, built their own community centre. Because the proposed wind farm is in two distinct sections it is difficult to generalise the pattern of habitation but there are 216 dwellings within the 2k zone of which 69 are within the 1km separation zone. The closeness to an area of High Value Landscape (HVL) and high sensitivity to development is such that if turbine T14 fell over it would fall in LCT4! The population density increases to the West further and so

many more sensitive visual receivers would be encountered. Fig 13.11 makes this point clearly and if the cumulative effects are considered this valuable scenic area will be inundated with visible and prominent turbine views. Fig 13.13 goes further identifying how widespread the landscape effects on important visual receptors will be. Particularly the coast scape from Whiddy island and the inner harbour -so important for cruise-ship tourism- will be impacted.(see p.91 fig 13-16 of this section)

13.5.1.4. The recreational routes were they to include the cumulative impacts of other permitted or proposed wind farms would look very different and present a completely altered picture of what might occur should this wind farm be permitted.

13.6.2. Cumulative context and theoretical visibility seeks to suggest or infer that since the existing and permitted wind turbines are already within the zone of visibility of the proposed wind farm that should somehow diminish the assessment of cumulative effect. The opposite is the case.

13.7.3.1. Seeks again to suggest that by virtue of the tables presented and the methodologies employed in Appendix 13-1 and 13-2 that the landscape changes are somehow acceptable. This is very contentious and observations of the site and the surrounds will show that its character will be devastated and affected by this wind farm. The photo montages presented show clearly that the whole context of the scenery will be undermined by the presence, within a most beautiful framing of the upper bay area, of moving wind turbines on the ridges surrounding its eastern periphery. This has been recognised time and time again in the planning history of the area. Previous attempts to gain permissions for smaller wind turbines have been rejected by both the County Planners and An Bord Pleanála Inspectors. See Appendix. The need for renewable energy may have increased but the value of an unexploited landscape has similarly increased as its rarity has increased. Wind turbines may have become an acceptable part of many landscapes but this is a landscape overall of international importance it mustn't be eroded further by encroachment. If anything the original delineation of these areas could be discussed; the 'rugged ridges' of the peninsulas that characterise LCT4 are continuous with the Maughanaclea hills and should have been acknowledged as being deserving of protection but these designations originated before the challenge of sighting wind turbines had become apparent.

Not withstanding the levels of visibility, the effects of the imposition of very large man made structures on the appreciation of the landscape environment is never tabulated

but is undeniably significant. Individually a wind turbine could be deemed to be beautiful but its ability, by its very size and movement, to draw the eye, challenges the visual character of the prospects and views which so undefinably add to the attractiveness of a scene.

13.7.3.1.4. At least there is at last an admission that the proposed wind farm could have an effect locally. It will dominate the valleys it surrounds with the cumulative effects being of overwhelming scale. So much of the LV Assessment is pure opinion and speculation. Residents that were asked about it in a survey were not supportive generally (not really surprising when informed). see appendix - survey

There is further diminution of the change in the perception of landscape from LCT4 where there is acknowledgement of them being a *'noticeable component of the distant landscape when looking inland'*. This is then followed by

> *'while the Proposed Wind Farm and other cumulative turbines are visible and indirectly influence the character of this landscape, they are well set back in one small area of the landscape and do not impact the key sensitivities and key landscape qualities associated with the rugged ridge peninsulas and coastline of the HVL in LCT4'.*

It could be summarised succinctly by saying if you look the other way you won't see them! See view from VP17.

13.7.3.4. The selection of Vantage Points is neither comprehensive nor representative. For instance there is no assessment of the view landward from Whiddy Island which would be representative of the anchorage of the various cruise liners which the Port of Cork are trying to attract to Bantry, and this is seen as an area of important tourism expansion, to benefit the whole area..

13.7.3.4.1. The discussion on the effects of the scenic routes omits to mention that the route Cousane to Kealkill is actually a specifically mention and protected route in the CCDP. It then pretends that the Proposed Wind Turbines would not really be viewable from that route for much of the journey. It is completely against GI14-12 (CCDP 2022-28, Volume1) and this is justified solely on the grounds that the area is 'Open to Consideration' only mentioning the associated caveats as being avoided by design measures, mitigation measures and site layout to preserve the character of the all important views and prospects ... views of unspoilt mountain upland.... landscapes. Furthermore preserving views of natural beauty will be achieved by the travellers only

seeing them on the periphery of their views. On balance the proposers of the development see the effect as not significant. Given the many exceedances of the CCDP both by this development and others who have been allowed to undermine the landscape and visual parameters set out in the CCDP, this may not seem to MKO a step too far – just nudging the boundaries, perhaps. The selection of VPs to substantiate this is so selective that, to anyone familiar with the road, it is unacceptably unrepresentative.

