



Maughanaclea Wind Farm Observation

Patrick O'Mahony

Maughanaclea, Kealkill, Bantry, Co. Cork. P75XA39

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1. Submission Letter

Strategic Infrastructure Development Planning
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Patrick O'Mahony
Maughanaclea,
Kealkill, Bantry,
Co. Cork. P75XA39
24 May 2026

Case reference: PAX04.324165

Description: 10-year planning permission for Maughanaclea Wind Farm consisting of 14 no. wind turbines, a 110kV substation and 110kV underground cabling connection and associated works by Maughanaclea Ltd

Location: Ardrah, Maughanaclea, Ballynamought, Gortloughra, Cousane, Coomclogh, Derragh, Glanycarney, Keenrath, Derrynacaheragh, Shiplough, Coolsnaghtig and other townlands Co. Cork.

Applicant: Maughanaclea Ltd, Enerco

Dear Planning Authority,

I refer to the above planning application and wish to lodge a formal objection to the proposed development.

My family and I are long-term residents of the townland of Maughanaclea. Our dwelling is located centrally between the two proposed turbine clusters and lies at the core of the semi-circular layout formed by the southern cluster of turbines. In particular, turbines T07 to T14 are positioned on elevated ground at distances of approximately 1 km to 2 km from my home. Due to this configuration, our residence will be directly surrounded by the proposed development and will experience its effects from multiple directions.

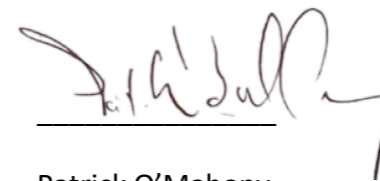
Having reviewed the application documentation, including the Environmental Impact Assessment Report, I am deeply concerned about the potential impacts of the proposed development on residential amenity, landscape character, cultural heritage and the overall suitability of the site. Given the scale of the proposal, the elevated and exposed location of the turbines, and the proximity to our

home and to other sensitive receptors, I am not satisfied that the application demonstrates that unacceptable adverse effects can be avoided or adequately mitigated.

I therefore wish to submit a formal objection to the proposed development on the planning grounds set out in the following submission. These grounds relate to matters of proper planning and sustainable development, as provided for under the Planning and Development Act, and are made in the interests of protecting residential amenity, landscape and visual quality, and the cultural and environmental character of the area.

I respectfully request that the Planning Authority give full consideration to the matters raised herein when assessing the application.

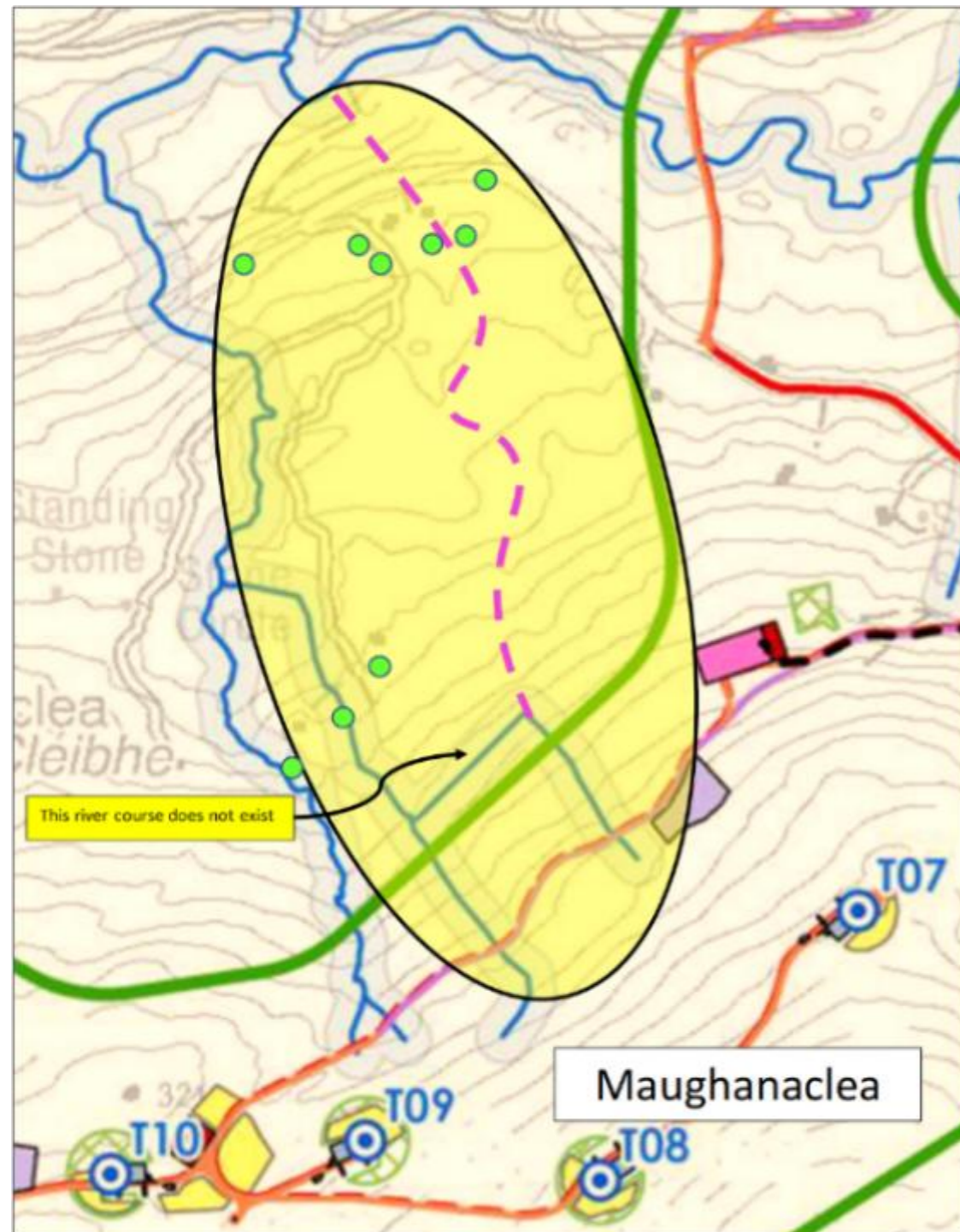
Yours respectfully,



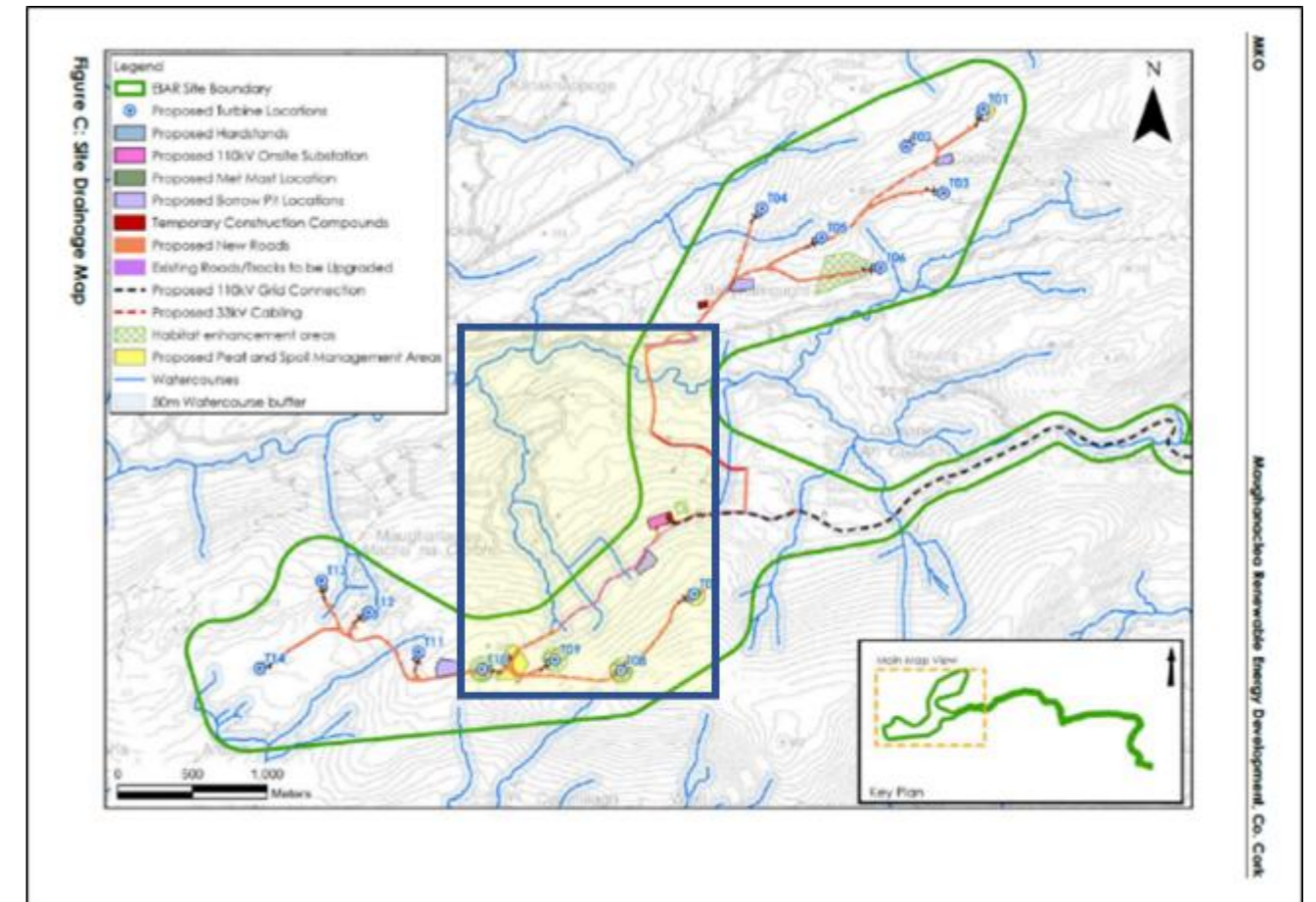
Patrick O'Mahony

2. Hydrology and Hydrogeology

2.1. Material Deficiency in Hydrological Mapping and Flood Risk Assessment in Maughanaclea



Focused extract of map from EIA showing incorrect water course, location of houses and estimated actual water course



Map from Appendix 9-1 and Chapter 9, Hydrology and Hydrogeology of the EIA

2.1. Core Issue

Chapter 9 of the Environmental Impact Assessment Report (EIA) and the accompanying Flood Risk Assessment (Appendix 9-1) are founded on an incorrect identification and mapping of a watercourse, which constitutes a material defect in the hydrological baseline and undermines the reliability of the flood risk assessment and proposed mitigation measures.

Page 15 of Appendix 9-1 (Flood Risk Assessment) incorrectly describes a watercourse as a tributary of the Maughanaclea River. This description is factually incorrect. Based on the on-the-ground hydrology, the watercourse:

- Rises in the Maughanaclea Hills,
- Forms a significant headwater stream, and
- Flows to the Owngar River downstream of the R585.

It does not discharge to the Maughanaclea River, notwithstanding repeated references to this effect within Appendix 9-1 and Chapter 9 (Hydrology and Hydrogeology) of the EIA, where the catchment

context and drainage pathways are described (refer in particular to Chapter 9, Sections 9.3.3, 9.3.5 and Figures 9-2 and 9-4).

2.2. Evidence of Inaccuracy

The focused mapping extract within the EIAR further highlights this discrepancy. The watercourse alignment shown in Appendix 9-1 does not correspond with the watercourse as it exists on the ground.

An alternative routing, based on field observation and local knowledge, more accurately reflects the true flow path and receiving water body, as demonstrated by supporting photographic evidence.

This misidentification of the receiving watercourse results in an incorrect catchment delineation, which directly affects the hydrological assumptions underpinning the Flood Risk Assessment (Appendix 9-1).

Consequently:

- Flow-path analysis and runoff modelling are unreliable;
- Flood extent predictions based on those assumptions are unsound;
- Flood mitigation measures designed on this basis may be inadequately sized or incorrectly located; and
- Residential properties identified as being outside areas of flood risk may, in fact, be subject to unassessed flood risk.
- Houses identified by the green dot may face increased and unassessed flood risk.

In this context, can the planning authority demonstrate how it is satisfied as to the accuracy, completeness and reliability of the hydrological and hydrogeological assessment, particularly in light of the acknowledged absence of critical baseline data, reliance on assumptions, and failure to fully account for site-specific conditions? Furthermore, can it be clearly demonstrated that the potential downstream impacts on hydrological connectivity, water quality and associated ecological receptors within the Owngar and Bandon Rivers have been comprehensively assessed and will not give rise to significant adverse effects? In the absence of such certainty, it is submitted that a fundamental reassessment of the hydrology and ecological impacts, supported by detailed site-specific investigation, baseline monitoring and robust mitigation and contingency measures, should be required prior to any determination of the application.

2.3. Implications for Flood Risk

Accurate identification of watercourses and catchment flow paths is a fundamental requirement of flood risk assessment under *The Planning System and Flood Risk Management – Guidelines for Planning Authorities* (DoEHLG, 2009)¹, which Appendix 9-1 expressly states it is prepared to comply with (Appendix 9-1, Section 1.1).

The reliance on a demonstrably incorrect hydrological baseline represents a material deficiency in the EIAR and Flood Risk Assessment. In the absence of a correct and robust identification of the watercourse and its receiving catchment, the application fails to demonstrate that the proposed development will not give rise to unacceptable flood risk or endanger public safety.

Accordingly, the EIAR cannot be relied upon to meet the requirements of the Planning and Development Acts or the EIA Directive, and the application is not capable of being lawfully approved.

2.4. Relevant Case Law on EIAR Adequacy and Defective Baseline Data

Irish planning and environmental case law consistently confirm that an Environmental Impact Assessment must be founded on a **correct, complete and reliable baseline**, and that material errors in baseline data render an EIAR legally inadequate. In *Sweetman v An Bord Pleanála* [2018] IESC 1, the Supreme Court reaffirmed that an EIA must enable both the decision-maker and the public to meaningfully assess the likely effects of a proposed development, which cannot occur where the underlying environmental baseline is flawed. Similarly, in *O’Grianna v An Bord Pleanála* [2014] IEHC 632, the High Court held that an EIS which contains fundamental errors or omissions in its description of the receiving environment cannot satisfy the requirements of the EIA Directive, and that mitigation measures based on such errors cannot remedy the defect.

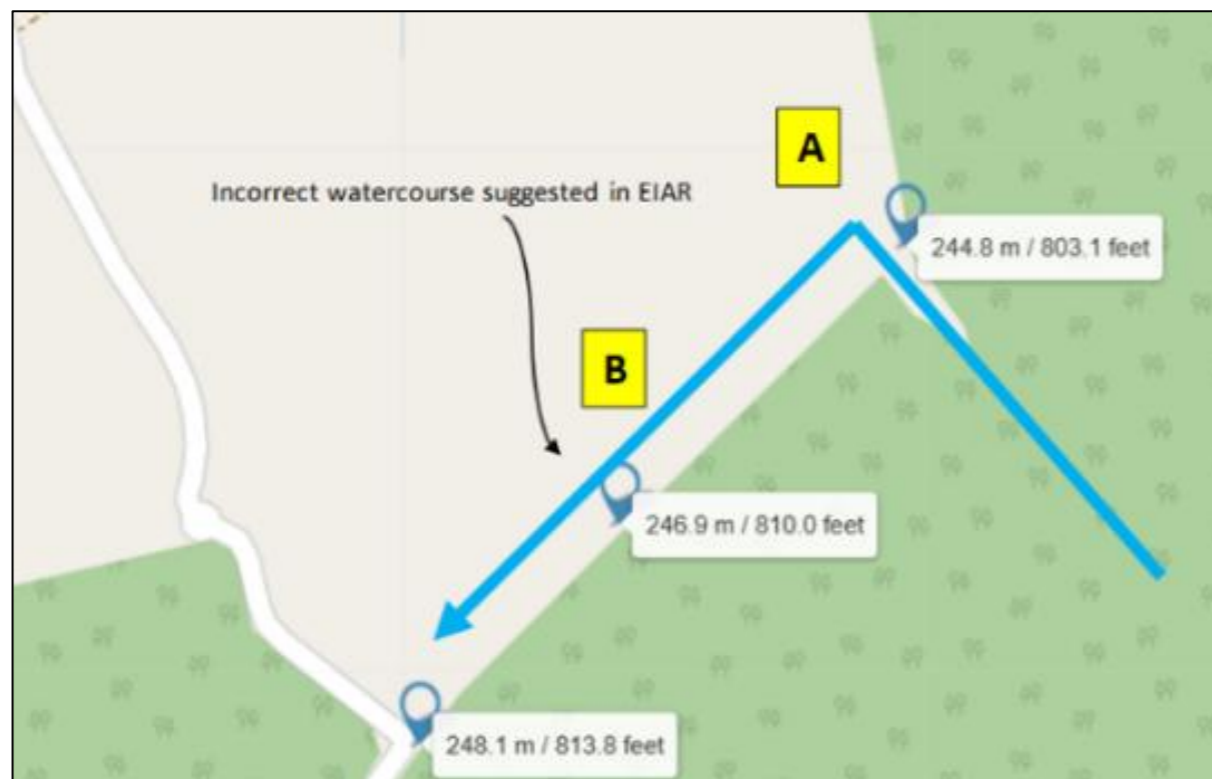
The courts have further confirmed that the authority is not entitled to correct or overlook material deficiencies in an EIAR by relying on its own expertise (see *Kenny v An Bord Pleanála* [2018] IEHC 686). In the present case, the incorrect identification of a watercourse and its receiving catchment undermines the flood risk and hydrological assessments in a manner analogous to the defects identified in these authorities, rendering the EIAR and Flood Risk Assessment incapable of supporting a lawful grant of permission.

