18h May 2026

Maughanaclea
Kealkill
Cork
P75 E062

Planning Application Reference: ACP-324165-26
Applicant: Maughanaclea Ltd / Enerco
Development: Maughanaclea Wind Farm (14 turbines and associated infrastructure)
Location: Maughanaclea, County Cork

To: An Coimisiún Pleanála

1. INTRODUCTION

My name is Sean Worboys and I have lived in the Maughanaclea area for over eleven years. I own my home here and over that time I have got to know the surrounding landscape, wildlife and hills extremely well through everyday life and spending time outdoors in the area throughout the year.

Although I was born in the UK, I have Irish family connections and spent a lot of my youth holidaying in Ireland. Living here was something I had hoped to do for many years and eventually became a reality when I moved here permanently.

I chose to live in this part of West Cork because of its quiet rural character, open landscape and the feeling that large parts of it still remain relatively untouched. One of the things I value most about living here is being surrounded by the landscape and wildlife every day. I regularly see birds of prey, red squirrels, deer and other wildlife from my home and surrounding land without needing to go anywhere else to experience nature.

I spend a lot of time outdoors on the land and one of the things that makes this area special is the peace and openness of the landscape. It still feels like a genuinely rural place rather than an area dominated by large-scale infrastructure, and in my opinion that character is gradually being lost across parts of West Cork.

I also regularly work away from the area and one of the things that has always stayed with me is the feeling of returning home through the Cousane Gap, where the landscape suddenly opens out across the West Cork uplands and valleys. Even after more than eleven years living here, that view still genuinely affects me every time I come home.

The openness, scale and unspoilt nature of the landscape are part of what makes this area special, not only for people who live here but also for visitors and tourists seeing it for the first time. The fact that the R585 is a designated Scenic Route shows that the value of this landscape is already recognised within the Cork County Development Plan.

I am not opposed to renewable energy in principle. However, developments of this scale still need to comply with proper planning and sustainable development principles and, in my opinion, this proposal does not.

I have reviewed the EIAR, appendices, photomontages and supporting documents submitted with the application, together with the wider planning history of wind farm development in the area.

The more I worked through the application documents, the more concerned I became. It wasn't one issue on its own, but the same problems appearing repeatedly throughout the EIAR. In particular, I became concerned by how often uncertainty seemed to be downplayed, how frequently impacts were reduced or screened out, and how much reliance was placed on assumptions or future monitoring rather than clear evidence available now.

This is particularly concerning given the scale of the proposed turbines, the sensitivity of the landscape and the increasing cumulative pressure already affecting the wider West Cork area.

The planning history of developments such as Shehy More, together with previous refusals including Ardragh, shows that these concerns are not new. An Bord Pleanála and Cork County Council have repeatedly recognised concerns relating to cumulative impact, scenic route protection, landscape saturation and the excessive concentration of turbines within this landscape.

In my opinion, the proposed Maughanaclea development represents another major step in the spread of large turbines across the West Cork hills.

The proposed turbines would not only affect the wider West Cork landscape, but would also have a major and permanent impact on my own home and quality of life through:

- extensive turbine visibility;
- industrialisation of the surrounding landscape;
- noise and shadow flicker impacts;
- and the loss of the quiet rural environment which led me to choose this area as my home.

This submission sets out my concerns regarding:

- the adequacy of the ornithological and biodiversity assessments;
- the extent to which impacts appear to have been reduced or screened out based on limited survey data;
- the visual and cumulative impact of turbines of this scale on the West Cork uplands and the R585 Scenic Route;
- the likely effects on residential amenity, including noise, shadow flicker and extensive turbine visibility around nearby homes;
- and the increasing cumulative pressure arising from the continued spread of large-scale wind farm development across this landscape.

Overall, I do not believe the EIAR has shown with enough certainty that this development can proceed without causing serious environmental, landscape and residential impacts.

Table of Contents

2. ORNITHOLOGY

2.1 Introduction

Having read Chapter 7 of the EIAR together with the relevant appendices, and compared them with my own observations from living in this area for over eleven years, I do not believe the ornithological assessment fully reflects how bird species actually use this landscape or the level of risk that may arise from the proposed development.

One thing that concerned me repeatedly while reading the assessment was how often species appeared to be acknowledged initially, but then discounted because only limited survey activity had been recorded. In several places, uncertainty appears to be reduced through assumptions or modelling rather than fully examined.

I also found that risks were often acknowledged in principle but then not assessed in meaningful detail. In many cases, uncertainty seems to have been deferred to post-construction monitoring rather than properly addressed at application stage.

Overall, I do not think the assessment reflects the full level of uncertainty or potential risk, particularly given the scale of the turbines and the sensitivity of the wider upland environment.

The EIAR itself repeatedly refers to limitations in available data and relies heavily on assumptions regarding bird activity, flight behaviour and likely avoidance rates. Despite this, the overall conclusions are presented with a high level of certainty that I do not think is fully justified by the underlying information.

During pre-application consultation, An Bord Pleanála specifically advised the applicant to ensure that biodiversity and ornithology surveys were robust and that cumulative impacts were properly considered. Having reviewed the final assessment, I remain concerned that a number of species have been screened out based on limited observations and that the cumulative assessment remains too narrow in scope.

Where uncertainty exists regarding protected species, I believe the assessment should take a more precautionary approach rather than assuming impacts will be low.

2.2 Long-Term Observation and Use of the Site

I have lived in this area for over eleven years and during that time I have regularly observed a wide range of bird species using the surrounding landscape, including raptors and chough.

These are not rare or isolated sightings. They form part of the normal pattern of bird activity in the area and reflect how the landscape is actually used over time.

From living here and spending a great deal of time outdoors throughout the year, it is clear to me that bird activity within the wider upland area changes depending on season, weather conditions and farming activity. Some periods are naturally quieter than others, while at other times birds of prey and other species are regularly visible across the hills and valleys.

By comparison, the survey data contained within the EIAR represents only a limited snapshot in time. Short survey periods cannot fully capture how wide-ranging species use a landscape over the course of an entire year, particularly in upland areas where weather and visibility conditions can vary significantly.

For that reason, low numbers of recorded observations, or the absence of sightings during surveys, should not automatically be taken to mean that the site is of low importance to bird species.

This is especially relevant for birds of prey, which can range across very large areas and may not appear consistently during short survey periods despite continuing to use the wider landscape regularly for hunting, movement and foraging.

Concerns regarding ornithology, particularly in relation to chough, were also raised by the National Parks and Wildlife Service during pre-application consultation. To me, that indicates that the ecological importance of bird activity within this area had already been recognised at an early stage.

Overall, I think the assessment places too much weight on limited survey results and does not fully reflect the long-term and ongoing use of this landscape by bird species.

2.3 Screening Out of Species

One of my main concerns with the assessment is how quickly certain species appear to be discounted from detailed consideration.

Throughout the EIAR, species are identified and then screened out based on limited sightings, short survey periods or observations recorded some distance from the site. The overall impression is that possible risks are often minimised before they are fully explored.

For wide-ranging and mobile species, particularly birds of prey, I do not think this is a reliable approach. The absence of frequent records during surveys does not necessarily mean that the site is of low importance, especially in a landscape used regularly for hunting, movement and foraging across a much wider area.

I think the assessment places too much weight on limited survey data while giving insufficient consideration to the uncertainty that naturally arises when dealing with protected and mobile species.

During pre-application consultation, An Bord Pleanála advised the applicant to ensure that biodiversity and ornithology surveys were robust. However, a number of species appear to have been screened out based on relatively limited observations rather than more detailed assessment.

Where uncertainty exists regarding protected species, I believe a more precautionary approach should have been taken.

2.4 Collision Risk – Not Properly Assessed

Collision risk is acknowledged within the EIAR, but in many cases it is not fully assessed.

