21/05/2026
The Secretary
Strategic Infrastructure Development Department
An Coimisiún Pleanála
64, Marlborough Street
Dublin 1. D01 V902

AN COIMISIÚN PLEANÁLA
LDG- 088031-26
ACP-
25 MAY 2026
Fee: € 50 PMO
Time: 9:15 By: Post

Please find enclosed my submission making observations for wind farm application PAX04. 324165.

To confirm my details:
Observer's name: Teresa Colk Lynch.
Address: The Gathering, Gortnacowly, Bantry, P75 V065, County Cork.

Enclosures: Main submission. Appendices of the same. Community Survey.
Postal order for 50 euros.

Could it please be noted that this application is one of a group of FOUR wind farm applications currently with An Coimisiún Pleanála for consideration. All four locations are within FOUR/FIVE kilometres of each other in this tiny area of West Cork, North of Bantry. The cumulative impacts of one on another and the receiving environment must be evaluated rigorously for the potential devastating effects they may cause.

Details of the applications are as follows:

Name	References	Potential Decision Date	Details
Curraglass	PL88.500665	25/05/2026	3 turbines, 156.5m tip height
Derreenacrinnig	PL-501243-WC-26	31/08/2026	3 turbines, 119.5m tip height.
Gortloughra	322743-25	FInfo by 05/05/2026	8 turbines, 175m tip height.
Maughanaclea **(SID)**	PAX04. 324165	29/04/2027	**14 turbines, 169m Tip height.**

Lastly, there are two submissions, one for myself and one for Mr Michael Colk. These has been written independently of each other so that we can cover more aspects - so they need to be read separately.

Thank you.

Submission Ref: PAX04.324165

Maughanaclea Ltd Wind Farm

Submission from:

Teresa Colk

Gortnacowly

Bantry

P75 V065

County Cork

THERE ARE 2 FILES

Main Submission

Appendices

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

21/05/2026

Council: Cork County Council.
Applicant: Maughanaclea Ltd: Enerco Energy Ltd, A member of the Craydel Group.
Company Directors/Subscribers: Michael Murnane. David Murnane.
Agents: MKO Planning and Environmental Consultants., Galway.
Location: Ardrah, Maughanaclea, Ballynamought, Gortloughra, Cousane, Coomclogh, Derragh, Glanycarney, Keenrath, Derrynacaheragh, Shiplough, Coolsnaghtig, Mallabracka, Derrylahan, Derreens, Demesne, Dunmanway North, Milleenanannig, and Ballyhalwick, Co. Cork. The surrounding area includes operating windfarms, such as Grousemount, 3.7km to north of Site, and Shehy More, 5.5km southeast of Site, and proposed sites, Curraglass, Gortloughra and Derreenacrinnig, which are currently in the planning process.

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

A Chara

My submission to An Coimisiún Pleanála is strictly grounded in planning law and policy. Its observations will demonstrate that the proposed wind energy complex materially contravenes multiple planning policies and legal requirements, and the documents presented in the application have significant substantive shortcomings.

<u>First, are two aspects that I would like to bring to An Coimisiún Pleanála's attention.</u>

One, ACPInspectors may like to note that there is nothing within the EIAR's Alternative Site Locations to suggest that a correct and proper scoping exercise for suitable locations has been carried out within County Cork, or even within the Southern Region. MKO states that they only make a cursory nationwide search for possible sites, whilst confirming their decision-making is based on whether a site would be profitable or not:

> *3.2.3.The process of identifying a suitable location for a development such as the Proposed Project is influenced by a number of factors. While wind speeds, the extent of suitable or available land, proximity to the grid connection point, and planning policy are all very important, a wind farm project must be commercially viable/competitive, as otherwise it will not attract the necessary project finance required to see it built. The Site has been identified as having potential for a wind energy development as a result of a nationwide search of suitable lands.*[1]

[1] p.3-7 MKO EAIR Chapter 3 on Alternatives.

It is the slightly arrogant expression of '*all very important*' that shows clearly the priorities and intentions for this project are purely commercial: not fancifully meeting climate objectives, energy targets, or respecting biodiversity, which all go unmentioned.[2] No alternative sites, local or national, new or to be re-powered, are provided for An Coimisiún Pleanála to consider. Commerciality is however, not something to be considered under the Planning and Development Act 2000 with amendments, and/or its guidelines, which are there to ensure proper planning and sustainable development takes place.

Second, it is important for An Coimisiún Pleanála to bear in mind that the proposed sites in Mealagh Valley need to be considered as two separate planning entities, and not MKO's simple designation of being the 'southern site'. The westerly part of their 'southern site', situated in the townland of Ardrah, has already been assessed rigorously for wind farm development and subsequently refused by An Bord Pleanála; a factor that is completely missing from MKO's EIAR and planning report. Having been refused permission by An Bord Pleanála in July 2014[3] the individual landowners seemingly accepted the decision and did not take this further to the High Court. Having bided their time, the same consortium have now placed their lands within Enerco's proposed development even though the reasons for the ABP's refusal have not changed. Likewise, MKO's designation of a 'southern site' gives little acknowledgement to the special nature of the Mealagh Valley, within which the two sites lie. For this reason, Section 4 brings the Valley out of MKO's shadowy descriptions exploring not only its unique geological history and its and beauty, but also its community.

SUBMISSION: The main part of my submission are a series of observations that examines, considers and assesses (in section 1-7) whether the proposed Maughanaclea sites are in a suitable and appropriate location for a wind energy complex. Reserved for Section 8 of this submission are examples of the inadequacies within the application prepared by MKO. These shortcomings, and many more inherent in the planning report and the EAIR, need to be carefully evaluated by the Inspectorate in the coming eleven months by carrying a full examination and analysis.[4] As MKO consultants state for themselves:

> *'It is important to distinguish the Environmental Impact Assessment (EIA) to be carried out by An Coimisiún Pleanála, from the EIAR accompanying the planning application...The EIA includes an examination, analysis and evaluation by An Coimisiún Pleanála that identifies, describes and assesses in an appropriate manner, in the light of each individual case and in accordance with Articles 4 to 11 of the Environmental Impact Assessment Directive, <u>the direct and indirect significant effects</u> of the Proposed Project on population and health, Biodiversity, Land Soil Water Air and Climate, Cultural heritage and Landscape.'*

---

[2] From this it can also be questioned as to whether the mitigation measures so aptly displayed will only be carried out at minimum cost ? One reason for choosing this part of West Cork is the natural lands are cheaper having less commercial value - and of course mountains tops of full of rock and granite? Rock can be blasted away with only the cost of a few cheap workers and heavy machinery which have been used many times before.

[3] ABP 240461 CCC 11/318 Refused permission 08/07/2014.

[4] The Application as a whole must be seen as meeting the satisfactory standards required in Articles 94 and 111 of the Planning and Development Regulations, 2001- 2025.

As this is a REDIII application, Enerco and its agents MKO would have already presented a 'good enough' EIAR to gain sign off at the Completion Check stage. This new REDIII process, as An Coimisiún Pleanála knows, truncates the need for asking for extensive further information, so the EIAR is to be judged as it stands apart from, say, a little further information to clarify a few minor points. For certain, this new REDIII process finally dispenses with the need for ACP Inspectors to ask for, and accept, one of MKO's usual commentaries on submissions from third parties. Past history shows that MKO writes these with one aim in mind: to dismiss, deprecate and devalue the validity of the observations received. The presenting application and EIAR, set alongside third party letters of representation, and independent professional reports, will assist the Inspector(s) for An Coimisiún Pleanála in carrying out a rigorous, independent and through assessment.

In reading this submission, others submitted, and professional reports, insurmountable problems are particularly apparent with the three sites chosen by Enerco. With 'Maughanaclea' wind farm proposal, the correct decision may be confidently reached on the unsuitability of the sites, and a recommendation made for planning refusal to the Board members.

For ease, this submission is split into sections and appendices, which are as follows:

1. GENERAL INTRODUCTION
2. EU DIRECTIVES, NATIONAL AND REGIONAL POLICIES, LEGAL AND PROCEDURAL GROUNDS. .
    - EU Directives, National policies and those of Southern Assembly.
    - Supreme Court Judgement 2026.
3. COUNTY CORK DEVELOPMENT PLAN 2022-2028.
4. The MEALAGH VALLEY.
    - Planning and the Mealagh Valley:
        - Previous Planning Application History, decisions and refusals for wind farms.
        - Visual Effects and Impacts.
        - Designations used for Planning Decisions.
    - Introduction to the Valley itself: its geology, its climate and its people.
    - Proposed turbines for Ardrah within in the Mealagh Valley. (Adjacent to HVL)
    - Proposed turbines for Maughanaclea hills in the Mealagh Valley. (Noise and Water)

5. EAST OF KEALKILL: effects of turbines proposed for Maughanaclea Hills and Ardrah.
6. EASTOF KEALKILL: effects of turbines proposed for Ballymought, Coomclogh and Gortloughra (Shehy Beg).

7. OVERALL ASPECTS, MAUGHANACLEA WF PROPOSAL :
    - Peat Removed, Biodiversity and Wildlife Impact.
    - Birds/ Ornithology and MKO's Assessment.
    - Biodiversity and the Kerry Slug DeRogation.
    - Montages / Loss of Night Skies.
    - Archeology.
    - Scenic Routes.
    - Tourism and Economic Considerations.
    - Cumulative Effects and a Corridor of Wind Turbines.

8. ANSWERING THE APPLICATION AND MKO'S EIAR.
    - Omissions and Misinterpretations.

- Public Consultation.

9. WIDER ASPECTS:
    - Alternatives to be considered in the way of renewable energy.
    - County Cork.
    - The Wind Energy Industry.
10. SUMMARY AND CONCLUSION.
11. REQUEST FOR REFUSAL OF PERMISSION.

APPENDICES A -G.

1. GENERAL INTRODUCTION.

This local area lies adjacent to a part of the Wild Atlantic Way touring route, and is visible from the R585 S30 scenic route through the Cousane Gap and within reach of Gougane Barra. Previous planning permissions for wind farms, along with their sub-stations and ancillaries, have been refused in both the Mealagh Valley and the Shehy Mountains to protect the visual amenity of the area, and to curtail the likely environmental damage that construction of these industrial entities would cause. When writing in opposition to a wind farm at Shehy Beg, Failte Ireland recently warned that this scenic area, described as a 'calling card' enticing visitors to West Cork, could have its tourism base undermined by all the disruption during the construction of a wind-farm on these ridgelines, and then by operating turbines and their significant impact on scenic landscapes. This Maughanaclea application submitted by Enerco would directly extend the number of turbines along the same ridges, and for the first time on the opposite side, appearing on the sloped ridges of the Maughanaclea hills. These observations will clearly show that the application does not meet the requirements of National, Regional, and County Council policies, in that all renewables development should be in Appropriate Locations. It can be stated with utmost confidence that the sites proposed for a 'Maughanaclea' wind farm are not in suitable or appropriate locations: end of. To grant permission for this wind energy complex would be contrary to the proper planning and sustainable development of this beautiful area of West Cork.

2. EU DIRECTIVES, NATIONAL AND REGIONAL POLICIES, LEGAL AND PROCEDURAL GROUNDS.

- MANY EU DIRECTIVES and the COUNCIL of EUROPE.

Listed here are just a small part of EU Biodiversity Directives, which also tie in with The European Landscape Convention 2000, from the Council of Europe. The Convention requires the integration of landscape protection into planning decision-making: landscape protection being defined in Article 1 as *'actions to conserve and maintain the significant or characteristic features of a landscape, justified by its heritage value derived from its natural configuration and/or from human activity'*. Note how it looks back, to conserve the heritage value and not forward to satisfy a consultant's fixation with shifting baselines?[5] Also, the Convention is not just concerned with

[5] Shifting Baseline syndrome: a psychological and sociological phenomenon where each new generation accepts the degraded state of the environment they experience in their youth as normal, lowering the standards for what is considered a healthy ecosystem.

designated scenic or conservation areas: it intentionally emphasises that all types of landscapes are afforded protection. Throughout, the EU Directives it is inferred, and frequently stated, that the precautionary principle that is embedded in EU environmental law must be applied in all planning matters. In using this principle it is made quite clear that where a potential development poses a risk of irreversible landscape harm, it must refused wherever uncertainty exists.