13.7.3.4.2. Similarly the route from the Pass of Keimeigh is claimed not to be compromised in its prospects despite the fact that for nearly all of its length the turbines will appear on the ridge line, not to mention on the North side of the road the turbines, permitted but under appeal, at Curraglass will be popping up just to keep the tourist on his toes. The conclusions of MKO here have driven a 'coach and horses' through the CCDP 2022-2028, particularly section G1 14 in general and G1 14-12, 13,14 and 15, in particular..

13.7.3.4.4 The road from Glengarriff to Ballylickey and Kealkill has particular views from its high position (about 50%) of its length and the illustration presented is from a sea-level perspective and not at all representative and hence misleading in the extreme. This is part of the Wild Atlantic Way and present as a 'gateway' route to either Bantry or Gougane Barra both clearly deserving of protection.

13.7.3.4.5. Another example of either carelessness or deliberate misinformation is SR110 described as 'Roads from Bantry via Gerahies...Bear Island and the Beara Peninsula' and suggests that VP2 is a representative viewpoint of the scenic route. That viewpoint is clearly at the Abbey Pier and is completely unrepresentative. The appended photomontage (although very poor quality) shows a much more representative view and the development will be visible from most of the road along the north side of the Sheeps Head peninsula which forms a part of the Wild Atlantic Way, the Sheeps Head Walk and the Sheeps Head Cycle Way. The peninsula has been conveniently moved by MKO from the LCT4 Rugged Ridge Peninsular (Landscape Value Very High, Landscape Sensitivity Very High, Importance National) to LCT 15a which they argue elsewhere is of only High Landscape Value and Sensitivity and Local Importance. It is clearly LCT4. The photomontage image appended[1] is from MKO's (the same consultant) EIAR for Curraglass 25/6398. In that case, the same developer is proposing that the three turbines (now permitted and on appeal to yourselves) are hardly visible in

[1] From view point16: Wild Atlantic Way (Rooska East) E494190 N546126 and viewable on CCC's website. and appended.

the cumulative effect with the proposals for Maughanaclea, Gortloughra and the existing turbines at Shehy More, a distance of 16Km from the nearest turbine at Curraglass.

13.7.3.4.6. The view described is greatly at variance with VP13 photomontage presented. At every view, as the end of the Bay appears from Adrigole travelling East, the turbines appear becoming more and more a noticeable feature of the landscape. It is called coastscape in earlier versions of the CCDP where they are accorded a degree of particular sensitive consideration.

13.7.4.4.7. The views form VP9 tell their own story. What would the writer consider significant? This view represents 90° or a quarter of the presented view.

13.7.3.4.8. The views from the Kealkill Stone Circle are already impacted by the visibility of the Shehy More turbines. Possibly in the view of MKO planners, now the cumulative effect is of not much further degradation of the view from another 6 turbines, and this is without considering the impact of the Gortloughra turbines should they received planning permission.

13.7.3.4.13. Despite the considerable scale of the turbines having admitted visual effects varying from significant through to moderate and sometimes the turbines being screened, they are reckoned to be of insignificant visual effect. This is on views and prospects which are to be protected and valued by all the CCDPs from 1996 to 2028. It is stunning to see this analysis advanced. At what point is the 'protection afforded' to be considered merely as a constraint, to be mitigated by the arrangement of the turbines?

The effect on the walking and cycling routes are all of 'no significance' despite them being dominated in the immediate vicinity of the turbines. Is this a realistic assessment of an environmental impact or is it re-writing reality? Will a selling point be to the cyclists and walkers to come and see what little visual, cultural and heritage value we attach to our environment?

Sli Gaeletacht Mhuscrai

The Pilgrims Way has much greater visibility of the turbines than is admitted and for the greater part of its length until it drops down south to the land below the permitted but appealed wind farm at Derreenacrinnig West. From then on it has visibility of 5 further wind farms in the basin that leads to Drimoleague. (This is the advantage of a real experience of the area, not working from Google.) It will have turbine visibility, and

considerable visibility at that, for virtually all its length being very close to many of them far less than 2.9Km suggested. (check map appended.) It will become 'Wind Farm Way' if this and the other nearby developments are ultimately permitted. It will be ruined and at least 1000's of its yearly users will be devastated, MKO's assessment of 'insignificant'!

Similarly the effect on the Wild Atlantic Way will be 'insignificant', despite the turbines being constantly visible for most of the length along the North and South sides of Bantry Bay. To be assessed as 'not significant' has no basis in reality.

13.7.3.5. The repetition of the set back distances from any sensitive receptor is stated so many times that it becomes almost believable the MKO and Enerco are doing this from the goodness of their hearts. They care so much for the local population who will be impacted. Then the phrase '*negligible significance*' for any visual receptor is repeated time and time again. It is to be hoped that this lack of any real assessment of the effects of 550ft high wind turbines with a blade swept area of very nearly 4 acres is give the incredibility it deserves.