Collision risk modelling appears to have been carried out for only a limited number of species, while other species recorded within the area are screened out or assessed using broad statements such as “low activity” or “negligible risk”. In my view, this is not a sufficient basis for assessment, particularly where survey data is limited and birds are known to use airspace within turbine height.

The collision risk assessment also relies heavily on assumptions regarding flight activity, flight height and avoidance behaviour. Small changes in these assumptions can significantly alter predicted collision rates, particularly where site-specific data is limited.

There also appears to be an inconsistency within the assessment itself. In some instances, the EIAR assumes birds will avoid or be displaced from turbines, while in other sections it assumes birds will continue to fly through the site at existing levels of activity. These positions are difficult to reconcile and undermine confidence in the conclusions being reached.

The limitations identified within Chapter 7 also have implications for conclusions drawn elsewhere in the EIAR. For example, the Alternatives chapter presents a clear conclusion that residual collision risk will not be significant following mitigation. In my view, this level of certainty is not supported by the underlying assessment, which repeatedly acknowledges limitations in survey data, relies on assumptions and screens out a number of species from detailed consideration.

The assessment also relies heavily on post-construction monitoring. However, monitoring does not remove uncertainty at application stage or demonstrate that impacts can be excluded before consent is granted.

In the absence of detailed quantitative assessment for multiple species recorded within the area, I do not believe it has been demonstrated that collision risk can be considered negligible.

2.5 Merlin – Misclassification

The EIAR describes Merlin as a winter visitor within the area. However, based on my own observations over a number of years, Merlin appears to be present throughout the year rather than only seasonally.

This suggests more regular use of the landscape than is reflected in the assessment and raises the possibility of breeding activity within the wider area.

Treating Merlin primarily as a seasonal visitor reduces the apparent importance of the site and results in no meaningful species-specific collision risk assessment being carried out.

In my view, this highlights a wider weakness in the baseline assessment. Where there is uncertainty regarding the status and use of the site by protected species, that uncertainty should lead to a more detailed assessment rather than a reduced level of consideration.

If Merlin is using the area year-round, including during the breeding season, this significantly increases the ecological importance of the site and the need for a more robust assessment of potential impacts.

2.6 White-tailed Sea Eagle – Evidence from Site Use

The EIAR acknowledges the presence of White-tailed Sea Eagles within the wider area, but largely dismisses the species on the basis of limited survey records.

However, I have personally observed White-tailed Sea Eagles on multiple occasions in and around the proposed turbine area on the Maughanaclea hills. On a number of occasions, the birds were seen crossing the ridge line into the Mealagh Valley, including movements close to the locations of proposed turbines T9, T10 and T11.

I have also recorded observations on two separate days where a pair of White-tailed Sea Eagles was present within approximately 500 metres of the proposed turbine locations. On both occasions, the birds were circling and soaring within the area rather than simply passing through it.

These observations were made during normal day-to-day activity rather than structured surveys, which in itself raises questions as to whether the surveys fully captured how the site is actually used by the species.

To me, these observations are significant because they show active use of the turbine area and surrounding airspace, including flight behaviour at turbine height. This goes beyond occasional or incidental presence and suggests regular use of the landscape as part of wider flight and foraging behaviour.

The species is subject to satellite tracking, although access to detailed locational data is restricted due to its sensitivity. An FOI request has been submitted seeking relevant tracking information from the competent authorities. While this information may not be available within the submission period, the authorities may nonetheless be in a position to corroborate use of the area by the species.

During pre-application consultation, the applicant referred to only a single sighting of White-tailed Sea Eagle at distance from the site. In my opinion, this contrasts with observed activity within and around the proposed turbine area and further suggests that the survey data may not fully reflect actual use of the site.

Overall, these observations raise serious questions regarding the conclusion that White-tailed Sea Eagle is of limited relevance to the development site.

2.7 Failure to Assess Collision Risk for Sea Eagles

Despite evidence that White-tailed Sea Eagles use the area, no species-specific collision risk modelling appears to have been carried out.

This is a large soaring raptor which regularly uses upland airspace and is known to be vulnerable to turbine collision. In that context, the absence of any meaningful collision risk assessment represents a significant gap in the EIAR.

Large, long-lived species such as White-tailed Sea Eagle are particularly sensitive to additional mortality, as even relatively low collision rates can have consequences at population level over time.

In my view, it has not been demonstrated that significant effects on this species can be excluded, particularly given the evidence of active use of the turbine area and the acknowledged limitations in the survey data.

Where a protected species is known to use the site and to operate within turbine height, a more detailed and precautionary assessment would normally be expected. That has not happened here.

2.8 Reintroduction Programme

The proposed development site is located approximately 16 km from the Glengarriff White-tailed Sea Eagle reintroduction programme.

This programme represents a significant long-term conservation effort aimed at restoring the species in the south-west of Ireland. The presence of White-tailed Sea Eagles within and

around the site indicates that the area forms part of the wider range used by the reintroduced population.

In that context, the absence of a detailed species-specific collision risk assessment is particularly concerning.

In my view, it is difficult to reconcile the conservation objectives of the reintroduction programme with a development where collision risk for this species has not been meaningfully assessed, despite evidence that the site and surrounding airspace are actively used by sea eagles.

2.9. Woodcock

Woodcock are present within the area and form part of the wider bird community using the site.

Based on my own observations over a number of years, Woodcock appear to be present throughout the year, which suggests the possibility of a resident breeding population within the surrounding landscape.

Woodcock are nocturnal and highly secretive birds, typically most active at dawn and dusk. They roost and nest within dense woodland and scrub, which makes them difficult to detect during standard daytime surveys. In my view, this introduces a further level of uncertainty into the assessment.

The species is also known to follow regular flight paths between feeding and roosting areas, including low light and night-time movement which may occur within turbine blade height.

There also appears to be an inconsistency within the EIAR itself. Section 7.3.7.18 states that Woodcock were observed during both the breeding and winter seasons, while Section 7.5.1.19 states that Woodcock were not recorded during the breeding season.

Despite this, the species is effectively screened out as insignificant within the assessment.

In my view, the absence of large numbers of survey records should not be taken as evidence that the site is of low importance to Woodcock, particularly given the behaviour of the species and the limitations of standard survey methods.

The assessment does not demonstrate that potential impacts on Woodcock, including collision risk and disturbance of flight paths, can be excluded.

2.10 Survey Limitations

I do not think the survey data fully captures the level of bird activity within the site and surrounding area.

From my own observations, surveys were at times carried out during poor weather conditions, and on some occasions survey activity appeared limited in duration and observer coverage. These factors can reduce the likelihood of detecting birds, particularly wide-ranging species such as raptors.

The fact that a large and highly visible species such as White-tailed Sea Eagle has been observed outside of the formal surveys raises further questions as to whether the survey data fully reflects how the site is used in reality.

For that reason, I think the survey conclusions should be treated with caution, particularly in relation to species that are mobile, weather-dependent or active outside the main survey periods.

Where survey conditions and survey coverage are limited, uncertainty naturally increases. I do not think that uncertainty is fully reflected in the overall conclusions of the EIAR.

2.11 Use of Buffers

The assessment makes repeated use of a 500 metre buffer in considering bird activity and potential effects.

In reality, birds do not use the landscape according to fixed distance thresholds. This is particularly true for raptors and other wide-ranging species, which may regularly move across much larger areas and utilise airspace well beyond arbitrary buffer distances.

In my view, the use of fixed buffers risks artificially constraining the assessment and understating the true extent of potential impacts.

The EIAR itself acknowledges that disturbance effects may extend beyond these distances in certain circumstances, which further suggests that the approach taken may not fully reflect how species actually use the landscape.

2.12 Monitoring Instead of Assessment

The EIAR proposes post-construction monitoring as part of the mitigation strategy.