- EU Dir. 2024/1203, to quote: (1) the Union is committed to ensuring a high level of protection and improvement of the quality of the environment. The environment, in a wide sense, should be protected, covering all natural resources, including air, water, soil, ecosystems, including ecosystem services and functions, and wild fauna and flora, including habitats, as well as services provided by natural resources. 2) Pursuant to Article 191 (2) TFEU, Union policy on the environment is to aim at a high level of protection taking into account the diversity of situations in the various regions of the Union. That policy <u>is to be based on the precautionary principle</u> and on the principles that preventive action is to be taken…

  - EU Birds Directive 1979: has two main sets of measures: (1) <u>habitat conservation</u> and the need to preserve, maintain or re-establish a sufficient diversity and area of habitats for Europe's wild bird species, particularly for threatened species listed in Annex I… (2) <u>the protection of the species themselves</u> and introduces a ban on the deliberate disturbance… NOTE[6]: New developments must be assessed for their potential impact on wild birds to ensure that they are compatible with EU nature legislation, leading to a more sustainable development agenda.

  - These protection measures are mirrored in its sister Directive – the EU Habitats Directive adopted in 1992 – which protects a further 1500 species other than birds as well as over 230 habitat types in their own right.

  - Not listed here in detail are EU Energy directives as they appear in MKO's ample documentation for reference. The Climate Act stated below brings the EU Directives into Ireland's legal framework.

NATIONAL POLICIES

- The Climate Action and Low Carbon Development (Amendment) Act 2021 is a landmark Irish law signed on July 23, 2021, that commits Ireland to a legally binding target of a 51% reduction in greenhouse gas emissions by 2030 (relative to 2018 levels) and net-zero emissions by 2050.

- Project Ireland 2040: National Planning Framework: Policy Objective 70: *Promote renewable energy use and generation <u>at appropriate locations</u> within the built and natural environment to meet national objectives towards achieving achieving a climate neutral economy by 2050.*

[6] p.8. The Birds Directive; 40 years of conserving our shared natural heritage. Produced by Natura 2000, EU publication.

SOUTHERN ASSEMBLY

- Project Ireland 2040: Southern Regional and Spatial Economic Strategy:

  RPO87:... increase the use of renewable energy sources across key sectors of electricity supply, heating, transport, and agriculture.

  RPO 95...to support implementation of the National Renewable Energy Action Plan (NREAP) and the Offshore Renewable Energy Plan ... the region as a leader and innovator in sustainable renewable energy generation.

  RPO 99. It is an objective to support the sustainable development of renewable wind energy (onshore and offshore) at appropriate locations and related grid structure in the region in compliance with national wind energy guidelines. (The Southern Assembly's share is an additional 978mw for wind power, across iall its counties of Carlow, Cork, Clare, Kerry, Kilkenny, Limerick, Tipperary, Waterford, Wexford: a population of 1.7 million.)

- Climate Action Plan 2025, Chapter 1, The Critical Nature of the Challenge:
  1.5 Taking Action in Ireland states that under the 2021 CAP& LCD Act:

  'Ireland's national climate objective requires the State to pursue and achieve, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable, and climate-neutral economy.'[7]

- REDIII - Renewable Energy Regulations, effective 06/08/2025: More extensive pre-app consultation, Article 16(2) Completeness Check, Limited Opportunity for Further Information, Mandatory EIA scoping, effective from May 2026.

A point to note from these: invariably from the EU Directives, and cascading through the national and regional strategies, objectives and policies speak in the round of all renewables, and not just offshore or onshore wind energy. However, at all levels of legislation and guidance, they offer a mandatory order that new installations must be at appropriate locations. The policies of the EU, National, Regional and County are all to speed up the development of wind energy projects being built. However, none of the imperatives are a carte-blanche to proceed at any cost. We have found that wind farm consultants and sadly some Planners take an attitude of 'renewables must be achieved' regardless of difficulties or the unsuitability of the site. As can be seen, national and regional policies are far more complex than this, constantly tying together objectives of improving biodiversity and the development of renewable energy generation, but with a constant caution that this must only be at appropriate locations. What this appropriateness looks like is contained within the County Development Plan's policies and objectives, which range from the protection of visual and recreational amenities, and environmental and cultural assets, to

[7] p.22. Climate Action Plan 2025. Chapter 1 The Critical Nature of the Challenge. Prepared by the Department of the Environment, Climate and Communications. Government of Ireland.

enhancing experiences for both tourists and residents. This then achieves the CCDP's stated Aims of ensuring

> *'a better quality of life for all making Cork County the most attractive place to live, work and invest in.'*

SUPREME COURT JUDGEMENT 2026. LEGAL AND PROCEDURAL GROUNDS.

Coolglass Wind Farm Limited (Appellant) and An Coimisiún Pleanala (Respondent) (Notice Parties: Ireland and the Attorney General) Delivered by Mr Justice O'Donnell, Chief Justice. First, it is worth reading the whole extract from MKO's planning report regarding this judgement[8]:

> 'The Supreme Court issued a judgment on this matter on 4th February 2026 (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5) and which establishes that consenting authorities must make decisions in a manner '*consistent with*' the approved national long term climate action strategy, the approved national long term climate action strategy etc., '*in so far as is practicable*'. This means that departure from climate objectives is permissible but only where there are genuine practical difficulties that make full alignment impracticable…
>
> Taking these legal duties into account, the Commission is required to attribute significant weight to national climate policy and the delivery of renewable energy infrastructure, such as the Proposed Project, even where they materially contravene a statutory development plan, particularly when that plan is out of step with national policy. …

This statement from MKO is incorrect as it does not concur with the rulings given by the Chief Justice, and misses the importance of some of the decisions made. It just touches slightly on what the actual Supreme Court judgement offers, being far more than the above minor insert in MKO's summation of the legal obligations of public authorities. No account is given of the Supreme Court firmly endorsing the use of County Development Plans within the planning process for renewables and in many ways reasserting its authority within. The Court also confirmed that Ireland's planning is fundamentally plan-led not government-policy led. MKO's insert above summarises part of the Climate Action and Low Carbon Development (Amendment) Act 2021, and its amendment of section 15(1) which states: *'a relevant body shall, in so far as practicable, perform its functions in a manner consistent with (a) the most recent climate action plan…'*, however, the inference MKO has drawn is erroneous. Within the Supreme Court Ruling 118, is stated:

- *the inclusion of 'in so far as practicable' makes it clear that there may be circumstances in which a relevant body may not be required to perform its functions in a manner consistent with the s. 15 objectives.*

- *In the field of individual planning decisions, it is perhaps less likely that s.15(1) will have a decisive effect that in respect of the actions of other relevant bodies. This is because the pursuit and achievement of the climate objective is already woven into the planning process to a significant degree.*[9]

---

[8] p.11. Planning Report. Maughanaclea Renewable Energy Development, Co Cork.

[9] p.67, Ruling **118** (iv). p.68, Ruling **118** (x).

The Supreme Court analysed in depth the level of obligation that *'consistent with'* placed on bodies like An Coimisiún Pleanála in carrying out its functions, and concluded that this would still produce a range of outcomes, allowing for a *'degree of tolerance'*, in the way this obligation was met. Relevant bodies do not have to comply with the precise climate objectives under section 15(1), just in a manner consistent with climate objectives, so their decision-making will vary widely on a case-by-case basis.

The Chief Justice states clearly that the approach urged by the developers, Coolglass WF ltd, cannot be accepted and its interpretation of the provision of Section 15 (1) 'would result in a strong presumption favouring the grant of permission for any renewable energy project, subject only to considerations of practicability and the exclusion of any other consideration' - this is the so-called idea of *'overriding public interest'*. In their interpretation given above, MKO is urging something similar to Coolglass WF ltd, in stating that the Commission is required to attribute significant weight to the delivery of renewable energy projects, even where applications submitted materially contravene a statutory development plan.[10] This loses the less-than-subtly worded decision in the Supreme Court Judgement, which reads:

> *The Question of consistency of an individual planning decision with the s.15(1) objective, is much more complex than a traffic light system of climate friendly 'go' (unless impracticable) and a climate unfriendly (stop).* [11]

This part of the 118.ruling is reinforced by the Chief Justice providing an example of a County Council have almost all of its lands designated as being open to wind farm development apart from 10 hectares of high scenic, cultural and amenity value. Multiple wind farm developments have been approved in the County, but an application is made for permission for a wind farm development in this reserved scenic area. In adhering to the approach urged by Coolglass (and adopted by the High Court) permission would nevertheless be granted - to achieve general climate objectives -as nothing was being deemed as impracticable. The Chief Justice states in very precise terms that this would make *a nonsense of the elaborate [planning] structure established by the 2015 and 2021 Acts, and the nuanced planning regime created by the P&D Act 2000 (as amended).* [12]

In their conclusion on the SC judgement, Mayes, Hayes and Curran LLP a leading Irish law firm based in Dublin states:

> *The Supreme Court* [has] *made it clear that section15(1) of the Act does not mandate climate-led decision-making to the exclusion of all other considerations. Climate objectives must be considered and addressed, but they do not automatically override development plans or other statutory requirements.'*

---

[10] p.11 MKO Planning Report.

[11] referring to a very useful article which came out on 10/02/2026 by Mason, Hayes and Curran.

[12] p.68-69, Ruling **118** (x). p.51 Ruling 87.

The Supreme Court judgement also clarifies:

> *'A planning authority is entitled to commence into consideration with a presumption that compliance with the development plan will itself be compliant with its s.15 duty'.*[13]

All parties, including MKO, must adopt the same presumptions with County Cork's development plans, in that due weight has already been given to national climate policies and objectives, especially those given in its Climate Action Strategy. There is no need for An Coimisiún Pleanala to decide to depart from its Objectives contained within: the present planning application simply needs to meet the development plan's policies and objectives, and in a manner not damaging or detrimental to their outcomes.

MKO writes boldly of the Commission's powers to grant permission where a proposed project would materially contravene a statutory development plan. To state this seems, first, to illustrate how little faith the agents have in their own choice of site or the application they have prepared and second, is a somewhat audacious comment. MKO provides no evidence within the application which would support a material contravention. Refusal of permission for a site within an 'open to consideration' area *'would not militate against the wider ability for planning consent to be secured'*[14] for a renewables proposal in other parts of County Cork, subject to the principles of proper planning.

Returning to MKO's planning report, there is an indication that the consultants are taking exception to something in the SC Judgement, possibly something to do the authority of County Development Plans and so their Wind Energy designations. Neither in the High Court or in the Supreme Court was a county's attribution of wind-energy designations, or landscape assessments, challenged or dismissed.[15] Designations protecting rural landscapes, amenity and heritage were treated as legitimate and robust. This confirms that where a county development plan identifies lands by its character, or designates it by whether it is appropriate or not for renewables, then decision-makers are entitled to rely on these assessments and protections. Climate policy does not automatically overrule these at all, especially as county development plans have been adopted following statutory processes, and given oversight by national regulators and Ministerial

---

[13] p.69, Ruling **118** (xi)

[14] See Reasons and Considerations for refusal of permission for Coumnagappul, County Waterford, ABP- 318446-23, 11/04/2025, so after High Court Ruling of Judge Humphries and before Supreme Court Judgement. ACP Order makes two points: 1) No evidence has been provided which would support a material contravention of the Waterford City and County Development Plan 2022-2028. 2) a refusal of permission in this case would not militate against the wider ability for planning consent to be secured for wind energy proposals in County Waterford, subject to the principles of proper planning and sustainable development / consistent with the applicable development plan policies and objectives/ accounting for European National and Regional polices…

[15] p.9/10: See 16. 17. of Supreme Court Judgement regarding an area designated 'not open for wind farms'. Ruling 19. They quote the ABP Inspector when the point is made that the unsuitability of the wind farm development was based on established policy provisions, significant visual impact, and landscape sensitivity, as well as oversight by the OPR and Ministerial Direction in 2022.