There is a claim made that there are 33 residential receptors located with 1Km of the proposed turbine locations but the map to illustrate this does not have the line of 1Km setback shown. If the maps that were given out to the nearby receptors in the Community Engagement are consulted a different picture emerges. Counting from these, the results are as follows:

The turbines are sited within one kilometre of 69 residences, a further 147 residences between one and two kilometres and a further 30 residences within three kilometres (all figures quoted from MKO's various maps). 24 of these are classed as 'involved landowners' without any further definition. This leaves 222 residences who have no 'involvement' in what MKO repeatedly calls a sparsely populated area. Given an estimated occupancy rate of 2.75 persons per residence (figure from MKO) means some 600-750 uninvolved persons will be within 3km of the turbines.[2] It has been estimated elsewhere that somewhere between 25-15% of people will be extremely annoyed by the presence of these turbines and this may or may not diminish or increase over time. Potentially the affected people may well have their health affected by their unwillingness to accept their 'new environment'. Not an unreasonably estimated outcome, but by any metric a significant unwanted effect, neither acceptable nor sparse. There will be a significant number of sensitive receptors who might well feel surrounded by the

[2] Figures from Appendix 12.3.8. Noise Modelling and Household Density from Chapter 5.3.1.3.

cumulative effect of Curraglass, Derreenacrinnig, Gortloughra and Maughanaclea developments. A stunningly beautiful landscape destroyed so that the voracious appetite of data centres can be assuaged.

At this point it is as well to remember the planning policy hitherto implemented of limiting local buildings to the lower slopes of the surrounding hills and constricting their style and appearances to protect the sensitive views from the Bay area. This policy has constrained development for the last 50 years or so. When was this abandoned? Now the adherence to the 4x tip height separation distance renders all the visual intrusion of the turbines to the residences of these three valleys 'not significant' (summary of the visual receptors section 13.7.3.5). Fig 13.16 shows that by far the majority of visual receptors within the 5km boundary of the proposal will have their current wind farm free views and environment changed by the cumulative effect of the proposed and recently permitted turbines. This is a major change in their visual environment and is in addition to the effect on the much wider 'Very High Landscape (HVL)' value of the Bantry Bay areas. The overall 'feel' of the area will be changed from a peaceful beautiful landscape to one where the feel will be of living within a wind farm complex. The visual attractiveness of the area to the nearby residences will be permanently, very significantly affected. Every journey will include views of huge wind turbines and they will become an inescapable feature of the area. For the information of the Inspectorate this constitutes, to many residents, landscape change of huge significance from which they feel they deserve protection. In the wider area they constitute a damaging diminution of the landscape value. This will have undesirable consequences to the tourism sector in a wider area.

If Fig13.20 (p. 120) shows anything it is a) just how many receptors in this 'sparse' population will be <u>significantly</u> impacted and just how much of the scenic protected roads will have 'little or no visual screening' in contrast to the claims made earlier. It is worthy of note that virtually all of the inhabitants to the south of the 'southern cluster' will have full view of the Derreenacrinnig West wind turbines and a significant number of 'receptors will be within 2Km of both developments. The sense of 'enclosure' by the Mealagh valley residents is not assessed at all and probably it is this omission which is the most damning of the 'Assessment of Cumulative Visual Effects'. It is absolutely nothing it claims to be. In a masterly understatement, this is followed by ...*'visual receptors; including local residents, commuters travelling along the local road network, and receptors along the recreational walking trails and C-SR28 and C-SR29 Scenic Routes, <u>may</u> experience views of other wind farms in combination with the proposed*

turbines, and cumulative visual effects' will occur...[3] It would be more accurate to say there is virtually nowhere where the presence of huge dominating wind turbines will not be the predominant feature of the prospects. To assert further in the Summary of Cumulative Effects... *'that LCT15a has the capacity to absorb the proposed wind farm with no unacceptable cumulative visual effects with other potential wind energy developments...'* is beyond absurd.

13.8 Conclusion. Although the Wind Farm site itself has little potential for recreational uses it is in itself a very beautiful backdrop to an area of picturesque farming landscape. To imply that the modification of the landscape by farming and forestry somehow justifies this area's exploitation for a wind farm, and that an area 'open to consideration' is a direction in the CCDP for that area to be exploited, is an inversion of what is clearly meant by the designation. The whole point is that the surrounds of the High Value Landscape are highly visible from that landscape. This has been recognised time and time again by CCC's planners and ABP's inspectors, (see the appended history of the planning applications for wind development in the Mealagh Valley.)

In EIAR Chapter 13: Assessment of Landscape Types. 'It' is acknowledged here just how close the turbines are to LCT4, being of Very High Landscape Value, Very High Sensitivity, and of National Landscape Importance. This LCT4 is also deemed as one of the most valuable landscapes in County Cork and designated as High Value Landscape (HVL). The distance from the boundary of the LCT4 area to the nearest turbine is given as 250metres[4]. It is vital to consider the effect on this valuable landscape which has been protected up to now. It is not a tenable argument that because some wind turbines are visible already that 14 more (plus 3 at Derreenacrinnig and 3 at Curraglass) will only make a slight change in magnitude. This is a never-ending argument for surrounding a Very High Value landscape with turbines all around the Wild Atlantic Way.