In my view, this suggests that the full extent of potential impacts is not yet properly understood. Monitoring can identify problems after they occur, but it does not address gaps or uncertainty within the assessment at application stage.

The monitoring programme also states that the results may inform additional mitigation measures during operation. This means that some mitigation measures are effectively being deferred until after consent and after the turbines are operational.

Under the RED III process, there is limited opportunity for further information following submission. In that context, there is an even greater need for the assessment to be complete and robust at application stage rather than relying on future monitoring and reactive mitigation.

Post-construction monitoring is not a substitute for a proper baseline assessment. In my view, the reliance placed on future monitoring highlights the level of uncertainty that still exists regarding the likely effects on bird species.

2.13 Cumulative Effects

The wider West Cork area is already subject to existing and proposed wind energy development.

In my view, the cumulative assessment within the EIAR does not adequately consider how multiple developments may affect bird populations over time, particularly wide-ranging species such as raptors.

Even where the impact of an individual development is described as low, the combined effect of multiple wind farms across the wider landscape may still be significant.

During pre-application consultation, An Bord Pleanála advised that cumulative impacts should be clearly identified and considered as part of the application process. However, the cumulative assessment presented appears limited in spatial scope and does not fully reflect the ecological range and movement patterns of species that operate across a much larger landscape.

For highly mobile species, cumulative effects cannot be properly assessed using a narrow study area alone. In my view, the assessment does not adequately address the wider cumulative pressures already affecting bird species within the region.

2.14 Cork County Development Plan

The Cork County Development Plan requires that development protects biodiversity, avoids significant impacts on species and is supported by reliable and robust environmental assessment.

In my view, the ornithological assessment within the EIAR does not demonstrate compliance with those objectives.

The assessment relies heavily on limited survey data, modelling assumptions and the screening out of species from detailed consideration. At the same time, a number of conclusions are presented with a level of certainty that does not appear to reflect the acknowledged limitations and uncertainty within the underlying data.

Taken together, these issues raise concerns as to whether the assessment is sufficiently robust to demonstrate that significant effects on bird species can be avoided.

2.15 Cross-Chapter Issues

The EIAR largely assesses ornithology, hydrology and biodiversity as separate topics. In reality, these systems are closely connected.

The hydrological assessment identifies a peatland environment characterised by high surface runoff, direct water connectivity and the potential for sediment mobilisation. These factors are directly linked to habitat quality, prey availability and the wider ecological conditions that support bird species.

In my view, the assessment does not adequately consider how changes to hydrology and peatland condition may also affect the ecological functioning of the site for birds and other wildlife.

This is particularly relevant in a sensitive upland peatland environment, where ecological impacts do not occur in isolation. Disturbance to peat, drainage patterns and water quality can have wider consequences for habitats and species across the landscape.

The separation of these assessments into individual chapters results in a fragmented approach which does not fully reflect how ecological effects arise in reality.

2.16 Conclusion

Overall, I do not believe the ornithological assessment fully reflects the actual conditions on the ground or the way bird species use this landscape.

The assessment relies heavily on limited survey data, modelling assumptions and the screening out of species from detailed consideration. At the same time, important uncertainties remain regarding long-term site usage, protected species activity and collision risk.

The EIAR itself acknowledges limitations within the available data and proposes post-construction monitoring to address remaining uncertainty. However, those limitations are not fully reflected in the overall conclusions, which present a high level of confidence that significant effects can be excluded.

Based on my own long-term observations in the area, I do not believe it has been demonstrated that the site is of low importance to bird species, particularly wide-ranging raptors such as White-tailed Sea Eagle.

I believe there remains a real risk of significant impacts on protected bird species, and I do not think those risks have been fully assessed.

Given the remaining gaps, uncertainty and reliance on assumptions, I do not believe the EIAR demonstrates with sufficient certainty that significant adverse effects on bird species can be excluded.

3. BIODIVERSITY

3.1 Introduction

I do not accept the characterisation of this site in the EIAR as having limited ecological value or supporting few species. That does not reflect what is actually present on the ground.

The reliability of any ecological impact assessment depends on the accuracy of baseline data. Where that data is incomplete or fails to identify species that are demonstrably present, conclusions regarding impact cannot be considered robust.

Over a sustained period, I have personally observed a wide range of wildlife within the site and along the stream corridor. This includes red squirrel and pine marten, both of which I have photographed on different dates. In addition, I have regularly seen badgers, foxes, Irish hare, sika deer, weasels and pheasants in and around the site.

This is not a one-off or occasional occurrence. These are repeated sightings over time, which clearly show that the site is being actively used by wildlife as part of their normal range. It is not a “dead area” or low-value habitat.

In particular, there is clear evidence of ongoing red squirrel activity, with hazelnut shells and feeding remains found all along the stream. This indicates regular foraging behaviour and consistent use of that corridor. The stream and its surrounding vegetation are clearly functioning as an important habitat and movement route.

3.2 Contradiction with the EIAR Findings

The EIAR states that “no breeding sites, sightings or other evidence of red squirrel were recorded.” However, this does not reflect what I have personally observed on site over a sustained period of time.

I have direct observations and photographic evidence confirming the presence of red squirrel within the site area. I have also regularly found hazelnut shells and feeding remains along the stream corridor, indicating ongoing and repeated use of the area.

Similarly, pine marten, which is a protected species, has been observed on multiple occasions but was not recorded during the applicant’s surveys.

To me, these are not minor discrepancies. If species that are clearly present within the area were not identified during the surveys, it raises important questions about how complete the baseline ecological data actually is.

I do not think the ecological value of the site is fully reflected within the EIAR, particularly in relation to the stream corridor and surrounding habitat which clearly function as an active wildlife route and feeding area.

3.3 Limitations of the Survey Approach

The assessment appears to rely mainly on walkover surveys and the absence of visible dens or dreys. In my opinion, that is not enough on its own to reliably detect species such as red squirrel or pine marten.

From basic reading on these species, it is well understood that:
• dreys can be difficult to identify depending on season and vegetation cover;
• pine martens are elusive and largely nocturnal;
• and many species are more reliably identified through repeated observation, field signs or camera monitoring over time.

No evidence is provided of more detailed survey methods such as camera trapping or longer-term monitoring within the site area. In those circumstances, it is not surprising that species using the area may have been missed.

This is particularly relevant given that I have personally observed species within the site that were either not recorded or were described as absent within the EIAR. To me, that raises concerns about how complete the baseline ecological data actually is.

I also think there is a wider issue with relying too heavily on short survey periods in a landscape like this. Wildlife activity changes throughout the year and can also vary depending on weather, vegetation cover and disturbance levels. A species not being recorded during limited surveys does not necessarily mean it is absent from the area.

Overall, I do not believe the survey approach fully reflects the actual level of wildlife activity within the site and surrounding landscape.

3.4 Ecological Value of the Site

The range of species observed—including prey species, herbivores and predators—shows that this is a functioning ecosystem, not a degraded or inactive landscape.

The site provides:

- Food sources (e.g. hazelnuts, small mammals)
- Cover and shelter
- Safe movement routes, particularly along the stream

The presence of species like pine marten and badger, alongside smaller mammals and prey species, indicates a balanced and active ecological system.

This demonstrates that the site functions as an integrated ecological system rather than an area of limited ecological value as described in the EIAR.

3.5 Upland Bog, Wetland and Heath Habitat Around T13 and T14

One area which I believe is particularly underestimated within the EIAR is the upland bog, wetland and heath habitat around the proposed T13 and T14 turbine locations, including the area surrounding Lough Naibiree.

I visited this area on multiple occasions and was genuinely struck by both its beauty and the quality of the habitat present. Unlike many areas of upland farmland, large parts of this landscape appear relatively undisturbed by modern agricultural improvement and still retain the character of intact bog, wet heath and upland heath habitat.

