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The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

16th May, 2026

Re: Case Reference PAX04.324165

Applicant: Maughanaclea Ltd., associated company of Enerco Energy Ltd.

Project: Maughanaclea Renewable Energy Development

Description: The applicant is seeking permission for the construction of a wind energy development comprising 14 wind turbines, a 110 kV substation, a 110 kV underground grid connection, and all associated infrastructure and works in Maughanaclea and associated townlands, Co. Cork. The proposed project is being made directly to An Coimisiún Pleanála, the Commission, as Strategic Infrastructure Development under Section 37E of the Planning and Development Act 2000, as amended.

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

A chara,

Please find enclosed my submission and fee in respect of Case Reference PAX04.324165 concerning the proposed Maughanaclea Renewable Energy Development by Maughanaclea Ltd., an associated company of Enerco Energy Ltd.

As the Board is aware, this is not a small energy proposal, but a major industrial development proposed for a sensitive upland landscape close to Bantry. As our leading planning authority, I ask the Board to give the upmost consideration to the proposed location and sheer scale of this development, its effects on our people, landscape, heritage, water, biodiversity and on our rural communities of West Cork.

I have divided this submission into the following sections. It is being made within the statutory timeframe and deadline of 25th May, 2026, as set by the Board.

1. Introduction

This proposed wind farm on the Maughanaclea Hills would consist of 14 wind turbines at 169 metres in height and rotor blades spanning over four acres. It is a major concern to myself and our local communities that this development will be assessed under national Wind Energy Guidelines dating back to 2006. These guidelines were never meant for colossal projects of this height and scale.

I refer you back to Dáil Éireann on 19 June 2013, when Deputy Micheál Martin stated: "A Government intervention is required. The 2006 planning guidelines are outdated and were never framed in the context of the technology that is emerging." (Cited - Oireachtas record).

Earlier this year on 25 March 2026, Deputy Brian Stanley again raised the long delay in updating the wind energy guidelines. The Taoiseach's response was significant and notably different stating: "I understand the issue, but let us be honest, when these guidelines emerge, they will probably lead to a reduction in the number of wind farms."

This recent response from Micheál Martin is indicative of what is being thrown at rural communities, as even he acknowledges that stronger and more up to date guidelines are likely to change the planning outcome for some wind farm proposals. Meantime, numerous private profit driven developers are swooping into rural areas of West Cork, in an attempt to take vast financial spoils resulting in the industrialisation of our rural lands. I ask An Coimisiún Pleanála, our highly respected and leading planning authority, to use its independent power, integrity and impartiality and make a lawful decision in refusing this Strategic Infrastructure Development (SID) from Enerco Energy and their highly paid agents MKO. I ask the Board to make a decision that this SID goes against proper planning laws, would cause massive visual and cumulative impact on the rural Maughanaclea Hills and communities and visitors should not have to bear the

consequences of an industrial scale development, being pushed through under guidance that is two decades old.

Micheál Martin and his present government are constantly piling on pressure for more wind farms developments, yet paying out vast curtailment fees. Our electricity grid is experiencing huge levels of renewable dispatch down as the grid cannot always absorb the power available. EirGrid reported that in 2024, 1,266 GWh of wind energy was dispatched down in Ireland, equivalent to 10.1% of available wind energy.

Across the all island system, 2,181 GWh of wind energy was dispatched down, equivalent to 14.0% of available wind energy. The stark reality of these official figures are evident in that the SEM Committee set Network Imperfections Charges for Year 2025/26 at €790.24 million. These millions of euros relate to network constraints and dispatch costs and are ultimately borne by electricity consumers.

Ireland had the highest household electricity prices in the EU in the second half of 2025, at €40.42 per 100 kWh, compared with an EU average of €28.96 per 100 kWh (Source: Eurostar). This remains the case so far in 2026. It is insufficient that applications such as this one from private developer Enerco Energy, can seek permission relying on broad renewable energy assurances, yet little weight can be given to grid capacity, dispatch down, system costs, carbon and data centre demand.

As this application is being made directly to An Coimisiún Pleanála as a Strategic Infrastructure Development, the affected community has no ordinary appeal route. That places an even greater responsibility on An Coimisiún Pleanála to decide with independence and ensure that this particular project is lawful, necessary, proportionate and environmentally sound on this particular rural landscape.

For the reasons set out in my submission, it is evident that this application contains major contradictions and assurances and goes against planning laws. Enerco Energy and their agents MKO have failed to demonstrate that the proposed development can be constructed without harm and irreversible damage to the landscape character, cultural heritage, residential amenity, tourism, rural life, biodiversity and water resources.

On that basis, An Coimisiún Pleanála should refuse permission.

Climate, Grid Constraints, Data Centres, Curtailment, Energy Security and Embodied Carbon

Introduction

My submission challenges the incomplete and over confident climate case put forward in this proposal. Enerco and their agents MKO has failed to demonstrate that this project would deliver the climate benefit claimed, once Irish grid conditions, rising demand, dispatch down, gas dependence and full construction carbon are properly taken into account.

This is mandatory as their application asks the Board to accept a major industrial development on the Maughanaclea Hills, a sensitive West Cork upland landscape on the strength of a reassuring carbon claim. If that claim is built on basic assumptions, weak treatment of constraints or carbon accounting that shows only the favourable side of the argument, then their justification fails and the Board should refuse permission.

1. The Board must assess the real climate value of this project

The Board has to consider proper planning and sustainable development and to reach a reasoned conclusion on likely significant effects, including climate, material assets, population, human health, land, landscape and their connections. In a proposed industrial development such as this, if climate benefit is being used as one of the main reasons to justify 169 metre turbines, construction, excavation, concrete, cabling and long term industrialisation of this landscape, then that benefit must be shown clearly and evidenced.

2. The national electricity context has changed sharply

The national electricity system is not operating in the simple terms so often used in slick wind energy advertising. Data centres consumed 21% of all metered electricity from the grid in 2023, up from 18% in 2022 and that share rose again to 22% in 2024. Data centre growth accounted for 85% of overall electricity demand growth over the period reviewed. Those figures show that the national context has changed and that renewable output cannot be assessed as though demand were stable or ordinary, which is certainly not the case in Ireland.

EirGrid's own resource material records approximately 2,100 MVA of contracted demand capacity for data centres and other new technology loads at transmission level, with a further 300 MVA contracted at 110 kV distribution level. It also points to a future in which

around 32% of all electricity demand could come from data centres and new technology loads by 2030. That is a structural change and the claimed 'renewable benefit' requires a lot more evidence than Enerco Energy and their agents MKO provides.

3. Grid constraints are central, not peripheral

One of the clearest weaknesses in MKO's climate case is their treatment of grid constraints, as though they were a secondary issue. If electricity cannot be moved efficiently from where it is generated in the west and south west to where demand is concentrated, then their paperwork data is not the same thing as actual decarbonisation on the ground.

Engineers Ireland points to the need for major grid reinforcement, stronger infrastructure and a more adaptable electricity network. This respected organisation also points to long planning and delivery delays for the infrastructure needed to move electricity around the country. That means the Board should be very slow to accept any assessment that leans heavily on gross output figures, while little is addressed on how it will be absorbed, transported and used under genuine operating conditions.

4. Dispatch down, the gap between headline claims and operational reality

The figures relied on show why a simple output equals benefit approach cannot safely be accepted. As previously mentioned, EirGrid's 2024 renewable constraint and curtailment figures recorded wind dispatch down in Ireland of 1,266 GWh, equal to 10.1% of available wind energy. On an all island basis the figure was 2,181 GWh, or 14.0% of available wind energy. It is hugely evident that a significant amount of renewable electricity was available, but could not be used by the system.

That is a serious problem for MKO's carbon logic and should be seen as so by the Board. If a share of renewable electricity is already being turned down because of system limitations, then the Board cannot simply assume that every megawatt hour claimed for the Maughanaclea Hills wind farm will translate into a matching climate gain. Any carbon benefit based on full or near full effective fossil fuel replacement, becomes more uncertain once real constraint and curtailment conditions are faced honestly.

5. Climate case is further weakened by Ireland's continued dependence on gas

Another important point is that Ireland still depends heavily on gas fired generation for balancing and security of supply. Engineers Ireland state that around 42% of electricity generated in 2024 came from gas and that around 80% of Irish gas is imported. It also records that Ireland has no domestic gas storage, no long term indigenous gas supply and no alternative supply route. That is not a stable or self sufficient system.

This matters because the application appears to rely on a neat assumption that renewable output will straightforwardly displace fossil generation. The reality is completely different. Gas remains a major part of the backbone of Ireland and keeps the lights on when wind drops and when stability has to be protected. A lawful and balanced climate assessment should have been presented to the Board.

6. Data centre demand changes the meaning of claimed public benefit

Rural areas such as West Cork are being targeted to absorb large scale industrial development, road works, excavation, visual change and loss of tranquillity, while a rapidly growing share of national electricity demand is being driven by very large and concentrated technology loads elsewhere. According to an Oireachtas report, there are approximately 69 data centres in the Greater Dublin area. MKO cannot simply claim a broad climate benefit without explaining where this project fits into the system and who, in practice, is likely to absorb the electricity it produces.

Without that transparency, the Irish public is left with headlines claims, while the real trade off is very different. The Board must ask whether this project would genuinely reduce fossil dependence in practice, whether its output would be swallowed by exceptional demand growth or whether the claimed public benefit is being stated more confidently than the clear evidence shows.

7. Carbon burden has not been dealt with fully enough

Another major weakness put forward by MKO is the one sided nature of the carbon story. A wind farm such as this one proposed for the Maughanaclea Hills does not arrive carbon free. Steel, cement, reinforced concrete, copper, cables, resins, transformers, cranes, excavation, blasting, haulage, road construction, plant, maintenance and eventual decommissioning all carry a huge carbon burden. In a development of this scale, these are not minor inputs, but are central to the project.