There is a whole other argument about the decision making the boundary between the LCT4 and LCT15a as being a relevant delineator between 'not suitable/normally discouraged' for wind development and 'open to consideration'. When the boundary first appears in the CCDP 2003, at that time wind developments were in their infancy and turbine size and visibility was of a couple of levels of magnitude smaller. There was also an element of leaving judging of appropriateness on a case by case basis, as evidenced by ACP inspectors' judgements.

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[3] p.13-125. section 13.7.3.7.1.

[4] p.13.31 Section 13.4.3. The closest High Value Landscape (LCT 4 – Rugged Ridge Peninsula) is located 250m north-west from the nearest proposed turbine (T14).

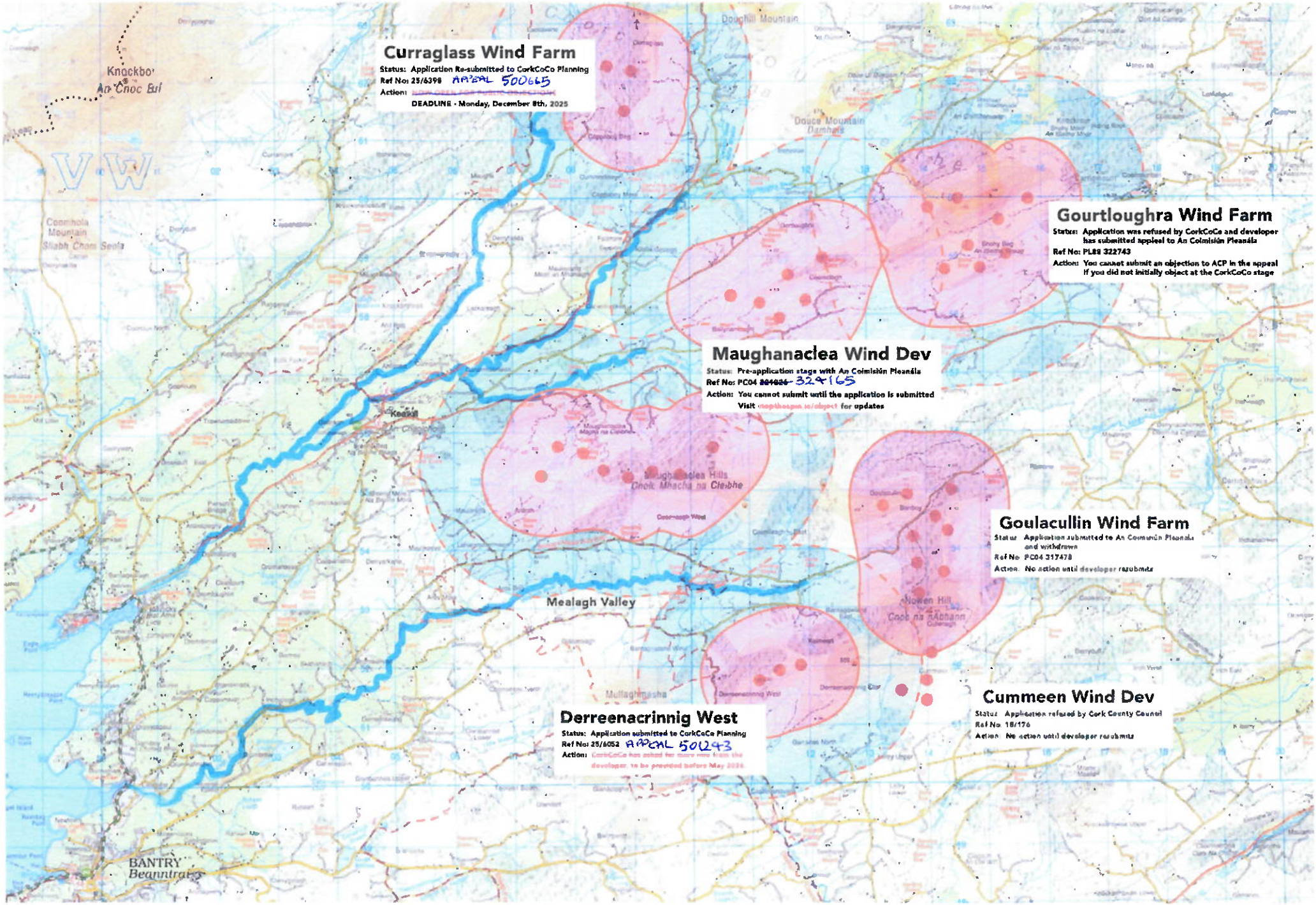
Clinging on to these national boundaries has lead to no end of confusion and contention. After all landscape types do not really begin and end with lines on the ground. A recent planner discussing this argument claimed that there had to be lines and boundaries and that is maybe so but the definition of a 'landscape type' bears no relation to the visibility or otherwise of a 170metre high turbine and it is simply inappropriate and indefensible to pretend otherwise. Where its foundation situated relative to a boundary is irrelevant to its visibility over a huge area and it seems rather pointless to argue over what obviously is not a significant determinant. Its zone of visibility is a far more meaningful criterion.