The lake itself is surrounded on three sides by bog and wetland habitat, with extensive areas of wet ground, bog cotton, sedges, rushes and wet heath vegetation. I observed large expanses of bog asphodel together with bog myrtle, multiple types of heather and heath species, sphagnum moss and a wide range of wetland plants including bog bean, sundew and butterwort.

In addition to the botanical diversity, the area appeared extremely active ecologically during my visits. Species observed included damselflies, dragonflies, meadow pipits, wrens, stonechat, skylarks, mallard ducks and swallows feeding over the lake surface. The surrounding wetland and heath habitat clearly supports a functioning upland ecosystem rather than isolated pockets of vegetation.

The presence of species such as sundew, butterwort, bog bean, sphagnum moss and extensive wet heath vegetation strongly indicates the ecological sensitivity of the area and its dependence on stable wetland and peatland conditions.

Particularly concerning is the area around the proposed T13 location. In my opinion, the description of parts of this landscape as “improved grassland” does not reflect the actual condition of the habitat on the ground.

The area includes rocky upland heath, old meadows, wet grassland, heather-covered slopes and significant areas of species-rich vegetation. I observed orchids and extensive devil’s-bit scabious within wet grassland very close to the proposed turbine area and access route. This is notable given that devil’s-bit scabious is specifically relevant to Marsh Fritillary habitat assessment. The EIAR states that significant devil’s-bit scabious was not identified in this area, which does not reflect what I personally observed on site.

The rocky outcrops and heath surrounding T13 also appear to provide structurally diverse habitat with crevices, exposed rock and dry heath vegetation which may support reptiles and upland bird species. The wider upland habitat also appears highly suitable for species such as Hen Harrier.

The proposed access road to T13 would, in my opinion, result in substantial and irreversible damage to a highly sensitive upland habitat area including wet heath, bog vegetation, rocky heath and species-rich wet grassland.

This area is also significant in the wider planning context given its proximity to the previously refused Ardragh turbine proposal. In my opinion, this reinforces the long-standing sensitivity of this upland landscape from both biodiversity and landscape perspectives.

More broadly, I am concerned that the biodiversity assessment tends to separate habitats into mapped categories and isolated assessment areas without fully recognising the extent to which the upland bogs, wet heath, rocky heath, streams and wetland habitats function together as one interconnected ecological system.

Disturbance to peat, drainage patterns, groundwater movement and surface water flows in these upland areas would not simply affect isolated habitat patches. It risks altering the wider hydrological and ecological functioning of the surrounding bog and wetland landscape.

In my opinion, the ecological richness, habitat diversity and overall sensitivity of the T13/T14 upland area are significantly understated within the EIAR.

3.6 Conclusion

Overall, I do not believe the biodiversity assessment fully reflects the ecological value of the site or the level of wildlife activity actually present within the area.

Species that I have personally observed on multiple occasions, including red squirrel and pine marten, were either not recorded or described as absent within the EIAR. In my opinion, that raises important concerns regarding the completeness of the baseline ecological data.

The site and surrounding upland landscape clearly support an active and functioning ecosystem, including protected species, wetland habitat, heath, bog vegetation and species-rich grassland.

This is particularly evident around the T13 and T14 areas, where the upland bog, wet heath and wetland habitat appear substantially more ecologically sensitive than is reflected within the assessment.

Given the limitations of the survey approach and the uncertainty that remains regarding species presence and habitat quality, I do not believe it has been demonstrated with sufficient certainty that significant ecological effects can be excluded.

Lough Naibiree showing Ardrah bog. T14 would be upper right. The road to T14 would cross this bog. this is a proper bog with varied flora including bog myrtle, devils bit scabious, bog asphodel, sphagnum moss, lousewort, butterwort, sundew, bog bean, cross leaf heath etc .

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ugh Naibiree looking towards Shehy mountain.

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 !

Bog asphodel and cross leaf heath, Ardrah bog Lough Naibiree

Devils bit scabious Lough Naibiree

4. LANDSCAPE AND VISUAL IMPACT

4.1 Introduction

I have reviewed Chapter 13 of the EIAR, the Landscape and Visual Impact Assessment (LVIA), the photomontage booklets, the cumulative assessment material and the associated appendices.

Having considered this material in detail, I do not believe the LVIA fully reflects how the proposed turbines would actually appear or be experienced within the landscape.

The issue is not simply whether turbines of this scale would be visible. At approximately 169 metres in height, they would inevitably become very prominent features within the West Cork uplands. The more important question is whether the assessment honestly reflects the true extent of that visibility and the level of change that would occur within the landscape.

In my opinion, it does not.

A repeated pattern appears throughout the LVIA where viewpoints are selected in ways that reduce turbine prominence through foreground vegetation, localised landform screening or carefully framed views. In many cases, moving only a short distance results in far more open and exposed views than those presented in the assessment.

This is particularly important in an upland landscape where visibility changes rapidly depending on position, elevation and direction of travel.

This is especially relevant along the R585 Scenic Route and within the wider Shehy uplands, where open panoramic views form an important part of the landscape character and visitor experience.

For these reasons, I do not believe the LVIA provides a fully reliable representation of the likely visual and cumulative effects of the proposed development.

4.2 Limitations of Photomontages and Viewpoint Selection

One of my main concerns with the LVIA is the way viewpoints and photomontages have been selected and presented.

While the photomontages may comply technically with guidance, I do not think they fully represent how the turbines would actually be experienced on the ground by residents, walkers or people travelling through the area.

A repeated pattern appears throughout the assessment where viewpoints are positioned in locations where foreground vegetation, local landform or turbine overlap reduces the apparent prominence of the development.

In several locations, moving only a short distance results in significantly more open views and much greater turbine visibility than shown within the selected viewpoints.

This is particularly important in the upland landscape surrounding the site, where visibility changes quickly and large panoramic views open up along roads, hillsides and valleys.

The assessment also repeatedly describes visibility as “partial”, “screened” or “blade-only”. In practice, rotating blades are often the most visually noticeable part of a turbine and can remain highly prominent even where part of the tower is screened from view.

Similarly, vegetation screening provides only limited reassurance over the long term. Vegetation changes seasonally, varies in density and cannot realistically be relied upon as permanent mitigation throughout the operational lifetime of a wind farm.

Another difficulty is that photomontages present static and carefully framed images of what is actually a moving lived experience. People experience this landscape while travelling through it, from multiple positions and under changing weather and lighting conditions.

As a result, viewpoints may technically comply with guidance while still failing to reflect the true visual experience of the development in reality.

Overall, I believe the combined effect of viewpoint selection, framing and reliance on localised screening results in the visual impact of the proposed turbines being understated throughout the LVIA.

4.3 Representative Viewpoint Issues

The concerns outlined above are not isolated issues, but part of a recurring pattern across multiple viewpoints within the LVIA.

Viewpoint VP10 – R585 Scenic Route

Viewpoint VP10 is particularly significant because it relates directly to the R585 Scenic Route, a designated scenic route within the Cork County Development Plan.

The selected viewpoint is positioned at a location where visibility remains relatively constrained immediately before the landscape opens into substantially wider panoramic views.

However, moving only a short distance further along the road results in a dramatic increase in visibility, with the landscape opening towards the Shehy uplands, the peninsulas and Kerry beyond. From these more open and representative positions, turbines T01–T06 would become clearly visible and visually dominant, with little or no meaningful screening.

This is important because the visual experience of the R585 is not static. Road users experience the landscape dynamically as visibility opens and closes along the route. The selected viewpoint therefore does not adequately represent the actual visual experience of travelling through this landscape.

In my view, the LVIA understates the significance of the effect on the scenic route by selecting a

viewpoint immediately before one of the most open and visually sensitive sections of the road.