Direction.[16] Acceptance of authorised CCDP's LandscapeCharacterArea and Wind Energy Strategy designations over alternative assessable models which MKO has put forward, will become something of a recurring theme in some of the following sections.

3. COUNTY CORK DEVELOPMENT PLAN 2022-2028. The proposed development would materially contravene the Objectives of the Cork County Development Plan 2022-28, being contrary to the principles of proper planning and sustainable development of the area, and not consistent with section 15(1) of the Climate Action and Low Carbon Development Act 2015, as amended, and the Climate Action Plans of 2024 /25. The relevant CCDP Objectives which relate to the proposal will be discussed in sections that follow. One Objective to state here is ET13-2, which is in accord with national and regional policies in that wind energy complexes can only be built at appropriate locations.

> 13-2. COUNTY DEVELOPMENT OBJECTIVE, RENEWABLE ENERGY
> *(a) Support Ireland's renewable energy commitments as outlined in Government Energy and Climate Change policies by facilitating the development of renewable energy sources such as wind, solar, geothermal, hydro and bio-energy and energy storage at suitable locations within the county where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or amenities.*

Some of the words used in the national, regional policies, and CCDP, are worth defining:

Something that is appropriate, is suitable for a particular situation. Something that is suitable for a particular purpose, is right for it. To demonstrate a fact, means to make it clear to people. Something that is satisfactory fulfils a particular need or purpose. Adverse decisions, conditions, or effects, are things which are unfavourable to you. The impact that something has on a situation, process, or person, is the sudden or distinct effect that it has.

4. THE MEALAGH VALLEY

THE MEALAGH VALLEY: PREVIOUS PLANING HISTORY, DECISIONS AND REFUSALS FOR WIND FARMS.

The Mealagh Valley has a long history of wind farm applications now spanning some twenty five years, where it has been concluded over and over again that the eastern end of the valley is an unsuitable and inappropriate location for the type of development being proposed. May I ask that Appendix A, of this submission, is read at length as it contains a precis of decisions made by both An Bord Pleanála and Cork County Council, which set a clear and substantial precedent for continued refusal, as being in accordance with the

[16] p,19. 19. Supreme Court Judgement.

proper planning and sustainable development for this area of West Cork. Appendix B contains planner's and inspector's reports pertaining to the same.

Applications for wind farms in the Mealagh Valley have appeared since the industry's early days, with turbine tip heights being offered at between 76 and 107metres. One application was for twenty (20) turbines on Mullaghamesha, the very highest hill in the valley. This was refused in 1998 by CCC Planning, followed by a refusal on appeal by An Bord Pleanála a few months later, by reason of their potentially significant visual impact: the wind farm's site was noted as being *'in a elevated and unspoilt exposed upland location in a rural scenic landscape of amenity, and recreational potential'* and as being visible from a designated scenic route. The Board concurred that the proposed large scale wind farm development would be visually obtrusive, out of character in the rural scenic and would seriously injure the visual amenities and natural beauty of the area.

Applications then followed for other locations within the valley. In 1999/2000, permission for seven (7) turbines at Coomleigh East, was refused by Cork County Council for reasons that closely mirrored those of Mullaghmesha: this time the tip heights were less at 'only' 64metres and the location situated on the opposite hills of Maughanaclea. The notification of decision reads:

> *'Having regard to the location of the site in a remote, elevated and unspoilt exposed upland are in a rural scenic of amenity/tourism/recreational potential and visible from... a designated scenic route....it is considered that the proposed large scale wind farm development would be visually obtrusive and out of character in the rural scenic and would seriously injure the visual amenities and natural beauty of the area...'*

Further, CCC Planning stated that the *'proposed development, in conjunction with existing and proposed wind farm development would constitute an unacceptable density of this type of large scale development in a sensitive and scenic area.'* An Appeal to ABP produced a similar refusal for the application, with a continued pertinent use of the same phrases: *elevated and unspoilt; visually obtrusive; out of character* and *seriously injuring* the valley's natural beauty. By 2006, the concept of a wind farm on the Maughanaclea hills continued to be something of an anathema with even a 50metre wind monitoring mast being turned down at a similar site as before. It was stated by An Bord Pleanála that the erection of a meteorological mast to measure wind speed, would be inappropriate where it *'is likely that there would be a presumption against wind energy development.'* The only exceptions to the series of refusals were Mr O'Mahony's early applications. With an attitude of 'try and try again', and a lucky lack of objections two applications finally made it over the line: Goulacullin/Barrboy was finally granted permission on very minimal paperwork; nothing progressed in twelve years, it was never built, and permission has lapsed.[17] For Mr O'Mahony's other project at Derreenacrinnig West: since 2011 the planning process has been beset with

[17]Statkraft is eyeing up townlands such as Goulacullin at the Head of the Mealagh Valley, near to Nowen Hill, but cannot yet figure how it would move massive turbine parts through the valley.

problems, especially with trying to scatter series upon series of poles and wires across the Mealagh valley's 'High Value Landscape' and his actual wind farm never raised itself above ground. Having once lapsed, he has submitted a 'new' application which is currently with ACP for a further re-consideration on appeal.

Then, of course, there is the Ardrah proposal of 2011-2014, which was refused by An Bord Pleanála. Just to recap, the landowners who were involved in this application are the same consortium, the Harringtons, Keller and Murnane, who have now offered their same lands for turbines T14, T13 and T12 to be built within the larger Enerco development application. The ABP decision to refuse permission for the Ardrah site in July 2014 was based on the following reasons and considerations (first part in précis):

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

[NB. for 'Strategically Unsuitable Areas' post 2014, this area became designated as: 'Normally Discouraged' / 'High Value Landscape'. Its landscape character assessment remained unchanged: 'Very High Value, Very High Sensitivity, National Importance.]

2. *The proposed development, which would by itself be visible over a wide area, would in conjunction with permitted and proposed development in the area, give rise to an undue concentration of wind energy development with significant negative impacts on the character and visual amenities of the area, and in particular the Mealagh Valley, and it's amenity, tourism and recreational potential. The proposed development would, therefore, seriously injure the visual amenities of the area and be contrary to the proper planning and sustainable development of the area.'*[18]

Alongside these planning decisions, it is important to consider the accompanying reports (precised in Appendix B) from the An Bord Pleanála Inspectorate, as well as those of County Cork Planning. The Inspector's reports, especially, have been written with great insight, based on their extensive experience and abilities in assessing large scale wind farm developments. The Inspectors' judgements are often based on their actual visits to the sites, rather than desktop studies, when they visually assess how a proposed wind farm might appear, especially if it is in a highly sensitive landscape of high/very high value, such as the Mealagh Valley and its wider area. Inspectors have sometimes returned to the Mealagh Valley more than once to assess appeals from developers, and a true consistency runs through these comprehensive reports regarding the significant visual impact a large industrialised wind-energy complex would have on the Mealagh Valley, as well as the coastlines and peninsulas, Bantry Bay and the Wild Atlantic Way.[19] With the Ardrah application, Mr McGrath notes in his first report of 2012 that

[18] Decision 08/07/2014, held on An Bord Pleanala web site. Ref PL 88.240461.

[19] A precis of his reports and others are provided in Appendix B's twenty pages, and I would ask for them to read at length as they are a real treasure trove of information.

- *'The selection of the site appears... based on its availability rather than its suitability over other locations'*, [adding] *'the lands immediately adjoining the site to the north, west and southwest are [all] identified as Strategically Unsuitable for wind energy development'.*

- [The site is] *'on an east-west trending ridge. The valley comprises a distinct unit, enclosed by hills on three sides... In contrast to other existing and proposed wind energy developments in the area, notwithstanding its lower elevation, the subject development would be visible over a wider area, while also having local visual dominance. This is reflective of the zoning of immediately adjacent lands as unsuitable... The primary visual impacts arise on views from the west and south. In particular, view from the public roads along the southern side of the Mealagh Valley would be dominated by the development. As one travels east form Drumbrow Lough along this road toward Barnagowlane, turbines would assume greater skyline prominence. Views from this road are located largely with an area identified.. as Unsuitable for Wind Energy Development.*

The ABP Inspector immediately recognised that most of the Mealagh Valley is an area designated as being strategically unsuitable for wind farms - and of course this simply becomes, post 2014, Objective ET 13-8: 'Normally Discouraged' still with its character assessment of LCT4: Very High Value, Very High Sensitivity and of National Importance. One can sense how uncomfortable it is for the Inspector that the proposed Ardrah site is immediately adjacent to LCT4, and this translates into one of the main reasons for refusal.

Further, it is worth considering the same Inspector's judgement on the Mealagh Valley's residential amenity, which is somewhat contrast to the present MKO consultants who seem to argue that the valley is sparsely populated or there are a sparse number of houses. Mr Conor states are a considerable number of houses within the Mealagh valley, particularly at its western end, and of course more have been built since 2014. He acknowledges which houses would be significantly impacted, such as those facing towards the appeal site, and assesses that the development would be an unduly dominant feature, with the suggested mitigation measures being inappropriate. There are many other aspects within his report that I will return to in later sections, but suffice to say his conclusion states:

> *'I consider that there are fundamental issues in the consideration of this proposal, relating particularly to the and visual impacts of the development. The Mealagh Valley comprises a distinct element, recognised in the county character assessment as being of high sensitivity.'*

This 2012 report and its supplement of 2013 concurs with earlier Inspectors' reports, such as the one from Mr Kelly in 2000 when assessing the proposed wind farm for Coomleigh East, part of the Maughanaclea Hills. The report brings in different visual elements such as the over-bright red navigation lights which would have a significant impact at night time within the valley below, and dismisses any idea that its visual impacts are akin to afforestation, stating this is natural growth in a static landscape where turbines represent 'man made' industrial type structures with vertical moving elements. There is also a crossover to noise impact, not even necessarily for the nearest house, but that noise can travel extensively within the valley. However, more than anything else,

certain phrases constantly appear such as *adverse visual impact, visual obtrusiveness, and exposed upland site of high scenic amenity*. These phrases repeat themselves in other Planning and Inspectors' reports regarding the Mealagh Valley and I would ask that they are read at length to gage their consistencies regarding the reasons why permissions have been refused on the grounds of adverse visual impacts on the valley's landscape. They set very strong precedents against which the present EIAR and application can be fairly judged.

Adhering to objectives in the County's development plans, wind farm applications have been refused in order to protect the visual endowment of the Mealagh Valley and to curtail any impact on the 'receiving' landscape. Inspector's reports and planning decisions of An Bord Pleanala and Cork County Council have, to date, been consistent in their protection of its higher slopes, which define the valley's nature and character. It is very apparent that over a span of fifty years, the two planning authorities have kept its higher slopes free of development by limiting the aims of builders and applicants to creep up these slopes for even more distant and dramatic views or outlooks. Ridge heights and external finishes of residential and farm buildings are all quite fiercely controlled to blend with the landscape and to be in balance with the surrounding properties which may be up to 150 years old.[20] The north side of Mealagh Valley, the Maughanaclea Hills and down to Kealkill has a further designation called '*Tourism and Rural Diversification Area*', which imposes further planning restrictions and conditions. As of today, there are <u>no</u> wind turbines on the ridges of the Mealagh Valley: any introduction of them would be a novel or dramatic change to the existing baseline conditions, and would significantly redefine its landscape character. The efforts to preserve this for future generations will of course need to continue to protect the Valley. The need for the 'urgent' governmental offerings to the EU for renewable energy can be addressed by considering <u>appropriate</u> locations to be found possibly in the County's lower 'Acceptable in Principle' areas, and other counties highlighted in the new national mapping for wind farms.