The tablature of 'Impact Assessment Classification Summary' 13-19 seems to find that the repetition of 'not significant' throughout justifies the assessment of visibility of 28 turbines from 120 to 170 metres high roughly within a 5km radius sufficient to render them barely visible. This is not a reasoned or credible conclusion, in fact it is nonsense not footed in reality.

There is now also evidence (Senior Planners Report CCC 25/6052) that a wind farm is no longer a temporary or even long term feature but will be a permanent feature in the landscape. This means that a beautiful landscape will be permanently disfigured and lost forever. The rationale that we will need more renewable energy results in an infinite increasing requirement and hence we must build wind farms anywhere and everywhere. Our collective short-sightedness about our economic and energy requirements of the last 40 years will result in virtually all our mountains and moorlands becoming power stations and the valuable resource of our beautiful scenery will be squandered. There are alternatives, and the criticism of the same senior planner above that this has not been addressed in submissions/objections to the Derreenacrinnig wind farm, is unbelievable. An observation on a planning application is not the correct place to debate alternatives in energy policy. However it is appropriate to question the validity of the assumptions made in demonstrating its necessary contribution to the greater good, for without that 'benefit' there would be no question of granting planning permission for a project which was purely for the financial benefit of the developer at a location such as this. It is a question of appropriate balance. Will the loss of an internationally important scenic attraction be adequately recompensed by the increase in renewable energy available. It is not as is suggested, an opportunity squandered rather it is a permanent loss of a precious resource, namely beautiful irreplaceable scenery which will only become rarer.

FROM IAN COLLINS FOR ABP 324165

PROPOSED WIND DEVELOPMENTS - BANTRY & KEALKILL



TAKEN FROM MKO'S EIAR FOR CURRAGLASS 25/6398 FROM VP 16 WILD ATLANTIC WAY (ROOSKA EAST) E494190 N596 126

IN THIS APPLICATON THEY SEEK TO SHOW THE CURRAGLASS TURBINES MAKING LITTLE FURTHER EFFECT CUMULATIVELY P.T.O.

This view comes from the Curraglass application 25/6398 now appealed to ACP. This EIAR is also from MKO where they argue that the 3 turbines they propose (now permitted but appealed) will be hardly noticeable in the broader context of the receiving environment. This is another way of saying that '3 more will make little difference', there being the potential for so many other wind turbines to be visible. This at the landward end of a world famous Bay which is being marketed internationally for its unspoilt landscape. In fact many of the VPs in the EIAR for 25/6398 showing the cumulative effects of Shehymore (existing) Gortloughra, Maughanaclea, Curraglass and Derreenacrinnig better illustrate those effects than the VPs chosen in the EIAR for Maughanaclea.

PART OF APPENDIX IAN COLLINS PAX 04 324165

MAUGHANACLEA WIND TURBINE DEVELOPMENT

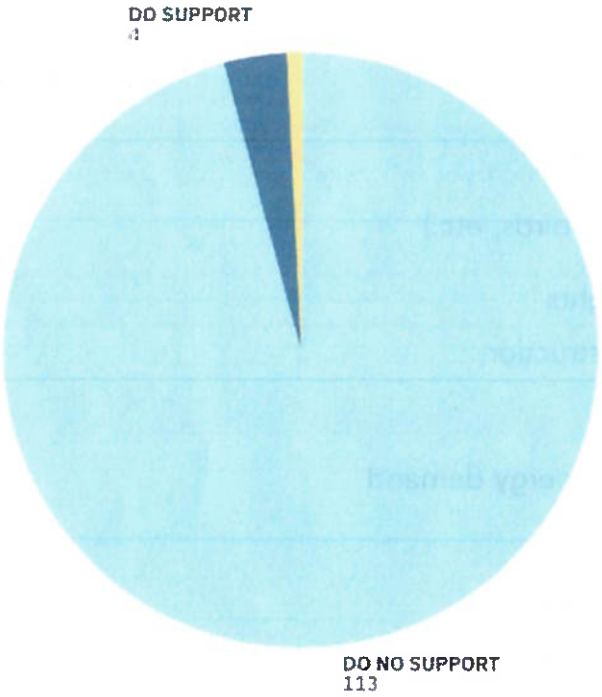
COMMUNITY SURVEY RESULTS

Of the 277 distributed door-to-door by volunteers, we received back 118 completed surveys - a respectable response rate of 42.6%. The survey was printed, distributed, and counted within a 10 day period May 6th-16th. 2025

Within the first day of distributing surveys, volunteers noticed that a few families support the wind turbine development and some wish to remain silent or neutral and not respond for social reasons.