Applicant's selected VP10 viewpoint on the R585 Scenic Route showing constrained visibility immediately before the landscape opens into wider panoramic views:

View obtained a short distance further along the R585 where the landscape opens

significantly, resulting in substantially greater visibility and prominence of the proposed turbines:

Within the selected viewpoint, foreground vegetation and turbine overlap reduce the perceived spread and prominence of the development:

Viewpoint VP16 – Residential Receptors (H013 / H019)

Viewpoint VP16 is particularly important because it relates directly to my home (H013) and the adjacent dwelling (H019), both of which represent highly sensitive residential receptors within close proximity to the proposed development.

View from the H013/H019 residential context illustrating the open nature of the receiving landscape, the proximity of proposed turbines and the extent of surrounding turbine visibility:

The visual assessment presented for VP16 does not, in my view, accurately represent the actual residential experience from these properties.

The surrounding landscape in this area is open and elevated, with very limited meaningful screening. From both dwellings, there are wide and uninterrupted views towards the proposed turbine locations. The proposed development would therefore form a prominent and unavoidable part of the day-to-day visual environment.

However, the photomontage materially reduces the perceived extent of this effect through:

- foreground vegetation which partially obscures turbines;
- viewpoint framing which minimises the relationship between the dwellings and the turbine layout;
- and presentation of turbines in a manner which reduces their apparent scale and dominance.

In reality, the proposed turbines would occupy a substantial proportion of the surrounding landscape and would introduce large-scale moving structures into what is currently an open rural environment.

This is particularly significant given:

- the close proximity of the nearest turbines;
- the elevated and exposed nature of the site;
- the limited screening available in practice;
- and the multi-directional arrangement of turbines around the properties.

The development would not be experienced as an isolated feature within a distant landscape. Instead, it would become a dominant and continuous visual presence within the principal outlook from the dwellings and surrounding landholding.

The visual effect is intensified further by the exceptional scale of the proposed turbines. At approximately 169 metres in height, these structures would appear substantially larger and more visually prominent than existing wind energy development within the wider area.

Even within the applicant's own assessment, VP16 is identified as experiencing significant residual visual effects. In my view, the true level of impact is understated due to the limitations of the viewpoint representation and the extent to which the residential experience has been minimised within the LVIA.

Taken together, the proposal would fundamentally alter the visual character and residential amenity of this location through:

- extensive turbine visibility;
- continuous blade movement;
- encircling visual influence;
- and the industrialisation of the surrounding upland landscape.

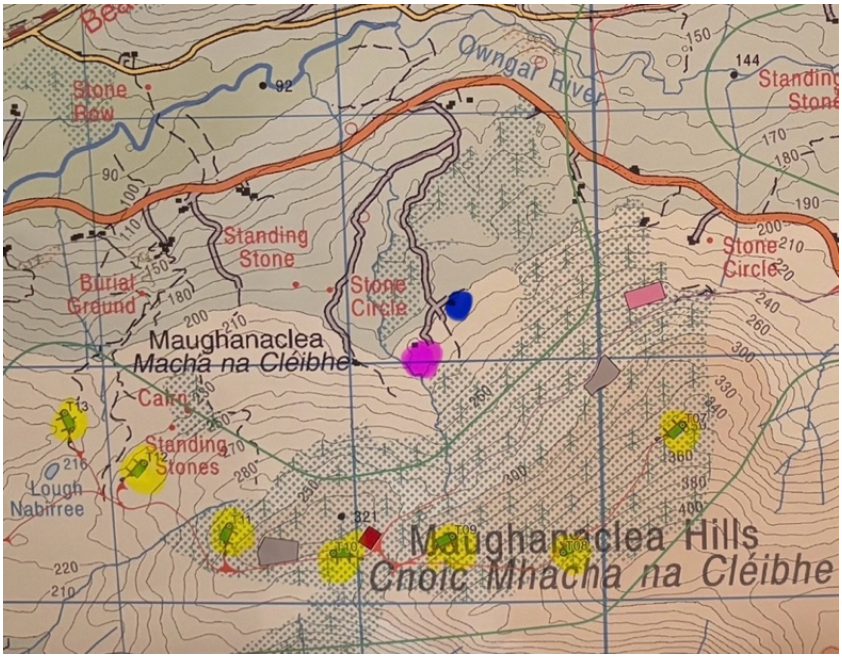
For these reasons, I do not believe the LVIA provides a reliable representation of the actual visual effects likely to arise at these residential receptors.

4.4 Residential Amenity – H013/H019

The residential effects of the proposed development are particularly significant in relation to H013 and H019, both of which are located within close proximity to the proposed turbines and experience wide, open exposure towards the development.

Unlike transient public viewpoints, these properties represent permanent residential receptors where the effects of the development would be experienced on a continuous day-to-day basis.

Residential context of H013 and H019 illustrating the open nature of the landscape, proximity of proposed turbines and the surrounding arrangement of turbine locations:



The surrounding landscape at this location is elevated and exposed, with very limited meaningful screening. From the dwellings and surrounding landholding, there are extensive outward views towards the proposed turbine locations.

The proposed turbines would not appear as distant or occasional features within the landscape. Instead, they would form a dominant and continuous visual presence within the principal outlook from the properties.

This effect is intensified by:

- the close proximity of the nearest turbines;
- the elevated topography;
- the exceptional scale of the proposed structures;
- and the extent of turbine visibility across a wide arc surrounding the properties.

At approximately 169 metres in height, the proposed turbines would introduce large-scale moving structures into what is currently an open rural upland environment.

Principal outlook from H013 towards the proposed turbine area demonstrating the direct relationship between the dwelling and surrounding turbine locations:

The principal elevation of H013 faces directly towards the proposed turbine area, meaning turbines would be experienced from primary living spaces and throughout normal day-to-day residential activity.

Even within the applicant's own assessment, VP16 is identified as experiencing significant residual visual effects. In my view, the true extent of the residential impact is understated due to the way the viewpoint has been framed and the extent to which foreground vegetation reduces perceived turbine prominence within the photomontage.

The combined effect would fundamentally alter the character and visual amenity of these residential properties through:

- extensive turbine visibility;
- continuous blade movement;
- encircling visual influence;
- and the industrialisation of the surrounding landscape.

In my view, the LVIA does not adequately represent the actual residential experience likely to arise at these properties.

4.5 Cumulative Landscape Saturation, Scenic Routes and the Shehy More Planning History

The proposed Maughanaclea Wind Farm must be considered within the context of the wider cumulative transformation of the Shehy / West Cork upland landscape.

This issue is not theoretical. It has already formed a central concern within previous wind farm assessments and decisions relating to this landscape, most notably the extensive planning history of the Shehy More Wind Farm.

The Shehy More process demonstrates a long-standing concern by both Cork County Council and An Bord Pleanála regarding:

- cumulative landscape impact;
- scenic route protection;
- landscape carrying capacity;
- and the excessive concentration of turbines within the West Cork uplands.

Earlier iterations of the Shehy More proposal sought permission for substantially larger turbine layouts. These proposals were progressively reduced following concerns regarding visual impact and cumulative landscape effects.

An Bord Pleanála previously concluded that large-scale turbine development within this landscape risked:

“seriously injuring the visual amenities of the area”

and referred specifically to the danger of:

“undue concentration of wind energy development”.

These concerns are directly relevant to the current proposal.