It is fact that steel and cement are among the most carbon intensive industrial materials in the world. Yet there is no clear sign in the MKO material before the Board that the applicant Enerco has transparently identified likely source countries, manufacturing routes, transport chains, shipping distances or realistic supply scenarios for all these principal components. If a quantified climate benefit is being claimed, the Board must know what assumptions underpin it. In this application, a generic or overly simplified embodied carbon calculation is not enough.

8. Country of origin and supply chains matter

This point should not be brushed aside as technical detail. Steel made through a high emission production route is not equivalent, in climate terms, to steel made under cleaner conditions. Cement with a higher carbon intensive binding ingredient is not equivalent to lower carbon alternatives. Turbine components manufactured under one electricity mix and shipped over long distances are not equivalent to components sourced under cleaner or shorter supply arrangements. If these matters remain vague, as they are in this application, then the carbon case appears stronger, which is misleading to the Board.

The Board should therefore be cautious about any climate payback or carbon saving claim that is presented by MKO, while major assumptions about sourcing, manufacture and transport remain unclear. A sensitive upland landscape such as the Maughanaclea Hills, should not be industrialised on the basis of a one sided false climate claim.

9. Rising system costs show the strain is already real

Strong attention must be given to the cost of operating a constrained electricity system. The official figures cited by Eirgrid show allowed network imperfections or related system charges of €567.21 million for 2024/25 and €790.24 million for 2025/26 after adjustment, with dispatch balancing costs identified as the largest component. The same material refers to further provisions linked to potential redispatch compensation. Those are broader system figures rather than a simple wind only line item, but they are important here as they show that the cost of operating a stressed grid is already very substantial.

The board must note that the application's climate narrative risks sounding frictionless, when the real system is not. Constraints, balancing, redispatch and network weakness have practical consequences and public cost. The Board should not be asked to assess this proposal on the basis of a simplified story that leaves these factual points in the background.

10. What this means for the Maughanaclea Hills application

Combined, these points seriously weaken any over confident claim by MKO that the proposed industrial-scale SID development will plainly deliver the climate benefit asserted. The problem is not support for renewable energy in principle, but whether MKO has shown, with enough clarity and honesty, that this project would produce a real net climate gain once dispatch down, grid limitations, demand concentration, gas dependence and full carbon footprint are properly counted. On the material now before the Board, this is extremely flawed with huge contradictions on the part of MKO.

This rural landscape is not an empty technical zone, it is a valued and sensitive part of West Cork. If the Board is being asked to permit a major industrial development here, it should insist on a climate assessment that is complete, balanced and grounded in real system conditions, rather than broad assumptions, that litter this application.

11. Conclusion and request to the Board

For these reasons, the Board must reject any suggestion that the climate effects of this application have been fully and robustly assessed. It appears too dependent on optimistic assumptions, too weak on real Irish grid conditions, too dismissive of dispatch down and lacks evidence in its treatment of carbon footprint and supply chain emissions.

The Board has not being provided with a project specific carbon footprint inventory for steel, cement, concrete, roads, hardstands, cabling, substation works and turbine manufacture. Nor a clearer statement of likely source countries, manufacturing routes and transport chains for principal components or a transparent assessment of how dispatch down, curtailment and local network constraints affect actual climate benefit; MKO lack a case in explaining how the claimed climate case remains robust in the face of exceptional data centre demand growth and continued gas dependence, for balancing and security of supply.

It is evident from this application that MKO has made huge assumptions and left a great amount of detail unexplained. This is not a sound or lawful basis for the Board to grant permission for a substantial and lasting industrial development, in this sensitive West Cork landscape.

References

House of the Oireachtas Library & Research Service, Data Centres and Energy, 23rd July 2024

Commission for Regulation of Utilities, Review of Large Energy Users Connection Policy, 2025

EirGrid and SONI, All Island Resource Adequacy Assessment 2026-2035

EirGrid Annual Renewable Constraint and Curtailment Report 2024

Engineers Ireland, Opening Statement to the Oireachtas Committee on Climate, Environment and Energy, 25th March 2025

Engineers Ireland, Powering Ireland: An Electrical Energy Review, 2023

SEM Committee, Imperfections Charges / Network Imperfections Charges decision papers, 2024/25 and 2025/26

International Energy Agency, Demand and Supply Measures for the Steel and Cement Transition.

House Prices, Tourism, Residential Amenity and Rural Settlement.

Introduction

Chapter 5 of MKO's material deals with Population and Human Health, Appendix 5-2 on house prices and Appendix 5-3 on tourism and the reliance placed on noise, landscape and mitigation chapters. It is clearly evident that the impact on people's homes and their lives have been greatly underestimated.

Their EIAR in accordance with planning laws, directives and objectives, must put forward a detailed and comprehensive document addressing the likely significant effects on population and human health, material assets, landscape, residential amenity, tourism and the interaction between these groups. I refer the Board to EIA Directive 2011/92/EU as amended by Directive 2014/52/EU regarding proper planning and sustainable development of an area, the Cork County Development Plan 2022-2028 and Section 28 Wind Energy Guidance, all of which should have been abided by developers Enerco's agents MKO.

The Board is being asked to consider if MKO's assessment is sufficiently site specific and properly evaluates this landscape and communities. Chapter 5 Population and Human Health is central to this application, as it deals with sensitive receptors, tourism baseline, property values, construction effects and residential amenity. Appendix 5-2, with no reliability to Ireland, MKO has chosen to use a 10 year old Scottish price study from 2016, which immediately throws up planning inconsistencies. Why would MKO use a 10 year old study from another country and rely heavily on this to allege that there would no consistent negative effects on property values around the Maughanaclea Hills, West Cork, Ireland? In contrast, in an Irish Independent article, Irish property expert, John Earley of Property Partners, estimates the value of a house located close to a turbine can decrease by 50% or more.

Appendix 5-3 of the Tourism Impact Assessment, is relied upon by MKO to suggest no significant tourism impact. Chapter 12 Noise and Vibration, Chapter 13 Landscape and Visual, Chapter 15 Material Assets and Chapter 18 Schedule of Mitigation and Monitoring Measures are then used to support those non evidential conclusions.

This is extremely relevant as conclusions on house prices, tourism and residential amenity are not independent. MKO rely on assumptions made elsewhere in the EIAR. If the noise assessment is inadequate, visual assessment understated, traffic effects downplayed or too much reliance is placed on future mitigation, then MKO's conclusions in Chapter 5 should not be accepted as sound assessments by the Board.

1. Property value

MKO's material treats decreases in property values as irrelevant. They give no correlation to 14 industrial turbines at 169 metres in height built close to rural homes and how these would affect home life, house values and perceived future sale prices. In planning terms, this goes directly to residential amenity, material assets, human health and the qualities of living on the Maughanaclea Hills.

For example, Chapter 5 records 79 sensitive receptors within 1,330 metres of the proposed turbines and also records third party receptors as close as 682.6 metres to a proposed turbine. The same chapter identifies 83 properties within 250 metres of the grid connection route. These homes would be exposed to a combination of visual dominance, moving rotor blades, noise, shadow flicker, road disruption, construction traffic and the wider industrialisation, of what is now a rural landscape. A conclusion of 'Not Significant' is not a convincing argument, unless it is based on a clear, property specific assessment of these combined effects. The Board must consider that no proper research was conducted and no evidential figures presented to them and does not reflect factual location evidence.

2. Broad international studies should not replace on-site data

Enerco's agents MKO lean heavily on general literature from outside Ireland, including the ClimateXChange 2016 study on Scottish house prices. This study cannot be a substitute for a proper analysis in Ireland and in particular, the Maughanaclea Hills, the subject of this application.

The Scottish report itself acknowledges variation across regions and accepts that the reasons behind those differences are complex and not fully captured by the data.

The Board should not accept broad differences here. The Maughanaclea Hills are not a generic rural setting, but a West Cork landscape of homes, scenic routes, upland views, private amenity, peatland, tourism activity and known for its sense of peace. Appendix 5-2 notes that visibility and proximity are important. Therefore, the logical conclusion is that the EIAR should have examined the likely risk on a receptor-by-receptor basis, cross referenced to the landscape, noise, shadow flicker, traffic and cumulative development material. MKO fails to provide any specific-site evidence and this has to raise questions on the unreliability of the EIAR.

3. MKO's lack of evidence cannot be dismissed

Importantly, MKO's own material accepts that Irish research has identified a possible property value effect. Chapter 5 refers to the CERIS working paper from the University of Galway, Wind Turbines and House Prices Along the West of Ireland: A Hedonic Pricing Approach. On document page 5-46, Section 5.3.5.1 records that this research covered turbine developments in Donegal, Leitrim, Sligo, Mayo, Galway, Kerry and Cork. This is evidentially much more relevant to this proposed project, rather than random speculative studies used by MKO from another country.

The summary records a potential decrease of -14.7% for houses within 0 to 1 kilometre of a turbine. Having disregard for this, MKO moves to reasons why the figures should be given less weight. MKO's own cited evidence identifies a potential effect within 1 kilometre, so following proper analysis, the EIAR should have identified every dwelling within that zone, assessed likely visibility, proximity, turbine number, noise, shadow flicker, access road exposure and the combined impacts on amenity, sales and value. This omission from their EIAR is especially relevant, as the proposed turbine height is 169 metres.

The reasoning, making turbine height this especially relevant is that 2023 CERIS also states: "The analysis finds a robust and significant reduction in property value of -14.7% within 1km of a turbine' and that 'Back-of-the-envelope calculations suggest that the total loss in value for houses within 1km of a turbine in the case counties is approximately €6.8 million."

"There was an even greater devaluation of houses when the turbine height was greater than 125m. The study found that "turbine height is influential on house price within 1km, with turbines taller than 125m incurring a greater discount (-22.9%) compared to medium sized turbines (-14.4%).(Gillespie et al,2023, pg18)"

This specific figure of -22.9% is not reproduced in EIAR Chapter 5, instead reference is made only to the -14.7% finding, with the 169 metre turbine height left unaddressed. The proposed turbines are significantly higher than the 125 metre threshold, but the Board is being asked to rely on reassurance drawn from only partial treatment of the Irish CERIS study. The scale and height of this SID makes it exceptionally relevant to the Board's decision.