¹ The Office of Public Works

2.5 Photographic Evidence.

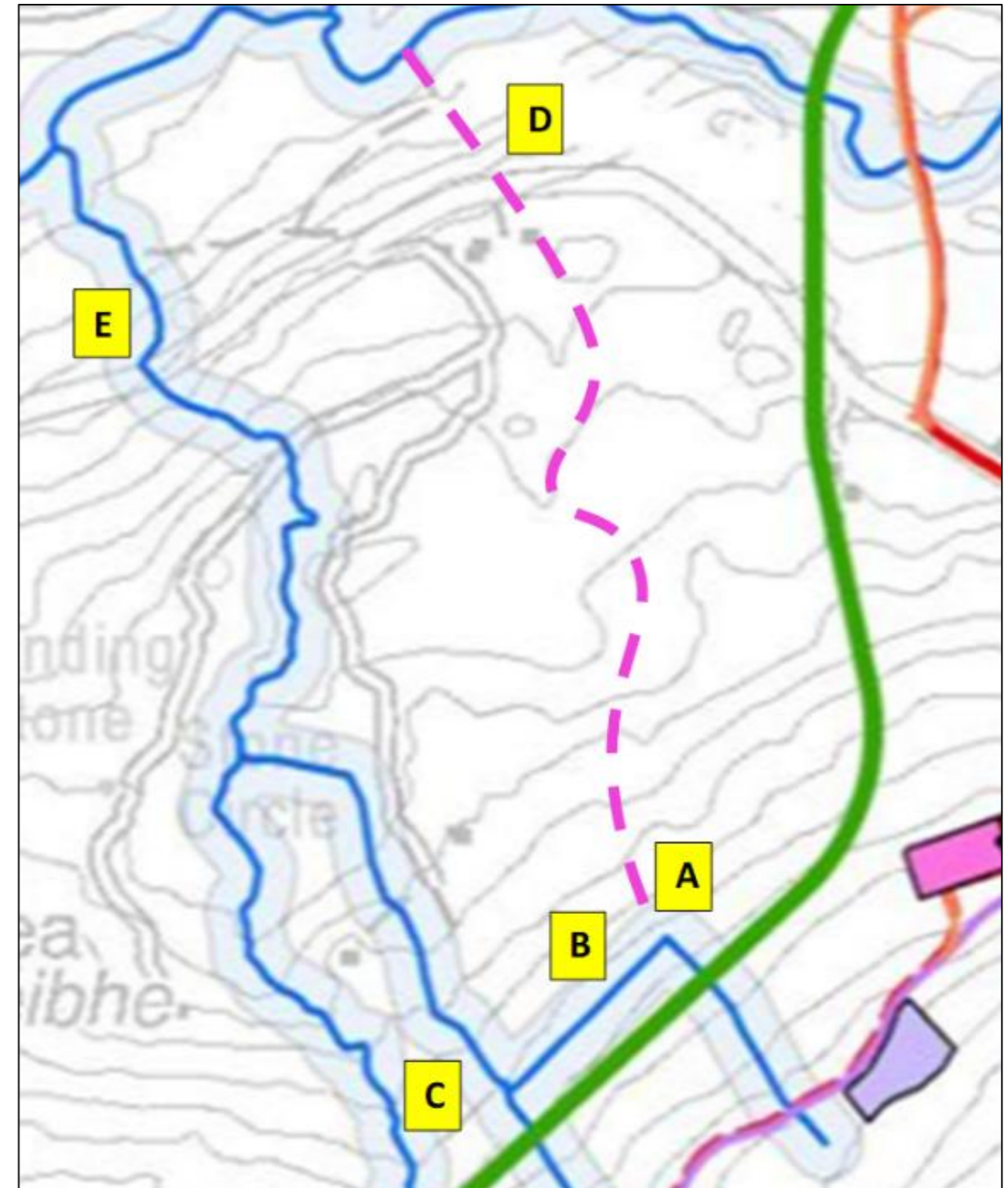
Locations A and D identify a watercourse that has been omitted from the Flood Risk Assessment, despite the fact that it would be required to convey storm overflow and surface runoff from the proposed development; no flood risk or capacity assessment has been undertaken for this river by the applicant's consultants. The watercourse between Points A and D passes in close proximity to three residential dwellings and crosses the R585 regional road, giving rise to a clear potential risk to property, road safety and infrastructure during extreme rainfall events.

The absence of any assessment of flood risk along the full course of this river represents a serious omission and **calls into question the accuracy and reliability of the flood risk assessment and hydrological modelling elsewhere within the project**, a concern compounded by elevation data shown in the accompanying image which suggests **sections of the river FLOWING UPHILL**, indicating likely errors in watercourse identification, elevation modelling, or interpretation of topographical data.



Elevations of points on incorrect leg of water course suggesting water would flow up hill.

<https://www.freemaptools.com/elevation-finder.htm>



Focused extract of map from EIAR showing incorrect water course, the estimated actual water course and photograph locations



Photographs of locations on watercourse incorrectly indicated on EIAR maps.

2.6. Note of concern from Hydrologist, Dr Pamela Bartley

*I have just looked at the EPA website and then in the Water Chapter of the EIAR for the proposed Maughanaclea WF and astoundingly the rivers are all High Status and not only that they are **High Status Objective Rivers**. These are very rare and really do **need to be protected**. The agent for the applicant states (opening para for page 63, Chapter 9) that "Our understanding of the objectives of the WFD is that surface waters, regardless of whether they have 'Poor' or 'High' status, should be treated the same in terms of the level of protection and mitigation measures employed, i.e. there should be no negative change in status at all. This is reflected in the strict mitigation measures in relation to maintaining a high quality of surface water from the Proposed Project will ensure that the status of surface waterbodies in the vicinity of the Proposed Project will be at least maintained regardless of their existing status." The facts of the matter are that the construction companies rarely get the memo that this is a High-Status pristine water environment and therefore the construction sites, and access to them, must be managed to within an inch of their life. The disconnect between planners instructed to implement government policy, the economics of construction procurement (lowest price/biggest profit for investors) and the complete lack of enforcement resources at county level = a RISK that cannot be adequately reduced to the level required by High Status & High-Status Objective environments that no amount of "Mitigation" on paper can counter.*

Dr. Pamela Bartley B.Eng., M.Sc., Ph.D.

Hydro-G

50 Henry St

Galway H91 FA 4X

In these circumstances, can the Board demonstrate how it is satisfied that the proposed development will not give rise to any risk of deterioration in these High-Status waters, having regard to the absolute protection objective under the Water Framework Directive and the practical challenges associated with implementing mitigation measures to the required standard? Furthermore, can it be confirmed whether the level of certainty required to protect such rare and sensitive water environments has been achieved, or whether a precautionary approach necessitates a more robust, site-specific assessment and management framework prior to any determination?

2.7. Private Well

I have serious concerns regarding the potential impact of this development on my private groundwater well. The EIAR acknowledges that the database of private wells is incomplete; however, no field survey or direct identification of wells appears to have been undertaken, notwithstanding recommendations from the HSE. The assessment instead relies on assumptions regarding groundwater flow and separation distances, rather than on site-specific evidence, and no baseline testing of private wells has been carried out. In the absence of such baseline data, there is no reliable mechanism to detect, attribute, or remediate any potential impacts on water quality or supply.

Having regard to the complex topography, steep gradients, and underlying geology of the area, I am not satisfied that the risk to private groundwater supplies has been adequately assessed. A comprehensive survey of private wells, baseline water quality testing, and the implementation of a robust monitoring and remediation framework should be required in advance of any development.

I am further concerned that the assessment does not adequately consider the effects of extreme rainfall events, which are becoming increasingly frequent and which have the potential to result in significant runoff, erosion, and contamination of groundwater and surface water receptors. The effectiveness of the proposed mitigation measures under such conditions has not been clearly demonstrated. The hydrological assessment relies heavily on generic mitigation measures, without providing sufficient evidence as to how these measures will perform under the specific conditions of this site, including steep terrain, high rainfall, and sensitive soils. There is therefore insufficient certainty that impacts on water quality can be avoided.

It is submitted that users of private groundwater supplies should be afforded a level of protection equivalent to that applied to customers of Uisce Éireann, particularly given their complete reliance on the quality and continuity of their local water source.

On that basis, can the applicant demonstrate how it has adequately identified, assessed and mitigated potential risks to private groundwater supplies, and, if such demonstration has not been clearly provided, can the applicant be required to undertake a comprehensive field survey of private wells, baseline water quality testing, a detailed site-specific hydrogeological assessment, and the preparation of a robust monitoring and contingency plan, prior to the determination of this

application, in order to ensure the protection of groundwater resources and residential water supplies?

It is further noted that, should the development proceed on the basis of an assessment which underestimates or fails to adequately address these risks, there is a clear potential for material and sustained impacts on private water supplies. In such circumstances, I reserve my position in respect of seeking appropriate remedies, including compensation, arising from any proven effects on groundwater quality or supply.



Private Well at my Property

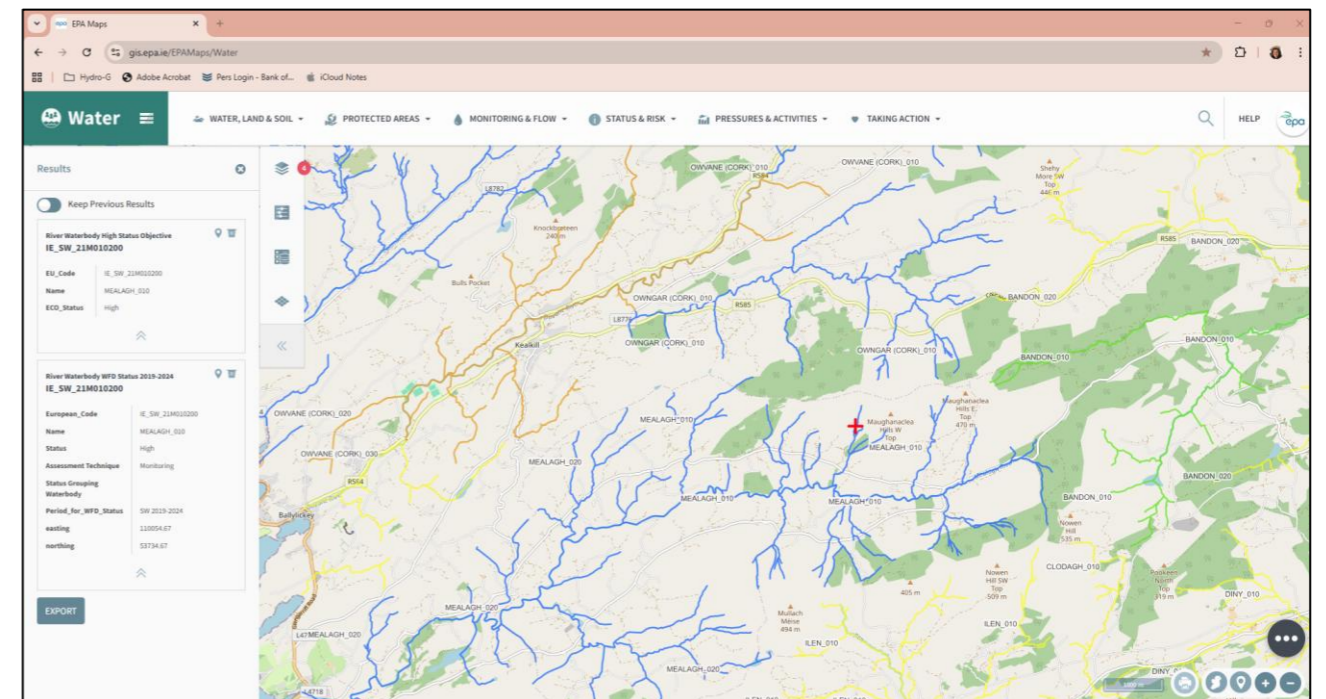
2.8. Previous decisions

Having reviewed comparable applications and material available on the An Coimisiún Pleanála website, can An Coimisiún Pleanála confirm whether it will make available and have regard to

relevant Inspector's Reports and Board decisions in respect of comparable wind farm developments where impacts on private groundwater supplies, High Status surface waters, and associated ecological receptors were assessed?

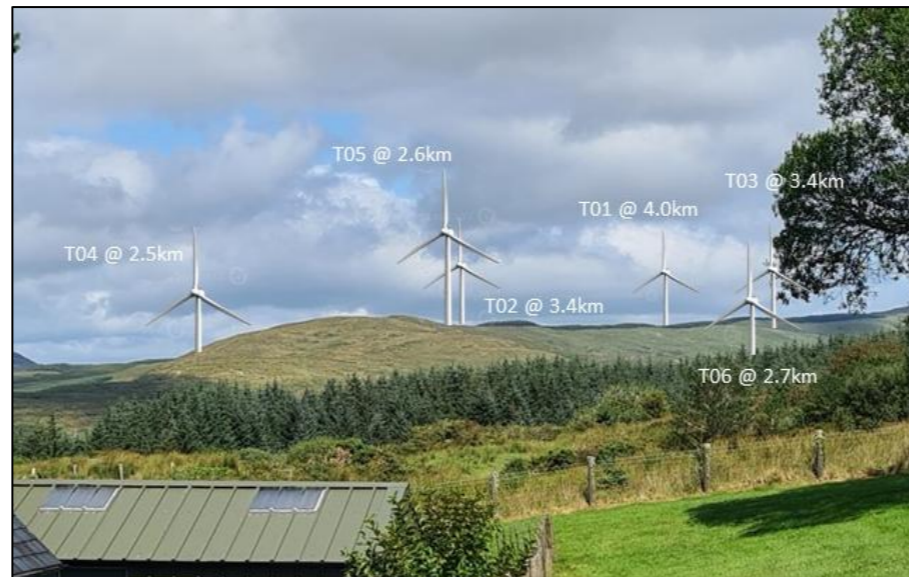
In particular, can such documentation be identified and considered in relation to cases where hydrological risk, protection of High Status or High-Status Objective rivers, or failures in mitigation and monitoring measures were identified as determinative factors, so as to ensure a consistent and fully informed assessment of the risks arising from this proposal?

Furthermore, can it be clarified how the Board proposes to take account of such precedent in assessing the potential for adverse effects on private well water quality and supply, river ecology, and downstream habitats, and, in the absence of this information, on what basis it can be satisfied that the proposed development will not give rise to deterioration of water quality or ecological integrity²?"



High-Status Rivers from the EPA website

² Appendix 2



Home Owner Photo Montages of Proposed Wind Turbines at P75XA39

3. Landscape and Visual Impact

3.1 Scale, Height and Landscape Fit

The proposed development comprises **14 no. wind turbines at 169 meters in height**, which the LVIA itself identifies as the “essential aspect” of the project giving rise to landscape and visual effects (EIAR, Chapter 13, Section 13.1.2.2).

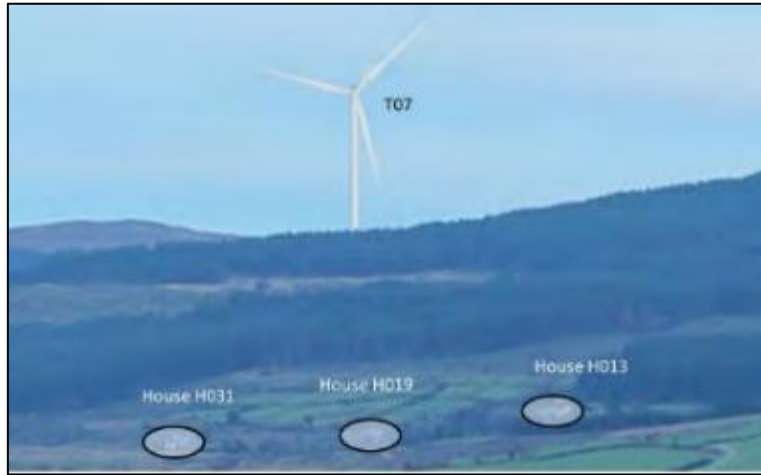
The LVIA acknowledges that the turbines are tall, vertical elements and the most visually prominent components of the development (EIAR, Chapter 13, Section 13.1.2.2).