SUPPORT

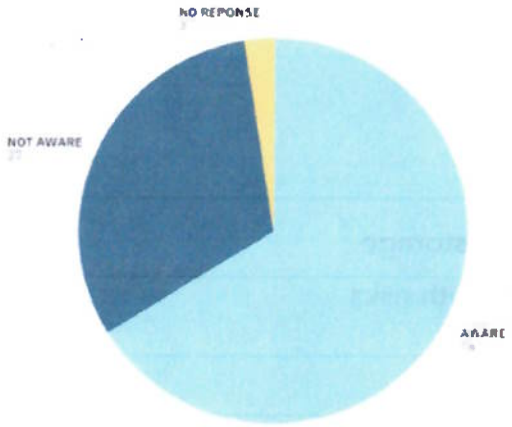
DO YOU SUPPORT THE PROPOSED WIND TURBINE DEVELOPMENT?



Over 95.8% of respondents (113) **do not s**upport the Maughanaclea Wind Turbine Development. 4 Support it and 1 resident answered "neither".

AWARENESS

WERE YOU PREVIOUSLY AWARE OF THE WIND TURBINE DEVELOPMENT?



Nearly a third of respondents were unaware of the turbines. Most of these respondents were outside the 2km zone, although 13 respondents were less than 2km and unaware of the development until receiving the survey.

PROXIMITY

How far do you live from the proposed wind farm?

50 Less than 1km 37 Less than 2km 28 More than 2km 3 No Response

A CONCERNED COMMUNITY

The results show that the community is highly concerned. On a scale of 1-5, every single category scored an average above 4 with visual impact, night skies, and environmental issues topping the list. The top community concerns are consistent with the top reasons planning applications have been turned down in the past.

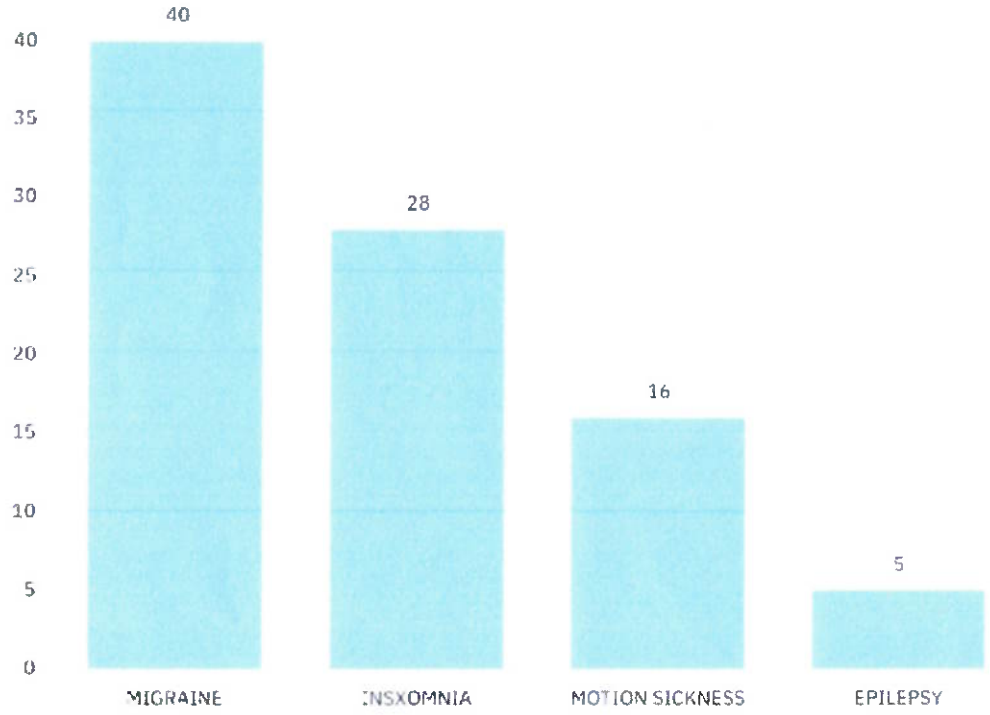
Issues where respondents were most divided were EMF, decrease in property values (a suspected renters vs homeowners divide), fire & safety issues, tourism, and shadow flicker from blades.

Rank	Concern	Avg. Concern
1	Visual impact on landscape	4.71
2	Harm to protected species (bats, birds, etc.)	4.70
3	No dark skies, stars, northern lights	4.62
4	Noise & disruptions during construction	4.58
5	Damage to archaeological sites	4.56
6	Rural community cost for urban energy demand	4.50
7	Lack of community benefit	4.41
8	Greenwashing (lack of true sustainability)	4.38
9	Pollution from blades & blade disposal	4.36
10	Low-frequency vibration health risks	4.36
11	Noise pollution from turbines	4.31
12	Risk to well water quality	4.24
13	Shadow flicker from blades	4.23
14	Impact on local tourism	4.21
15	Decrease in property values	4.21
16	Toxic smoke / fire evacuation risk	4.16
17	Effect on farm animals	4.16
18	Fire risk of substations / battery storage	4.15
19	EMF (electromagnetic fields) health risks	4.11

HEALTH ISSUES

The survey showed that 54 respondents (45.7%) had one or more health issue that they worried might be exacerbated by the wind turbine development.