4. THE MEALAGH VALLEY: VISUAL EFFECTS AND IMPACTS.

> *CCDP 2022: (GI) 14.9. <u>Views and Prospects</u>: the County contains many vantage points from which views and prospects of great natural beauty may be obtained over both seascape and rural . This scenery and landscape are of enormous amenity value to residents and tourists and constitutes a valuable economic asset. The <u>protection</u> of this asset is therefore of primary importance in developing the potential of the County…*

The 2006 and then the draft 2019 Wind Energy guidelines state that Landscape and Visual Impact is considered by assessing the size, scale and layout, and the degree to which the wind energy project is visible over certain areas and in certain views. Just to remind ourselves, the size and scale of turbines, summarised from 2006 guidelines, are as follows:

[20] because being a Tourism and Rural diversification area, the Mealagh Valley only has 22 Vacant and 9 holiday homes out of 260 houses identified in the Valley survey.

The Tower may vary in height from 35 metres upwards, the rotor diameter is from 35 metres upwards, and turbines concrete bases are between 7 and 18 metres square.

Compare this with the turbines currently proposed for the Valley, which are way beyond these measurements. Each 'Maughanaclea' turbine would have a tower of 102.5metres high, and three rotor blades with a diameter of 133metres. Even the concrete bases, without its supporting slopes, would have be 25metres in diameter to support such structures. The Landscape and Visual Impact is far greater than ever anticipated in either guidelines: not only because of the increasing height of the towers, but the three absolutely enormous blades being attached and sweeping over four acres of land below. It is worth saying that the agents' assessment on this, and the degree to which their visual impact is not 'high' but only 'moderate' is neither here or there, given the agents' views are based on biased subjectivity, a very generic visual impact model, and are guilty of a 'shifting baseline syndrome'.[21] The negative effects on the receiving environment are immediately apparent, providing substance to the valid belief that the proposed 'southern sites' within the Mealagh Valley are totally unsuitable for wind turbines.

With the agents/developer placing their layout of turbines along northern ridges in this eastern part of the valley, then as one enters massive turbines would be visible for at least 9/10ths of their height. There is insufficient/no screening that would hide these eight turbines. People drive to the townlands of Ardrah, Gortnacowly and the Coomleas by the only road running along the North of the valley, or by joining it from the Kealkill turnoff. Viewed from these roads' highly sensitive key viewpoints, three(3) turbines would be seen in a shallow triangular formation, usurped by a 'one behind the other' set of five(5) turbines behind. This would certainly result in confused sense of visual stacking: the spatial extent of a wind energy development is then out of balance and totally out of scale with its context. This cannot of course be verified by a montage because none have been created for the northern roads which brings one into this area of the valley before Ardrah and Maughanaclea.[22]

A further almost insurmountable difficulty for the agent is the 'High Value Landscape' boundary which wraps itself around the very curve of the proposed site, at some places this is as close as 250 and 400 metres.[23] Being so adjacent, the effects on this 'High Value Landscape' would be direct, have a material detrimental effect on its visual amenity, and so the change is deemed as having at least 'high' if not 'very high significance'. This 'High Value' Landscape is considered in the County Cork Development Plan 'to be our most valuable scenic landscapes', and this application fails the test as it obviously 'unduly obtrusive'.

---

[21] Using same criteria as set out in ABP-313261-22 ABPInspectors Report: Sue Lynch 25/10/2022, for Carrigdangan extension.

[22] The description of visual stacking comes from the 2006 guidelines. There are montages from the original Ardrah application for five turbines at 99m which gives an indication of this.

[23] p.13.31 Section 13.4.3 The closest High Value Landscape (LCT 4 – Rugged Ridge Peninsula) is located 250m north-west from the nearest proposed turbine (T14). In other MKO chapters the is other area which is stated as being 400 meters from the (HVL) boundary.

4. THE MEALAGH VALLEY: DESIGNATIONS USED FOR PLANNING DECISIONS.

The current Cork County Development Plan notes that the surrounding local area is 'High Value Landscape' and designated as LCT4. It has a Character of Very High Value, Very High Sensitivity and of National Importance. High Value Landscape and LCT4 encompasses most of the Mealagh Valley. It is essential to note at this point that there is no physical demarkation or boundary within Mealagh Valley that separates 'LCT4' from its eastern end of 'LCT15a' which is Ridged and Peaked Upland and assessed as High Landscape Value and High Landscape Sensitivity[24] It is also necessary to note that nothing can be found in CCDPs preparatory work to explain why the whole of the Mealagh Valley is not in LCT4, especially as in 2007 the assessment was a geological assessment first and foremost. There was either a 'physical' measurement from the seashore as to what was counted as Coastal-landscapes - a rather blunt indicator- or as it appears here, that 'Bantry Bay's Drumlins' were incorrectly separated, on paper, away from the Three Valleys' numerous eastern hills. It is worth noting that the Drumlins in the Mealagh valley occur all the way up into the townland of Gortnacowly[25] and the Mealagh's eastern hills once contained the glacial ice sheet that created very same Drumlins, so it is all one geological entity.[26] It can be easily seen that with Cork County Council's later repurposing this 2007 character assessment for use in wind energy mapping, unnecessary anomalies and problems have occurred, which need to be sorted out for the next development plan due in 2028.

For the duration of at least two development plans, the Landscape Character Assessment designations have held good, having been originally based on local field survey data. Even with evolutions within various national documents, the CCDP assessments have been deemed as perfectly valid. Further, on the ground, those visiting and living in the valley assess with perfect reasoning what is in front of them: the whole valley is High Value Landscape, and its Eastern Hills are considered by locals, visitors and tourists alike as a high point when driving through the Mealagh Valley, which they do without noticing an imaginary line drawn across dividing it into two somewhere.

4. THE MEALAGH VALLEY: Introduction to the Valley itself: its geology, its climate and its people.

With MKO's constant designation of a 'southern site', and little referencing to the special unique nature of the Mealagh Valley, this section is absolutely vital to bring the Valley out of the MKO's shadows and to the fore, exploring not only its unique geological history, its climate and its landscape and beauty, but also its people and community.

---

[24] p.514 CCDP 2022-2028 15a Ridged and Peaked Uplands : established as this in the 2006 survey assessment.

[25] See Map in Appendix F

[26] Please also see the introduction to the Mealagh Valley and Appendices for map.

The Mealagh Valley is located just North East of the town of Bantry. There are around 260 houses, as well as thriving local farms and businesses. People, both from the Valley and Bantry town, see it as 'hidden gem', a quiet, almost silent, peaceful place to live and to work: a place not only to enjoy nature but to be a living part of it. The Mealagh Valley is well loved by many who wish to escape busy lives to enjoy its tourism facilities, and also simply to walk, cycle, ride, do road-bowling, or swim in a natural pool hidden in the woods and enjoy our flourishing wild-life, flora and fauna.

The Valley is approximately 15 kilometres long and follows the course of its Mealagh River. At the eastern end, Nowen Hill (535m) closes in the head of the valley. Looking from this, on South side are the Derreenacrinnig hills (402m & 509m). West of these hills is formidable Mullaghmesha at a height of 494 metres ASL. On the North side leading away from Nowen Hill are the Maughanaclea Hills (452 to 470 m). The effect of all these high hills is to surround this part of the valley, invoking a feeling that one has journeyed through the valley from Bantry, along its lower slopes, to reach what is quite the most beautiful and unexpected landscape.

We have already touched on the geological studies that explain why this most unexpected landscape exists. This part of the Mealagh valley once contained a Pleistocene-Holocen lake and has important geological features as part of the 'Bantry Valley' area. Here, glacial lakes had become established, perhaps 13,000-11,000 years ago, as a thick ice-mass melted during the last interstadial warm phase. Studies suggest that three(3) distinct and unique lakes formed, which for clarification are named Lake Bantry, Lake Ownbeg and Lake Maolagh (Mealagh) in the studies. The level of Lake Maolagh was at one time 340metres deep, draining through the Barrboy Pass at the head of the valley, and also Derreencrinnig Pass. Then as levels dropped, and deposits grew, a southwesterly flowing river system formed which also allowed erosive transgression from the sea shearing off deposited sediments.[27]

[27] Precis. Full Article is in Appendix F. Pleistocene-Holocene Lakes in the Bantry Valley, County Cork. Ivor A.J. MacCarthy. University College Cork.

Towards Bantry the hills are less pronounced, being formed from the deposited sediments, the features are Drumlins having been deposited at the base of the ice sheet moving southwestwards into Bantry Bay towards the end of the last Ice Age. The Northern side of the valley has some differences, such as the Maughanaclea hills, which are iluvioglaicila outwash deposits. However, the prominent Eastern Hills we see today, though rounded in shape due to extensive erosion during the successive glaciation periods, still echo the shape of the Pleistocene-Holocen lake that once was here.

It is relatively easy to assess that our impressive Eastern Hills would be visually compromised by having non-static structures, such as industrial turbines, on their ridges. The enjoyment of them would be impaired significantly not only for the people that live here but also visitors that come to enjoy the landscape and follow the many recognised walks into and across the valley below. The first walk, linking to the popular Wild Atlantic Way, starts at Drimoleague near Castle Donovan, and takes walkers across the very top of Mullaghmesha and through the river valley, across to Maughanaclea and onto Kealkill before returning to Bantry. The Mealagh Valley itself is designated as part of the Sheeps Head Way East, and there is also a shorter walk called the Mealagh Valley Loop. These two walks incorporate St Finbar's Pilgrim's Walk which from Kealkill eventually arrives at the famous Pilgrim's chapel at Gougane Barra. These beautiful walks are the result of the sheer monumental efforts of our local people in gaining landowners' permissions, preparing routes, and maintain signposting, to cater for a increasing number of visitors and tourists who bring much needed economic benefits to West Cork. It is vital to preserve the character of these walks and views obtainable from these scenic routes, and especially to protect the peacefulness, character and quality of particular stretches that have very special views and prospects. Many who live in the Mealagh have also completed these walks and know first hand that it is the openness and tranquility that strikes one. As with many tourist and visitors, getting away from the modern stresses for a short time is essential, and the worst would be directly confronted by the view of industrial wind turbines when arriving home.

The unique geological formation of the Eastern part of the Mealagh Valley creates an extremely quiet, tranquil place to live. It's so quiet that after a heavy rain fall it is possible to hear the Mealagh and Little Mealagh rivers flowing fast some 2-3km in the lowest parts of the valley. In addition, one can hear burbling echoes from numerous streams around each of our houses, cut long ago by farmers to prevent pastures flooding, (as a by the by, these are totally unmapped by the agents). Other sounds such as farm tractors cutting silage, or farmers putting in new fence posts, can clearly be heard resonating across the valley from one side to another, due to its natural geological features. Tourists, Visitors and Bantry people always comment on the peacefulness of the Valley even before its natural beauty.

Having said this the Mealagh valley's distinct micro-climate makes some days very interesting! There is sometimes snow, and certainly the rainfall is higher than in Bantry, with recorded flooding

of the Valley in recent times from not one but three '*once in a 100 year rainfall events*'. Only a few years ago the Mealagh River burst its banks, shattering its holding walls, and using the northern road as its new course for more than two days. Some winter mornings, we wake in Gortnacowly and Maughanaclea to find our houses completely cloaked in thick low-lying cloud, which can grow quickly into storm clouds. Storms in this eastern end of the valley are much more intense given the 'funnel' effect of its turbulent winds, and there are differing weather patterns even within. (Extensive wind calculations are not provided in the application, but if ever erected these turbines will be constantly trying to switch themselves on and off, and not know which way to turn. Turbines are also found to be responsible for increasing the low-lying cloud base.)