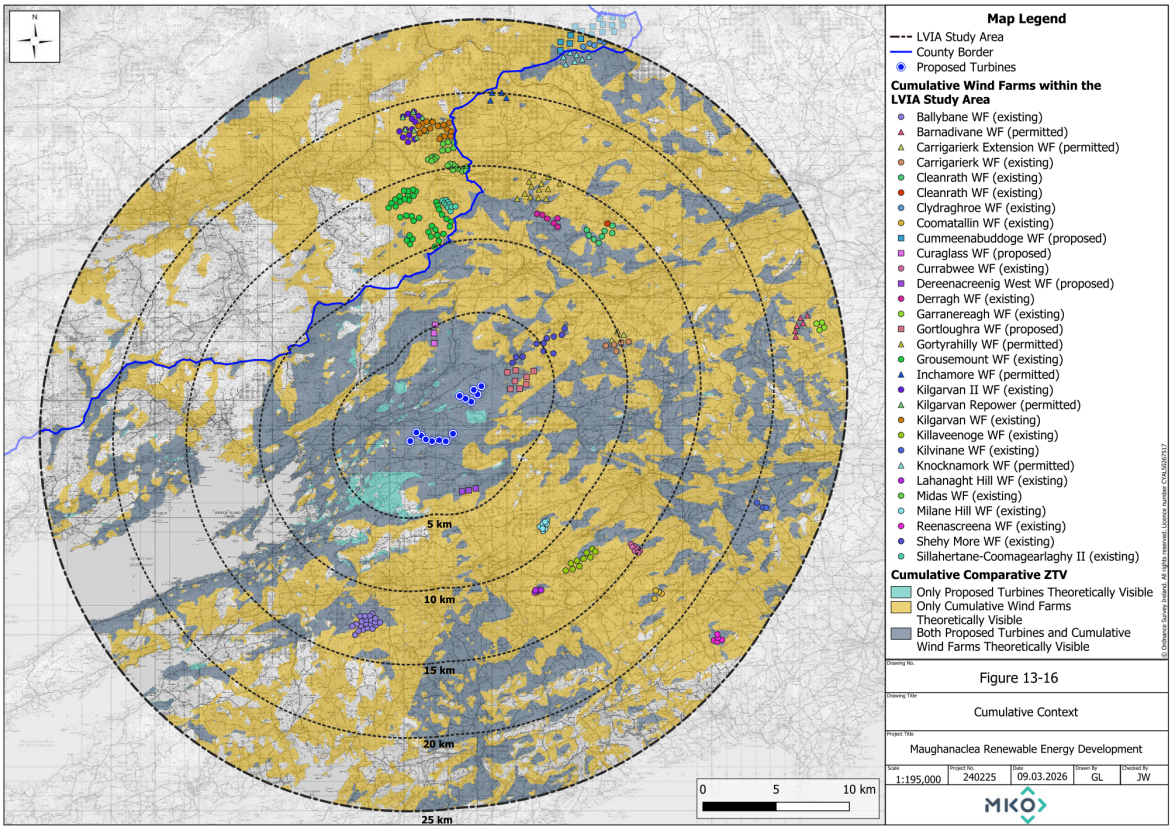
The eventual reduction in turbine numbers and layout intensity at Shehy More is significant because it demonstrates recognition that the landscape possesses a finite capacity to absorb wind energy development before cumulative effects become unacceptable.

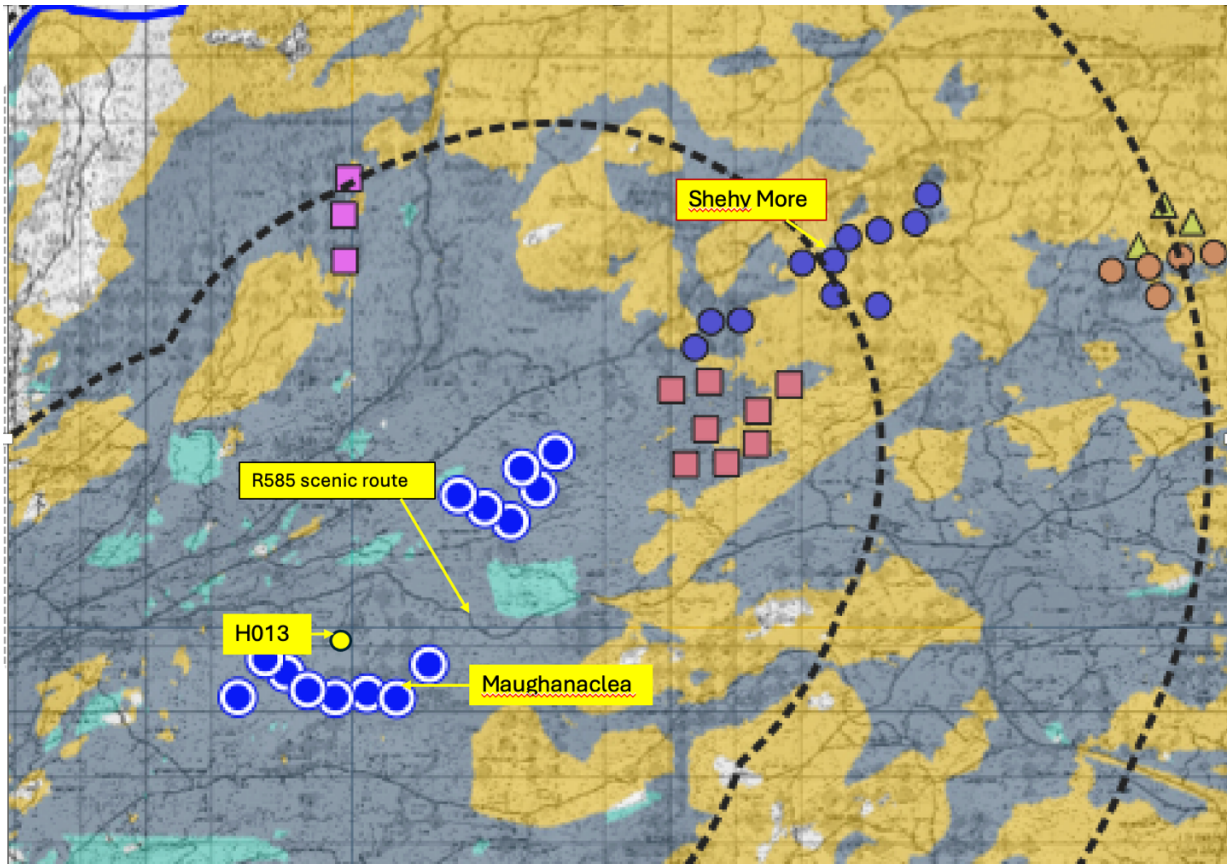
The current proposal raises the same concerns, but at a materially greater scale.

The EIAR itself identifies:

- 19 existing wind farms;
- 6 permitted wind farms;
- 4 proposed wind farms;
- amounting to over 300 turbines within 25 km of the site.

This illustrates the extent of existing and emerging wind energy pressure already affecting the wider landscape.





However, the cumulative assessment largely treats developments as isolated visual components rather than assessing the overall transformation of landscape character arising from their combined presence.

Photomontages within the LVIA already demonstrate:

- simultaneous visibility of multiple developments;
- increasing occupation of skylines;
- and coalescence into an increasingly continuous wind energy landscape.

The proposed turbines, at approximately 169 metres in height, represent a further step-change in visibility and dominance within that cumulative context.

Due to the elevated and exposed nature of the landscape, these structures would become dominant features across extensive areas of the wider uplands and would materially intensify the industrialisation of the landscape.

This is particularly important in relation to the R585 Scenic Route, which traverses highly exposed and panoramic landscape within the Shehy uplands. The visual experience along this route already includes visibility of existing wind energy development, including Shehy More.

The proposed development would significantly intensify this cumulative effect by:

- increasing skyline occupation;
- extending turbine visibility across a wider geographical area;
- reinforcing the perception of a continuous wind energy landscape;
- and further eroding the sense of openness and remoteness which characterises the area.

The cumulative issue is not simply the visibility of individual turbines in isolation, but the progressive industrialisation of the upland landscape as experienced sequentially by residents, road users and visitors moving through the area.

While the LVIA assesses viewpoints individually, it does not adequately assess the combined and evolving experience of travelling through a landscape increasingly characterised by large-scale turbine development.