Notwithstanding this, the scale of the proposed turbines is **incompatible with the receiving landscape**, given their height, movement, and skyline dominance.

The turbines would:

- Introduce large-scale industrial structures into a rural upland landscape,
- Dominate views and skylines within close and medium-range distances,
- Create long-range visibility, as confirmed by ZTV mapping extending across the Maughanaclea and Mealagh valleys (EIAR, Chapter 13, Sections 13.3.1 and 13.3.3).

This scale of development conflicts with Cork County Development Plan objectives requiring that wind energy development be **appropriate in scale to landscape sensitivity and character**, particularly in upland areas of high visual exposure.



3



Home Owner Photo Montages of Proposed Wind Turbines

3.2 High Landscape Value and High Landscape Sensitivity

The proposed wind farm is located within Landscape Character Type (LCT) 15a – Ridged and Peaked Upland, which the Cork County Development Plan assigns:

High Landscape Value, and High Landscape Sensitivity (EIAR, Chapter 13, Section 13.4.1.1.3).

The LVIA confirms that landscapes with this classification are defined as:

“Vulnerable landscapes with the ability to accommodate limited development pressure... landscape elements are highly sensitive to certain types of change”

(EIAR, Chapter 13, Section 13.4.1.1.3, quoting the Draft Cork County Landscape Strategy).

The site is also located **approximately 250 meters from LCT 4 – Rugged Ridge Peninsulas (Castletownbere–Bantry–Schull)**, which is designated a **High Value Landscape (HVL)** under the Development Plan (EIAR, Chapter 13, Section 13.4.1.1.3 and Section 13.4.5).

Despite acknowledging the high sensitivity and vulnerability of these landscapes, the LVIA concludes that the proposed turbines would not significantly affect their character (EIAR, Chapter 13, Section 13.8). This conclusion is **not reconciled** with the acknowledged scale, number, and prominence of the turbines.



³ Segment from Maughanaclea Ltd photo montage



3.3. Scenic Routes and Public Views (R585 – C-SR-29)

The LVIA confirms that the **R585 Regional Road**, designated as **Scenic Route C-SR-29**, passes between the northern and southern turbine clusters (EIAR, Chapter 13, Section 13.3.3 and Section 13.5.1.1).

The Route Screening Analysis records:

- Predominantly “**Little / No visual screening**” along this route,
- High levels of actual visibility in close proximity to the turbines (EIAR, Chapter 13, Section 13.3.3.1).

Photomontage viewpoints **VP10, VP11 and VP12**, which represent views from the R585, record **Moderate to Significant residual visual effects**, including substantial changes in landscape composition (EIAR, Chapter 13, Appendix 13-3 and Table 13-17).

The visibility and prominence of the turbines from this designated scenic route conflicts with Development Plan Objectives GI 14-12 to GI 14-14 relating to the protection of scenic routes and views.



3.4. Wild Atlantic Way and Tourism Sensitivity

The LVIA identifies the **Wild Atlantic Way** as a sensitive recreational and tourism receptor and scopes it in for assessment due to its national importance (EIAR, Chapter 13, Section 13.5.1.4 and Table 13-11).

Although the LVIA seeks to downplay effects at longer distances, it confirms that:

- The Wild Atlantic Way and associated viewing points fall within the LVIA Study Area,
- Visibility of the proposed turbines occurs at selected viewpoints, including **VP2 and VP13** (EIAR, Chapter 13, Table 13-14).

The Landscape Character of West Cork is a core attribute of the Wild Atlantic Way experience and is explicitly recognised as such within the LVIA baseline (EIAR, Chapter 13, Sections 13.4.5 and 13.5). The introduction of multiple large-scale turbines into this landscape represents a **permanent alteration** to an internationally marketed scenic environment.

The area is also covered by the Fáilte Ireland West Cork Coast Destination and Experience Development Plan (DEDP), which prioritises:

- Landscape integrity,
- Visual quality,
- Sense of remoteness and naturalness.

The scale and visibility of the proposed turbines conflict with these objectives and would undermine the tourism and recreational value of the area.

3.5. “Open to Consideration” – Burden of Proof on the Applicant

The LVIA confirms that the site falls within an area designated “**Open to Consideration**” for wind energy development under the Cork County Development Plan Wind Energy Strategy (EIAR, Chapter 13, Section 13.4.1.1.5).

The Development Plan states that proposals in such areas must **demonstrate that adverse impacts can be avoided**, including impacts on:

- Residential amenity,
- Visual quality of the landscape,
- Scenic routes and tourism assets.

The LVIA records:

Significant visual effects at four assessed viewpoints (VP6, VP11, VP12 and VP16),

A Substantial magnitude of change at VP16, where turbines account for **44% of the available landscape view** (EIAR, Chapter 13, Table 13-17).

In light of these findings, the LVIA fails to demonstrate that the development avoids adverse landscape and visual impacts, and therefore fails to satisfy the policy requirements applicable to an “Open to Consideration” area.

3.6. Summary

When read as a whole, EIAR Chapter 13 demonstrates that:

- The proposed turbines are the dominant visual elements in the landscape,
- The receiving landscape is of **High Value and High Sensitivity**,
- Significant visual effects are recorded from scenic routes, recreational assets and close-range receptors,
- The overall LVIA conclusion (Section 13.8) is not consistent with its own detailed assessments (Table 13-17).

Accordingly, the proposed development represents an **unacceptable landscape and visual impact** and is in **material conflict with the Cork County Development Plan**, as confirmed by the applicant’s own LVIA.

3.6.1. Clarity sought from the Planning Authority

Can the planning authority demonstrate that the proposed development will not give rise to significant adverse effects on the Wild Atlantic Way, associated tourism assets and designated Scenic Routes, and that it complies with the Cork County Development Plan requirements for lands designated ‘Open to Consideration’? In particular, can it be demonstrated, having regard to the applicant’s own LVIA findings, that the development will not result in undue visual intrusion or material harm to landscape character and tourism value; and, failing such demonstration, should the applicant be required to submit a revised and more robust LVIA, including verified visualisations and a comprehensive tourism impact assessment, prior to determination?

3.7. Cumulative Landscape, Visual and Tourism Impact

This proposal forms part of a cluster of four wind energy developments proposed within an approximately 12-kilometre stretch, extending from Curraglass to Derreenacrinnig West, along exposed upland ridgelines characterised by their rugged natural form and high scenic quality. The cumulative effect of these developments would result in an almost continuous corridor of large-scale turbines across the uplands of West Cork, fundamentally altering the landscape character of the area and significantly increasing visual dominance across long-range views.

The cumulative turbines would be **visible from multiple locations along the Wild Atlantic Way**, a nationally and internationally promoted tourism route whose appeal is strongly dependent on the perception of unspoilt, dramatic and natural landscapes. The introduction of repeated turbine clusters along skylines would erode the sense of remoteness and wildness that defines this region.

The proposed development would be clearly visible from the R585, a designated Scenic Route, described in the Cork County Development Plan as the *“regional road to Kealkill via Cousane Gap to Derragh Bridge, offering views of remote mountainous landscape”* (Cork County Development Plan 2022–2028, Volume 2, p.248). The Development Plan seeks to protect the character and views obtainable from such routes.

The R585 is a **key tourist route** for visitors travelling through West Cork to the Beara and Sheep’s Head Peninsulas, both of which are core destinations on the Wild Atlantic Way. At present, the route offers **unspoilt rural scenery and panoramic mountain vistas**. The introduction of multiple turbines of industrial scale along ridgelines would **drastically compromise these views**, introducing elements that are visually dominant, moving, and incongruous with the surrounding landscape.

The turbines would also be **visible from Bantry Bay**, a major amenity and tourism asset. Bantry Bay regularly accommodates **cruise ships**, which contribute significantly to the local economy by supporting hospitality, retail and service businesses in Bantry and its hinterland. Views from the bay are defined by open water, mountainous backdrops, and a strong sense of natural enclosure. The visual intrusion of multiple wind farms along surrounding uplands would diminish the quality of these views, with cumulative effects further intensifying the impact.

The Cork County Development Plan explicitly acknowledges that the county possesses a wide range of nationally significant tourism assets, and that landscape quality is fundamental to their value. The proposed wind farm site lies at the **convergence of the Caha and Shehy Mountains**, a landscape of

exceptional scenic, ecological and cultural value, and is immediately adjacent to, and visible from, the Gaeltacht Mhúscraí area. This Gaeltacht holds deep linguistic and cultural significance and forms part of Ireland’s protected living cultural landscape.

Visibility of large-scale turbines from the Gaeltacht Mhúscraí, from Bantry Bay, and from the Beara and Sheep’s Head Peninsulas would undermine the visual integrity of some of the most iconic and sensitive landscapes in the county. These areas rely heavily on their **coherent natural character** to sustain tourism activity.

Tourism in County Cork is founded on the county’s natural and built heritage, as recognised in the Cork County Development Plan, which identifies the core elements of the county’s tourism product as including:

- Mountains and upland habitats,
- Rivers and lakes,
- Over 1,100 km of scenic, rugged coastline and peninsulas,
- Fertile agricultural landscapes,
- Upland peatlands and forested areas,
- A rich heritage of archaeological sites, historic landscapes, towns and villages
(Cork County Development Plan 2022–2028, Volume 1, p.215).

The Development Plan further identifies nationally significant assets including:

- Gaeltacht areas,
- The West Cork Peninsulas (Beara, Mizen, Sheep’s Head), valued for their distinctive landscape character and outdoor recreation potential,
- Mountain ranges including the Caha and Shehy Mountains.

The cumulative introduction of industrial-scale wind turbines into this sensitive upland setting would conflict with these objectives and would **erode the scenic quality that underpins West Cork’s tourism economy**. In particular, the cumulative visual impact of multiple wind farms along prominent ridgelines represents an **unacceptable alteration of landscape character** and a material conflict with the Cork County Development Plan’s tourism, landscape and scenic route protection policies.

3.8. Further Information Sought

Having regard to the well-established approach of An Coimisiún Pleanála in refusing wind energy developments where cumulative landscape and visual impacts are not adequately assessed, or where such impacts are considered unacceptable in sensitive upland landscapes and areas of high scenic value (for example, the refusal of the Ardragh Wind Farm in Cork, upheld in [2019] IEHC 795, where cumulative landscape and visual impact was a key determining factor, and more recent refusals including the Gougane Barra wind farm decision in 2024 on visual and scenic grounds), can the Board confirm whether it is satisfied that the application contains sufficient and robust information to enable a full and proper assessment of cumulative impacts?

Given the wider tourism context and inter-county connectivity of the region, can the Board also clarify whether consultation will extend beyond Cork County Council to include Kerry County Council, having regard to the established tourism links between Bantry Bay, Killarney and the Ring of Kerry, and the regular movement of visitors, including cruise passengers, between these areas?

In that regard, can the applicant be required to submit additional verified photomontages and visualisations demonstrating cumulative visibility from key viewpoints, Scenic Routes and along the Wild Atlantic Way, including sequential views, and, in addition, from sensitive tourism and recreational receptors including Bantry Bay (having regard to cruise ship approaches and anchorage locations), established walking routes such as St. Finbarr's Way and the Beara-Breifne Way, and key tourism gateways linking West Cork and Kerry, in order to adequately assess the experiential impact on mobile receptors within the landscape?

In the absence of such detailed and site-specific analysis, can it be demonstrated how the development, when considered in combination with other wind farms along prominent ridgelines, will not result in an incremental and unacceptable alteration of landscape character, serious visual intrusion, or erosion of the scenic quality that underpins the interconnected tourism economies of West Cork and the wider southwest region, having regard to previous Board findings in comparable cases?

Furthermore, it is noted that turbine T14 is located in close proximity (approximately 250 metres) to lands described within the Development Plan landscape classification as "normally discouraged" for

wind energy development. In this context, can it be demonstrated how the siting of a turbine of this scale so close to such a designation is consistent with Development Plan objectives, and how the associated visual and landscape impacts have been adequately assessed and justified?

Can the applicant also be required to prepare and submit a detailed tourism impact assessment, with specific reference to the Fáilte Ireland West Cork Coast Destination and Experience Development Plan, the pending classification of the Mealagh Valley as a Dark Skies⁵ destination, and the importance of cultural tourism initiatives in Bantry, including the development of new performance and event infrastructure and the long-established activities of organisations such as West Cork Music?

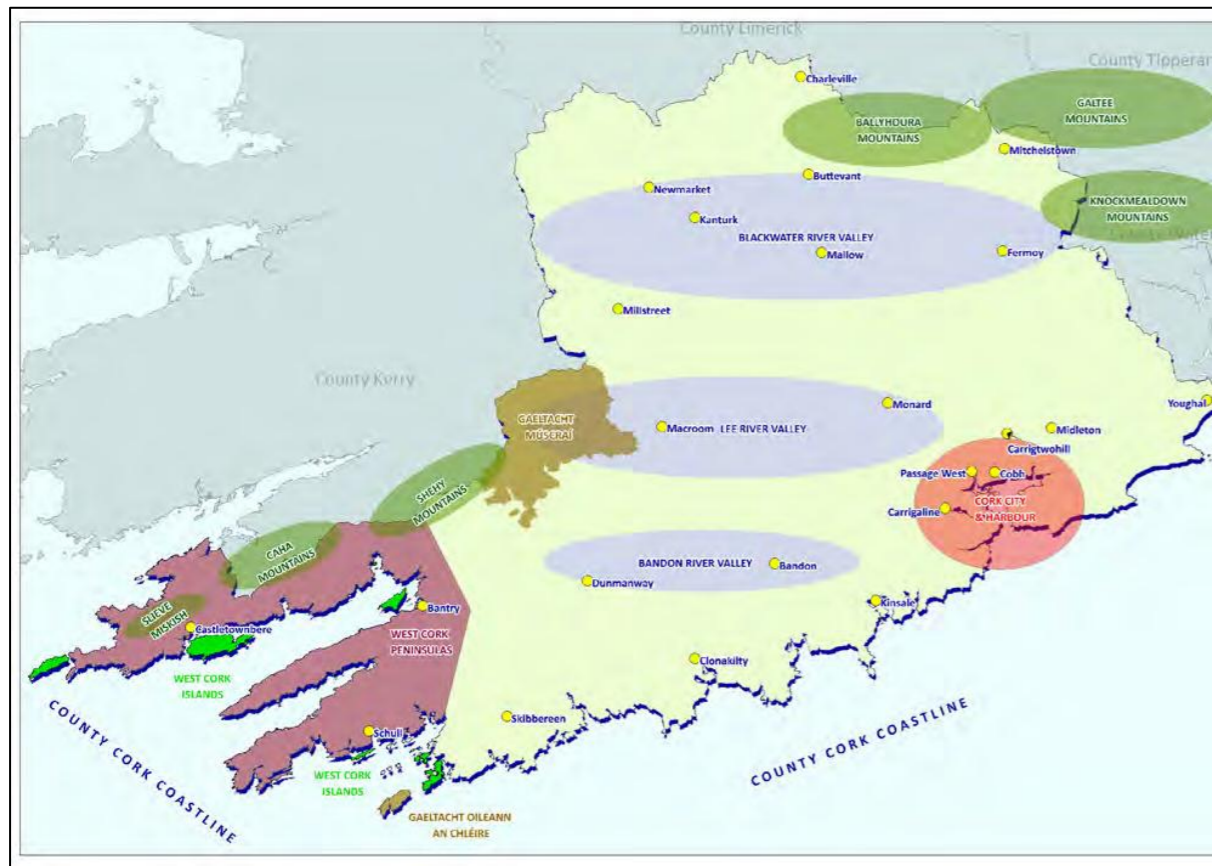
In this context, can it be demonstrated how the proposed development will not adversely affect the visitor experience associated with these cultural and tourism assets, including emerging proposals such as the Bantry Music Centre and related community-led initiatives?

Pending the submission of such information, can the Board confirm that it has a sufficient evidential basis to conclude that the proposal would not materially contravene the Cork County Development Plan policies relating to landscape protection, tourism and Scenic Routes, or give rise to significant adverse cumulative impacts?

⁵ [Appendix 3](#)



Proposed Curraglass windfarm in the background. Maughanaclea windfarm would be visible to the right.



Cork's Key Tourism Assets

3.9. High Value Landscape – Policy Context

A High Value Landscape (HVL) is a designation arising from the Cork County Landscape Character Assessment, as incorporated into the Cork County Development Plan (CCDP). As confirmed in EIAR Chapter 13, HVLs are landscapes of high scenic quality and high sensitivity to change, requiring a heightened level of protection in the planning process.