4. The assessment ignores rural homes and retirement settlement

West Cork rural life and homes are very often passed down through generations and this must be preserved. Their value lies within daily lives filled with quietness, dark skies, landscape character and tranquility. Chapter 5 records that the Population Study Area, covering Douce, Kealkill and Mealagh Electoral Divisions, has 1,249 people and among

those aged 15 and over who are not in the labour force, retired people account for 45.5%. West Cork attracts people from all over the world, who move here for the quality of life. As an example, my husband is from Spain and has made his home here for 25 years, our close friends and neighbours in the Mealagh valley also come from Spain, Germany, Netherlands, England, Belgium, Israel, United States, South Africa and many other locations. These are just a few examples of those who live in close proximity to us, yet the EIAR barely acknowledges this wide diaspora.

5. West Cork tourism

The Tourism Impact Assessment material is based on vague figures. It notes there is only one registered accommodation within 5 kilometres of the site and 11 Airbnb's within the study area. It is significant that it then accepts not all tourism assets are captured through formal accommodation or attraction databases. People come here for scenic drives, walking, cycling, photography, dark skies, short breaks, second homes, visits to friends and family, retreats and zen experiences across rural lands. This type of tourism would be highly sensitive to cumulative industrialisation. You will note from a map in my submission (5. Landscape Visual Impact) the cumulative attack with numerous proposed developments across this area of West Cork. The narrow data from MKO is wholly inaccurate.

6. Bantry, Ballylickey, Glengarriff, Gougane Barra and Beara Breifne Way

MKO acknowledges Bantry, Ballylickey and Glengarriff as roughly 8 to 10 kilometres from the proposed site and from the nearest hub of tourism activity. It acknowledges Gougane Barra Forest Park and St. Finbarr's Oratory as significant tourism assets, along with older visitor data of about 63,000 visitors, as referred to as the Forest Park. It identifies the Sheep's Head Way and St. Finbarr's Way, including sections linking Gougane Barra, Drimoleague and the mountains north of Kealkill. Yet MKO push the idea of a fragmented connection between these areas, while at the same time, omitting the Beara Breifne Way.

Beara-Breifne Way is a recognised national walking route with a specific connection to Kealkill. The route follows the legendary 14 day march taken by Dónal Cam O'Sullivan Beare and his one thousand supporters in 1603, visiting many of the places and communities shaped by that story. Kealkill is expressly identified as a stage of the Beara-Breifne Way and is closely associated with Carriganass Castle, an O'Sullivan Beare stronghold linked to the Battle of Kinsale, the retreat to Leitrim and the wider O'Sullivan Beare history.

This is not a minor omission. It means MKO's tourism and recreation assessment fails to reflect the full heritage walking route of Kealkill and the surrounding landscape. By

referring to St Finbarr's Way and the Sheep's Head Way, but omitting the Beara-Breifne Way and its direct historical connection to Kealkill and Carriganass Castle, the assessment clearly fails to understand the cultural heritage, recreational and tourism value of this landscape.

Figure 1. Slí Gaeltacht Mhúscraí information board showing the Kealkill section of the Beara-Breifne Way and Beara Way network, including routes between Glengarriff, Kealkill, Gougane Barra and Ballingeary.

Figure 2. Historic portrait associated with the O'Sullivan Beare.

Figure 3.Beara-Breifne Way route stamp for Slí Gaeltacht Mhúscraí.

Visitors do not experience West Cork as isolated pins on a map nor it is based on a single attraction. Visitors drive approach roads, walk ridges and valleys, stop at vista view points, pass through Kealkill and Cousane Gap, head towards Bantry and Gougane Barra and experience the area as a whole. Bantry's tourism value is uniquely tied to its surrounding rural lands, an example being the importance of Gougane Barra and the fact that it does not remain within a formal boundary. To construct an industrial-scale wind farm in the midst of this, would destroy the tranquillity, skyline, ridge line character and cause cumulative landscape damage, resulting in a tourism decline. The Maughanaclea Hills are close to Bantry and 169 metre high turbines would be clearly visible from the landward side of the famous Bantry Bay, where even more tourism is flourishing with the arrival of luxury cruise ships.

7. Scenic routes and construction impacts are treated too lightly

MKO identifies the important Scenic Route S29, Regional Road R585 to Kealkill via Cousane Gap to Derragh Bridge and accepts that it passes through the centre of the proposed wind farm site. It also identifies Scenic Route S28, R584 through the Pass of Keimaneigh to Gougane Barra, as 'requiring consideration.' What is greatly understated is the importance of these tourism routes, recognised as scenic routes under the Cork County Development Plan. MKO ignore the fact that a Strategic Infrastructure Development would alter the experience of residents, walkers, cyclists and the thousands of visitors that come through this region of West Cork.

MKO in their Chapter 5 regarding construction, suggests tourism effects during construction would be 'short term, negative and imperceptible' and wrongly assesses that visitors could use other routes during Enerco Energy's prolonged grid works and construction phase. A crucial factor for the Board to consider is that the grid connection route would use public roads including the R585, L4909, L4609, L4615, R587 and R586.

In a rural tourism setting, this will undoubtedly cause significant and prolonged disruption as Enerco has acknowledged that only 100-150 metres will be completed per day, meaning the grid construction phase will extend over many months. There will be ongoing road closures, diversions and restricted access to residents, farmers, local businesses, tourists and many more. Continuous heavy machinery along country roads, never envisaged for these purposes, will also cause detrimental harm and destruction to roadside habitats, hedgerows and biodiversity areas.

Enerco Energy announced that cabling will be located within the 'public road corridor' raising concerns for communities along that route and the proximity of works to private property boundaries, potential encroachment and access issues during construction. There is also the potential legal issues of long term high voltage infrastructure adjacent

to their homes, with regard to their rights in relation to Enerco Energy's works, particularly where road boundaries intersect with private dwellings and land.

8. Residential amenity, tourism and landscape divisions

Chapter 5 clearly demonstrates an attempt to divide impacts. For example, communities living here would experience visual intrusion, shadow flicker risk, traffic disturbance and loss of tranquillity. A visitor would encounter turbines on the skyline, moving blades, construction traffic, road disruption and clear changes along the route.

MKO's conclusion that there will be no significant impact is unacceptable. If visual assessment has been understated, noise approach too permissive, mitigation left to assumptions and cumulative impact minimised, then MKO's conclusions on residential amenity, tourism and property value cannot be accepted as good planning law. The Board must judge the full combined picture, not fragmented impacts.

9. Cumulative change matters

The Tourism Impact Assessment concludes there would be no significant cumulative tourism effect. This does not withstand scrutiny as the wider pattern of existing, permitted and proposed wind energy developments within the same visitor geography must be considered also. Tourism in West Cork is cumulative by nature and so is landscape harm. Repeated industrial-scale developments across ridges, routes, valleys and approaches destroy rural landscapes can never be replaced and permission must be refused by the Board.

Significant concern lies within landscape resource, on which tourism, community, retirement, relocation and day to day rural life would be steadily diminished.

The EIA Directive requires a reasoned lawful conclusion based an assessment of likely significant effects on population and human health, material assets, landscape, cultural heritage and interaction between environmental factors. The Planning and Development Act 2000, as amended, requires An Coimisiún Pleanála, as our leading planning authority, to consider proper planning and sustainable development of the area. The Cork County Development Plan 2022-2028 requires lawful protection of scenic routes, landscape character, rural amenity and visual quality. Fáilte Ireland's tourism EIA guidance states that tourism impacts must be properly assessed, where a project may affect tourism assets or tourism experience. These have not been fulfilled by MKO.

Material presented to the Board by Enerco's agents MKO leave conclusions on house prices, tourism and residential amenity too generic, too dependent on borrowed studies

and too reliant on mitigation elsewhere in the EIAR. Omitted in their assessments are evidence of property specific amenity risk, the 79 sensitive receptors within 1,330 metres, third party homes around 682.6 metres from turbines, 83 properties within 250 metres of the grid route, retirement character of the area, dispersed visitor economy, scenic routes S28 and S29, walking and cycling routes, construction phase disruption, cumulative tourism effects and the combined acknowledgment of landscape, noise, traffic, shadow flicker and amenity.

Where people's homes, daily rural life, settlement value, tourism income and the recognised scenic beauty of West Cork would all be affected, the Board has not been presented with a stable legal assessment. In the absence of that legal assessment, the Board should not accept mere conclusions and would be very justified legally in refusing permission.

References

Directive 2011/92/EU on Environmental Impact Assessment, as amended by Directive 2014/52/EU.

Planning and Development Act 2000, as amended.

Planning and Development Regulations 2001, as amended, including Schedule 6 EIAR

Cork County Development Plan 2022-2028 including objectives on landscape, scenic routes, tourism and rural amenity.

Fáilte Ireland guidance on the treatment of tourism in EIAR

Wind Energy Development Guidelines 2006 and Draft Revised Wind Energy Development Guidelines 2019

Archaeology, cultural heritage, heritage setting and route based visual impact

Introduction

The main planning issue is that turbines of 169 metres would alter the setting of an archaeologically rich upland landscape extending across the Maughanaclea Hills and the ancient lands of Kealkill, Coomclogh, Cousane and the Mealagh Valley. This is not an empty upland. It is a landscape that already contains nationally important and locally significant heritage, including the Kealkill monument, which is, according to the National Monument Service protected by Preservation Order and comprises a stone circle, standing stones and a cairn with a circle of radial standing stones and the nearby Breeny More stone circle and boulder burials. Cork County Council also identifies Kealkill Stone Circle as one of the County's key archaeological heritage sites.