The planning history of Shehy More demonstrates that An Bord Pleanála has previously accepted that cumulative landscape saturation within the Shehy / West Cork uplands can become excessive and unacceptable.

In my view, the proposed Maughanaclea development represents a further substantial intensification of that existing pressure and would materially contribute to the over-industrialisation of this sensitive upland landscape.

4.6 Landscape Character, Sensitivity and Policy Conflict

The EIAR identifies the surrounding landscape as being of high or very high sensitivity, including exposed upland areas, scenic routes and open rural landscape.

Despite this, the assessment repeatedly reduces predicted effects to “Moderate” or “Slight” significance even where turbines would occupy open skylines and remain visible across extensive areas.

To me, there is a repeated pattern throughout the LVIA where landscape sensitivity is acknowledged initially, but the significance of resulting impacts is then reduced through reliance on distance, screening or selective viewpoints.

At approximately 169 metres in height, the proposed turbines would introduce very large moving structures into an upland landscape currently characterised by openness, undeveloped ridgelines and a strong rural character.

The cumulative effect would be a substantial change in the character of the landscape through increasing turbine visibility, greater skyline occupation and the continuing spread of large-scale infrastructure across the uplands.

This is particularly relevant in the context of Cork County Development Plan objectives relating to scenic route protection, landscape character and cumulative wind energy development.

The wider planning history of the Shehy uplands also demonstrates that concerns regarding excessive turbine concentration and cumulative landscape impact have already been recognised repeatedly by both Cork County Council and An Bord Pleanála.

In my opinion, the proposed development conflicts with those landscape protection objectives and would result in an unacceptable level of visual and cumulative landscape impact.

4.7 Lived Experience and Localised Impact

I appreciate that matters such as electricity distribution, grid operation and financial arrangements are not determinative planning considerations in themselves. However, they are relevant to understanding how the effects of this development would actually be experienced by those living within the area.

The proposed development is presented primarily in terms of wider national energy benefit. However, the visual and environmental effects would be experienced locally, continuously and over the long term by residents living within and around the development site.

For those residents, the impact would not be theoretical or occasional. It would form part of the day-to-day lived experience of the area through:

- extensive turbine visibility;
- continuous blade movement;
- aviation lighting;
- noise and shadow flicker;
- and the permanent industrialisation of what is currently a quiet rural upland landscape.

This is particularly significant in a landscape which is currently characterised by openness, relative remoteness and a strong sense of rural character.

The scale of the proposed turbines would fundamentally alter that experience. At approximately 169 metres in height, the structures would become dominant features within the surrounding landscape and would remain visible across extensive areas of the uplands and surrounding valleys.

There is also an evident imbalance between how the effects and benefits of such development are distributed. While a limited number of landowners may receive financial benefit, the wider visual and residential impacts are experienced by a much broader group of residents who receive little direct benefit but experience the long-term change in landscape character and residential environment.

The cumulative effect is not simply a change in views, but a broader change in how the landscape is experienced and understood by those who live within it.

In my view, the EIAR does not adequately reflect the extent of that lived and continuous impact on the surrounding residential environment.

4.8 Conclusion

Overall, I do not believe the LVIA fully reflects the true visual and cumulative impact of the proposed development.

The assessment repeatedly relies on selective viewpoints, foreground screening and carefully framed photomontages which, in my opinion, reduce the apparent prominence of the turbines and understate how they would actually be experienced within the landscape.

When considered in the wider landscape context, the proposed turbines would introduce extensive visibility across exposed upland areas, significant visual effects on nearby residential properties and a substantial increase in cumulative turbine presence across the West Cork uplands.

The planning history of developments such as Shehy More also demonstrates that concerns regarding cumulative landscape saturation, scenic route protection and excessive turbine concentration within this landscape are long-standing and well established.

At approximately 169 metres in height, the proposed turbines would become dominant features across large parts of the surrounding upland landscape and would contribute further

to the gradual transformation of the area through the spread of large-scale wind energy infrastructure.

In my opinion, the proposal would materially alter the character of the surrounding landscape, erode residential visual amenity and conflict with the landscape protection objectives of the Cork County Development Plan.

For these reasons, I respectfully request that permission for the proposed development be refused.

5. NOISE AND SHADOW FLICKER

5.1 Introduction

I live in a very quiet rural location approximately 800 metres from the nearest proposed turbine location. One of the defining characteristics of this area is the low level of background noise, particularly during the evening and night-time period.

The proposed development would introduce a large-scale industrial noise source into that environment on a continuous and long-term basis.

Having reviewed the EIAR, I do not believe the assessment fully reflects how turbine noise is likely to be experienced in reality at this location.

The assessment focuses primarily on predicted compliance with numerical noise limits. However, living beside wind turbines is not experienced as an averaged mathematical value. Turbine noise can fluctuate depending on wind conditions, atmospheric conditions and turbine operation, and may become particularly noticeable during quieter periods when background sound levels are naturally very low.

This is especially relevant in a quiet upland rural environment such as Maughanaclea, where even relatively moderate increases in noise can become highly perceptible due to the absence of existing background activity.

The assessment also relies heavily on modelling assumptions, including assumptions regarding turbine specification and operational behaviour. At the time of application, the final turbine model has not been confirmed, which introduces further uncertainty into the assessment.

In my view, the EIAR places significant emphasis on technical compliance while giving less consideration to the actual lived experience of residents over the operational lifetime of the development.

Construction impacts are also likely to be significant. Activities such as excavation, rock breaking, heavy vehicle movements and prolonged construction activity would introduce substantial disturbance into what is currently a quiet rural environment.

5.2 Character of Turbine Noise

A particular difficulty with wind turbine noise is that it is not experienced as constant background sound.

The EIAR largely presents noise through averaged predicted levels. However, turbine noise can contain:

- fluctuating aerodynamic noise;

- rhythmic or pulsing characteristics;
- tonal elements;
- and periods where blade movement becomes more noticeable under certain weather and wind conditions.

These characteristics may increase the extent to which turbine noise attracts attention, particularly at night when background sound levels are lowest.

The proposed turbines would also be exceptionally large structures, approximately 169 metres in height. Larger turbines have the potential to generate noise across a wider area and over greater distances than earlier turbine models.

In a landscape which is currently characterised by very low ambient noise levels, even intermittent or moderate turbine noise may become intrusive over time due to its continuous and repetitive nature.

5.3 Shadow Flicker

I am also concerned about shadow flicker effects arising from the proposed development.

The EIAR identifies nearby residential properties as being potentially affected by shadow flicker, including properties where predicted effects exceed commonly referenced guideline thresholds.

Importantly, the proposed mitigation strategy appears to rely primarily on turbine shutdown at certain times rather than avoiding the issue through the design or layout of the development itself.

In practical terms, this indicates that shadow flicker is expected to occur and that operational intervention may be required in order to manage it.

Shadow flicker is not experienced as a minor or abstract effect. Within residential properties it can create repeated moving light and shadow patterns within living spaces and around dwellings, particularly during periods of low-angle sunlight.

The actual experience of shadow flicker may also vary depending on:

- local weather conditions;
- seasonal sunlight patterns;
- vegetation cover;
- and how rooms and living spaces are used throughout the day.

In my view, the assessment does not fully reflect the extent to which recurring shadow flicker may affect residential amenity and quality of life for nearby residents.

5.4 Link to Detailed Residential Submission

I am aware of the detailed submission made by Annabel Seymour in relation to noise, shadow flicker and residential amenity impacts associated with the proposed development.

That submission addresses these issues in substantially greater technical detail, including:

- existing background noise conditions;
- likely operational turbine noise;
- local topography and sound propagation;
- shadow flicker exposure;
- and the cumulative effect on residential living conditions.

I support and agree with the concerns raised within that submission.