EIAR Chapter 13 (Section 13.4.1.1.3) confirms that:

- Landscape Character Types are assessed in terms of Landscape Value, Sensitivity and Importance;
- Landscapes with High or Very High Value and Sensitivity, and of County or National Importance, are designated as High Value Landscapes;
- Such landscapes are defined as vulnerable and capable of **accommodating only limited development pressure without unacceptable harm to character.**

The LVIA further confirms that High Value Landscapes require considerable care in the siting, scale and design of large-scale development, due to risks of visual dominance and skyline intrusion (EIAR Chapter 13, Sections 13.4.1.1.3 and 13.4.5).

3.9.1. Landscape Character Assessment and Mapping

As set out in EIAR Chapter 13, Section 13.4, Cork County Council’s Draft Landscape Strategy identifies Landscape Character Types (LCTs) through a systematic Landscape Character Assessment process, which:

- Identifies distinct landscape types (upland, ridged, valley, coastal, etc.);
- Assesses scenic quality, cultural associations, natural features and susceptibility to change;
- Informs the mapping of High Value Landscapes within the CCDP.

These designations are spatially mapped within the Development Plan and frequently overlap with:

- Scenic Routes,
- Sensitive upland and ridgeline landscapes,
- Archaeological and cultural heritage zones,
- Tourism and recreational assets.

3.9.2. Application to the Proposed Development

As confirmed in EIAR Chapter 13, the proposed Maughanaclea Wind Farm is located within LCT 15a – Ridged and Peaked Uplands, which is assigned:

- High Landscape Value, and
- High Landscape Sensitivity (EIAR Chapter 13, Section 13.4.1.1.3).

Furthermore, the site is located immediately adjacent to LCT 4 – Rugged Ridge Peninsulas, which is a designated High Value Landscape (EIAR Chapter 13, Sections 13.4.1.1.3 and 13.4.5).

Accordingly, the receiving environment is one where:

- Landscape capacity is limited,
- Visual impacts carry greater weight,
- Large-scale industrial development must meet a high evidential threshold.

3.9.3. Protection of Tourism Assets (CCDP Chapter 10)

The Cork County Development Plan recognises that many of the County’s most important tourism assets derive their value from landscape quality.

Section 10.6 of the CCDP identifies nationally significant tourism assets, including:

- Mountain ranges, specifically the Caha Mountains and the Shehy Mountains;
- Upland and ridgeline landscapes forming the backdrop to West Cork’s tourism economy.

Section 10.6.2 requires that development in such areas:

- **Does not adversely affect landscape character,**
- **Does not undermine tourism assets,**
- Is directed **only to areas with demonstrable capacity to absorb change without degradation.**

Section 10.6.3 further emphasises that:

- The exceptional quality of the landscape is itself an economic resource;

Natural assets such as mountains, rivers, forests and dark skies must be protected to sustain tourism growth.

These objectives must be read in conjunction with EIAR Chapter 13, which identifies extensive visibility of the proposed turbines from scenic routes, recreational assets and tourism receptors.

3.10. Impact on Residential Amenity

The proposed development would give rise to a significant adverse impact on residential amenity, arising from:

- The introduction of **red aviation warning lights, which would erode the rural darkness of this High Value Landscape;**
- The scale, height and movement of turbine blades, which are acknowledged in EIAR Chapter 13 as the primary visual element of the development (Section 13.1.2.2).

Such impacts would disrupt the tranquillity, character and visual harmony of the surrounding countryside and are inconsistent with the protection afforded to High Value Landscapes.

It is further noted that Cork County Council has refused modest residential development in similarly High Value Landscape contexts on the basis that sites were:

- Elevated and exposed,
- Out of keeping with settlement patterns,
- Visually intrusive when viewed from the R585 Scenic Route.

(Ref: Cork County Council planning decisions, 2023)

Permitting a large-scale industrial wind farm in the same landscape context would therefore represent a clear inconsistency in planning approach.

3.11. Scenic Route R585

The R585 Regional Road is a designated Scenic Route, described in the CCDP as:

“Regional road to Kealkill via Cousane Gap to Derragh Bridge – views of remote mountainous landscape.”

(EIAR Chapter 13, Section 13.5.1.1; CCDP Volume 2)

EIAR Chapter 13 confirms that:

- The proposed turbines would be clearly visible from the R585;
- Multiple viewpoints along this route record Moderate to Significant residual visual effects.

The introduction of turbines at this scale would **fundamentally alter the experience of this scenic route** and conflict with Development Plan objectives for its protection.

3.12. Request for Further Information – Residential Amenity and Nuisance Impacts

Having regard to recent Irish case law in which residents were awarded substantial damages for nuisance arising from wind turbine development, the Board is requested to seek clarification from the Applicant on the following:

Has the Applicant considered the implications of recent High Court findings in Ireland⁶, where wind turbine operations were deemed to give rise to actionable nuisance impacting residential amenity, including noise, disturbance, and loss of enjoyment of property?

What specific assessment has been undertaken to evaluate the risk that the proposed development could give rise to similar nuisance impacts for properties in proximity to the site?

How has the Applicant assessed the potential for significant interference with the ordinary use and enjoyment of nearby dwellings, particularly in relation to:

Noise (including amplitude modulation, turbine spacings and low-frequency noise)

Shadow flicker

Visual dominance and landscape intrusion

What evidence can the Applicant provide to demonstrate that the proposed development will not give rise to conditions comparable to those that resulted in substantial damages being awarded to residents in the Ballyduff Windfarm case?

Has the Applicant undertaken a cumulative impact assessment, including the interaction of noise, visual effects, and turbine proximity, as these combined factors were central to findings of nuisance in previous cases?

What monitoring, enforcement, and remedial measures are proposed in the event that operational impacts give rise to complaints or exceed predicted thresholds?

⁶ https://www.archyde.com/windfarm-nuisance-e300k-awarded-to-residents-irish-times/#google_vignette

In the context of identified risks from comparable developments, what precautionary approach has been applied to turbine siting, scale, and separation distances from residential properties?

Has any consideration been given to the potential liability implications for residents and the planning authority should the development result in proven nuisance impacts post-construction?

In light of recent legal findings concerning wind turbine nuisance, it is submitted that the Board should be satisfied that the proposed development will not give rise to significant adverse impacts on residential amenity or actionable nuisance, and that a robust precautionary and mitigation framework is in place.

3.13. Conclusion

Having regard to the location of the proposed development within and adjacent to a High Value Landscape, the findings of Chapter 13 of the Environmental Impact Assessment Report, and the provisions of the Cork County Development Plan 2014 and the Cork County Development Plan 2022–2028, it is considered that the proposed development, by reason of its elevated, exposed and visually prominent siting, would give rise to significant adverse impacts on landscape character, visual amenity and residential amenity, would undermine the scenic quality of the area and associated tourism assets, and would materially contravene the policies and objectives of the Development Plan. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area

Scenic Route	Does Route Run Through or Adjoin High Value Landscape	Does the Route adjoin a NHA, pNHA, cSAC a SPA or pSPA	Landscape Type(s) Route Runs Through	Overall Landscape Value	Main Features of Land Cover	Description & General Views Being Protected	Structures of Historic or Cultural Importance Visible from Route	Key Characteristics of Land Use	Is There a Sense of Remoteness as you Travel the Route?	Rural Character
S29	Yes	No	Type 4 Rugged Ridge Peninsula & Type 15a Ridged & Peaked Upland	Very High - Medium	Trees & pastoral landscape	R585 Regional Road to Kealkill via Cousane Gap to Deragh Bridge Views of remote mountainous landscape	No Information Available	Agriculture & Forestry	Yes	Prevalent
S30	Yes	No	Type 4 Rugged Ridge Peninsulas, Type 9 Broad Marginal Middle-ground & Lowland Basin, Type 6a & Type 16b	Very High - Medium - High - Low	Forestry, residential development, mountains & lakeside	Local Roads between Dunmanway and Coolkelure, Castledonovan and Bantry. Views of hills, mountains, the Rivers Clodagh, Ilan & Owen-nashingaun, Lough Bofinna & the surrounding rugged remote rural landscape	No Information Available	Intensive forestry, agriculture & residential	Yes	Prevalent



Views of Shehy and Caha Mountains from R585.

View of Doughill, Douce and Shehy (Duchoill, Damhas agus Seithe) and location of northern cluster of wind turbines from L95853-7





Photograph Location A, Ballylickey



Photograph Location B, Seskin, Bantry



Photograph Location C, Rooska, Bantry



Photograph Location D, Durrus, Bantry



Photograph Location E, R585, between Gougane Barra and Bantry Bay



Photograph Location E, R585, between Gougane Barra and Bantry Bay

3.14. Previous Planning Judgements

3.14.1. Observation on Proposed Development

Having regard to the statutory provisions of the Cork County Development Plan 2014 and the Cork County Development Plan 2022–2028, and to the established planning authority approach to development on visually sensitive lands adjoining designated Scenic Routes, the following observations are made in respect of the proposed development.

The site of the proposed development is located within a designated High Value Landscape and visible from a Scenic Route. These designations reflect the particular visual sensitivity of the area and the importance attached to the protection of landscape character, scenic views and public amenity. Development proposals in such locations are required to meet a particularly high standard of site suitability and visual integration.

It is noted that Cork County Council has previously refused permission for a domestic dwelling on lands of comparable character, elevation and exposure, on the basis that such development would result in unacceptable visual intrusion and serious injury to the scenic and visual amenities of the area. The reasoning and conclusions set out in that refusal are directly relevant and applicable in this instance.

3.14.2. Planning No. 23/469:

Construction of dwelling, and domestic garage, and all associated site works at Maughanaclea Kealkill Bantry Co. Cork.

*The proposed development would be positioned on highly prominent lands next to a scenic route (S 88). As stated in the Cork Development Plan 2014 it is the Councils stated **policy to protect scenic routes** (Objective GI 7-2 and G7-3), to prevent significant alterations to the appearance or character...*

*... the proposed dwelling house would exacerbate ribbon development and **provided for a visually intrusive and a domineering form of development to the detriment of the character of the area, including when viewed from the scenic route.** Accordingly, the proposed development would therefore materially contravene stated objectives of the County Development Plan 2014 and would be contrary to the proper planning and development of the area.*

*As stated in the Cork County Development Plan 2022-2028 it is the Councils stated policy, as defined by Objective GI 14-9, GI 14-12, GI 14-13 and GI 14-14 to **Protect the visual and scenic amenities of the High Value Landscape the site is set within and to protect the very special views and prospects of a***

***Scenic Route.** The proposed development would be situated on an elevated, exposed and unspoilt steep hillside devoid of screening set above the R-585 Regional Road and Scenic Route and notwithstanding the 'local' connection to the area the proposed development involves the erection of a dwelling on a highly unsuitable site that if permitted would form an unduly prominent feature incongruous feature including intermittent points **along the Scenic Route and the high visibility over a wide area that would result in serious injury to the visual and scenic amenities of the area.** The proposed dwelling house would therefore materially contravene stated objectives of the County Development Plan 2022-2028 and would not be accordance with the proper planning and sustainable development of the area. As stated in the Cork County Development Plan 2022, it is the Councils policy, as defined by Objectives GI 14-9, GI 14-12, GI 14-13, GI 14-14 and RP 5-22 **to protect the visual and scenic amenities of the High Value Landscape the site is set within and to protect the very special views and prospects of a Scenic Route.** The proposed development would be situated on an elevated, exposed and unspoilt steep hillside devoid of screening set well above the **R-585 Regional Road and Scenic Route** and, notwithstanding the 'local' connection to the area, the proposed development would involve the erection of a dwelling house on a highly unsuitable site that, if permitted, would form an unduly prominent and incongruous feature including at intermittent points along the Scenic Route and a high visibility over a wide area that would result in serious injury to the visual and scenic amenities of the area. The proposed dwelling house would, therefore, materially contravene stated objectives of the County Development Plan 2022 and would not be accordance with the proper planning and sustainable development of the area.*

(Cork County Council Planning No. 23/469)

3.14.3. Clarification sought from the Planning Authority and the Developer

Having regard to the findings of Chapter 13 of the EIAR, which identify the site as visually sensitive, highly visible and forming part of a High Value Landscape of significant scenic and amenity importance, can the planning authority clarify how it is satisfied that the proposed development would not result in undue prominence, visual intrusion and a material alteration of the character of the landscape, particularly given its location on elevated, exposed and largely unscreened hillsides in proximity to designated Scenic Routes?

In this context, it is noted that the EIAR itself acknowledges the potential for significant adverse landscape and visual effects in such locations, and that relevant Development Plan objectives seek to protect high value landscapes and scenic routes from precisely such impacts. It is therefore

submitted that the proposed development would materially contravene the Cork County Development Plan 2014 and the Cork County Development Plan 2022–2028, would conflict with the findings of Chapter 13 of the EIAR, and would be contrary to the proper planning and sustainable development of the area.

Having regard to the foregoing, can the planning authority require the applicant to submit a more robust and detailed Landscape and Visual Impact Assessment, including additional verified photomontages, cumulative impact analysis, and specific mitigation proposals, in order to clearly demonstrate that significant adverse effects on the landscape character and visual amenity of the area will not arise?

3.15. Impact on Property Value

A recent email from a local estate agent to Annabelle Seymour (30 April 2026) indicates that properties in close proximity to existing or proposed wind farm developments experience reduced market value, diminished saleability, and loss of residential amenity.

The agent highlights a comparable property near Ballybane Wind Farm which sold significantly below its expected value after a prolonged sales period, with consistent buyer concerns relating to noise, visual impact, and proximity to turbines.

In addition, recent market activity in the Kealkill, Cousane and Mealagh Valley areas shows a pattern of failed sales, reduced buyer interest, and withdrawals from the market associated with awareness of proposed wind developments.

This evidence suggests a clear emerging trend whereby wind farm proximity adversely affects both property values and the enjoyment of homes, creating uncertainty and distress for residents and prospective purchasers.⁷

3.15.1. Clarification sought from the Planning Authority and the Developer

The application does not appear to include a detailed assessment of potential loss to the Exchequer through reduced capital gains tax receipts and associated charges; can the planning authority confirm whether this omission is consistent with the requirements of the various planning guidelines and legislation and national government financial strategy, including the Public Spending Code and

Department of Finance requirements for robust and transparent economic appraisal, comprehensive cost–benefit analysis, and the proper identification and evaluation of all costs, benefits, and forgone revenues to the Exchequer in the overall public interest; and, if necessary, require the submission of a detailed and independently verifiable assessment to address these matters.

3.15.2. Request for Further Information – Residential Amenity

Having regard to the proximity of the proposed development to existing dwellings, the Board is requested to seek clarification from the Applicant on the following matters:

In light of research undertaken by the Centre for Economic Research on Inclusivity and Sustainability (University of Galway), which finds a statistically significant reduction in property values of approximately 14.7% within 1 km of a wind turbine, with greater impacts associated with taller and more numerous turbines, has the Applicant undertaken a robust, site-specific assessment of the potential impact of the proposed development on residential properties within this distance band?

In particular, how has the Applicant assessed the potential for material adverse impacts on residential amenity, including visual dominance, noise, shadow flicker, and the overall living environment, having regard to the proximity of turbines to nearby dwellings?

How does the proposed development comply with the Wind Energy Development Guidelines for Planning Authorities (2006), the Draft Revised Guidelines (2019), and the Planning and Development Act 2000 (as amended), in ensuring that no undue adverse impact on residential amenity arises?

Given that the CERIS research identifies increased effects associated with turbine height, turbine density, and recent construction, what consideration has been given to these factors in the context of the proposed development, including local topography, landscape exposure, and inter-visibility with nearby residential properties?

Furthermore, in circumstances where robust Irish-based evidence demonstrates a quantifiable and significant impact within 1 km, how has the Applicant addressed the potential for material

⁷ [Appendix 1](#)

diminution of residential amenity and associated property value effects within the overall planning balance?

Finally, in light of the evidence that such impacts are most pronounced in the years immediately following construction, what mitigation or precautionary measures are proposed to protect nearby residents over the lifetime of the development?

The Board is requested to be satisfied that the proposed development will not give rise to undue adverse impacts on residential amenity, particularly for properties within approximately 1 km, and that all such impacts have been fully assessed, transparently evaluated, and appropriately mitigated in accordance with the principles of proper planning and sustainable development.⁸

4. Archaeology and Heritage.

The proposed wind farm would be widely visible from St. Finbarr's Pilgrim Path, part of the Irish Camino heritage walking network. Chapter 13 of the EIAR confirms, through Zone of Theoretical Visibility (ZTV) mapping and the photomontages and photo-wireframes presented in Appendix 13-5 and the Photomontage Booklet, that extensive sections of this route fall within areas of turbine visibility and that turbines would appear as prominent vertical elements in an open, elevated and visually sensitive landscape.