There is a strong community within the Mealagh valley. A recent survey of everyone, including children, was carried out by the Mealagh Valley Community Centre Ltd, all funded and in partnership with SICAP and West Cork Development Partnership: published in the summer of 2024, a copy was provided for every household. *(A Copy of the Valley Survey Report is attached to this submission).* There were 241 adult responses and 39 child responses. When asked about their favourite places in the Mealagh Valley: there were 465 replies including:

Nowen Hill , Standing Stones, The views of the Hills, Swimming Spots, Mullaghamesha, Quentin's Woods : ie. the Mealagh woods, and its river walk.

The Survey showed the woods and river are the favourite locations amongst the children in our community, along with the Loop walks, Hill walks and Road walking, swimming (the woods has natural pool, Ardrah has two hidden loughs), stone circles, flat rock and Castle Donovan Hill. They really feel at one with the natural valley as it is now and enjoy its stunning natural environment. It is so encouraging that our teenagers like to come away from AI, social media and smart phones to enjoy the open fresh air, and often swim in the created pool. The water is clear, pure and importantly not tainted by runoffs or pollution.

The Survey shows clearly that residents in the Mealagh Valley valued the quiet, peace, and tranquil nature of the whole valley. Further insights and comments include:

> *'Our communal appreciation of the environment we are living in is clear'.*
> *'the stunning natural environment we share is clearly appreciated by the young people'.*
>
> *"the peace and quiet, access to nature, the space, the valley is a hidden gem"*
> *"the peace and quiet"*
> *"Living in a beautiful place"*
> *"The sense of love for the valley"*
> *"The peace and quiet and feeling safe"*
> *"Its a beautiful place to live-full of beauty and walks, loving community"*
> *"The natural environment and wild life"*
> *"Lovely wild life and we are happy here"*

"The Mealagh Valley is the most beautiful and peaceful place to have a home with gorgeous trees and shrubs and many wild birds and the butterflies and bees slowly coming back. Fuchsia growing along the sides of the roads gives the valley a special character. Let's keep it that way".

The views expressed are actually strongly echoed in the National Landscape Strategy for Ireland 2015-2025 vision statement:

> *Our landscape reflects and embodies our cultural values and our shared natural heritage and contributes the well being of our society's environment and economy. We have an obligation to ourselves and to future generations to promote its sustainable protection, management and planning.* [28]

The 2024 Valley Survey also asked about people's main concerns for the community and the valley, and environmental issues came a very high third, along with loss of heritage. There is an active appreciation of all we have inherited from previous generations: the local hedge schools narrated in The 'Schools' Folklore Collection of the 1930/40s has created much interest, and David Myles' book: An Archaeological Survey of the Mealagh Valley was reprinted as a second edition in 2024, due to popular demand. Since 2025, the whole community has been involved in a funded Heritage project, filming and recording our older people's remembrances of life in this unique valley - its joys and its hardships. Proudly, its first results are now on YouTube and called 'Voices of the Valley: The Mealagh Valley Oral History Project'. The community also came together to take direct action in maintaining places like Quinten's (Mealagh Loop) Woods - which is actually privately owned by a kind farmer. The Woods have suffered, like many areas in Ireland, from Ash dieback and so the community cut certain trees down last autumn for firewood so the affected part of the woods can be replanted, and grow anew.

If wind farms are referred to at all in the Community Survey- and note this was pre-Enerco and pre the Quille visitation- it was always in the negative:

> *[What are your main 3 concerns for the community we live in?]*
> *More renewable energy working around the valley.*
> *Sustainable energy sources.* *Wind turbines being built.*
> *The possibility of wind-farms.* *Building of wind turbines/farms.*
> *Having valley overlooked by windmills.* *Wind development.*
> *Potential for more sitka forests and any wind-farm proposals.*
>
> *Loss of rural setting.*
> *Climate change: wind farms being built purely to fill peoples pockets. Our response to climate change requires proper joined-up thinking.*
> *Climate Change: much heavier rain washing away the roads.*
> *Erosion and impact of severe weather on roads, ditches and land.*
> *The amount of surface water on our roads.*

[28] p.8. National Landscape Strategy for Ireland 2015-2025, Dept of Arts, Heritage, and the Gaeltacht.

Given the positive views people have of the Valley, it is of little surprise that many responded to a snap Community Survey, after receiving the Quille visitation to extol the virtues of his wind farm, and the prospect of an open evening in Bantry. The survey included those people also directly affected on the other side of the Maughanaclea hills going down to Kealkill, Within days, 42.6%- 118 - of households returned the survey forms to the community hall. The forms firmly expressed their serious concerns, with only four in favour. On a score of 1-5, every single category scored above 4, with visual impacts, loss of night skies, noise and disruption, and environmental issues at the top of the list, and other significant concerns included health conditions and shadow flicker. These concerns have not abated, and the stress that has suddenly been brought to this valley is palpable. It would useful to end this section with a resident's quote from the survey:

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

4. THE MEALAGH VALLEY: Proposed Turbines for Ardrah in the Mealagh Valley (adjacent to HVL).

So now armed with the previous planning history, clarification of planning designations, and a fair knowledge of the valley, the present application may be robustly assessed. First to be considered are the three turbines: (T14, T13,T12) which are proposed for the older Ardrah site. The turbines may not be sited in quite the same places as before, due to their increased height and huge blades; however, they are in the self-same location which was turned down by An Bord Pleanála following the specialist noise report, and reports from the Inspectorate. The EIAR from the original Ardrah application, states that within the Ardrah site that there are acid oligotrophic lakes (Carrignaneane and Nabirree) which are of national importance, Transition mire and quaking bog of regional importance, and Upland blanket bog/ Wet Heath of high local importance.[29] It would be now for ACP's Inspectorate to check that these areas have been similarly assessed by MKO? Certainly, the proposed standing for T14 is in a particularly beautiful blanket bog and wetland area, and the present EIAR states how it is feasible to drain this so that a road-way may be formed across to reach the turbine, which sounds somewhat disturbing. The loss of biodiversity and the effect on birds in this beautiful area will be covered in a later section, though just to mention here looking at the data for Kestrels and Choughs alone and one can see that MKO has an near insurmountable problem.[30]

The Ardrah site sits within a huge area now called 'Open to Consideration', so large that one could journey on it all the way back to Youghal! However, this proposed site literally sits on the

[29] p.55 Atkins ABP Submission, Table 4.4. Evaluation of habitats within the proposed Ardrah wind farm site.

[30] See Appendix for the maps that MKO has provided for the recorded Kestrel Flight patterns. The green of the landscape disappears into the pink of all the flight patterns there are so many!

edge of its western boundary. Turbine T14 is only 250 and 400 metres away, with its proposed shadow blades over-rotating into the adjacent 'Normally Discouraged for wind farms' area. This is so close that if houses were located at either of these two distances, it would mandatory to have Turbine T14 excluded from the proposal. The complexity goes further, in that there are many affected properties within the 1-2km zone of significant visual impact, which are within the 'Normally Discouraged' area, as well as LCT4 and High Landscape Value (HLV). They are listed here by the numbers which MKO has arbitrarily given them: H053, H054, (2 on the edge of 1km) H078, H083, H085, H086, H088, H101, H106, H115, H118, H123, H129, H137, H147, H148, H153, H154, H169, H183, H190.

To put a little further detail on this: all the above properties are actually situated in the LCT4 area of Very High Landscape, Very High Sensitivity, National Importance. Further, their large lands surrounding the houses are also in the 'Normally Discouraged' area for a wind energy complex, which can only be built in exceptional circumstances where <u>it is clear that adverse impacts do not arise</u> with proposals to be considered. So the house/land owners, themselves, could not offer their lands to be used for wind turbines, but they could be disturbed by them right next to their houses? In addition, with boundary location margins this small, a slight realignment of the standings, even if it is practical reasons, could fail the up and coming guidelines on visual impact and noise guidelines, with huge reprisals for their developer.

However, Ardrah is not all designations and invisible boundaries, and one must come back to practical realities for people who live here.

Just for a moment, consider the predicament of a elderly farmer living his whole life on the family farm of 58hectares, of which his house and 15ha. is near lands to be utilised for this wind farm. He and his wife were so worried about the original Ardrah application that he puts pen to paper and wrote objections to the planners, saying how much he loved his quiet outdoor life. Now very elderly and in very poor health he seems have had the Quille's visit, and has been red-spotted on maps as a 'participating landowner' (Though MKO has provided no paperwork to say what this means). For whatever small recompense the Quille has offered, this elderly farmer and his wife will have no recourse or protection from excess construction noise or turbine noise and shadow flicker, as any complaint process will not apply to them. Further, when this poor man and his wife steps outside they could be faced with three and more massive turbines on their doorstep. Is this the way to end a good life lived in the valley?

4. The MEALAGH VALLEY: Proposed turbines for Maughanaclea Hills within the Mealagh Valley. (Noise and Water)

One of MKO's maps shows vegetative screening along the northern road, purporting to hide up the impact of the turbines. However, it needs to be noted that the 'drawn in' Sitka plantations are due to disappear long before any turbines could be erected. Harvesting the conifers in the lower

forest is nearly upon us, and tracks are presently being rebuilt to access the forest running parallel to the Valley road. Turbines T11, T10,T9,T8,T7 will all be exposed on the ridgelines, with very little screening left to hide them further down the slopes. Of course, this may actually be the least of our worries in the townlands of Maughanaclea, Gortnacowly, and Coomleigh East.

1) GROUND WATER VULNERABILITY. An insurmountable problem awaits us all, and it has been glossed over in the EIAR as not being worth any separate consideration for this part of the site. This is ground water vulnerability, as shown on IE GSI. The GSI site explains:

> *'Groundwater is the water that soaks into the ground from rain and can be stored beneath the ground. Groundwater is used to supply drinking water and needs to be protected. It is mainly protected by lakes for subsoil, sands or peats. The vulnerability map classifies how vulnerable groundwater is to pollution across Ireland, based on its level of protection, Knowing this helps people to plan and to carry out activities on the land in a way that keeps our groundwater safe to drink.*
>
> *The vulnerability category [[indicating] where groundwater is easily polluted] given to a site or an area is based on how easy it is for water which may contain pollutants to reach the groundwater.... Landforms found in the Irish like sinkholes and sinking streams ['Karst' landforms] are categorised as extremely vulnerable as water can pass straight through '* [31]

On the GSI/EPA map,[32] areas shown in dark pink indicate those which have the most extreme vulnerability to pollution as there is 'Rock at or near the Surface or Karst'. From first hand, it can be seen that many houses in our townlands are built directly on Rock with a thin layer of peat covering. The lighter pink is Category One, ie. areas which have an <u>extreme</u> vulnerability to pollution. What effects may explosions and the shattering of the Rock have on our ground water, or the pouring of concrete saturated with chemical additives? This is without considering the proposed borrow pits high on the hills which could be akin to sinkholes, and is readily acknowledged as being a feasible risk.[33] This information must be set against CCDP 2022 Groundwater policy where it is noted that the *'quality of groundwater is threatened by worsening pollution levels, directly attributable to human activities'* and would surely also be covered by EU Dir. 2024/1203. Following the precautionary principle, Cork CC has to ensure that an input of pollutants into groundwater is prevented, adding a severe caution that once contaminated,

[31] Taken from IE GSI Groundwater Vulnerability 40k Ireland (ROI) ITM View -created 31/05/2022 and map updated 14/08/2025.

[32] Please see the map in Appendix F, a screen shot from the website. All in Appendix F are photos from Enerco's Carrigdangan extension site - which is currently 'under construction' by contractors with little supervision so it seems?