The industrial harm here would not be limited to excavation. It would reach into the wider setting of these monuments, the views along historic route ways and ancient walking routes and the immense cultural significance of a landscape valued for its centuries old archaeological history. Kealkill holds extra significance due to its striking upland position above Bantry Bay and its intertwined history with the surrounding mountains and valley landscape. St. Finbarr's Pilgrim Path is cherished in history as an ancient route that runs through a rich archaeological landscape with views over Bantry Bay and the West Cork coastline. The archaeology of these lands cannot be simply fenced off from construction works. An industrial wind farm of this scale could not be inserted into this landscape, without damaging areas of immense historical significance.

How to read the figures

All attached figures are illustrative visual aids. The baseline images are Google Earth Pro ground view and Street View images. The turbine model was prepared in SketchUp using turbine dimensions provided by MKO. Turbine positions were plotted in QGIS using coordinates supplied by MKO. Blue lines show St. Finbarr's Way and where shown, the linked Sheep's Head Way route. Yellow pins show turbine locations. Red pins show viewpoint locations.

1. The applicant's own material points to a stronger heritage objection

The application itself accepts that Kealkill Stone Circle is a sensitive heritage asset. The Landscape and Visual chapter confirms that turbines were omitted or moved at the western extent of the site in order to reduce effects on the landscape and visual setting of Kealkill. That is an important, as once Enerco's agents MKO accepts that the monument's wider setting is substantial enough to influence their material design, but yet leave the remainder of the scheme as still acceptable.

The same material records five of the fourteen turbines as visible from the Kealkill viewpoint, while treating the monument as highly sensitive. MKO in their material attempt to reduce the importance of this archaeological treasure, citing that turbines would sit on the periphery of the highest quality views. This is disputed as a prehistoric monument in open upland country is not only protected in one preferred direction, but as part of a wider archaeological landscape, as it has been for past centuries.

MKO's demonstrate inconsistency in its significance for the Kealkill viewpoint. The route screening analysis records that 57% of surveyed roads within 3km and on major roads out to 5km, had little or no screening. Chapter 14 accepts moderate negative indirect effects to a number of archaeological sites, due to changes in setting. These are certainly not the foundations of a reassuring heritage case being put before the Board.

2. Legal and policy

Under the EIA Directive, the Board will be aware that it must assess the likely significant effects of the project on material assets, cultural heritage and landscape, before granting permission or refusal. The EPA's 2022 EIAR Guidelines emphasise that an EIAR must identify, describe and assess direct, indirect and cumulative effects with emphasis to uphold their lawful decision making.

The Cork County Development Plan 2022–2028 has protections in place regarding important views and prospects, scenic routes, archaeological landscapes and heritage assets. Objective GI 14-12 seeks to preserve views of historical or cultural significance; GI 14-13 and GI 14-14 protect views from scenic routes and require applicants to demonstrate that development will not obstruct or degrade vulnerable landscape features and ET 13-7 expressly requires wind energy proposals in areas 'Open to Consideration' to avoid adverse impacts on architectural and archaeological heritage, visual quality and cumulative effects.

At national and European level, Ireland's National Landscape Strategy was adopted to implement the European Landscape Convention, which requires landscape to be recognised not as scenery on its own, but as an essential part of people's surroundings and quality of life. Centuries old St Finbarr's Way, Kealkill Stone Circle and the surrounding uplands are historical parts of the one landscape - the Maughanaclea Hills and should not be divided into convenient boxes, for application purposes.

The Architectural Heritage Protection Guidelines for Planning Authorities are also relevant, as they clarify that protection extends beyond physical fabric - to setting, special interest and character. This planning ethos is highly relevant to the Board considering industrial wind farm developments across monuments, historic routes and rural landscapes in a sensitive rural setting.

2. Kealkill Stone Circle should be assessed as part of a wider archaeological landscape

Kealkill Stone Circle is an ancient Bronze Age ceremonial monument, dating from c. 1500–800 BC and is protected as a National Monument and is one of the best known and important archaeological sites in West Cork. It forms part of a wider prehistoric upland landscape of exceptional archaeological interest, including a stone circle, radial cairn and standing stones in a prominent hilltop setting above Bantry. Its significance lies not only in its great age, but in the way its elevated position, visibility and relationship with the surrounding open landscape still allow its historic character to be experienced today. Its setting is a central part of its heritage value.

Enerco's agents MKO attempt to reduce the importance and effect of this Bronze Age Monument, by pointing unconvincingly to the edge of the 'highest quality views' Visitors and local do not experience Kealkill Stone Circle by standing in one fixed spot and looking in one approved MKO direction. Tourists, local, walkers, ramblers and many more make their way to the Bronze Age treasure surrounded by untouched rural beauty. Once multiple industrial turbines are introduced, a beloved historical monument that has stood here for at least 35 centuries, will be changed forever.

Figure 1. Kealkill Stone Circle and the wider upland setting

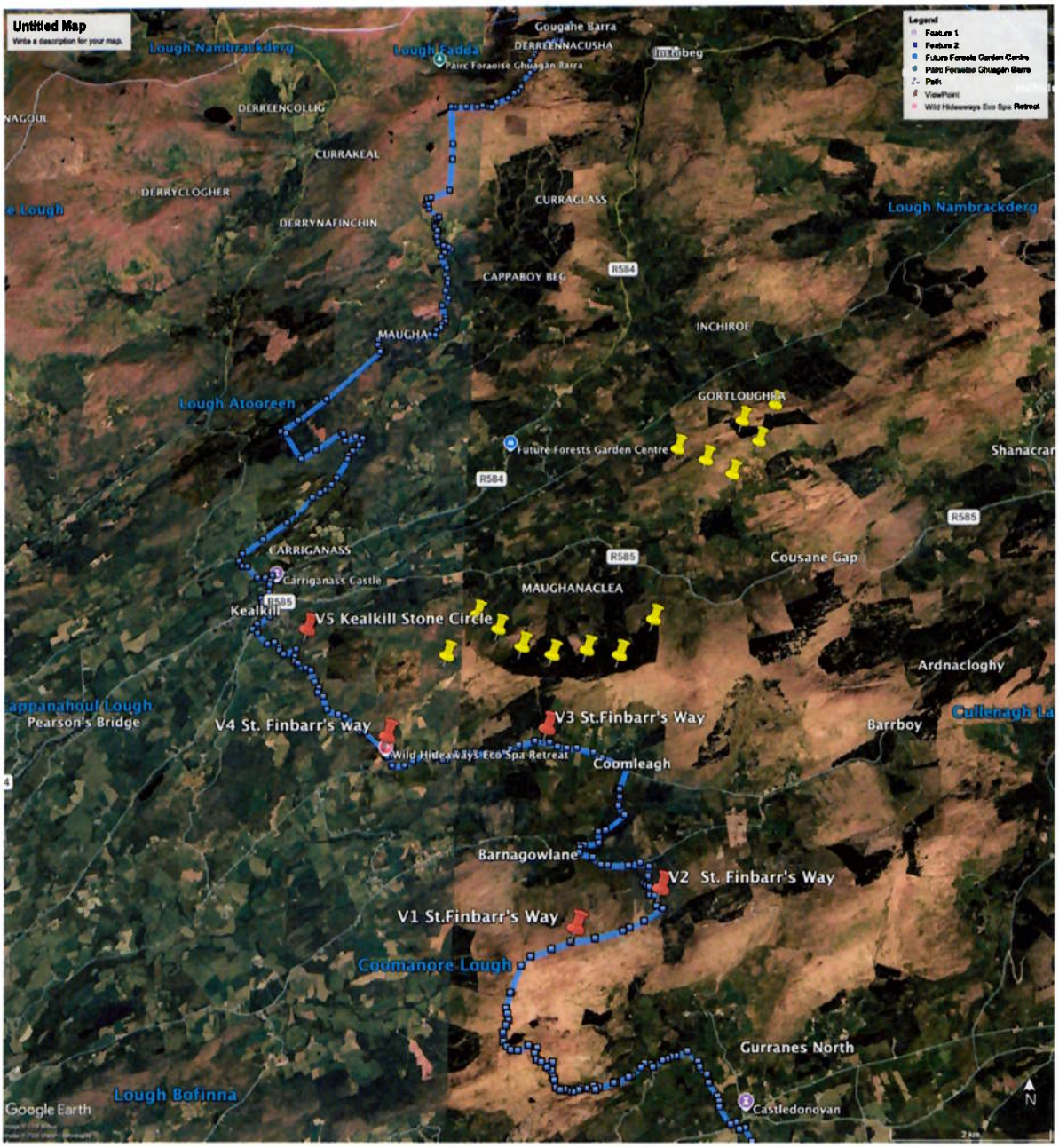


Figure 2. map has been prepared to show the location of five red pins selected viewpoints along St. Finbarr's Way, marked V1 to V5, turbines in yellow pins. The same references are used throughout the photographic material in this submission. For example, a photograph labelled V3 – St. Finbarr's Way corresponds to the viewpoint marked V3 on the map.