The development is also located in close proximity to the nationally important Bronze Age stone circle complex at Kealkill, together with a wider concentration of archaeological monuments including stone circles, cairns, standing stones and Carriganass Castle. Chapter 14 of the EIAR, which explicitly relies on the ZTVs and photomontages from Chapter 13, confirms that these monuments derive much of their significance from their wider landscape setting and long-range views across Bantry Bay and the Ouvane Valley.

Chapter 14 further concludes that the proposed turbines would give rise to residual operational-phase impacts on the setting of archaeological and cultural heritage sites and that these impacts cannot be mitigated due to the scale and prominence of the development. When Chapter 13 and Chapter 14 are read together, the EIAR demonstrates that turbines of up to 169 metres in height, incorporating moving blades, would introduce dominant and unavoidable visual intrusion into views from sensitive amenity routes and heritage sites.

Having regard to the development boundary objectives for Kealkill, which require the protection of landscape character, green infrastructure and heritage assets, it is submitted that the proposed development fails to comply with these objectives and would be contrary to the proper planning and sustainable development of the area.

⁸ Gillespie and McHale 2023, Wind Turbines and House Prices Along the West of Ireland. A Hedonic Pricing Approach.



Views of Bantry Bay and the Caha and the Slieve Miskish Mountains on the Beara Peninsula.



Photo and location of Maughanaclea Ring Fort

Kealkill Stone Circle with a view of potential Maughanaclea windfarm in the background

4.1 Cultural Heritage and Archaeology

In considering the Environmental Impact Assessment Report (EIAR), and in particular Chapter 14: Cultural Heritage, regard must be had to the statutory obligations to protect archaeological, architectural and cultural heritage.

Chapter 14 of the EIAR establishes that the proposed development is located within an exceptionally archaeologically sensitive landscape. The baseline assessment confirms the presence of 11 recorded archaeological sites within the Proposed Wind Farm site, 210 further archaeological sites within the 5 km study area, and six National Monuments within 10 km of the proposed turbines (Section 14.3.1, pages 14-12 to 14-13).

The archaeological resource includes megalithic tombs, stone circles, standing stones, ringforts, souterrains, ritual sites and historic routeways spanning the prehistoric, early medieval and post-medieval periods (Sections 14.3.1.1 to 14.3.1.2, pages 14-32 to 14-36).

Of particular importance is the Kealkill Stone Circle complex (AH157), which is subject to a Preservation Order (PO 69/1938). Chapter 14 acknowledges that the setting of this and other National Monuments forms an integral part of their significance (Sections 14.3.4.1 and 14.3.1).

Chapter 14 also identifies the Butter Road (CH18), a historic route associated with the Cork Butter Exchange, crossing the Proposed Wind Farm site. The EIAR accepts that proposed road upgrades and associated works will permanently alter this historic route and change how it is perceived within the landscape (Section 14.4.3, pages 14-64 to 14-65).

In assessing operational phase impacts, the EIAR states that it is not possible to mitigate indirect effects on the archaeological, architectural and cultural heritage resource due to the nature and scale of the proposed turbines (Section 14.4.4, page 14-67). It further confirms that residual effects will remain on the setting of archaeological and cultural heritage sites because such effects cannot be mitigated (Section 14.4.4, page 14-67).

However, in direct contradiction, the EIAR concludes that there are no significant negative effects on the archaeological, architectural and cultural heritage resource during the operational phase (Section 14.7, page 14-69).

These conclusions are irreconcilable. The EIAR's own methodology classifies National Monuments and sites subject to Preservation Orders as receptors of very high sensitivity (Table 14-2, page 14-9).

Non-mitigable effects on the setting of such receptors cannot reasonably be dismissed as not significant.

4.2. Conclusion.

Having regard to the findings of Chapter 14 of the EIAR, which confirm that the Mealah Valley constitutes an exceptionally rich and sensitive cultural landscape, containing National Monuments, Preservation Order sites, historic routeways and a high density of recorded and potential unrecorded archaeological remains, can the Board demonstrate how it is satisfied that the proposed development will not result in unacceptable harm to the archaeological, architectural and cultural heritage of the area?

In particular, having regard to the EIAR's explicit acknowledgement that operational phase impacts on the setting of archaeological and cultural heritage sites cannot be mitigated and will persist for the lifetime of the development, can it be reconciled how such effects are subsequently assessed as not significant, and on what evidential basis this conclusion has been reached?

In light of this apparent internal inconsistency, can the applicant be required to submit a revised and more robust cultural heritage assessment, including a detailed setting analysis of all affected heritage assets, cumulative impact assessment, and a clear and transparent methodology for determining significance, in order to demonstrate that the proposed development will not result in a material adverse impact on the cultural landscape, prior to any determination of the application and, in the absence of such clarification and supporting evidence, on what basis can the Board be satisfied that the proposal would not be contrary to the proper planning and sustainable development of the area?



Storm at Kealkill by William Orpen

⁹ <https://sirwilliamorpen.com/storm-at-keal-kill-co-cork-by-william-orpen-1901/>

5. Shadow Flicker

5.1. EIAR Adequacy Defect: Failure to Assess Shadow Flicker Impacts on the Full Living Environment of Affected Homes

The Environmental Impact Assessment Report, in particular **Chapter 5: Population and Human Health**, acknowledges that residential amenity, including shadow flicker, is a key human health and quality-of-life consideration. However, the shadow flicker assessment as presented fails to provide a complete and adequate assessment of impacts on my home and associated private amenity space, contrary to the requirements of section 172 of the Planning and Development Act 2000 (as amended) and Article 299B of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, which require an Environmental Impact Assessment Report to contain sufficient, accurate and coherent information to enable a proper assessment of likely significant effects on population, human health and residential amenity prior to the granting of development consent.

While the EIAR models shadow flicker effects primarily as an indoor phenomenon focused on dwellings, it does not meaningfully assess the effects of repeated and predictable shadow flicker on private outdoor amenity areas such as gardens, notwithstanding that these form an integral part of the residential environment. My garden is my primary private amenity space, and several principal living rooms within my dwelling rely on natural daylight from the south-east, south and south-west elevations. The proposed turbines (T07–T14), by virtue of their layout, bearing and elevation, will give rise to **recurring shadow flicker events across morning, mid-day and evening periods throughout the winter months**, affecting both internal living spaces and external amenity areas.

The EIAR itself confirms that shadow flicker events can be precisely predicted, are repetitive in nature, and are dependent on turbine positioning, sun angle and receptor orientation. In these circumstances, the omission of any substantive assessment of impacts on external amenity areas represents a failure to adequately describe the full receiving environment, as required by Article 5 of the EIA Directive. The repeated occurrence of flicker during the limited winter daylight hours constitutes a **material interference with the peaceful enjoyment of my home**, yet this impact pathway is not properly examined or evaluated.

Furthermore, while the EIAR relies heavily on post-consent turbine control software as mitigation, recent Commission decisions have consistently found that **an EIAR must first adequately assess the impact itself** before proposing mitigation, and that mitigation cannot compensate for a deficient or incomplete assessment. By excluding gardens and associated outdoor living spaces from consideration as sensitive receptors, the EIAR underestimates the true extent of residential amenity loss.

In these circumstances, the EIAR does not enable the competent authority or the public to carry out a proper, complete and informed assessment of likely significant effects on population and human health, rendering it materially deficient for the purposes of the EIA Directive and incapable of supporting a lawful grant of development consent.

5.2. Relevant Irish Case Law on EIAR Adequacy

Irish courts have consistently held that an Environmental Impact Assessment Report (EIAR) must provide a complete, coherent and accurate assessment of all likely significant effects of a proposed development. In *Sweetman v An Bord Pleanála* [2018] IESC 1, the Supreme Court confirmed that the purpose of EIA is to ensure that both the public and the decision-maker can properly understand the nature and significance of environmental impacts before consent is granted. Where material aspects of the receiving environment or impact pathways are omitted or inadequately assessed, the EIAR fails to meet the statutory requirements of the Planning and Development Act 2000 and the EIA Regulations. The High Court in *O’Grianna v An Bord Pleanála* [2014] IEHC 632 further held that EIARs containing fundamental omissions or inaccuracies are legally deficient, and that such defects **cannot be cured by planning conditions or reliance on mitigation measures at decision stage**.

The courts have also made clear that deficiencies in an EIAR **cannot be remedied by the expertise of the planning authority or the Board**. In *Kenny v An Bord Pleanála* [2018] IEHC 686, the High Court held that the competent authority is not entitled to fill gaps in an inadequate EIAR and must base its decision solely on the information properly before it. Taken together, these authorities establish that where an EIAR fails to adequately assess impacts on residential amenity, including predictable and recurring effects affecting the enjoyment and use of residential property, it does not comply with the requirements of Irish planning and environmental law and cannot lawfully support a grant of development consent.

5.3. Overview of the Problem

Shadow Flicker Impacts from Turbines T07–T14 on dwelling and garden at my home at 51.7517° N, – 9.3126° W

Eight turbines (T07–T14) will generate material, repeated, and harmful shadow-flicker effects on both the interior of my home and the main private amenity area (the garden). The cumulative impacts represent an unacceptable loss of residential amenity.

The proposed turbines range in bearing from 119° to 255° relative to my home and garden.

Together, they cover the entire SE → S → SW → WSW solar arc during winter months; the months in which the sun is low enough to cast long, sweeping turbine shadows across my property.

Although each turbine affects me at different times of day and under different low-sun conditions, the result is a pattern of shadow flicker that is:

- Frequent in winter
- Occurs on multiple mornings and afternoons
- Varies in intensity depending on the turbine
- Affects both internal rooms and external garden space
- Highly intrusive when it does occur

A brief overview of what can be expected from shadow flicker per turbine. At my home, this will be repeated between October and February for Turbines T07 to T11 at different times of the day:

Wind turbines relative to my home						
Turbine ID	Distance (m)	Base Elevation Difference (m)	Hub Height (m)	Tip Height (m)	Rotor Diameter (m)	Direction relative to North (°)
T07	1053	150	102	169	133	119
T08	1116	190	102	169	133	158
T09	958	120	102	169	133	181
T10	1159	190	102	169	133	207
T11	1314	190	102	169	133	226
T12	1434	40	102	169	133	243
T13	1650	30	102	169	133	255
T14	2251	20	102	169	133	243

5.3.1. T07 (119° SE): Morning Flicker into Garden and SE Windows

T07 aligns with the south-east sunrise in winter.

When the Sun rises behind the turbine:

- A moving band of shadow sweeps across the garden for 5–20 minutes (occasionally up to 30 min).
- The turbine blades produce **rapid strobing pulses of light and shadow** (20–40 flashes/min).
- This flicker passes across the centre of the lawn, the SE wall, and directly into SE-facing windows.

Resulting impacts:

- Strong early-morning light flicker inside living spaces.
- Outdoor space temporarily unusable due to visual disturbance.

THIS TURBINE WAS NOT ACCOUNTED FOR IN THE APPLICANT’S ASSESSMENT FOR HOUSE H031

5.3.2. T08 (158° SSE): Mid-Morning Winter Flicker

As the Sun rises further south:

- T08 produces flicker in the mid-morning period during winter.
- The blade shadows sweep across the lawn and the back part of the house.
- The flicker affects later in the morning than T07.

Impacts:

- Secondary morning disturbance following T07.
- **Disruption of natural daylight indoors at a time when light is needed most.**

5.3.3. T09 (181° South): Mid-Day Winter Flicker

Although the Sun is higher at midday, in winter it remains low enough that:

- T09 can cast flicker when the Sun is near due south.
- The shadow band moves quickly but distinctly across the garden and house.
- **Indoor flicker affects south-facing areas such as the kitchen.**

Impacts:

- **Unexpected mid-day flicker in winter months.**
- **Additional flicker episode on days when T07 and T08 already caused morning disturbance.**

5.3.4. T10 (207° SSW): Afternoon Flicker

As the Sun begins to move toward the southwest:

- T10 produces flicker during early winter afternoons.
- The shadow sweeps across the garden from a different angle than the morning turbines.
- The flicker reaches windows on the south and south-west facing sides of the home.

Impacts:

- **Intrusive afternoon pulses when the Sun is lowest and windows are fully illuminated.**
- Flicker may occur after T07–T09 have already created morning/mid-day disruption.

5.3.5. T11 (226° SW): Late-Afternoon Flicker (Strongest Contributor)

T11 has the largest effective tip height relative to my property and the highest alignment frequency in the winter solar arc.

This turbine produces:

- **Repeated late-afternoon flicker throughout winter.**
- Strong shadow events lasting 5–20 minutes per alignment.
- Highly noticeable pulses across the garden due to the low, golden-hour sunlight.

Impacts:

- **This is the single worst flicker source.**
- Occurs at a time when the garden and house windows are naturally used for evening light.
- Creates highly intrusive strobing toward the end of the day.

5.3.6. T12, T13 & T14 (243°–255° WSW): Sunset Flicker

These turbines produce flicker when the sun is:

- Extremely low (4–8° elevation)
- Near sunset

But when flicker occurs:

- The garden receives **intense, slow-moving shadow pulses.**
- The low-angle sunlight creates long, sharp blade shadows across outdoor amenity space.
- The flicker enters windows oriented toward the SSW/WSW.

Impacts:

- Even though short in duration (often <10 minutes), they occur during relaxation and evening outdoor times.
- The late-day timing makes the **disturbance more noticeable and unpleasant.**

THESE TURBINES WERE NOT ACCOUNTED FOR IN THE APPLICANT'S ASSESSMENT FOR HOUSE H031

5.3.7. Cumulative Effect Across All Eight Turbines in Southern Cluster

Individually, each turbine causes flicker only during a small seasonal window.

However, combined:

- T07 produces sunrise flicker
- T08–T09 produce mid-morning and midday flicker
- T10–T11 produce early and late afternoon flicker
- T12–T14 produce sunset flicker

This results in multiple, separate flicker events across a single winter day.

Across the year, this creates a pattern of repeated disturbance, including:

- Loss of enjoyment of the garden
- Repeated pulses of intrusive light inside the home
- Visual disturbance during key times of day (mornings/evenings)
- Stressful, unpredictable daylight disruption
- Degradation of peaceful use of private amenity space

This cumulative impact is far beyond what can reasonably be expected at a rural dwelling.

5.3.8. Impact on Sensitive Receptors (House + Garden)

Planning policy recognises that the dwelling AND its garden/amenity area are sensitive receptors.

This development negatively affects:

- The garden: The centre of the lawn is subjected to sweeping shadow bands from almost all turbines.
- Indoor living spaces: The SE, S, and SW windows receive flicker across three different times of day.
- Daily life: The pattern of flicker, though intermittent, is recurrent, seasonally concentrated, and unpredictably disruptive.