[33] p.32 Non-Technical Summary. The primary risk to groundwater at the site would be from hydrocarbon spillage and leakages at the borrow pits. It is stated in 9-3: *Hydrocarbon has a high toxicity to humans, and all flora and fauna, including fish, and is persistent in the environment.*
NB. Mitigation measures appear minimal, given its high toxicity, and our need for private wells. The quotes in blue also come form this page.

'groundwater is difficult and expensive to clean'. [34]

In continuing with CCC's precautionary principles, it is now within An Coimisiún Pleanála's remit to consider whether this SID planning application and EIAR, has shown due diligence in preventing any deterioration in the groundwater's status. The agents believe they have covered private wells by saying *'the bedrock underlying the Site is classified as poorly productive in terms of well water yields'*, and there *'will be no impact on private wells'*. They have based everything purely on assumption, without any investigation or evidence.[35] Their Chapter 9 reads:

> *'The biggest risk to down-gradient wells will be from where deeper excavations are required such turbine bases and borrow pits... in order to be conservative and following a worse-case assumption, we have assumed that all dwellings have a private groundwater well.*
>
> [It ends by] *significant effects on wells are unlikely. Pre-Mitigation Potential effect: Negative, imperceptible, indirect, short-term, unlikely effect on local wells. In the absence of mitigation measures there will be no significant effects on local groundwater well supplies.*[36]

Working through the above quotes: First, which authority has suddenly classified this bedrock as poor? Certainly, there are ample supplies of water seeping through the bedrock for the houses here served by private wells. Second, not all our wells are deep-drilled to be fed from the water table, which is created by ground water. Some people have a deep well for the house and a gravity-fed well for the land. Other houses only have these 'surface' wells which are fed directly from the Maughanaclea hills, and its small flowing streams. None are, or have to be, registered. Third, to state 'unlikely' is no way good enough. Potential contamination of our supplies of uncontaminated spring-like water, whether by industrial contaminates or rock-dust, is a significant effect, as it would leave everyone without water per se, given there is no alternative mains supply. The consultants are skirting over an exceptional problem which they already know is insurmountable and insolvable, and is sufficient reason alone for ACP to refuse permission for this proposal.

2) PROTECTING SKYLINES AND RIDGELINES.

- One needs to turn to the protection offered by the CCDP 2022-2028: to an Objective written in a few short words with no exceptions or caveats: GI 14-9: *d) Protect Skylines and Ridgelines from Development.* MKO's proposals fails this Objective significantly, in writing a proposal that leaves the Mealagh Valley's skylines and ridgelines unprotected and seriously affected by Turbines T11, T10, T09, T08. [37]

---

[34] See Appendix CCDP 2022-2028 Water policies.

[35] Have self-assessed and completed their Water Farmework Directive (WFD) Compliance assessment and unsurprisingly all is 100% ok.

[36] p.9-67 Chapter 9 MKO Hydrology and Hydrogeology.

[37] - it shown by the montage that only T07 is remotely away from the ridgelines. Refer Out to MAP Figure 13-21 for visibility.

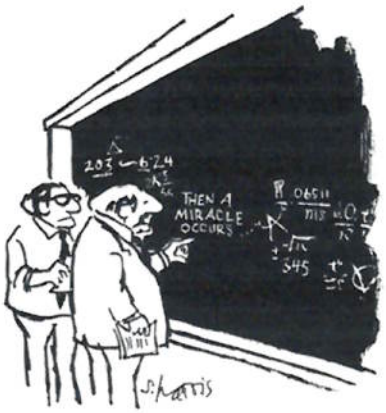
The agents do not deny this eastern part of the Mealagh Valley is one of Ridged and Peaked Upland: they state the:

> *'proposed turbines are located the ridgelines of an upland moorland landscape interspersed with patches of heath, agricultural pastures, and commercial forestry'.*[38]

However, they then set up their own criteria[39] and have modelled this within tables to provide an opinion that,

> *'the susceptibility of the Proposed Wind Farm site to the proposed change is considered 'Medium.' On balance, the landscape sensitivity of the Proposed Wind Farm site is deemed 'Medium.'*[40]

Note the agent's wording: 'considered' and 'deemed', which shows the modelling is not of sufficient gravitas to provide proof, and, of course this opinion has no legal standing. The County Cork Development Plan, which does has legal standing in these matters, confirmed just four short years ago that the Maughanaclea Hills have a LCT of High Landscape Value, and High Landscape Sensitivity. In readopting the 2007LCA, the Plan identified this landscape as being vulnerable and only capable of accommodating limited development pressure, beyond which its character will be fundamentally altered or changed. Further, the current Variation1 of the CCDP is shortly to be adopted and this too confirms that the County's Landscape Character Assessment should remain unaltered. For the agents to deny these designations for the ridgelines of the Mealagh Valley falls into all sorts of traps and arguments as to how other CCDP objectives for biodiversity, residential amenity, archaeological heritage, tourism, may then be met. They are also at a loss to state how would they prevent failing the Objectives, written to protect West Cork's ridgelines and skylines and other scenic qualities inherent in its landscape.



"I THINK YOU SHOULD BE MORE EXPLICIT HERE IN STEP TWO."

•Likewise, there is little stated as to how the agents would prevent turbine noise in this particularly quiet environment, in a real and practical sense. This is apart from them having a complaint procedure! It is not sufficient or any way acceptable for the agents just to say that AM noise cannot be predicted in the planning stage.[41] Having worked in project management within a multi-national, it is obvious that MKO/Enerco cannot leave things to chance, for what is a

[38] p. 13. nd Farm site

[39] p.13-30. They are following guidance as old as 2013. They state they use three 'authorities'. The first is a manual from the UK: GLVIA3: Guidelines for Landscape and Visual Impact Assessment - 3rd Edition 2013, MKO refers to p.80 and states this as being current 'best practice'. The 2021Survey of the GLVIA3 found that only 26% agreed that it was still fit for purpose and a useful framework for undertaking LVIA, and 27% stated it needed a rewrite, (which is still going on). Also, this modelling does not specify it is for proposed windfarms being only guidance for identifying the effects of developments of all types on views and on the landscape itself. The second and third authorities are paid-for membership bodies for the career orientated: LI (Landscape Institute) & IEMA (Institute of Environmental Management and Assessment, now the ISEP).

[40] p.13-32. 13.4.3. Sensitivity of the Proposed Wind Farm site: Landscape Value & Susceptibility to Change. One can refer to other old guidance - WEDGE 2006- which states the assessment of landscape sensitivity is to on based on *common sense, observation and professional knowledge* (no modelling necessary).

[41] p.12-16 MKO EIAR Chapter 12 Noise. 'It is not possible to predict an occurrence of AM at the planning stage.'

commercial project. The mantra must be 'prevention is better than failure' - as failure is especially expensive, whether it is the time and money spent in the High Courts, or the expense of trying to fix and manage problems. Switching off turbines, whether part of the day or entirely, is extremely costly for the developer/operator, or for Ireland if they reclaim under curtailment, and it hardly adds to meeting the EU's or our country's climate objectives.

From previous complaints, post 2015 research, specialist reports and submissions to ABP/ACP, MKO/Enerco has free access to sufficient data to identify potential locations where receptors/ households could be vulnerable to noise nuisances, including AM and Infrasound. There is also nothing finer than the judgements recently handed down from the High Courts[42] which clearly lays out physical relationships between houses affected and the locations of offending turbines. Where we and our neighbours live: Gortnacowly in the Mealagh Valley, Shehy Mountains area, seems to be the very sister of the valley described in the Rollo & Webster High Court Case:

> (504) (48)...*a quiet rural valley close to the Sliabh Bhui mountains in County Wexford.*
> *Ms Webster's evidence is that, absent of the Ballyduff turbines, ambient noise is generally characterised by the sound of nature. The rear elevations of HH and NF are shelters from the prevailing SW winds by a high hill on which the turbines are placed...(50) [they thought] that because of their location in a sheltered valley HH would be shielded from impact. It was the opposite..... (51) the wind turbine noise is annoying and ever changing: varying with the wind speed: the faster the rotors turn, the worse the noise... the time of day and the weather impacts on the intensity of the wind turbine noise.*

To be clear, the offending Ballyduff turbine is over a 1Km away and up on a hill, with a higher elevation than Ms Webster's house i.e. the plaintiff's house is in a south westerly direction from the turbine. The turbine is much shorter than the ones envisaged for our Valley, and this noise nuisance of thumping and whooomphing was from only the One. In contrast, MKO/Enerco wishes to plant no fewer than eight(8) turbines in the Mealagh Valley: all of which are on its high hills/ridges and above receptors to the North (and South), with strong winds blow in westerly from the Atlantic Ocean. These winds would carry the same noise nuisance with ease. Even if winds turn and blow in from the East, as they do occasionally, the effects will be similar, just from different turbines. Ourselves and our neighbours are therefore either south-east or south-west of tall turbines, just like Webster/Rollo's house in Co Wexford. This already proven vulnerability from the High Courts shows that T11, T10,T9,T8,T7, as well as those for Ardrah, would not be in appropriate or acceptable locations. An Coimisiún Pleanála, in following the precautionary principle, has firm grounds for refusing permission due to the turbines being a potential noise nuisance to the 'receptors' at a lower level on the Maughanaclea hills.

In closing this section on the Mealagh Valley, one has to note obliquely MKO and Enerco's total lack of concern for the valley, its environment and the people who live here. They deem to speak of an increase in local employment, whilst ignoring the irrevocable loss of a local economy located in the Mealagh valley townlands nearest to the turbines. The disruption of the construction period, and beyond, could kill this completely within the two years. Local enterprises run from

[42] Rollo & Webster (and others) v Meenacloghspar (Wind) Ltd. Byne & Moorhead v ABO Energy Ireland Ltd & Waxwing Ltd.

homes with the emphasis on peacefulness in the valley to clientele, their endeavours range from mediation to yoga and to breathwork, and from Hawaiian treatments to physiotherapy. Furthermore, the greatest loss may yet be our two thriving hospitality establishments, that have had to meet very strict planning criteria to even be in business.

There is no clearer evidence of the agents' lack of concern than their proposed site-layout for the necessary detritus that appears alongside their beloved turbines. They intend to have huge cranes which will dominate our skylines, and even the temporary compound appears on a ridge in order to be clearly seen. Their associated background noise, along with sudden disruptive hostile sounds, will bounce and echo across (possibly to Derreenacrinnig's nightmare, and) around our hills from dawn until dusk and beyond. Both sets of consultants deem this type of noise to be transient and of a slight to moderate inconvenience. Residents had enough noise with Enerco's first metrological mast, and the sounds were the first its neighbours knew of being erected. Oddly, this mast was erected for around fifteen months, one would expect to see its full wind-speed results included in the EIAR, but only a limited time graph appears in the Noise section? Curiously, a metrological mast now appears in the plans as being high on the Maughanaclea hills between turbines T10 and T9 without any explanation as to why its location was 'moved' from its lower Ardrah site.

As well as their hospitality compound, Enerco intends to make a borrow pit impossibly high on the same ridges causing thunderous sounds to echo right across the valley, whether they use explosives or massive machines to drill the rock out. There is also no caution as to the effect of the valley's downpours and rainstorms, that could literally pour contaminating water into the deep borrow pits, and then down into the valley's water table, which they say is impossible to measure. In addition to this, there would be pollution from dust contaminating rainwater flowing into the Mealagh river and its many inflowing streams. As a last resort, ACP's Inspectorate may decide to ask Enerco to consider re-planning where all this detritus needs to go, but there is no practical solution that would suffice. Further, the underlying attitude towards the Mealagh Valley, its people and its environment will firmly remain and would likely materialise with some force if we ever have the misfortune of permission being granted.

5. EAST of KEALKILL: effects of turbines proposed for Maughanaclea Hills and Ardrah.

Outside of the Mealagh Valley, a smaller area to consider is the lands north of Maughanaclea 's actual ridgelines running down to Kealkill.