Figure V5A. Google Earth Kealkill Stone Circle: existing

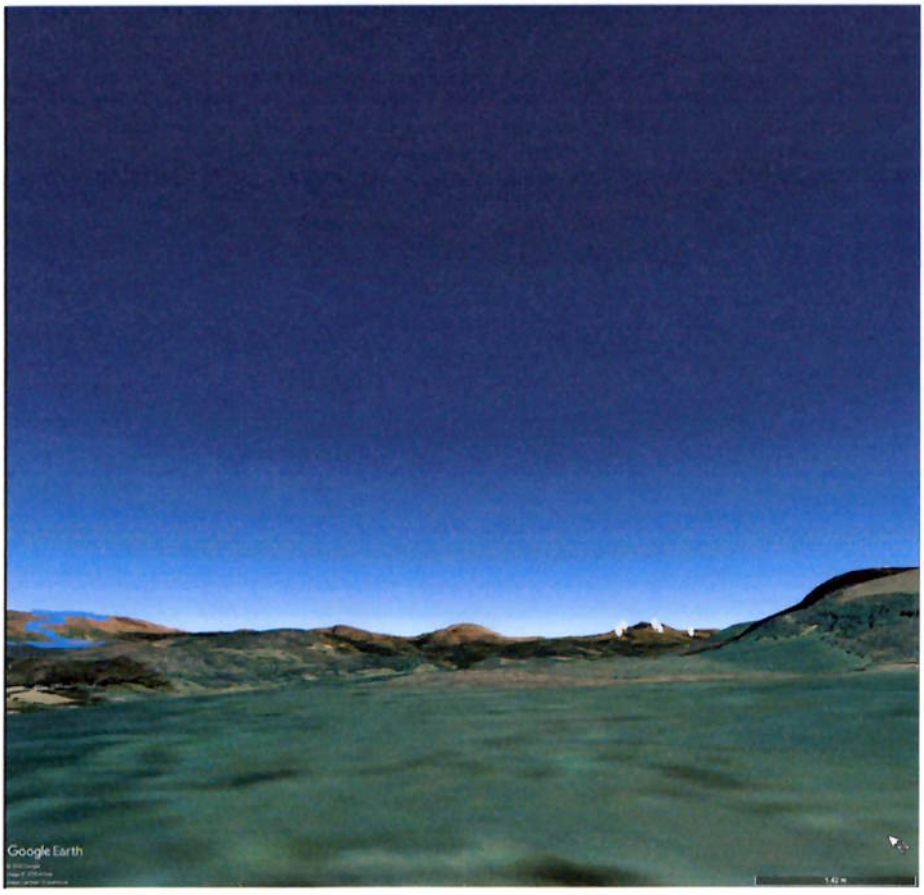


Figure V5B. Google Earth view from V5 towards the proposed turbine area

3. CH55 - unresolved design conflict

CH55 reference is one of the clearest weaknesses in the cultural heritage chapter. MKO accepts that construction of turbine T03 and its hardstand would have a direct, negative, permanent and significant effect on CH55 before mitigation. CH55 is described as a sub-rectangular enclosure containing lazy beds and may form part of a wider field system, associated with nearby recorded monuments. The Board should note that this is a direct acknowledgement that the footprint of the project conflicts with a heritage feature on the ground.

MKO does not resolve this conflict through avoidance. Instead it proposes test trenching, monitoring and a later decision, on whether preservation by record or preservation in situ is possible. In simple terms, they ask the Board for permission first and then propose an archaeological answer later. That is not a proper heritage assessment. Recording is different to preservation. Conflict at the permission stage remains in a wind farm of this scale across a landscape of this sensitivity involving one of West Cork's most important heritage monuments. The Board should recognise that failure and refuse.

4. St. Finbarr's Way - route importance

According to Discover Ireland, St Finbarr's Pilgrim Path is an ancient West Cork pilgrimage route associated with St Finbarr, the 6th century saint of Gougane Barra and Cork. Today the restored and way marked route extends for roughly 35 km from the Drimoleague area to Gougane Barra, passing Castledonovan, Mullaghmesha, the Mealagh Valley and Kealkill. It is one of Ireland's most important early Christian pilgrimage destinations. Its value is not confined to religion or recreation. It is a historic route through a culturally rich upland landscape and its significance depends in large part on the continuity, openness and coherence of that landscape as experienced by walkers and pilgrims.

MKO's Landscape and Visual chapter identifies Slí Gaeltacht Mhúscraí as part of St. Finbarr's Pilgrim Way and places is at approximately 2.9 km from the nearest proposed turbine. MKO is incorrect. The route comes much closer than that at several points, in places around 1 km with distance directly affecting how close, dominant and intrusive the 169 metre turbines would be apparent to walkers.

St. Finbarr's Way is not experienced from one fixed point, but along a moving route of changing vistas. By using a distance that does not reflect the route's nearest points, MKO gives the Board a false impression of separation and downplays the likely effect on this ancient pilgrim way. Sport Ireland describes St Finbarr's Way as one of Ireland's main pilgrim paths, valued for outstanding scenery, heritage and folklore.

The experience of the those walking the pilgrim's path cannot be reduced to one or two isolated viewpoints. MKO indicate that screening would occur elsewhere. Intermittent screening does not remove impact from a heritage route. Repeated emergence of turbines along a route would intensify the sense of industrial intrusion constantly appearing throughout the journey.

The Google Earth images included in this submission demonstrate the true situation, to assist the Board in understanding how 169 metre high turbines would damage this ancient St. Finbarr's pilgrim route.

Figure V2A. St. Finbarr's Way viewpoint and route setting

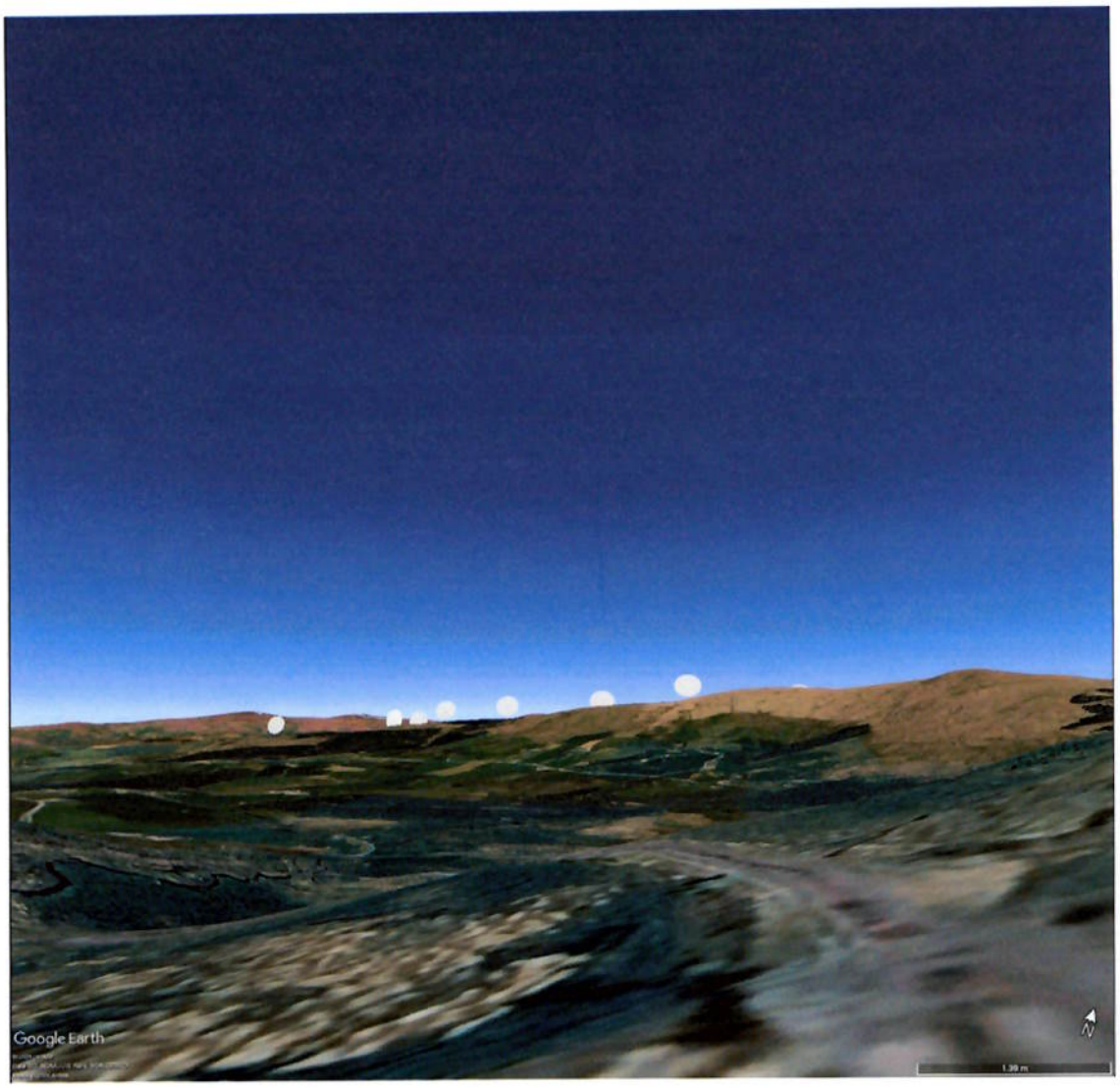


Figure V2B. Google Earth view from V5 towards the proposed turbine area

5. The Gortnacowly and related route viewpoints

Referring to our home in Gortnacowly, Mealagh Valley, you will see that it is indexed as House Number H38. Enerco stated that our home would be just above 1 km from the nearest turbine, number 10. MKO states that St. Finbarr's Way is at approximately 2.9 km from the nearest proposed turbine. The below photo was taken directly in front of our home. It is St. Finbarr's plaque, showing walkers that this is part of the pilgrim path through the Mealagh Valley. Therefore the pilgrim signage does not align with Enerco's written application to the Board.

Figure 3. St Finbarr's Way waymarker sign recorded on 17 May 2026 using Timestamp Camera, showing the date, time and GPS location of this point on the route through Gortnacowly, Bantry, Co. Cork. Indexed as House Number H38 by Enerco

Gortnacowly appears as a cluster of archaeological and cultural heritage features, including a four poster monument, a memorial stone, a cross inscribed stone and a souterrain, with further Gortnacowly cultural heritage entries recorded to the south of Turbines 10 and 11. MKO demonstrate that this is a landscape of repeated heritage presence, rather than a single point of interest. When those places are taken together, the effect is not inconsequential, it is cumulative. The issue is not whether every metre of every route is fully open to view. This is a landscape where turbines would repeatedly affect the experience of moving through culturally heritage important ground. MKO concludes that the residual visual effect is "Slight" and not significant, which is incorrect.

Figure V3A. Google Earth street view. Gortnacowly viewpoint on the St. Finbarr's Way corridor

Figure V3B. Gortnacowly terrain view showing turbine visibility in the wider setting.

A second route viewpoint reinforces the same pattern. It is repeated visual encounter as the route rises, turns and opens out across the uplands.