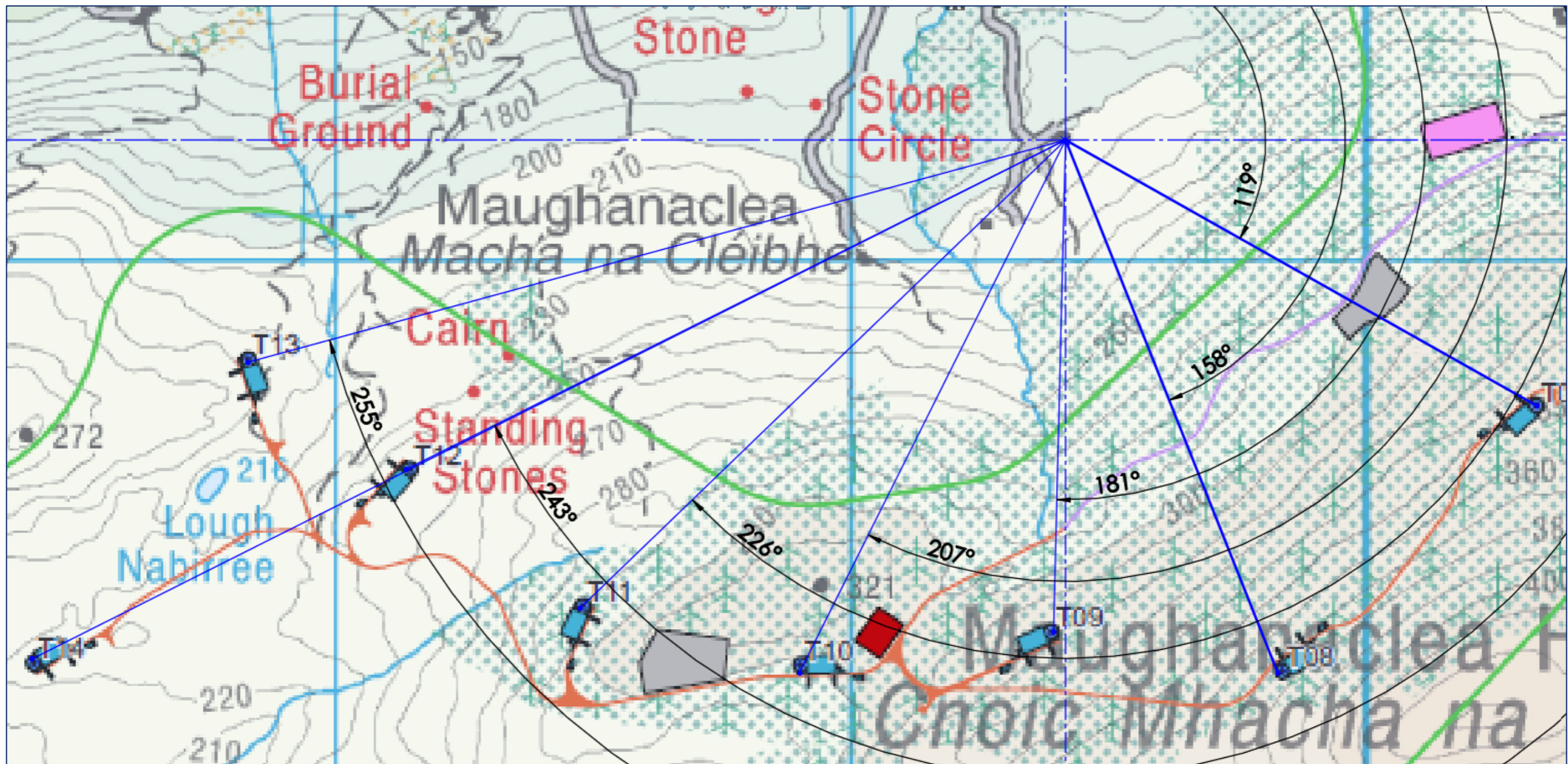
Enerco House ID	ITM Coordinates (Easting)	ITM Coordinates (Northing)	Description	Distance to Nearest Turbine (metres)	Nearest Proposed Turbine No.	Max. Daily Shadow Flicker: Pre-Mitigation (hrs:min:sec)	Max. Annual Shadow Flicker: Pre-Mitigation (hrs:min:sec)	Max. Annual Shadow Flicker Adjusted for Average Regional Sunshine (hrs:min:sec)	Proposed Turbine(s) Giving Rise to Daly Shadow Flicker Exceedance	Mitigation Strategy Required (Daily)	Mitigation Strategy Required (Annual)
H017	507408	556640	Dwelling	861	T13	01:03:00	49:49:00	16:38:25	T12, T13	Yes	Yes
H030*	510981	559534	Dwelling*	1057	T02	00:30:00	19:05:00	6:22:28	T02	No	No
H031	509370	556302	Dwelling	958	T09	01:22:00	98:44:00	32:58:47	T08, T09, T10, T11	Yes	Yes
H032	509867	554282	Dwelling*	988	T08	00:00:00	0:00:00	0:00:00	N/A	No	No

Property No.	No. of Days 30min/day Threshold is Exceeded	Turbine(s) Producing Shadow Flicker Exceedance	Days of Year When Mitigation May be Required (Day No's)*	Days of Year When Mitigation May be Required (Dates)*	Post-mitigation Maximum Daily Shadow Flicker (hrs:mins:sec)
H013	101	T08, T09, T10	1-41, 306-365	1st of January - 10th of February, 2nd of November - 31st of December	00:28:00
H030	6	T02	33-35, 311-313	2nd of February - 5th of February, 7th of November, 9th of November	00:28:00
H031	74	T08, T09, T10, T11	1-27, 319-365	1st of January - 27th of January, 15th of November - 31st of December	00:28:00
H033	62	T12, T13	1-8, 13-26, 321-335, 341-365	1st of January - 8th of January, 13th of January - 26th of January, 17th of November - 1st of December, 07th of December - 31st of December	00:28:00

EIAR Ch. 5. Extracts from Table 5.111 and 5.8

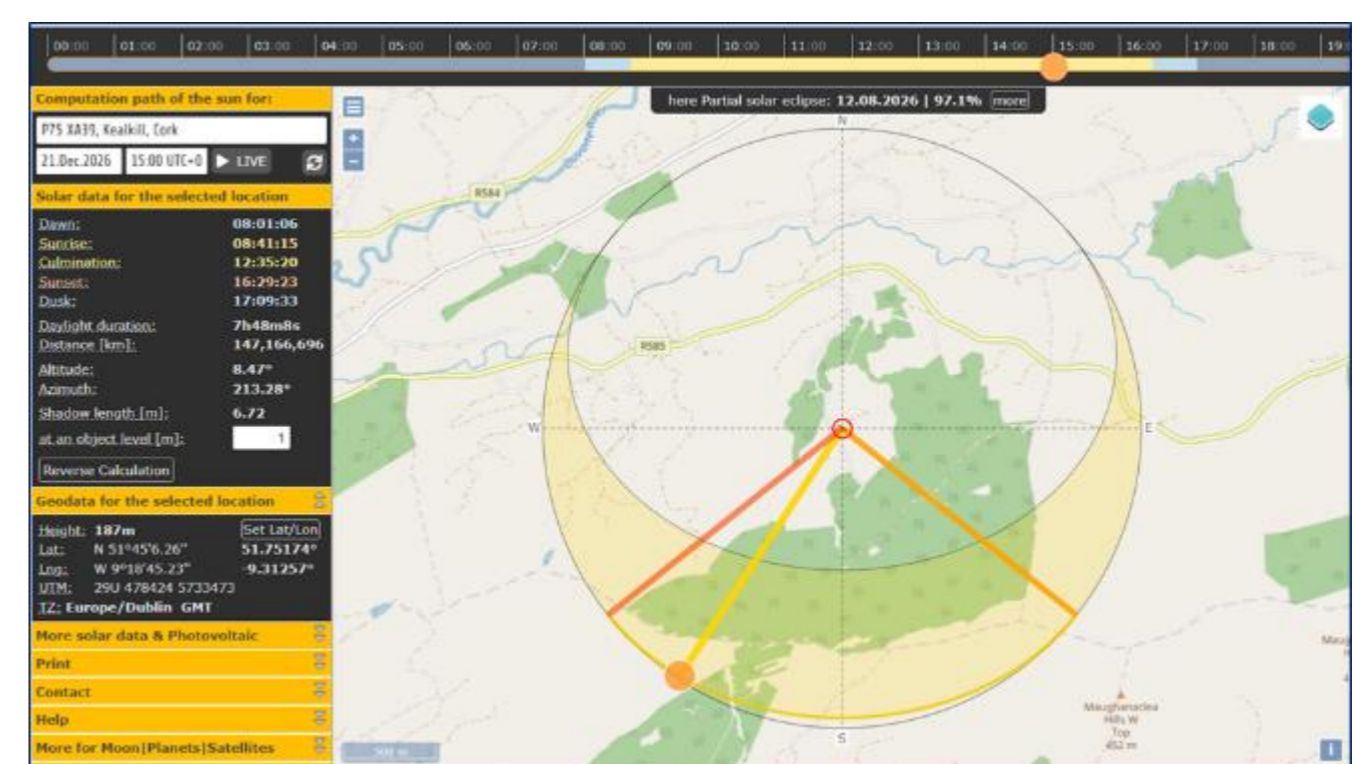
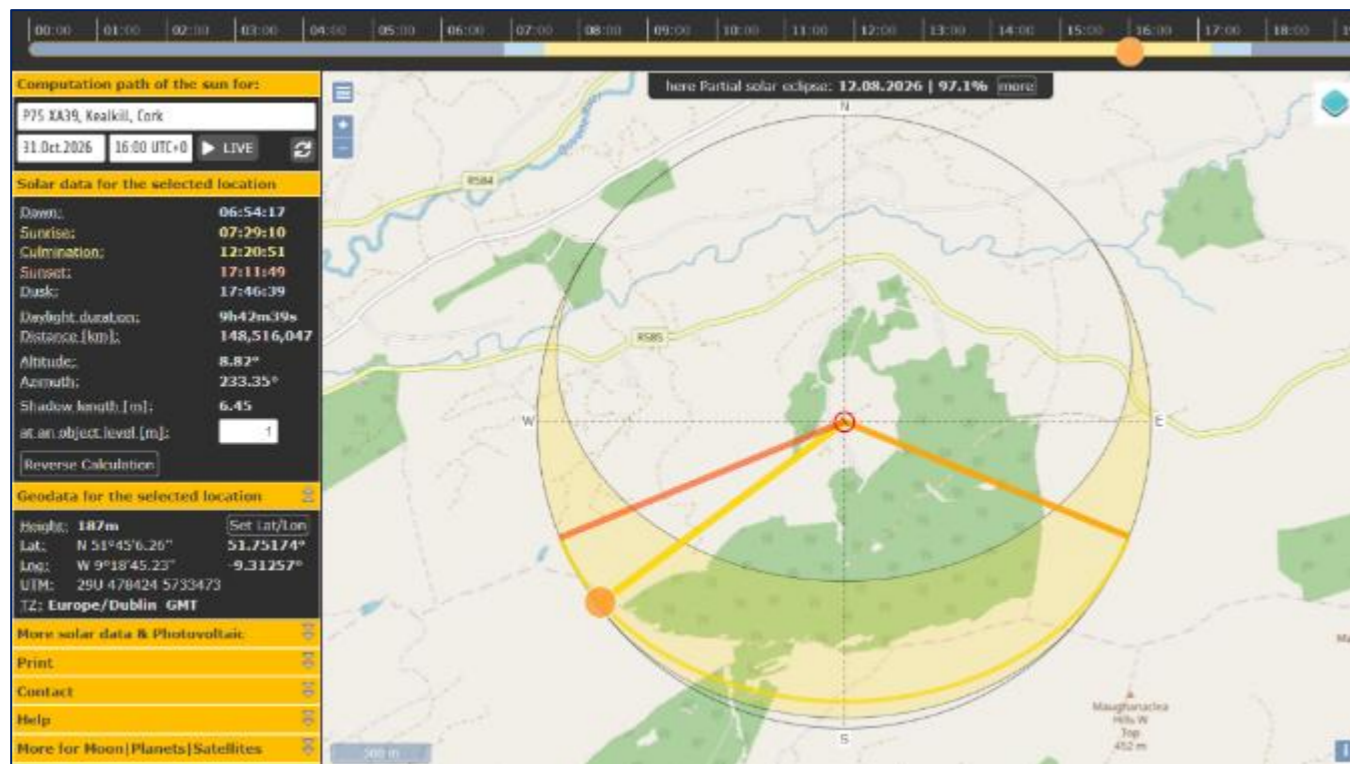
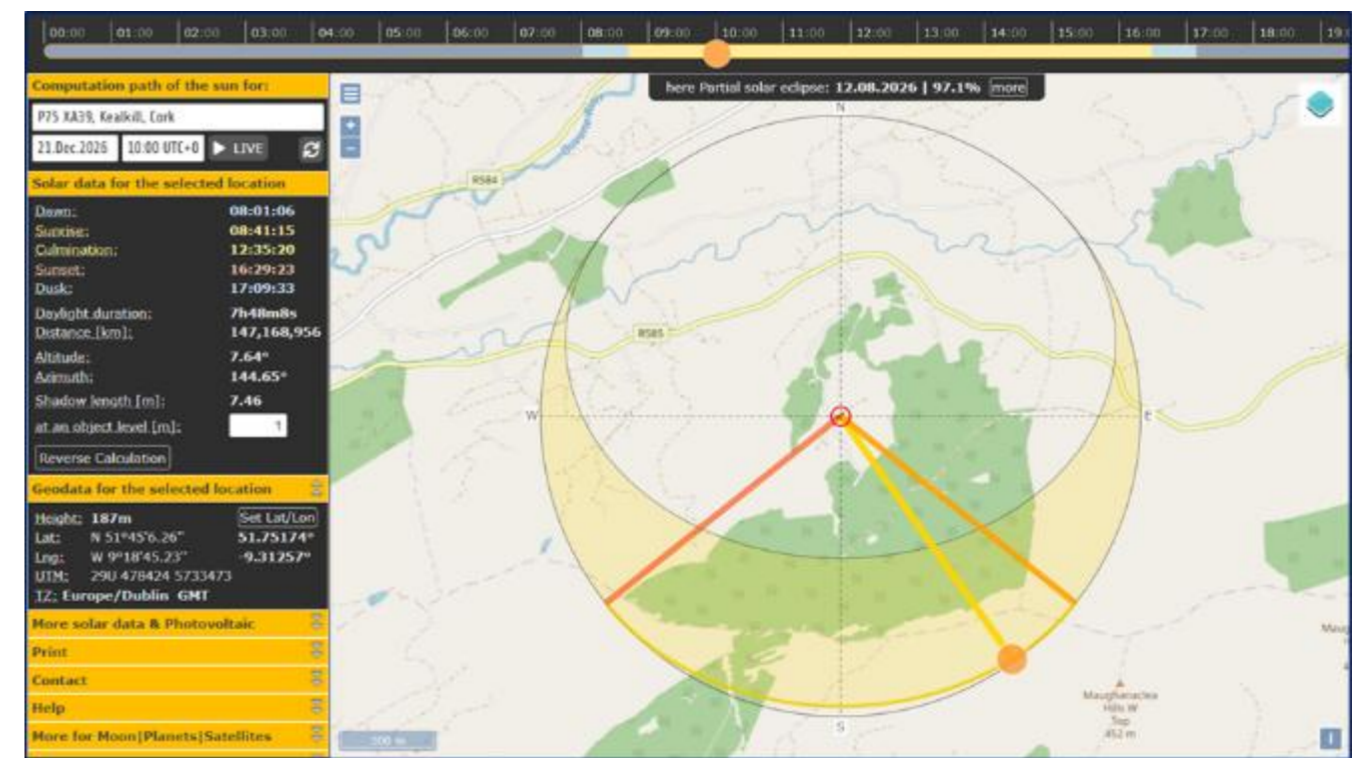
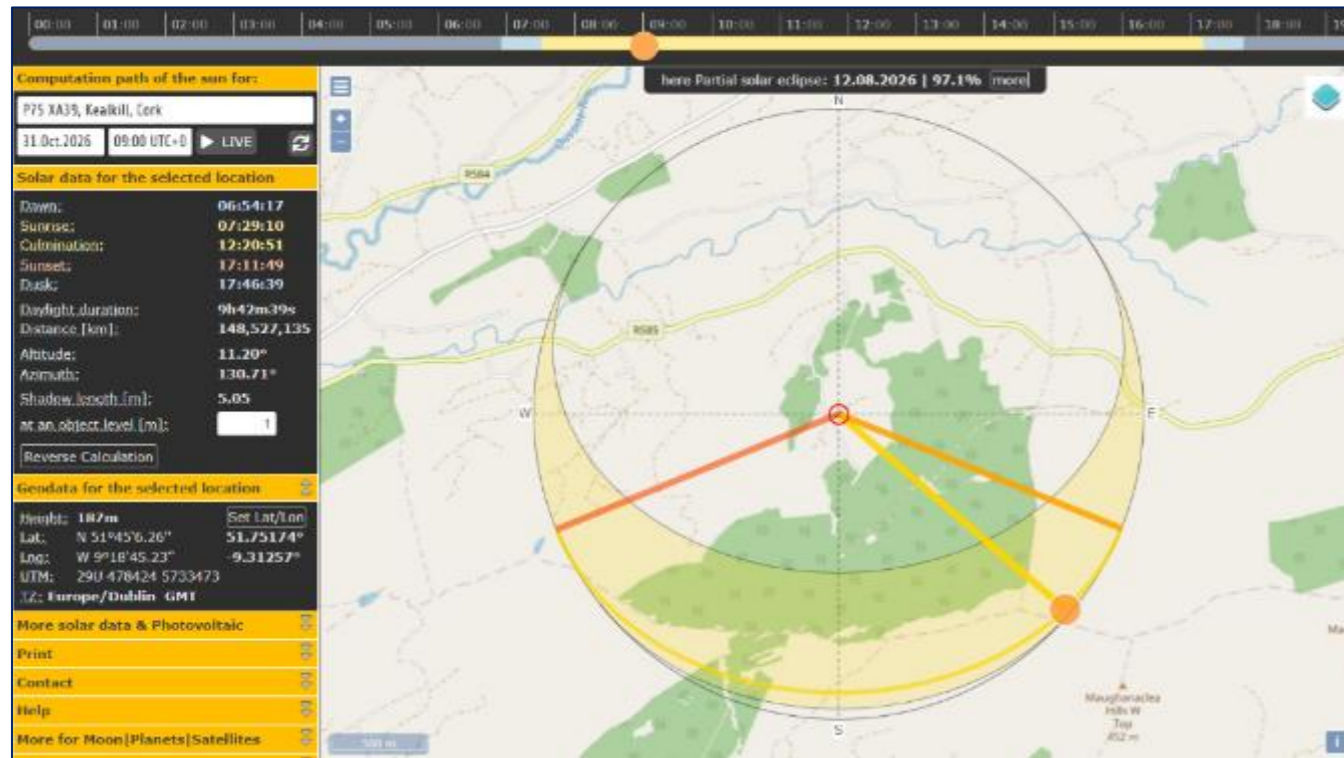
5.4. Maps and Graphics

5.4.1. Maps, Sun Paths, Photos and Graphics



Locations of Turbines T07 to T14 relative to my house.