A number of respondents wrote in answers as well including autism, ADHD, tinnitus, vertigo, and misophonia. Migraines and insomnia topped the list of common health concerns.



COMMUNITY COMMENTS

- "No focus on energy descent. - Damage to water cycles -"Renewable" energy projects implemented at huge scale under the same political / economic framework as fossil fuels PTO"

"170m turbine = 350 cubic metre concrete base x 14 turbines = 4900 cubic meter concrete that will never be removed again. All the while i have to count the flowers in the grass on the same hill to improve biodiversity. It's insane. All for the benefit of one man. China has already developed a solution which is sustainable. It will come. We have to wait, meanwhile protect our hills from irreversible damage."

"As an island nation, we should make use of wave power and install wind turbines at sea rather than on land"

"Putting sign up along the Cousane Gap to create greater awareness of what is happening there...the bulk of people would not know about these proposed Windmill parks..."

"We learnt recently that businesses (ie call centres, server farms) use more electricity than all of the homes in the country, yet electricity prices continue to rise. It seems clear that there is no benefit to the people of the country and it all feels like a continued exploitation of our natural resources. concerns."

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number of locations within these areas with limited potential for small-scale wind projects, their contribution to any significant reduction in greenhouse gas emissions would be negligible. Except on a small scale and at particularly suitable locations, wind projects would normally be discouraged in these areas.

6.7.13. The identification of these areas does not of course give any certainty about the outcome of any particular wind energy proposal and, even within the strategic search areas there will be particular constraints at individual sites. For example, within the identified search areas, important breeding and feeding grounds for rare and protected hen harriers can be found and these can be damaged or destroyed by inappropriate development.

6.7.14. In general terms, for a wind energy project to succeed in the planning process, a whole range of criteria must be met, whether in the search areas or in other areas. The Department of Environment, Heritage and Local Government's "Wind Energy Development" guidelines sets out in detail various development control considerations (including site selection, siting and layout) for various types of wind energy projects.

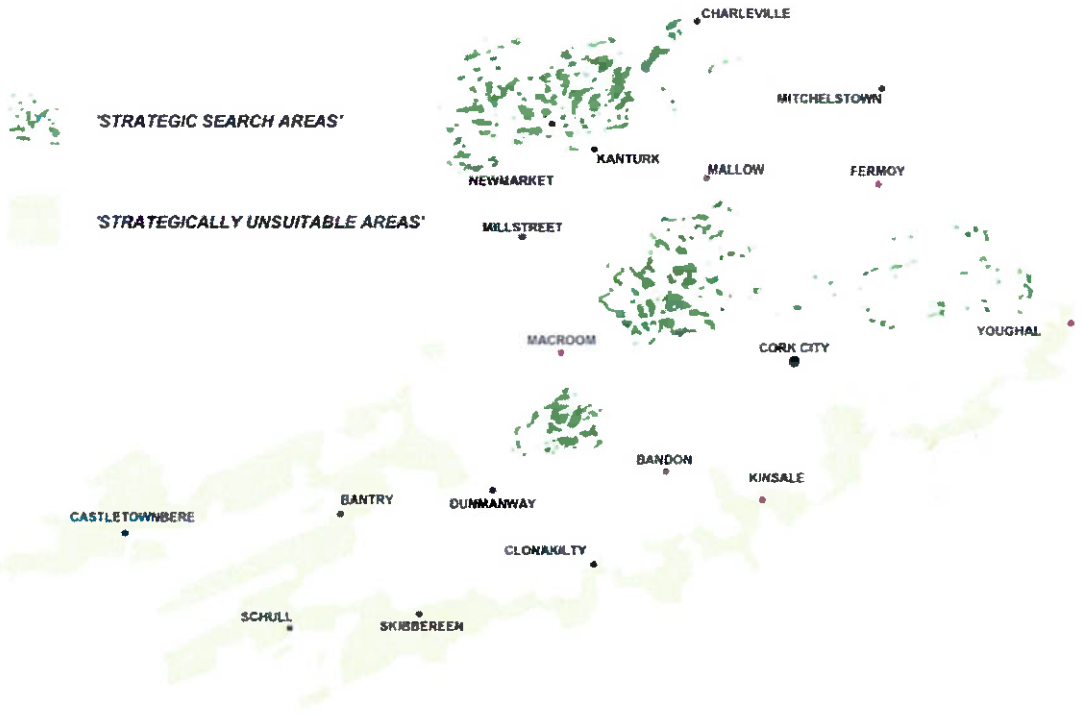

Figure 6.3: Strategic Wind Energy Areas

Please refer to Ch 17 EIAR

EIAR Chapter 17, Interactions, reveals the following:

- (17) Section: Population and Human Health. Hydrology and Hydrogeology. This states that a search in the GSI showed no mapped private wells within 5Km of the site. This is a meaningless assessment as every house in the Mealagh valley has one if not two private wells, as do most houses and farms within 5Km of the Northern site! It shows that interest searches in Galway or Dublin are no substitute for local knowledge or even just basic common sense.