Figure V4A. Additional St. Finbarr's Way route viewpoint

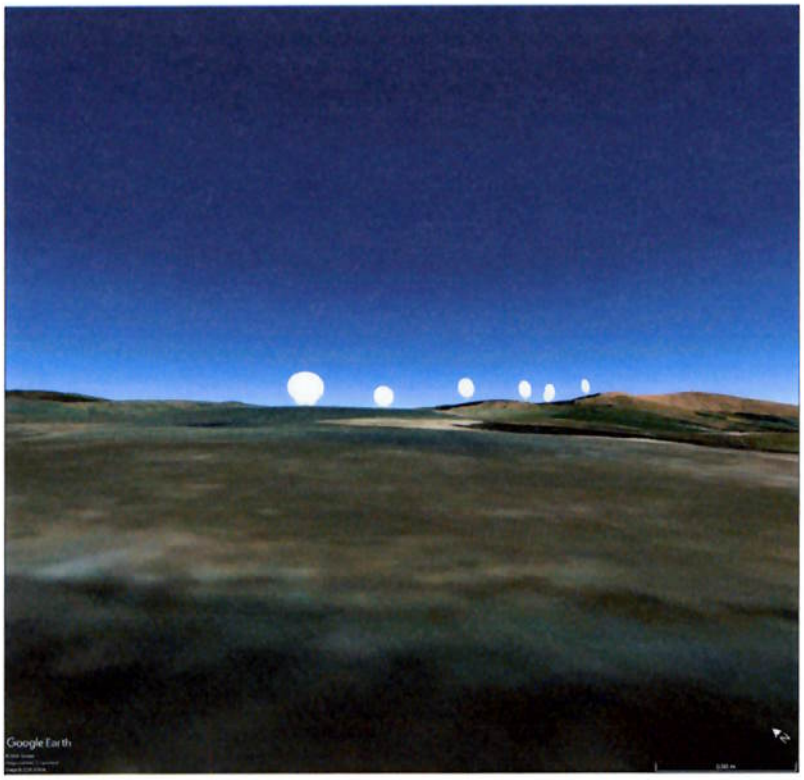


Figure V4B. Terrain view showing how multiple turbines could begin to enter the skyline and wider upland frame.

The Mullaghmesha figure broadens that picture further. It shows that the route based effect extends across a wider corridor of movement and visibility, rather than remaining confined to one localised setting.

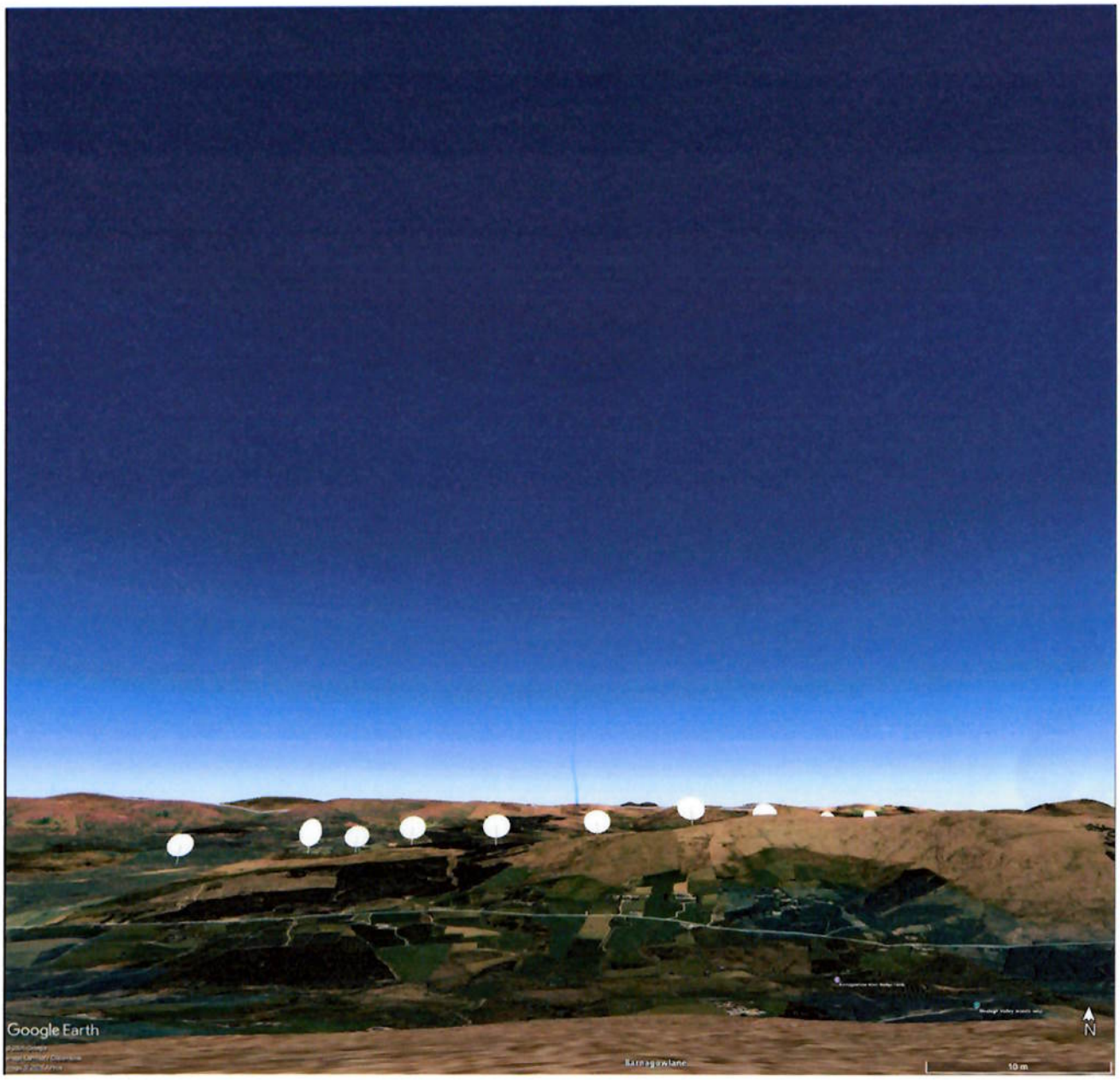


Figure V1. Google Earth Pro terrain view showing the spread of turbine visibility from the Mullaghmesha viewpoint on St. Finbarr's Way

All attached figures are illustrative visual aids. The baseline images are Google Earth Pro ground view and Street View images. The turbine model was prepared in SketchUp using turbine dimensions provided by MKO. Turbine positions were plotted in QGIS using coordinates supplied by MKO.

6. Conclusion

The archaeological and cultural heritage case against this proposal is far stronger than the EIAR would have us believe. MKO's own material shows that Kealkill Stone Circle was sensitive enough to require design changes, that multiple turbines would still remain visible from the monument, that tourists, walkers and locals using St. Finbarr's Pilgrim Way, would face repeated open views of the turbines, in a landscape where screening is plainly limited. They also indicate that a number of archaeological sites would suffer moderate negative effects and that CH55 would face a significant direct effect before mitigation, with the real response left to later trenching, monitoring and possible preservation

MKO attempts to reduce the seriousness of the heritage harm by downplaying the setting, character and experience of St Finbarr's Pilgrim Way and other historic routes through out this landscape. As in other chapters of the application, they attempt to move problems out of the assessment and into later mitigation, monitoring and management. This would insert large industrial wind farm into a landscape of known historical importance and would materially alter walking routes valued for their historic value, visual experience, continuity and landscape connection. The MKO material contains too much minimisation and resons for harm to be dealt with later, rather than properly assessed now at the application stage. The Board should refuse permission, based on the fact that heritage effects have been greatly understated and the extent of the harm, has not been properly confronted.

Source material relied on in this chapter

- Applicant EIAR Chapter 13: Landscape and Visual, including the route screening analysis and the viewpoint material for Kealkill and St. Finbarr's Way.
- Applicant EIAR Chapter 14: Cultural Heritage, including the assessment of operational setting effects and the treatment of CH55.
- Applicant appendices dealing with viewpoint assessment and cultural heritage mitigation.
- The route and viewpoint figures attached to this submission, prepared from Google Earth Pro imagery, MKO turbine dimensions and MKO coordinate data.

- Cork County Development Plan objectives GI 14-12, GI 14-13, GI 14-14 and ET 13-7.
- Department of Housing, Local Government and Heritage, Architectural Heritage Protection Guidelines for Planning Authorities.
- Sport Ireland Outdoors, St Finbarr's Way trail material.
- Discover Ireland

Landscape Visual Impact

Key Flaws, Contradictions and Policy Weaknesses

Introduction

This section of my submission consolidates the main landscape and visual concerns arising from Chapter 13 and Appendices 13-1 to 13-5. Most notably, Enerco's agents MKO repeatedly describes the proposed Maughanaclea Hills wind farm site as visually contained, workable and capable of accommodating this scheme. However, their assessment records significant effects on nearby residents, on the R585 scenic route corridor, noticeable change to a high sensitivity upland landscape and cumulative impact and visibility with multiple other wind farm schemes, all targeting this same area of West Cork.

1. Overview

The landscape and visual material prepared by MKO does not factor in that this area is a remote upland site. They give the impression of a site where visual impact is negligible and then dispute that in their own documentation. They also place heavy emphasis on topographical containment, a "horseshoe" of enclosing land forms and repeatedly claim that visibility is mostly restricted to a narrow visual range. The policy setting is also more constrained than MKO suggests. The proposed turbines are not in an area designated "Acceptable in Principle" for wind energy. They are in fact in an area designated "Open to Consideration". This is an important point as "Open to Consideration" is not a green light for planning permission. It is a policy warning to private wind developers that the area has environmental constraints and that commercial wind energy will only be acceptable, where adverse impacts on residential amenity, landscape quality, ecological receptors, heritage and cumulative visual effects can genuinely be avoided. The burden is on Enerco Energy and its agents to demonstrate with valid evidence, that this particular site can carry such a industrial SID development without unacceptable harm. They do not withstand scrutiny in the case of the proposed Maughanaclea Hills wind farm development.