5.4.2. Sample Sun Paths During Autumn and Winter Months



5.4.3. Images of winter sun from my home



Image taken facing west, showing low summer sun at my home @ 6.30 pm on 9 October 2025



Image taken facing west, showing low summer sun at my home @ 2.40 pm on 24 December 2025

5.4.4. Absence of analysis of selected turbines

Having regard to the applicant's assessment which indicates pre-mitigation shadow flicker levels of 98 hours and 44 minutes per annum, reduced to 28 minutes post-mitigation, can the Board demonstrate how it is satisfied that this assessment is accurate and reliable, particularly in circumstances where turbines T07, T12, T13 and T14 do not appear to have been fully incorporated into the cumulative analysis?

In this regard, I have provided photographic evidence demonstrating that during the winter months the sun is positioned directly behind these turbines relative to my dwelling and garden, confirming that shadow flicker from these turbines will arise in practice. Can it therefore be explained how the assessment has not materially underestimated the true extent, frequency and duration of shadow flicker impacts at this receptor and, by extension, at other similarly affected receptors within the study area?

Furthermore, given that the predicted post-mitigation exposure is contingent on the completeness and accuracy of the underlying modelling, can it be demonstrated how the omission or underestimation of contributions from these turbines has not rendered the overall assessment unreliable or materially flawed?

In these circumstances, can the applicant be required to undertake a revised and comprehensive cumulative shadow flicker assessment, incorporating all contributing turbines (T07–T14), supported by site-specific verification, seasonal solar modelling, and worst-case scenario analysis, including a clear breakdown of daily and seasonal exposure levels?

In the absence of such revised assessment, can the Board confirm on what evidential basis it can reasonably rely on the stated post-mitigation exposure of 28 minutes per annum as a robust, accurate and representative assessment of actual conditions, and that an unacceptable loss of residential amenity will not arise?

It is further noted that, should the development proceed on the basis of an assessment which materially understates actual impacts, significant and ongoing interference with the use and enjoyment of my property may arise. In such circumstances, I reserve my position in respect of seeking appropriate remedies, including compensation for nuisance, arising from any proven impacts on residential amenity.

5.5. Driving Hazard due to T07, T08 and T09

The bearings of turbines T07, T08 and T09 relative to the R585 are in the 240°–250° range (WSW). This means that shadow flicker would occur in winter evenings, when westbound drivers on this stretch of road are facing directly toward the descending sun.

At these times, the turbines lie directly between the drivers and the low sun, which can create rapid light–dark strobing across the carriageway. This effect is strongest during clear winter evenings when the sun is at its lowest elevation.

The combination of low-sun glare, intermittent turbine shadow, and vehicle speed on this section of the R584 presents a potential driver- **distraction risk that has not been assessed in the application.**

While current shadow-flicker guidance focuses on residential receptors, the potential for distraction to road users is a reasonable concern in this case.



Images of T07, T08 and T09 viewed facing westward

5.5.1. Request for Further Information

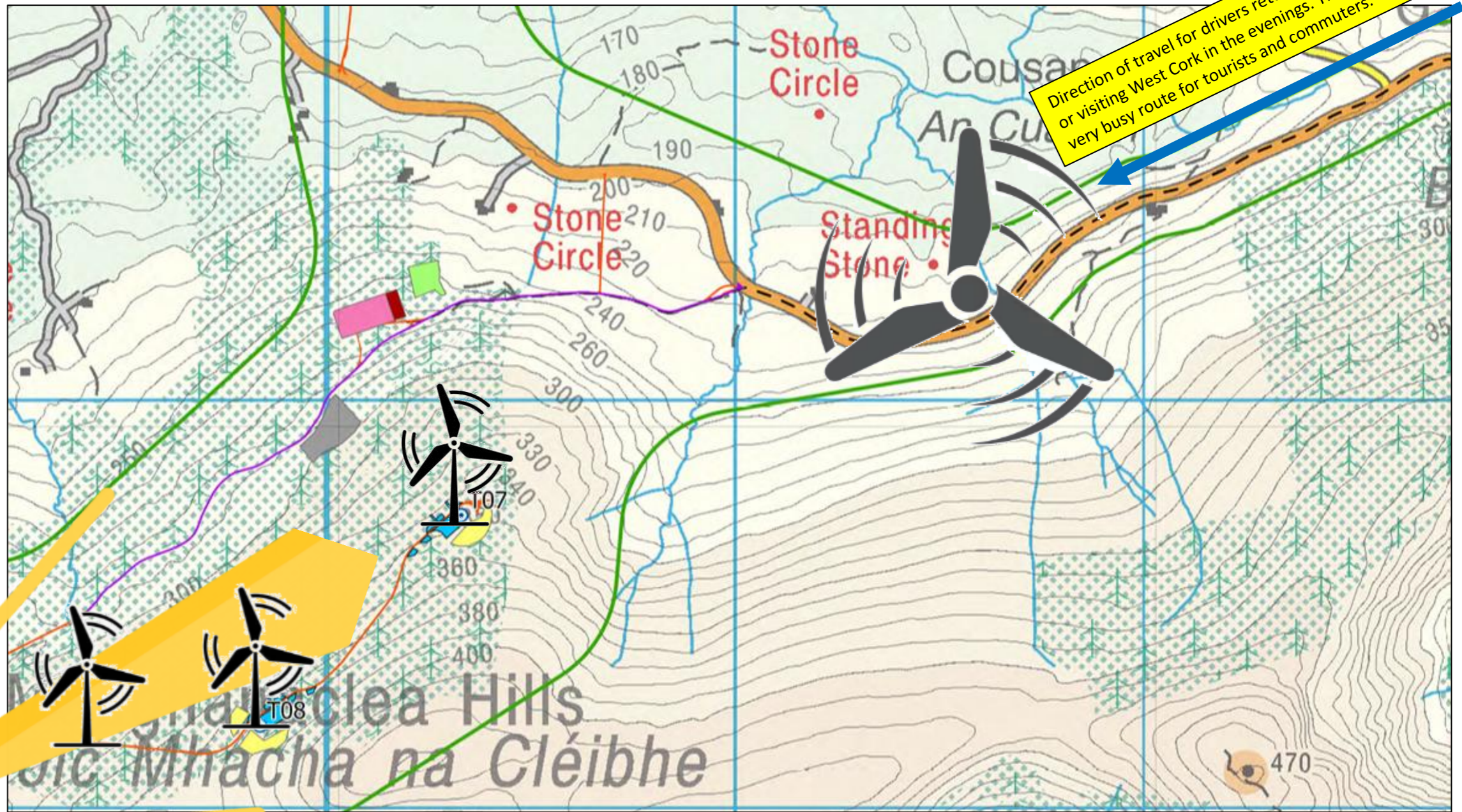
In light of the alignment of turbines T07, T08 and T09 relative to the R585, can the Board demonstrate how it is satisfied that the proposed development will not give rise to a hazard or distraction risk for road users, particularly during winter evenings when westbound drivers are exposed to low sun conditions?

In these circumstances, where the turbines are positioned directly between drivers and the descending sun, resulting in the potential for rapid light–dark strobing across the carriageway due to rotating blades, can it be demonstrated that the combined effects of sun glare, intermittent shadow flicker and vehicle speed have been adequately assessed?

It is noted that no specific assessment appears to have been undertaken in respect of this stretch of the R584, notwithstanding its alignment with the affected turbines and the predictable occurrence of low-angle winter sun conditions. In light of this omission, can the applicant be required to undertake a dedicated road safety and visual distraction assessment, including seasonal modelling of shadow flicker across this section of roadway and an evaluation of driver response under worst-case conditions?

In the absence of such assessment, can the Board demonstrate on what evidential basis it can be satisfied that the development will not give rise to a risk to public safety or constitute a material hazard to road users, and, if such certainty cannot be established, whether the proposed development should be considered contrary to the proper planning and sustainable development of the area?

5.5.1. Maps and Graphics



Low evening winter sun



6. Noise and Vibration

I have serious concerns regarding the adequacy of the Noise and Vibration assessment contained in Chapter 12 of the EIAR. Having regard to the site context, receptor sensitivity and acknowledged limitations of standard noise modelling, I am not satisfied that the assessment demonstrates with sufficient certainty that the proposed development will not result in adverse noise impacts.

These concerns relate in particular to night-time disturbance, low frequency noise and amplitude modulation, and to the failure of the assessment to properly reflect the complex terrain and the presence of non-residential noise sensitive receptors.

I therefore request that An Coimisiún Pleanála apply the precautionary principle when considering this application.

6.1. Failure to account for complex terrain

The proposed development is located along a ridgeline within a landscape characterised by steep slopes and glacially formed valleys. This constitutes acoustically complex terrain.

Notwithstanding this, Chapter 12 relies on standard ISO 9613-2 noise propagation modelling, yet contains no explicit consideration of terrain effects. There is no reference within the Noise and Vibration chapter to valleys, slopes, hills or terrain, nor is there any explanation of how topography has been incorporated into the modelling assumptions.

Standard noise modelling is known to be less reliable in complex topography, where sound can be channelled, refracted or amplified along valleys and slopes. The EIAR does not demonstrate that these effects have been assessed, nor does it include validation using measured data from comparable sites with similar terrain. In the absence of such analysis, I am not satisfied that the predicted noise levels represent a robust worst-case scenario for surrounding receptors.

6.2. Inadequate background noise monitoring for sensitive uses

Section 12.3.2.4.6 of the EIAR acknowledges that noise limits should apply to areas frequently used for relaxation or activities for which a quiet environment is highly desirable, in accordance with the Wind Energy Development Guidelines for Planning Authorities.

Despite this, all background noise monitoring locations selected for the assessment are residential dwellings. None are located at or near non-residential but highly noise-sensitive uses within the area, including:

- Wild Hideaways Eco Retreat
- Hagal Farm B&B
- Owl Cabin B&B
- Therapy and wellness facilities
- Archaeological monuments and scenic viewpoints

As a result, the background noise data used to derive noise limits does not reflect the most sensitive receiving environments, despite these being specifically identified in national guidance as requiring protection. This omission undermines the reliability of the noise criteria applied and casts doubt on the conclusions of the assessment.

6.3. Contradiction in the identification of Noise Sensitive Locations

A clear internal contradiction exists within Chapter 12.

Appendix 12-1 defines a Noise Sensitive Location as including any facility or area of high amenity which, for its proper enjoyment, requires the absence of noise at nuisance levels. This definition clearly encompasses facilities such as Wild Hideaways Eco Retreat.

However, in Chapter 12 and Appendix 12-3, only residential properties are identified as Noise Sensitive Locations, and Wild Hideaways is entirely excluded from both the baseline monitoring and the operational noise assessment. No justification is provided for this exclusion.

This represents a fundamental defect in the assessment. A receptor which clearly meets the EIAR's own definition of a Noise Sensitive Location has been omitted without explanation, contrary to both the stated methodology and national guidance.

6.4. Underestimation of construction phase impacts

The EIAR concludes that construction phase noise effects will be not significant. This conclusion does not adequately consider site-specific acoustic conditions.

Rock breaking and foundation works will occur within a valley environment where sound is likely to travel further and reverberate, particularly under calm or temperature inversion conditions.

Construction is expected to last approximately 18 to 24 months, representing a prolonged duration of disturbance rather than short-term impact. In addition, repeated heavy goods vehicle movements and turbine component deliveries will use the local road network throughout this period.

The assessment relies primarily on distance-based attenuation and generic BS 5228 thresholds and does not address how terrain or duration may increase the experience of disturbance for nearby residents and amenity users.

6.5. Application of the precautionary principle

Having regard to the complex terrain, the exclusion of recognised noise sensitive amenity receptors, inconsistencies in the identification of Noise Sensitive Locations, and the potential for night-time disturbance and amplitude modulation, I submit that the information provided is insufficient to conclude that adverse noise effects will not occur.

In these circumstances, An Coimisiún Pleanála should apply the precautionary principle. If permission is considered, it should include, at a minimum:

- a revised noise assessment that explicitly addresses terrain effects and includes all relevant noise sensitive locations
- strict, enforceable cumulative noise limits for both daytime and night-time periods
- independent post-construction noise monitoring at residential and non-residential amenity receptors
- a clear and enforceable complaints and corrective action protocol

In the absence of these safeguards, the EIAR does not provide a sufficient basis upon which to conclude that the proposed development will not give rise to unacceptable noise impacts.

In light of the complex ridgeline and valley topography of the site, can An Coimisiún Pleanála demonstrate how it is satisfied that the Noise and Vibration assessment provides a robust and reliable basis to conclude that adverse noise impacts will not arise?

Can it be explained how reliance on standard ISO 9613-2 modelling is appropriate in the absence of any explicit consideration of terrain effects, including sound channelling, amplification and refraction, and how predicted noise levels can be regarded as representative of worst-case conditions in such acoustically complex terrain?

Given that national guidance recognises highly noise-sensitive non-residential receptors, can it be demonstrated how the exclusion of locations such as Wild Hideaways Eco Retreat, Hagal Farm B&B, Owl Cabin B&B, and other high-amenity uses from monitoring and assessment is justified?

In circumstances where Appendix 12-1 defines Noise Sensitive Locations as including high amenity areas requiring quiet conditions, can it be reconciled how such receptors have been omitted altogether, and whether this represents a defect in the methodology applied?

Given the duration and nature of the construction phase, including rock breaking, heavy goods vehicle movements and prolonged works over 18–24 months, can it be demonstrated how the conclusion of ‘not significant’ impacts have been reached without assessment of terrain-influenced propagation and prolonged disturbance?

In light of these deficiencies, can the applicant be required to submit a revised and comprehensive noise assessment incorporating terrain-adjusted modelling, inclusion of all relevant receptors, cumulative noise assessment, and worst-case night-time analysis including amplitude modulation and low-frequency effects?

In the absence of such revised assessment, can An Coimisiún Pleanála confirm on what evidential basis it can be satisfied that unacceptable noise impacts will not arise and that the development would not be contrary to the proper planning and sustainable development of the area?

It is further noted that, should the development proceed on the basis of an assessment which underestimates actual impacts, there is potential for sustained interference with the use and enjoyment of nearby properties. In such circumstances, I reserve my position in respect of seeking appropriate remedies, including compensation for nuisance arising from any proven impacts.

7. Inadequate Consideration of Reasonable Alternatives and Over-reliance on Claimed Climate Benefits

7.1. Introduction

This submission objects to the proposed development on the grounds that the Environmental Impact Assessment Report (EIAR) fails to adequately assess reasonable alternatives, as required under Article 5(1)(d) of Directive 2011/92/EU, and places disproportionate reliance on claimed climate benefits to outweigh significant and permanent environmental harm.

In particular, the assessment of alternatives in Chapter 3: Reasonable Alternatives, when read together with the findings of Chapter 11: Climate, does not demonstrate that the proposed wind farm represents the least environmentally harmful means of achieving the stated renewable energy and climate mitigation objectives.

7.1.1. Climate Benefits Are Acknowledged but Not Decisive

Chapter 11 of the EIAR indicates that the proposed 67.2 MW wind farm would displace approximately 44,498 tonnes of carbon dioxide per annum, equating to approximately 1.56 million tonnes over a stated 35-year operational lifespan, following a claimed carbon payback period of approximately 3.4 years. These figures are acknowledged.

However, Chapter 11 also identifies **significant lifecycle carbon losses**, estimated at approximately **149,000 tonnes of CO₂ equivalent**, arising from turbine manufacture, construction activities, peat and soil disturbance, forestry removal, embodied carbon and construction-phase transport.

These up-front and irreversible carbon losses are not minor or incidental. They form a substantial component of the project's overall carbon footprint and arise directly from the scale, location and nature of the proposed development.

7.1.2. Unreasonably Narrow Definition of "Reasonable Alternatives"

Chapter 3 of the EIAR adopts an **unduly narrow interpretation of "reasonable alternatives"**, focusing almost exclusively on:

- alternative turbine layouts,
- alternative turbine sizes,

- alternative access arrangements, and
- alternative grid connection alignments,

all of which remain fundamentally tied to the same site, technology and landscape context.

While solar photovoltaic development is briefly addressed as an alternative technology, this consideration is confined to a hypothetical, utility-scale solar installation within the application site, and is rejected primarily due to land-take, forestry felling and footprint constraints *within that site*.

This approach fails to reflect the intent of the EIA Directive, which requires the assessment of alternatives that are reasonable in environmental terms, not merely convenient or commercially aligned with the applicant's landholding.