- First. There is a total lack of concern shown in placing a biodiversity enhancement area next to the proposed sub-station

once they have cut down the commercial conifers. This placement does not take into account that as a matter of routine the operators continually use strong chemicals to kill grasses and vegetation around a substation to eliminate any fire risks! [43]This compartmentalisation of nature into a few hectares of land is a commercial company's present answer to the powerful EU Habitat and Bird Directives, which isn't plausible in reality

- More serious, possibly, is an apparent loss of reason that seems to extend from the very core of the proposals. The expanded application of fourteen(14) turbines forces a number of rural households to live in the very centre of an industrialised complex. First, will be the disruption of borrow pits and pathways being hammered out in front and behind, and the constant sound of vehicles going past from the specialist ones bringing monster turbine parts, to Trucks one after another, carrying in 3,970 truckloads of sand, concrete etc and 595 Artic-lorryloads carrying paraphernalia.[44] These HGVs would all use minor forestry roads that join the R585/SR29 close to unfortunate households.

The consultants' bland judgement on this situation ignores the construction period and goes straight to the 'operational' period, saying:

> *In all instances, it does not seem that the proposed turbines are visible in all directions, but two separate directions and they are not perceived to fully surround receptors in these areas. Furthermore, as seen in the photomontages, visual effects from the furthest turbine cluster is always largely mitigated by distance.*[45]

To speak of a *'perception of not being fully surrounded'* [46]can only be a result of some faulty AI 's desktop dreaming. When it is all built, households in H011, H016, H036, H045, H048, H060, H077, H085, H111, H122, H119, H121, will face the prospect of being both within the 1km zone of the Maughanaclea site and within the 2Km zone of the Coomclogh site, this is 8 turbines behind and 6 in front. Higher on the Maughanaclea, noise-sensitive households fare little better, H031, H019, H013, H012 will have a towering semi-circle of shadow-flickering, noise-producing turbines 800m-1KM directly behind them and still be in plain sight of six in front and other wind farms beyond. It's hard to imagine what these landscapes may all look like at night with all the bright red illumination that is planned. These cumulative effects of erecting set after set of turbines has

---

[43] See Appendix F for larger photo for the Enerco Killaveenoge SubStation, screenshot taken from Enerco's website.

[44] Figures given in the Carbon Chapter for the three sites are as follows: transport is 1498 truckloads full of concrete, 306 truckloads full of sand, binding, stone and pile foundation, 5704 truckloads full of sand, 432 truckloads involved with tree felling. They is a total of 7,940 truckloads. This forestry road would be taking at least half of this: 3970 truckload passing these houses. In addition there will be a total 1190 large Articulated lorry journeys for delivery off plant ducting etc. The specialist delivery of the fourteen tubing parts and blades do not appear to have been included.

[45] p.13-27. Chapter 13. Landscape and Visual. Views of both turbine clusters in opposing directions. There appears to be no other assessment such as construction or operational noise etc.

[46] Please see Appendix F, This A3 map was produced by MKO for its 'public consultation' which has not been included in their EIAR or application. Is it because it clearly shows the impossible situation of being with 1Km of one set of turbines, and with 2Km of the other set?

not been near adequately assessed within the EIAR, as invariably MKO passes off its application as only being the one project or the one development.

The significant negative visual impacts of turbines in this local area have already been highlighted in a number of ABP Inspector's reports, such as that for Curraglass site which is in another highly sensitive upland:

> *'where wind turbines of the scale proposed would have a significant and adverse visual impact, including impacts extending beyond the immediate site boundary. [He concluded] the proximity of the High Value and High Sensitivity landscapes is a determining factor [and] turbines of this nature would dominate skyline views and materially alter the character of the wider landscape.'* [47]

An Coimisiún Pleanála Inspectors need to examine and assess carefully the nightmare scenario presented in the present proposals for people living too close to two and three sets of turbines. Further, there is the continuation of significant visual impacts on lands designated as of '*High Value Landscape (HVL)*' - between less than 1Km to 2km - which continues across the eastern side of Kealkill, and into Kealkill itself and beyond. Near Keakill there are more houses which are both within the 1-2km zone of significant visual impact, <u>and</u> firmly situated within the *High Value Landscape* (HVL) Area. The houses are listed here by their 'numbers': H017, H011, (2 under 1Km) H052 (1 on the edge of 1km), H070, H073, H091, H092, H094, H096, H097, H098, H099, H100, H102, H103, H110, H117, H124 ,H127, H131, H134, H141, H162, H166, H168, H182, H186, H196, H198. To reiterate, the lands certain houses sit upon are in a designated area as having the very highest LCA of Very High Landscape, Very High Sensitivity, National Importance, and designated as being 'Normally Discouraged' for a wind energy complex, which can only be built in exceptional circumstances where <u>it is clear that adverse impacts do not arise</u> with proposals be considered.

In addition to all of this, to a very obvious degree the Maughanaclea proposal fails one of the twelve planning objectives set out in West Cork's planning strategy, as well as the Main Development Plan's Objective of GI14.14:

> *CS2-6 (j) <u>Protect and enhance</u> the natural and built heritage assets of the towns and villages* [ie. Kealkill] *from inappropriate development.*
>
> *GI14.14 OBJECTIVE: DEVELOPMENT ON THE APPROACHES TO TOWNS AND VILLAGES: Ensure that the approach roads to towns and villages* [ie. Kealkill] *are protected from inappropriate development, which would detract from the setting and historic character of these settlements.*[48]
>
> [Note: this Objective is from the Green Infrastructure and Recreation Chapter and encompasses all development, both industrial and domestic.]

[47] taken from Hazel Mc Carthy's report for Curraglass 26/01/2026: report ABP-305350-20.

[48] p.332 CCDP 2022-2028 Volume 1 Main Policy Material

6. EAST of KEALKILL: effects of turbines proposed for Ballymought, Coomclogh, and Gortloughra (Shehy Beg)

- This is known by MKO as the 'northern site'. First to mention briefly the extraordinary turns that sometimes occur when planning permission is being considered as to whether it would be in accordance with proper planning and sustainable development for this local area of West Cork. Like the Northern side of the Mealagh Valley, and down to Keakill, this area around Coomclogh has a restriction of being a Tourism and Rural Diversification Area. However, the restrictions go much further than first appears, and the 'significant' visual impact on the receiving environment is always considered by the local planners, as is the height of a bungalow or house. Further, in the case of single dwelling application 23/469, they consider whether the R585 should have any further access points linking into it. One reason given for refusing this application was:

    - *The proposed vehicular access for a dwelling house directly on to the R-585 Regional Road would not be sustainable and would endanger public safety by reason of traffic hazard since it would involve the making of a further access point on to a heavily trafficked and unimproved section of the R-585 Regional Road and where the traffic movements likely to be generated by the development would interfere with the safety and free flow of traffic.*

Other similar planning permissions and refusals are listed within Appendix E and one would ask if An Coimisiún Pleanála Inspectorate might find the balance between these and the present wind farm applications, given that the same objectives of CCDPs' Green Infrastructure and Recreation applies to both type of applications.

- Second, in considering the 'northern site' spread over three townlands, it is crucial to pair the ecology, biodiversity and ornithological reports with the same titled reports from the Gortloughra/Shehy Beg application. The two sites abut up to one another, have similar ecological characteristics and habitats, are within the same LCT15a/ open to consideration area, and within the same wind speed corridor.[49] Under section 132 of the P&D Act 2000, Gortloughra's consultants have been required to provide many more documents, from an updated habitat survey, to a slope instability risk assessment, and a re-report on adverse effects for receptors[50]. It needs to be noted that Reason 1 for Refusal by CCC planning for the Gortloughra site states that this adjoining development would lead to the removal of over 11 hectares of peatland in the form of wet heath, wet heath mosaics, and blanket bog, the former and latter of which are regarded as *'habitats of special conservation significance'* and can be considered as Annex I habitats. How much of this peatland is stretching into the 'northern site',

[49] Distances of proposed Maughanaclea turbines from proposed turbines at Gortloughra: 'Northern' Site is circa 2.1Km to the South West, and 'Southern Site' is 4.40 Km to the South West, south of the R585 SR29. Note: ABP-322743-25 CCC ref 25142. This proposal for Gortloughra has placed two of its turbines within 550 metres of two on the Shehy More wind farm. So this would appear as a string of turbines but of different heights, different blade lengths and also running at slightly different speeds.

[50] See Appendix D.

and how much more Annex I habitats would be lost? [51] It is worth comparing the two sites' figures for peat removal, as set out in the same required tables: so this is like for like given in cubic metres:

Gortloughra Application. ABP-322743-25. Charts dated 20 March 2025 by planning office. Application for 8 turbines.	**Maughanaclea Application: for application registered 30/03/2026. Application for 14 turbines: 8 on Ardrah/ Maughanaclea site and 6 on Coomclogh site.**
Total Volume of Peat removed due to wind farm construction: Expected: 22,249 cubic metres, (Min: 12,672 Max 24,677).	Total Volume of Peat removed due to wind farm construction: Expected: 92,950 cubic metres, (Min: 64330 Max 92,950).
This includes peat figures for 8 turbine foundations and hardstandings.	Note: there are no figures included in the above for the peat to be removed from turbine foundations or hard-standings as this has been shown as NIL!
Total area of land lost due to windfarm construction Expected: 66,052 cubic metres (Min:61,532; max 70,132.)	Total area of land lost due to windfram construction Expected: 126,416 cubic metres (Min:126,416; max 126,416.)

The figures MKO provided are not spilt down to peat losses on the Coomclogh site of 6 turbines, but we can see the Peat losses for 'Maughanaclea' and they represent way over double that of Gortloughra wind farm. It is not for us to try and explain the reason, but the figures do suggest that the peat at the 'Maughanaclea' sites could be much deeper then even Gortloughra. The loss is much more significant and it would suggest that that MKO's project, in terms of Peat removal and Loss alone, should be refused permission on these grounds alone as all these sites are '*habitats of special conservation significance*'.

Further, an unusual but necessary task for the Inspectorate to closely cross-reference the two sets of papers to see how much potential peat slippage has actually been identified. It is worth noting that the assessment-consultants for all of the 'Maughanaclea' sites state:

> *1.4 'Peat instability in this report is defined as a mass movement of a body of peat that would have a significant adverse impact on the surrounding environment. Peat instability excludes localised movement of peat that would occur below a floating access road, creep movement or localised erosion type events'.*
>
> *Adherence to the peat and spoil management plan should reasonably minimise the potential **(??)** for all such peat movements. It is noted that due to the soft ground nature of the peat terrain it is not possible to completely avoid such localised peat movement'.*[52]

---

[51] DoHLG&H's request that MKO provides an assessment of the loss of underlying peat within the development site as a cumulative loss of peat overall and should be assessed in terms of a carbon benefit analysis versus restoration to peatland habitats.

[52] p.2 of 25. Nature Impact Statement. Appendix 3 Report produced by FehilyTimoney ltd.

This is essentially saying that whatever they do the peatlands will have movement, but it is localised and not so massive as to have significant adverse impact on the surrounding environment? Such confidence, given contractors will be moving around a massive amount natural Peat terrain in the three sites that hasn't been touched to any real depth since it was formed. It is worrying to read such caveats in an Nature Impact Statement (NIS), which are there to 'protect' and consultants may possibly be sued for foreseeable damage caused by peat slippage. Further, on looking through MKO's EIAR the recovered peat is just going to be tossed around the site; hardly what would be expected for such a precious resource, and of course one must think of all that carbon that has been released to the atmosphere. As a side issue MKO estimate of land lost is 126,416 square metres, so one can doubt very much that their proposed biodiversity enhancement area will come any way near this figure. This is certainly something for the Inspectorate to consider in great detail in their EIA.