The proposed wind farm sits in LCT 15a, a landscape of High Value and High Sensitivity in the Cork County Development Plan and lies beside the County's High Value Landscape LCT 4. In that chapter MKO also accepts that effects on scenic routes, residential receptors and cumulative landscape and visual impact are key issues. The Maughanaclea Hills are a visually sensitive West Cork upland landscape, with recognised scenic and residential vulnerability.

Method and figure note

The attached figures use Google Earth Pro ground views and Street View images, with turbine models prepared in SketchUp to the dimensions stated by MKO and turbine locations plotted from MKO's own coordinates in QGIS.

Blue lines mark the Sheep's Head Way and where relevant, St. Finbarr's Way. Yellow pins mark turbine locations. Red pins mark viewpoint locations.

They are offered as clear, transparent visual aids to help the Board understand proximity, route sequence, openness of view and the relationship between the proposed turbines and their locations on the rural landscape.

Figure 1. Map prepared to show the location of two selected viewpoints, marked with red pins, and the proposed turbine locations, marked with yellow pins. V1 identifies Scenic Route S29 on the R585. V2 identifies the designated Wild Atlantic Way viewpoint. The same viewpoint references are used throughout the photographic material in this submission.

2. Main contradictions

2.1 MKO indicate that the site is visually contained, yet their same assessment records widespread openness. One of the clearest contradictions in this chapter lies in the repeated claims of containment and the actual screening survey results. The chapter relies on enclosing peaks, ridge lines and local minor folds in the terrain, to suggest visibility is tightly controlled. The Route Screening Analysis records little or no visual screening along 57% of surveyed roads, with only 18% subject to dense or full screening. Put simply, the survey does not support their argument that 169 metre turbines on the ridges of The Maughanaclea Hills, will rarely be seen.

2.2 MKO state that the R585 scenic route would retain its scenic integrity, yet one of MKO's own representative viewpoints on that route, attracts a significant residual visual effect. MKO state that turbines would be strategically set below the most elevated ridges, ensuring long ranging views from Scenic Route C-SR29 would remain unobstructed. However, Appendix 13-3 records a significant residual effect at VP12 on the R585 road. A similar contradiction appears in the residential analysis for the Maughanaclea Hills, where MKO indicate that turbines would be carefully set back and visually separated. Again, contradictions arise here, as yet their chapter still accepts significant visual effects for a very small number of residents, between the two turbine clusters (Northern cluster T1 - T6 and Southern cluster of T7 - T14) and for other residents in closest proximity.

Figure V1A. Scenic Route S29 viewpoint and route setting

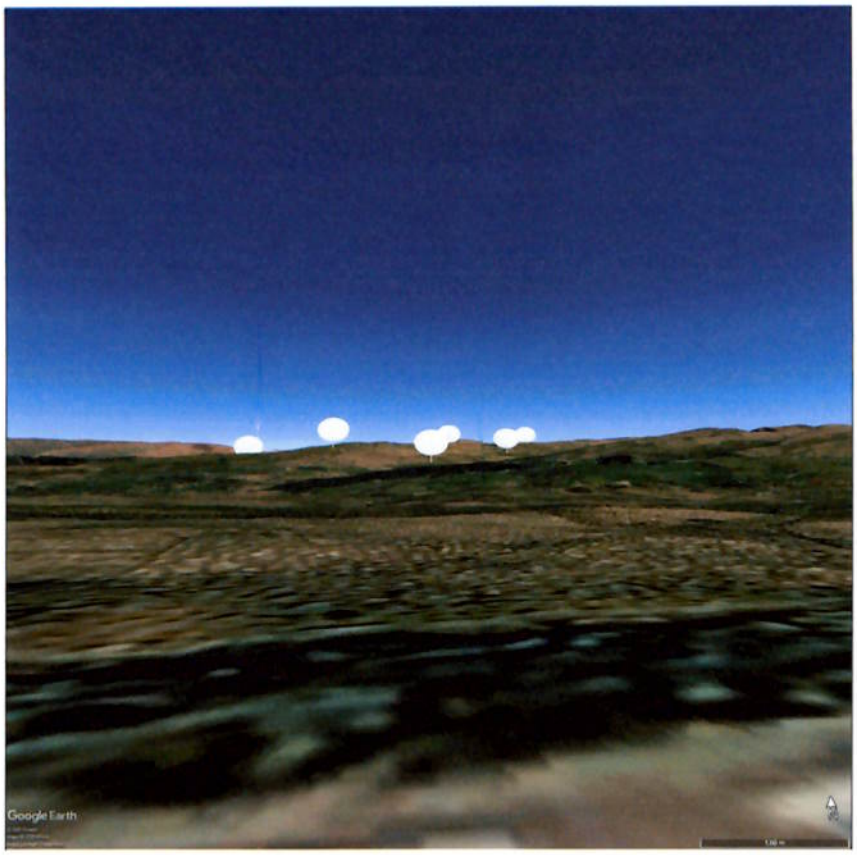


Figure V1B. Google Earth view from V1 towards the proposed turbine area

All attached figures are illustrative visual aids. The baseline images are Google Earth Pro ground view and Street View images. The turbine model was prepared in SketchUp using turbine dimensions provided by MKO. Turbine positions were plotted in QGIS using coordinates supplied by MKO. The figures are not presented as verified EIAR photomontages.

2.3 MKO's material indicates that The Wild Atlantic Way would not be significantly affected. This is false assurance being put before the Board. To give another example of these consistent false reassurances, the main chapter shows the relevant visible extent within the LVIA Study Area, described as approximately less than 11km of the route. In MKO's Appendix 13-3 that corresponding figure is stated as approximately 24km. The route may be long, but that does not explain why two different visibility figures are used for the same overall point. That leaves a clear statistical inconsistency in the material.

The fundamental issue here is not the total length of route affected, but in planning terms, would the local sections, viewpoints and route that carry value in this receiving landscape, not be significantly changed?

Figure V2A. Existing Google Earth Streetview from the Wild Atlantic Way viewpoint in Bantry

Figure V2B. Google Earth view from V5 towards the proposed turbine area

2.4 MKO presents the site as suitable in principle, but local planning policy does not go that far. The proposed turbines are in an area "Open to Consideration", not "Acceptable in Principle". The chapter makes much of that designation, while passing too lightly over the conditions attached to it. It is important to note that Cork County planning policy requires that wind energy proposals in these areas avoid adverse effects on residential amenity, visual quality of the landscape and cumulative impacts. MKO's argument does not correspond with its own assessment, which identifies significant residual effects at Gortloughra, on the Maughanaclea Hills, along the R585 corridor and at the close range residential viewpoint at Maughanaclea. Those findings should not be passed over in the overall analysis.

2.5 MKO indicates that the turbines sit in a strong working landscape, yet the same chapter accepts sensitivity in the same landscape. The Maughanaclea Hills site lies in LCT 15a, which the Cork County Development Plan identifies as High Value and High Sensitivity. The MKO landscape chapter acknowledges moderate residual landscape effects on LCT 15a and on adjacent High Value Landscape LCT 4. MKO's repeated attempts to describe the site as a modified upland working landscape should not be accepted or their own incorrect conclusions.

3. Chapter material goes against law and policy

MKO's material sits uneasily with the Environmental Impact Assessment Directive, which requires the likely significant effects of a project to be properly identified, described and assessed, including effects on landscape and cultural heritage. It also cuts across the European Landscape Convention, ratified by Ireland, which requires landscape to be recognised as an essential component of people's surroundings and to be protected, managed and planned accordingly.

Ireland's National Landscape Strategy reinforces the same point. It is expressly framed as a high level policy framework for achieving balance between the protection, management and planning of landscape, while positively managing landscape change. It states that a developer must do more than rely on visibility modelling and broad assurances in relation to receiving landscapes. In a landscape such as the Maughanaclea Hills, which includes scenic routes, recognised heritage settings and nearby residential receptors. Transparent and consistent assessment of landscape and visual effects has not being put before the Board.

The Cork County Development Plan 2022 to 2028 reiterates this also. Objective GI 14-9 seeks to protect the visual and scenic amenities of the County. Objective GL 14-10 requires development to have regard to the value, character, distinctiveness and sensitivity of the landscape, especially in High Value Landscapes. Objectives GI 14-12, GI 14-13 and GI 14-14 protect views, scenic routes and development in their surroundings.

Objective ET 13-7 states that in areas "Open to Consideration" commercial wind energy must avoid adverse effects on residential amenity, the visual quality of the landscape and cumulative visual impacts. This indicates that the Cork County Development Plan would not be not satisfied by broad compliance with separation distances. It requires a development that is appropriately integrated into the landscape and does not cause unacceptable visual change.

4. Overview

MKO, in their route screening assessment records little or no visual screening along 57% of surveyed roads within 3km and on major roads out to 5km. That defeats their claims that visibility is tightly contained.

The proposed Maughanaclea Hills wind farm would be in an area designated "Open to Consideration", not "Acceptable in Principle". Local policy therefore requires Enerco and their agents to demonstrate that adverse impacts on residential amenity, visual quality and cumulative effects can be avoided, not merely managed or moderated.

The site lies in LCT 15a, which the County Plan classifies as High Value and High Sensitivity and it sits beside High Value Landscape LCT 4. MKO's own assessment records moderate residual landscape effects on both LCT 15a and LCT 4.

The chapter indicates that design changes protect Scenic Route C-SR29 and key scenic views, yet Appendix 13-3 still records a significant residual visual effect at VP12 on the R585 road corridor. That is one of the strongest contradictions in their material.

Their residential material contains substantially flaws also. The chapter acknowledges 33 residential receptors within 1km of the turbines and accepts significant residual visual effects for a small number of residents in closest proximity, including receptors represented by VP6, VP11, VP12 and VP16.