7.1.3. Failure to Consider Distributed and Urban-Based Solar Alternatives

Critically, the EIAR does not assess the potential for distributed solar photovoltaic development on existing built or brownfield land, including:

- rooftop solar on industrial, commercial or public buildings,
- solar canopies over urban or suburban car parks,
- solar installations integrated with existing transport or service infrastructure.

Such forms of renewable generation are capable of delivering meaningful climate mitigation while:

- avoiding peat excavation and drainage,
- avoiding forestry removal,
- avoiding significant adverse effects on landscape character,
- avoiding impacts on the setting of archaeological and cultural heritage assets.

No explanation is provided as to why these alternatives were excluded from consideration, nor is any evidence presented to demonstrate that they would be unreasonable, unviable or incapable of contributing meaningfully to national climate targets.

7.1.4. Planning Balance and Environmental Proportionality

The EIAR acknowledges that the proposed development would give rise to significant and permanent impacts on landscape character and visual amenity, which, by their nature, cannot be fully mitigated.

In such circumstances, it is submitted that claimed climate benefits cannot be relied upon in isolation, particularly where:

- those benefits are achieved only after substantial upfront environmental and carbon losses, and
- feasible alternative technologies exist that could deliver climate benefits with materially less environmental harm.

The failure to meaningfully assess such alternatives materially weakens the applicant’s reliance on climate considerations as justification for the development.

Comparative Summary (for clarity)

Issue	Proposed Wind Farm (67.2 MW)	Distributed Urban Solar (Indicative)
Annual CO ₂ displacement	~44,498 t CO ₂ /year	Lower per MW, but scalable
Lifecycle carbon losses	~149,000 t CO ₂ upfront	Minimal (no peat/forestry loss)
Ground disturbance	Extensive (peat, roads, foundations)	Negligible / none
Landscape & visual impact	Significant and permanent	Minimal
Heritage setting impacts	Identified and non-mitigable	None anticipated
Alternatives assessed in EIA	Yes (site-limited only)	No

Source: EIA Chapter 3 and Chapter 11

Live and Planned Renewable Energy Capacity ¹⁰ . * Estimated Summary		
Renewable source	Installed capacity (approx.)	Notes
Onshore wind	≈5.0–5.1 GW	By far the largest contributor; over 300 wind farms nationwide [greystonesguide.ie] , [pleanala.ie]
Solar PV	≈1.7–1.8 GW	Rapid growth since 2022, utility-scale and microgeneration [pleanala.ie]
Hydro (large + small)	≈0.25–0.3 GW	Largely legacy assets
Biomass / landfill gas / others	≈0.2–0.3 GW	Dispatchable renewables
Offshore wind	≈0.025 GW (25 MW)	Arklow Bank Phase 1 only (legacy)
Total renewable electricity capacity	≈8 GW	Confirmed milestone. Government target for 2026
Total current planning pipeline	~7.5–10 GW	
TOTAL LIVE AND PLANNED CAPACITY	≈15.5 - 18 GW	The government target for 2030 is to have 22 GW installed

¹⁰ Based on the most recent Government, SEAI, EirGrid and Wind Energy Ireland reporting

7.2. Summary of Renewable Energy Applications Under Assessment by An Coimisiún

Pleanála

Wind-Farm Applications Under Assessment by An Coimisiún Pleanála. * Estimated Summary					
Province	County	Active Applications (Approx.)	Typical Turbine Range	Indicative Capacity Range (MW)	Notes
Munster	Cork	5–6	9–18	60–120 MW	Strong clustering in West Cork uplands (Shehy/Caha); cumulative effects a recurring issue
Munster	Kerry	2–3	8–15	50–100 MW	Includes upland and border sites; some repowering
Munster	Clare	1–2	10–16	70–110 MW	Generally, SID-scale proposals
Munster	Tipperary	1	9–14	55–90 MW	Inland uplands
Munster	Limerick	1	7–12	40–80 MW	Repowering / modification focused
Connacht	Mayo	4–5	12–22	80–150 MW	Largest average project size nationally; Atlantic-facing uplands
Connacht	Galway	2–3	10–18	70–120 MW	Western and inland uplands
Connacht	Roscommon	1	9–12	55–80 MW	Midlands fringe
Connacht	Sligo	1	8–14	50–90 MW	Upland / coastal visibility sensitivities
Leinster	Laois	2	9–13	60–90 MW	High proportion of court remittals
Leinster	Kilkenny	1	12–16	80–110 MW	SID-scale
Leinster	Offaly	1	8–12	50–75 MW	Midlands
Leinster	Wexford	1	6–10	40–65 MW	Repowering focused
Ulster (ROI)	Donegal	2	15–25+	100–180 MW	Very large upland schemes
Ulster (ROI)	Cavan	1–2	10–16	70–110 MW	New-build and repowering
TOTAL				930-1570 MW 0.93-1.57 GW	

7.3 Questions posed by research

Can the applicant demonstrate that the assessment of reasonable alternatives contained in Chapter 3 of the EIAR complies with Article 5(1)(d) of Directive 2011/92/EU, in circumstances where the alternatives considered are largely limited to variations of layout, scale and infrastructure within the same site and landscape context? In particular, can it be explained how this approach satisfies the requirement to assess alternatives in environmental terms, rather than those constrained by landholding or project design?

Given that Chapter 11 identifies significant lifecycle carbon impacts, including approximately 149,000 tonnes of CO₂ equivalent arising from construction, peat disturbance, forestry removal and embodied carbon, can it be demonstrated how the proposed development represents the least environmentally harmful option, particularly where these substantial and irreversible losses occur upfront?

In this regard, can it be clarified how the significant peatland disturbance associated with infrastructure such as turbine T11-T14 has been fully accounted for, having regard not only to the EIAR but also to site-specific evidence indicating the presence of deep peat (in places up to approximately 2 metres), extensive sphagnum-rich bog habitat, and a consistently high-water table in the T11-T14 area (*Appendix 2 Lough Naibree / Ardragh bog*)? Can the applicant demonstrate how the long-term release of stored carbon, disruption of peatland hydrology, and degradation of peatland function arising from such disturbance have been robustly quantified in the carbon balance?

Furthermore, can it be demonstrated how excavation for turbine bases, access tracks and drainage infrastructure across what is identified on the ground as a wet, hydrologically connected bog system has been assessed, given that these works will directly interact with saturated peat soils and a linked lake-bog system which appears to operate as a stable, undisturbed hydrological unit (*Appendix 2 Lough Naibree / Ardragh bog*)?

Can the applicant also demonstrate that the proposed borrow pit strategy is sufficient to meet the demand for crushed rock required for turbine hardstands, haul roads and associated infrastructure, and, if not, explain how additional material sourcing, transport and associated environmental impacts have been accounted for, including any additional disturbance to peat and hydrology not explicitly assessed in the EIAR?

While the claimed annual displacement of approximately 44,498 tonnes of CO₂ is acknowledged, can it be demonstrated how these benefits, realised only after a multi-year carbon payback period, outweigh the significant and permanent impacts on peatland, hydrology, landscape, visual amenity and cultural heritage identified elsewhere in the EIAR, particularly where site evidence indicates a largely undisturbed and sensitive peatland environment?

Can the applicant explain why alternative renewable strategies with potentially lower environmental impact have not been meaningfully assessed, including distributed and urban-based solar photovoltaic development and offshore wind energy, which can deliver large-scale renewable capacity while avoiding the peat disturbance, hydrological disruption and landscape impacts associated with upland bog sites?

In the absence of such assessment, can it be demonstrated that these alternatives were reasonably considered and dismissed on environmental grounds?

Given the acknowledged permanent and non-mitigable impacts of the proposed development, can it be demonstrated how reliance on climate benefits alone provides a sufficient basis for the proposal in the planning balance, particularly where less environmentally damaging alternatives may exist and where site-specific evidence points to a highly sensitive and intact peatland system?

In these circumstances, can An Coimisiún Pleanála confirm on what evidential basis it can be satisfied that the proposed development represents the least environmentally harmful means of achieving the stated climate objectives, and that the failure to fully account for site-specific peatland and hydrological conditions does not materially undermine the EIAR?

In the absence of such demonstration, can it be confirmed whether insufficient weight can be attached to the claimed climate benefits and whether the EIAR provides a sufficient basis for determination, having regard to the requirements of the EIA Directive and the principles of proper planning and sustainable development?

In this context, can it also be demonstrated how the efficiency and effective utilisation of the electricity generated by the proposed development has been considered, having regard to evidence that a material proportion of wind energy generated on the Irish grid is subject to constraint and curtailment due to system limitations? In particular, can it be clarified how the assessment has taken account of “dispatch-down” effects, whereby renewable energy is generated but not utilised due to

grid constraints and operational limits, including the current system non-synchronous penetration (SNSP) restrictions and transmission bottlenecks?

Given evidence indicating that a significant proportion of wind generation may be curtailed or constrained annually, can it be demonstrated how the claimed carbon displacement figures fully reflect actual usable generation rather than theoretical output, and whether this has been appropriately considered in the overall climate and planning balance?

Can the Applicant provide a detailed assessment of the transportation of turbine components on the local and regional road network?

In particular, what upgrades, alterations, or removals (e.g. hedgerows, walls, junction modifications) will be required along the transport route?

What impacts will arise for local residents, road safety, and existing infrastructure, particularly on narrow rural roads?

Can it be demonstrated that the route is suitable without causing significant permanent or temporary environmental and community impacts?

What Traffic Management Plan is proposed in respect of the extensive excavation works required to lay grid connection infrastructure between Maughanaclea and Dunmanway, including along the R585?

What are the anticipated duration, phasing, and extent of excavation and reinstatement works?

How will disruption be managed on the R585, a busy commuter route and key corridor for time-sensitive fresh-fish haulage from Castletownbere to ferry ports, as well as an important tourist route?

What measures will ensure continuity of commercial transport, emergency access, and local traffic during works?

What cumulative impacts will arise from extended works along this route, and how will prolonged disruption be avoided?

8. Appendices

Appendix 1. Email from Estate Agent



Patrick O'Mahony <patrickomahony1000@gmail.com>

Fwd: MAUGHANACLEA, KEALKILL, P75 E062

1 message

Annabel Seymour <annabelsey3@icloud.com>

4 May 2026 at 14:33

To: patrickomahony1000@gmail.com

For context... the house he is referring to is 600m approx. from the closest 120m turbine - so easily meets even the 2019 guidelines of 4x tip height and yet noise and visual impact affected length of time to sell (2 years) and price (nearly 20%).

Begin forwarded message:

From: Harrington Estates <info@harringtonestates.ie>

Subject: Re: MAUGHANACLEA, KEALKILL, P75 E062

Date: 30 April 2026 at 12:03:10 IST

To: Annabel Seymour <annabelsey3@icloud.com>

Good morning, Annabel and Sean,

I hope you are both well and my apologies for not responding sooner.

As the selling agent responsible for your small farm purchase back in 2014 at Maughanaclea, Kealkil I am acutely aware of the distinct and unique privacy and peaceful offering the property was back then. In fact, the previous owners operated BOAB a wellness and meitation centre of yoga practice there.

I recall your instant appreciation of the countryside setting as it offered you the lifestyle choice that you searched extensively for, privacy and peacefulness.

Now in Spring 2026 I can fully understand your enormous concerns for the ongoing enjoyment of your farm holding. As you outlined in your visit to my office the likelihood of a wind farm development and the detrimental effects to both your enjoyment of your residence and lands not to mention a significant negative impact on your estate value.

In recent years we were appointed agents to sell Dereenacknow House at Dereenacknow, Bantry P75 HD21. The property was in the immediate proximity of Ballybane Wind Farm and had a very long selling campaign. The property comprises a superb detached period style countryhouse and

landscaped gardens on ca. 3.5 acres. We went on the market in the Spring of 2022 and had a valuation expectancy in excess of €725,000.

There was a constant flow of interest and viewings however the feedback regarding the proximity of the wind turbines was regularly negative. In summary prospective buyers were upset by the sound and sights of these wind turbines. Depending on the weather and wind direction it seemed that the sound varied quite a bit ultimately, we sold the property in February 2024 for €585,000.

Our view and that of the vendors was that we lost considerable value and time in our effort to engage with the open market due to the proximity of these wind turbines. In recent marketing of property through 2025 around the areas of Kealkil, Cousane and the Mealagh Valley we have had a number of sales either fall through upon realisation of the impending development or the properties were withdrawn from sale due to complete lack of interest.

The property market in general is performing well in all areas that Harrington Estates cover however though 2025 and up to the current day the areas of close proximity to this valley are showing an upset and negative property market.

There is a clear pattern of behaviour emerging on foot of this proposed development and that is one whereby property values and enjoyment are severely impacted in a negative manner. This negative atmosphere is causing distress to potential purchasers as well as the current property owners.

This brief outline is based on my day to day engagement with people from all strands of the property model and I hope it will be of assistance to you in your endeavours.

Regards,

Denis Harrington MIPAV

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Email:- info@harringtonestates.ie

Web:- www.harringtonestates.ie

License No:- 002952



Appendix 2. Hydrology Notes – T11 to T14 Area (Lough Naibree / Ardragh Bog)

These notes are based on a number of site visits by local residents, focusing on the area around Lough Naibree, particularly around the proposed turbines T11 to T14 and the access tracks.

The lake is surrounded on three sides by bog and the wider area appears largely undisturbed. It doesn't seem to have been agriculturally improved in any significant way. Across the site there is a mix of wetter, lower ground around the lake and higher ground with rock outcrops and drier heath.

In terms of ground conditions, it was noted that areas which might be described as “wet grassland” are, in places, underlain by peat. In one exposed section (see photo), peat depth appears to be about 2 metres. In the lower areas the ground is generally soft underfoot and often waterlogged. On higher ground (for example around T13), the ground becomes rockier with thinner soils.

The vegetation reflects this. Across the wetter areas there is a strong presence of typical bog species, including sphagnum moss, bog cotton, bog asphodel (extensive in places), and bog myrtle, along with sundew and butterwort. Bog bean is also present in places. There are also areas with sedges, rushes and grasses, and species such as orchids and devil's-bit scabious, which appear to be fairly widespread.

From a hydrology point of view, the bog and the lake appear closely linked. It has been observed that the Ardragh bog seems to hold water upslope of Lough Naibree. The area is consistently wet, and no obvious artificial drainage was seen during visits. Overall, it looks like a system with a high and fairly stable water table.

There are also nearby water bodies, including Lough Carrignaneane. There seems to be some level of connection across the wider area, for example through bird movement between the lakes, suggesting it forms part of a broader wetland and lake system.

From the EIAR (Chapters 8 and 9), it is understood that the proposed development includes excavation for turbine bases, construction of access tracks, and the installation of drainage infrastructure, along with runoff management measures such as drains, culverts, settlement ponds and controlled discharge points.

Chapter 4 describes the construction approach. This includes new internal access tracks across the site, including through the T11 to T14 area, as well as upgrades to existing tracks. Track construction is described as using a mix of floating methods (placing material over the existing ground) and excavated methods (removing peat or soil and replacing it with stone), depending on ground conditions.

Construction would involve excavation of peat for tracks, turbine bases and cable trenches, with excavated material stored and then reused or reinstated on site. The tracks would include drainage features such as side drains, interceptor drains and culverts. During construction, temporary drainage may also be needed, including dewatering of excavations and pumping of water where necessary. Borrow pits are also proposed for sourcing stone, which would involve further excavation and water management.

In the T11–T14 area, the proposed tracks would cross ground that is currently wet and, in places, peaty based on what has been observed. This brings the proposed construction methods into direct contact with these ground conditions.

T13 location:



The road from the forestry towards T12 T13 and T14 would cross this area of what appears to be wet grassland but can be seen to be 2m deep peat.



Lough Naibiree showing Ardrah bog. T14 would be upper right. The road to T14 would cross this bog.



Appendix 3. Letter from Christopher O’Sullivan TD



Christopher O’Sullivan TD

Minister for Nature, Heritage and Biodiversity. TD for Cork South–West.



Dear Amy,

I am delighted to have the opportunity to express my support for the initiative being undertaken by Wild Hideaways and the local community to develop an accredited Dark Sky Park within the Mealagh Valley, County Cork.

The goal of a Dark Sky Park is to raise awareness of the need to reduce light pollution and promote responsible lighting solutions, in order to protect the natural night sky for the benefit of both people and wildlife.

I am also conscious that it brings the potential for the development of rural tourism products outside the typical summer season. Dark Sky tourism is a growing sector internationally, attracting visitors who are seeking experiences rooted in nature, heritage and wellbeing, and promoting sustainable rural development and tourism diversification.

Wild Hideaways have demonstrated an innovative and forward-thinking approach with this proposal, and I understand they have engaged widely with the local community. I believe that Dark Sky Park accreditation would be a very positive addition to the region and I wish them the best of luck with this work.

Kind Regards,



Christopher O’Sullivan T.D.

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