- (17) Section: Population and Health/Climate. This notes that the development will have a long-term moderate positive effect on climate and therefore a long-term moderate positive effect on health. It implies this has significance, whereas an effect positive is acknowledged and it is as stated, but it will be imperceptible in reality. This is just continuing the value loaded judgements implied throughout this EIAR, which are pretty much unfounded, and without evidence.

- (17) Section: Population and Human Health: Landscape and Visual. This admits there will be Significant visual impacts, but only for a small number of residences, which are beyond the '4xTip Height Setback' so 'therefore effects will be satisfactorily mitigated'! So 'Significant' is no longer considered significant! Nearly all residents do not agree.

- (17) Section: Biodiversity: Noise and Vibration. This is cited as being negative and permanent and yet also to have an imperceptible effect on biodiversity. This is without any research being done. (Chapter 6 Biodiversity, Chapter 12 Noise, also refers). The Coimisiún needs to satisfy itself that despite the lack of research that this is so.

- (17) Section: Ornithology: Noise and Vibration. This is stated as having a negative, long-term effect but imperceptible: it will remain so, especially as no monitoring will take place to detect it. This aspect will be ignored in reality. The history of human development of late illustrates only too well how the unintended consequences of our actions are manifold and very environmentally damaging.

- (17) Section: Landscape and Visual, and Cultural Heritage. This states that any potential, indirect, visual effect of the proposed turbines on sites and monuments range from imperceptible to moderate. This is incorrect. The wind energy complex and its turbines will completely dominate and change the perception of the entire valley. Hence this will undermine the setting of the archaeological landscape, let alone what it inflicts on the lives of the inhabitants of the valley whose 'culture' will be destroyed. This is very divisive already, even before any permission can be reasonably considered. In addition, the

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unacceptable concentration of wind farms immediately adjoining Maughanaclea is specifically referenced in Cork County Council's refusal of planning permission 25/142 for Gortloughra currently on appeal before An Coimisiún Pleanála 322743.

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CONCLUSION.

What is proposed for the head of Bantry Bay's Three Valleys is a power station which has the capacity to power half of all households in County Cork. That is Curraglass, Derreenacrinning, and Maughanaclea combined. It will be the permanent industrialisation of a landscape and the sacrifice of a very high value[7] landscape of National Importance. It is too high a price to pay and there is no real case for it to be sited here other than the wind strength, which is very variable, and the willingness of landowners to cooperate. The price will be damaging to tourism and local amenity, and disastrous for the nearby residents. It is not even clear whether or not this will contribute to the reduction of CO_2 emissions or go to power 'new' requirements ie. Direct sales of power to data centres.

There is plenty in the EIAR, which states why this development is needed, so it is appropriate here to argue why the development is not needed in this location. Within the EIAR there are implicit assumptions that because there are existing wind farms around, which have proved acceptable, that the 'limit' has not yet been reached.

There is some ambiguity in the County Planners refusing permission for a wind farm at Gortloughra, due to loss of habitat and visual amenity, and then granting permission for Curraglass and Derreenacrinnig. It doesn't make sense to split up the area, refusing one but not others. It doesn't recognise the cohesive nature of the landforms forming the scenery: now all are before An Coimisiún Pleanála and should be seen as a whole. If CCCouncil feels that the previous permissions granted for Derreenacrinnig West and Curraglass make it hard to refuse them, then maybe the previous refusals for the Mealagh valley (see Appendix) should also be viewed by An Coimisiún Pleanála as precedents. What is certain is that if Derreenacrinnig West and Curraglass are granted planning permission on appeal, then it will leave the door open for development in Ouvane, Mealagh and Coomhola valleys, even if the present 'Maughanaclea' application is refused. After nearly 30 years of being targeted, the area deserves some definite protection.

As argued here, the area forms an integral part of a landscape LCT4 which is at present protected and is accorded a High Landscape Value (HLV) in its own right. It is an opportunity here for An Coimisiún Pleanála to rectify past inconsistent decisions and afford a naturally cohesive landscape the protection it deserves. If the areas 'Open to Consideration' are truly examined then the Coomhola Valley leading up to the 'Priest's Leap' will be the next target for the wind farm industry, and indeed landowners have already been approached. It is vital that the precious highlands of Bantry are seen as the future asset for tourism and recreation that they undoubtably are. These are 'forever' decisions: at the moment there are no turbines on the seaward side of the ridges that frame the upper end of Bantry Bay. This is the only chance to protect it.

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[7] LCT 4,: Very High Lands. Value, Very High Sensitivity, National Importance, : designated as (HVL), the highest category, with all necessary protections set out CCDP 2022-2028.