The Wild Atlantic Way argument is diluted by scale and presented inconsistently. The main chapter refers to less than 11km of visible route within the LVIA Study Area, while Appendix 13-3 refers to approximately 24km. Another flaw is that focusing on the total route length takes away from scenic local sections and important viewpoints. Cumulative effects are also contradictory. Within the 25km LVIA Study Area the chapter identifies 19 existing wind farms, 6 permitted wind farms and 4 proposed wind farms. MKO then relies heavily on topography and separation to reduce the industrial cumulative landscape and visual impact. This does not alter the fact that the Maughanaclea Hills and surrounding landscapes are being targeted by private developers, seeking to establish a connected cluster of industrial wind farms across already pressurised rural landscapes.

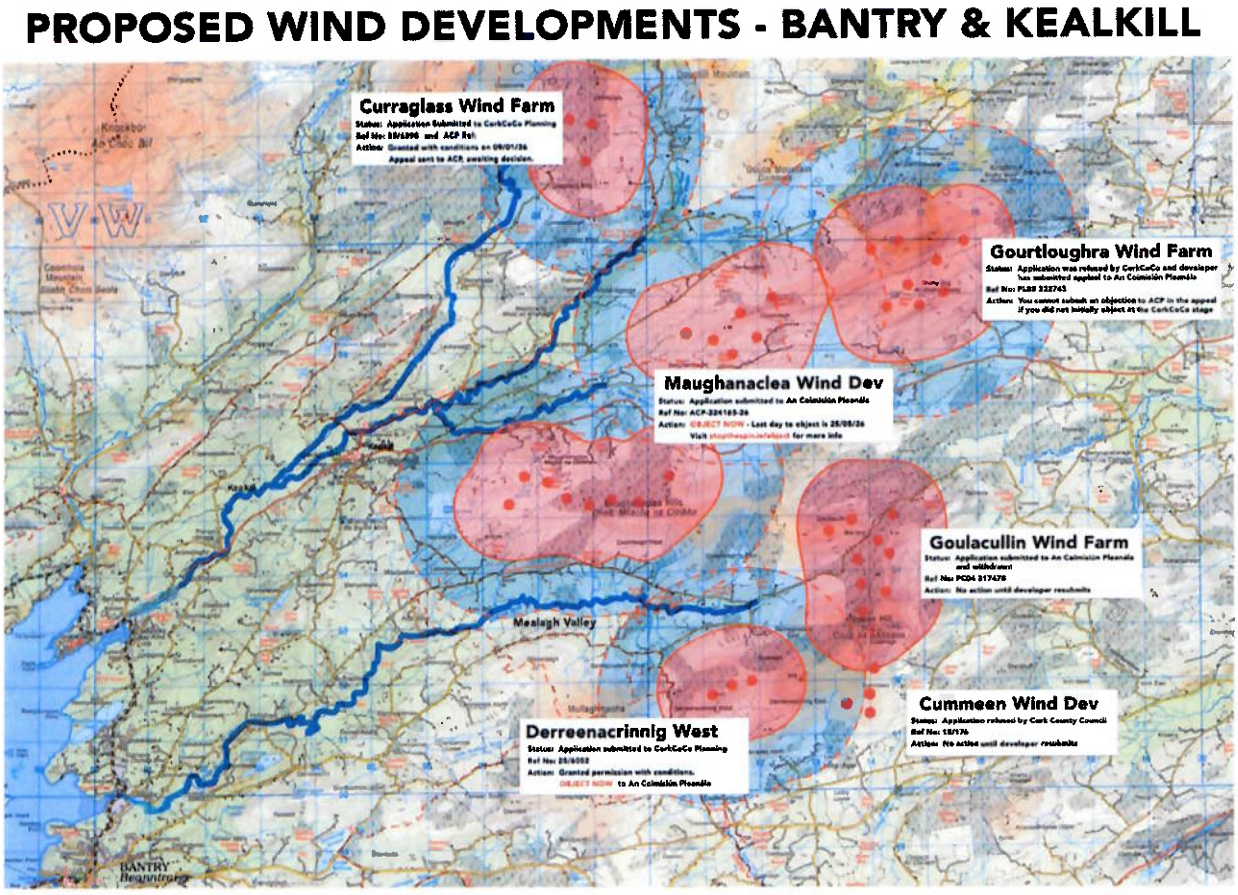


Figure 2. This map illustrates the cumulative wind farm pressure now facing the Bantry, Kealkill, Mealagh Valley, Cousane, Coomclogh and wider Shehy uplands area. The Maughanaclea Hills is not an isolated proposal, but part of a wider pattern of industrial wind energy development affecting the same rural landscape, communities, scenic routes, heritage settings and water catchments.

5. Conclusion

Together, MKO's material relating to their landscape and visual assessments goes against the idea of an industrial development that would integrate into a rural landscape. They present a scheme in high sensitivity uplands, beside a High Value Landscape, on scenic route corridors, near cultural heritage viewpoints and around nearby rural homes. MKO's common repeated mantra throughout this chapter and indeed, application, is to downplay facts with language of containment, set back, coherency, modified landscape and selective visibility.

Their material records significant residual visual effects from important local viewpoints, significant effects for a small number of residential receptors, moderate landscape effects on the targeted landscape and adjacent High Value Landscape and acknowledged cumulative visibility with other wind farm developments. There are strong inconsistencies

regarding The Wild Atlantic Way visibility figures and the mismatch between claims of scenic route protection and the significant effect recorded on the R585 corridor.

MKO's case in its material and assessment is fundamentally unstable and based on the contradictions and errors that go against planning law, the Board should refuse planning permission.

Additional Official Sources

Directive 2011/92/EU, as amended by Directive 2014/52/EU, on the assessment of the effects of certain public and private projects on the environment.

European Landscape Convention, Florence 2000, ratified by Ireland in 2002.

National Landscape Strategy for Ireland 2015 to 2025.

Cork County Development Plan 2022 to 2028, especially GL 14-9, GL 14-10, GI 14-12, GI 14-13, GI 14-14, ET 13-4 and ET 13-7.

Volume 2 of the Cork County Development Plan 2022 to 2028, Heritage and Amenity, including the County's scenic routes and views and prospects.

Wind Energy Development Guidelines for Planning Authorities 2006.

Draft Revised Wind Energy Development Guidelines 2019.

EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022.

National Landscape Strategy and Heritage Ireland 2030, both of which reinforce the public value of landscape, scenic character and heritage setting in planning assessment.

Source references

Chapter 13 Landscape and Visual

Appendix 13-1 LVIA Methodology

Appendix 13-2 Landscape Character Assessment Tables

Appendix 13-3 Photomontage Assessment Tables

Appendix 13-4 LVIA Baseline A0 Map

Appendix 13-5 Photowire Visualisation Booklet

6. Conclusion

Enerco's agents MKO attempt to portray this as a strong, watertight project, but their application contains contradictions, errors, wrong conclusions, selective photomontages and scoping concerns.

I refer the Board to a previous application and Board refusal concerning the following:

An Bord Pleanála refusal of Ardrah Wind Farm Limited permission on 8 July 2014, under PA Ref. No. 11/318 / ABP Ref. No. PL04.240461, for five turbines in Ardrah, Bantry, with access roads in Laharanshermeen and Maughanaclea.

An Bord Pleanála's decision to refuse was based on the following reasons:

"The Cork County Development Plan 2009 sets out policies and objectives in relation to wind energy development and identifies areas in broad strategic terms for the location and siting of such development, identifying "Strategic Search Areas" and "Strategically Unsuitable Areas". The overall strategic approach as set out in the said Development Plan is considered to be reasonable. The proposed development, which is not located within a "Strategic Search Area", is located immediately adjacent to areas designated as "Strategically Unsuitable Areas", would be unsuitable for wind energy projects and where such projects would normally be discouraged".

"The proposed development, which would by itself be visible over a wide area, would in conjunction with permitted and proposed development in the area, give rise to an undue concentration of wind energy development with significant negative impacts on the landscape character and visual amenities of the area, and in particular the Mealagh Valley, and it's amenity, tourism and recreational potential. The proposed development would, therefore, seriously injure the visual amenities of the area and be contrary to the proper planning and sustainable development of the area".

This previous refusal by the Board was based on good planning law and is directly relevant to the present Enerco Energy's Maughanaclea Hills wind farm application.

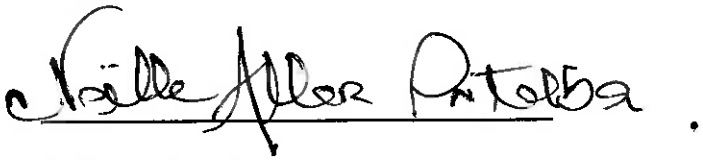
Of crucial importance are the connections between these two applications and relating to the same wider Ardrah, Maughanaclea and Mealagh Valley landscape, including townlands. The previously Board refused Ardrah proposal involved a substantially smaller wind farm of five wind turbines with a hub height of up to 70 metres and a rotor diameter of up to 71 metres. By contrast, the present Enerco Energy proposal involves 14 turbines with a tip height of 169 metres, a rotor diameter of 133 metres and a hub height of 102.5 metres.

After 12 years, Enerco Energy appears to disregard An Bord Pleanála's 2014 refusal decision, presenting a much larger wind farm scheme as having 'no significant negative impact" on the landscape, on the same townlands and wider landscape, despite the substantially greater scale of the project.

The Maughanaclea Hills project from Enerco Energy, should not have been presented as a viable proposal, nor should it have taken up the valuable time and resources of An Coimisiún Pleanála. Either the project has been advanced to MKO as viable by Enerco Energy or MKO has presented it to Enerco as a viable project? Whichever is the case, we can be assured that MKO is being substantially paid for its role, which raises legitimate questions about the independence and objectivity of this application.

An Coimisiún Pleanála must be free to assess the evidence independently and without political or policy pressure to favour a particular outcome, simply because the development is labelled as 'renewable energy.' An Coimisiún Pleanála must refuse the proposed Maughanaclea Wind Farm Ltd development on the grounds set out in this submission and particularly given their previous decision to refuse Ardrah Wind Farm Limited and their reasoning on the same wider Ardrah, Maughanaclea and Mealagh Valley landscape, including townlands.

Yours sincerely,



Noëlle Aller Ontalba