5.5 Conclusion

In my view, the EIAR does not adequately represent the likely day-to-day experience of noise and shadow flicker for residents living in close proximity to the proposed development.

The proposed turbines would introduce continuous industrial-scale activity into what is currently a very quiet rural environment characterised by low background noise levels and a strong sense of rural tranquillity.

Even where technical guideline limits may be predicted to be met, the practical residential experience of:

- turbine noise;
- blade movement;
- aviation lighting;
- and recurring shadow flicker
  would still represent a significant and long-term change to residential amenity and quality of life.

For these reasons, I do not believe the likely effects on nearby residents have been fully or adequately assessed.

6. OVERALL CONCLUSION

Having reviewed the EIAR and supporting documents in detail, I do not believe this application has demonstrated with sufficient certainty that the proposed development can proceed without causing serious impacts on the surrounding landscape, wildlife, peatland environment and residential amenity.

Throughout the assessment, there appears to be a repeated reliance on limited survey data, modelling assumptions, selective viewpoints and future monitoring in order to reduce or minimise impacts. In my opinion, too many important issues remain uncertain or only partially assessed.

From my own long-term experience living in this area, I believe the ecological and landscape sensitivity of the site is substantially greater than is reflected within the EIAR.

This is particularly evident in:
• the level of bird activity across the uplands;
• the ecological richness of the T13 and T14 areas;
• the extent of turbine visibility from the R585 Scenic Route and nearby homes;
• and the increasing cumulative pressure already affecting the wider West Cork uplands.

At approximately 169 metres in height, the proposed turbines would become dominant features within a landscape that is currently valued for its openness, relative wildness and scenic quality.

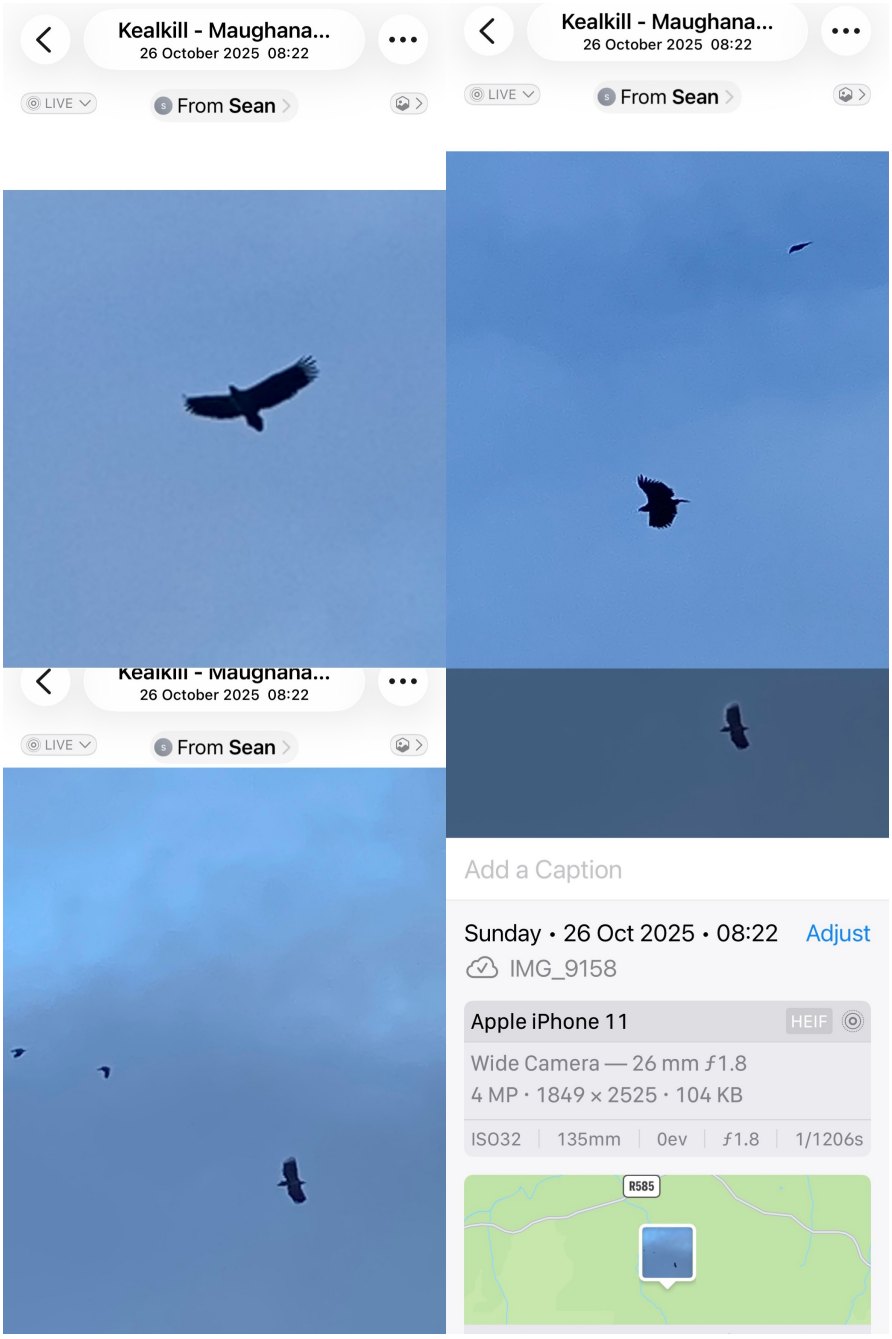
The development would not only alter the wider upland landscape, but would also have a major and permanent effect on nearby residents through turbine visibility, noise, shadow flicker and the continuing loss of rural character.

I do not believe the current assessment fully reflects the true extent of these effects or the degree of uncertainty that still remains.

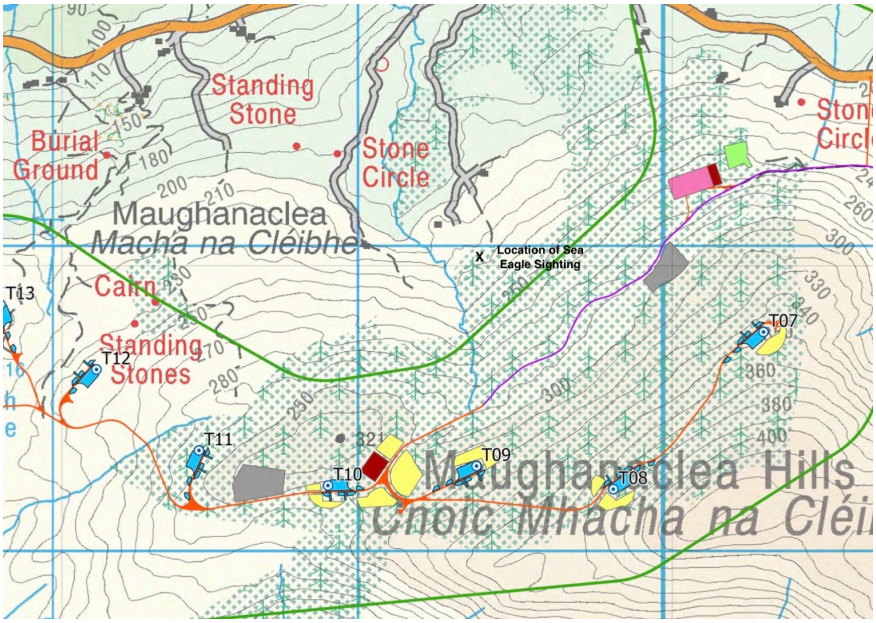
For these reasons, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development.

APPENDICES

Photographs of sea eagle on 26th October 2025.



Sea eagle seen on Maughanaclea hills on 28th October 2025



Location of sighting.

Red Squirrel, Pine Marten and Hare all seen regularly at potential development site.

Badger:

Squirrel and metadata at the site in 2025