In Cork County Council's ecologist reports[53] are details of birds recorded for the adjoining Gortloughra/Shehy Beg site, which has been refused by CCC's Senior Planner partly on adverse aspects on biodiversity and ecology. One report assesses the statistics for predicted bird fatalities for raptors and other sensitive bird species. Most people would be pleased to read of 102 sightings of Kestrels across the five breeding seasons, followed quickly by being alarmed to see that 2.4 Kestrels could be cut to pieces each year by the proposed eight turbines when in operation. Assuming that avoidance could even reach 95%, the modelling still indicated that nearly one hundred (100) Kestrels would be killed by a single wind farm development. (the contrasting figures for 'Maughanaclea' are assessed in the next section). No true mitigation measures can be offered for Kestrels and other birds at risk: and the fatality/corpses monitoring and flight activity surveys would in effect only be able to watch the catastrophe unfold. The lists go on for creatures that presently inhabit both the Gortloughra site and the 'northern site', only to be moved or die through impact or loss of habitat: no matter whether they are rare and on protected species lists[54], or in abundance in these rich-biodiverse areas: all are at risk of disappearing forever.

7. OVERALL ASPECTS: THE MAUGHANACLEA WF PROPOSAL.

OVERALL ASPECTS: Peat removed, Biodiversity and Wild Life Impact.

The issue of peat removal is huge as it is a natural carbon mechanism; if peat is taken 'out of the ground' all of its stored carbon will be released back into the atmosphere, and it will years to

---

[53] p.36 of 50. PRP 2 13/05/2025 This is from the Council's Ecologist.. Also see p.57. Volume II Chapter 7 Ornithology Report from Jennings O'Donovan., prepared by Fehily Timoney Co.

[54] EIAR Volume 11 Table p.31. The Kestrel (Falco Tinnunculus) is on the Birds of Conservation Concern in Ireland 2020-2026. It is a **RED-LIST SPECIES (HIGH Conservation Concern).** Kestrels also appear throughout the Mealagh Valley.

balance that loss using wind energy. What also needs to be considered is that this loss is all front loaded, and will add carbon into atmosphere, which will not be recovered until after 2030.

The Irish Peatland Conservation Council (IPCC) does not support the construction of wind farms on intact peatlands including upland blanket bog and heath habitats. There is a very significant overlap between sensitive upland blanket bog areas and areas of highest average wind speeds and according to the IPCC it is these very areas that are targeted for wind farm development. Further, in this local area, the potential cumulative effect of a number of wind farms in a concentrated area, this proposal for 'Maughanaclea' plus three others could be catastrophic for natural peat retention in the receiving environment.

At the Maughananclea site close to wind turbines T11, T12, T13, T14 are Lough Naibree and Ardragh Bog. Lough Naibree 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. Near by there are also water bodies including Lough Carrignanaeane. None of this mixed landscape has been reported or assessed in MKOs EIAR. This has to be surveyed correctly by the IPCC, to assess the potential risk of significant peat loss and serious environmental damage, as they are already aware that wind farms have serious impacts on undesignated blanket bogs and consider it is a threat in the wider countryside[55]'.

In considering the presence of peat, one must also consider its interdependency with its wildlife and biodiversity, which is protected under the EU Habitats Directive, EU Birds Directive and the Irish Wildlife (Amendment) Act, 2000. While only 10% of Ireland's biodiversity has been assessed, 15% of the original flora of Ireland are peatland plants. 14% (59 species) bird species have been recorded on peatland. 49% of all endangered birds in Ireland occur on peatlands, most are breeding species. 26% of Ireland's animal species are dependent on peatlands in some phase of their life cycle. 23 of the 35 butterfly species found in Ireland are found on peatlands, and there are two that rely on bogs for breeding: the Large Heath (Coenonympha tullia) and Green Hairstreak (Callophrys rubi). Ireland's bogland are home to a variety of plants and animals, many of which cannot thrive in other Irish habitats. There is a wide variety of life on peat bogs, birds nest on these open sites relying on heather for shelter, other species, health butterfly, red grouse, cottongrasses and many species and plants can be found.

[55] IPCC Website Article Wind Farms and Peatlands.

Peat Lands are an important part of Ireland's biodiversity, and depending on how these are managed they can contribute to Ireland's Biodiversity emergency. The planned construction of of this wind farm is not only releasing mega amounts of stored carbon into the atmosphere, it is endangering the Peat Land biodiversity. Clearly the significance of these lands at the Maughanaclea site is of considerable importance and needs to be protected. Given there is peat is across an extensive part of the site and so this must add to the number of other concerns that accumulate in a logical and sustained conclusion that a wind farm in an unsuitable and inappropriate development for this site.

7. **OVERALL ASPECTS: Birds/ Ornithology and MKO's assessments.**

Within the EIAR there is inadequate consideration of the sections contained within the Wildlife Acts of 1976 and 2000 which sets out Ireland's commitment to conservation and its legislation which is provided to protect flora, fauna, and our natural heritage. The application has a series of non-compliances with established Guidelines, the current CC Development Plans, High and Supreme Court rulings, and EU directives. There is so much that could be covered on this given that An Coimisiún Pleanála recognises that it *operates in an increasingly complex planning regulatory environment with an emphasis on environmental protection, including protection of habitats and biodiversity.*[56] However, time only allows a covering of Birds and the Kerry Slug derogations.

• KESTRELS, (*Falco tinnunculus*).

In carrying out their EIA function, the Inspectorate and the Board will no doubt wish to test the robustness of the 'Maughanaclea' Bird Monitoring Programme and subsequent reporting. For this reason, this section returns to a particular bird population within the local area, the Kestrels, which are on the BOCCI Red List of Conservation Concern. To clarify, this Red List from Bird Watch Ireland places species of birds into certain categories: breeding, passage, wintering, and breeding and wintering. To quote BWI: '*Each species on the resulting list are assigned with Red, Amber or Green levels of concern, with Red being the highest conservation priority.*'

In his report, MKO's (PO) Project Ornithologist indicates that there were 327 sightings of Kestrels during the vantage point surveys alone: 306 sightings were of single birds, 18 a pair, 2 of a threesome, and 1 observation of 4 kestrels together, giving a total of 352 individual sightings for a Red listed bird species.[57] It is further noted that Kestrels were regularly hunting within the proposed site, and actively breeding only 330metres away from the perimeter.[58] In reporting this, MKO includes two readership quotes :

---

[56] p.3 of 23. ACP: Information Booklet for the appointment of Senior Planning Inspector. May 2026

[57] See Appendix F for the Kestrel flight pattern maps produced by MKO.

[58] p.7-65 Table 7.5.5.5. Chapter 7 Orthology Report 26/03/2026.

> *Displacement and Barrier Effect:... Goodship and Furness (2022) suggest disturbance from humans up to 200m during the breeding season can occur, with disturbance distances reduced to less than 50m during the non-breeding season. Additionally, Pearce-Higgins et al. (2009) suggest that flight activity by kestrels appeared to be negatively related to track proximity. It is assumed that kestrel will show similar avoidance to the Proposed Wind Farm.*
>
> *...Kestrel were recorded hunting within 200m of the proposed turbine locations. However, the habitats utilised by kestrel are not unique to the Proposed Wind Farm site and are abundant in the wider surrounds....*
>
> *Collision Risk: ...If 0.55 collisions were to occur per year, it would mean that the losses at the proposed wind farm would increase the annual mortality of the county population (c.1,431) by 0.11%. The predicted collision risk is negligible. No significant effects are anticipated.*

First, given the wind farm would be virtually unmanned once it is operational, the first part regarding human disturbance is superfluous.

Second, no note is made of Tom Gittings' recent work on collision rates where he states:

> *For upland wind farm sites with rugged terrain and extensive forestry...due to distance effects, most of the the flight activity detected will be outside of the wind farm site. This may give false impressions of low use of the site by bird populations of concern and can cause further biases to the collision risk modelling.*[59]

Therefore, the numbers recorded are too low because of terrain and forestry, and so the collision risk is destined to be vastly under-stated. Third, MKO's Project Orthnologist (PO) has carefully avoided quotes commonly appearing in other reports on bird surveys and collision risks :

> [The same] *Pearce-Higgins et al. (2009) noted that previous studies have found that Kestrel are "known to continue foraging activity close to turbines and to be susceptible to collision".*
>
> *Fennelly (2015) reported the highest level of Fatalities for kestrel following a review of monitoring at 25 wind farm sites in Ireland.*
>
> *Cordeiro et al (2013) showed that kestrel prefer to forage over open ground on wind facing slopes.*[60]

In considering two proposed wind farm sites close to 'Maughanaclea's',[61] it seems the number of Kestrel sightings from their vantage point surveys are much lower: 21 occasions with an average sighting of once every 17 hours for Curraglass, and for Gortloughra, across five seasons Kestrels was recorded 102 times. Even taking into account that they are smaller sites, the 'Maughanaclea' survey results are quite extraordinary in that the number of kestrel sightings was an average of once every 5 hours when surveying. Rather than downplaying the activity of these birds, it does

---

[59] Beyond the 100/36 standard: an evidence-based review of wind energy ornithological guidance – by Tom Gittings MCIEEM, 12/02/2024. On 12th March 2024 Tom Gittings has produced many a report for consultants of wind farm applications. This is from his Blog.

[60] These two quotes appear in the bird reports for Derreenacrinnig West.

[61] When considering other local wind farm dev. the EIAR's for Gortloughra and Curraglass were consulted. However, not a single piece of data from the surveys were assessed, more a quick skim through to the conclusion, and for some reason an inspectors report for the Derreenacreenig Wind Farm was consulted instead of the current EIAR.

appear that MKO's PO has come across the best favoured sites of kestrels in our local area. Comparing sightings of kestrels across the three sites, during the raptor, breeding and incidental surveys, show very similar bias.

Yet, given all the data on Kestrel activity for 'Maughananclea's operational phase, the collision-computer opaquely turfs out a low figure of 0.55 collisions a year and magnitude of effect of *low/ long term slight negative effect/not significant*. These are far too low a grading. Using different statistical modelling, Gortloughra's Ornithologist predicted that number of Kestrel collisions will be 2.4 per year over the life of the wind farm, and this is for a smaller site and smaller number of turbines. Several ornithology reports for proposed windfarms have already expressed serious caution with collision modelling, in recognising a high degree of uncertainty for Kestrels. This is apparently because none of the modelling copes very well with Kestrels' hovering-flight activity. One can only conclude that a genuine requirement exists to assess the actual data for Kestrels, especially as they are Red Listed Birds, and come to very cautious conclusions rather than merely accepting entries from a desk-top study. Already submitted to ACP is the 2025 Derryadd WF Bird report, which concluded its review on Kestrels by saying:

> *'However, there are anecdotal reports of relatively high levels of Kestrel fatalities from post-construction monitoring of Irish wind farms, although this data has not been published'.*[62]

I trust that the ACP Inspectorate will evaluate the conclusions for Kestrels against the EIAR Bird report which MKO has presented. Another problem to be sorted is the EIAR's preoccupation as to whether our local Kestrels are also of county or national importance. First, no baseline source information is available to be able to estimate County Cork's Kestrel population at a local or county level. Therefore, MKO like other consultants just uses guesswork based on an estimated figure for the whole of Ireland, and then does the following calculation: the Kestrel's breeding population for Ireland is around 13,500.[63] Taking no account of topography or habitat, 1%, 135 birds, is needed to gain a classification as being a nationally important population. Similarly, *'a regularly occurring population of 14 birds is required for classification of county importance'*. Taking the three/four local WF surveys, and noting how breeding pairs and juveniles have been observed regularly, the Kestrels recorded can easily be classified as being of County Importance.

Certainly, extreme caution must be taken in assessing the effect that an additional fourteen turbines will have on our local Kestrels, whether through collisions or loss of habitat, especially as desktop modelling offers so little helpful analysis. Given that 'Maughanaclea' has the highest activity of kestrels around its sites, therein lies the greatest potential for significant disturbance and fatalities for this bird species. This cannot be allowed to happen, especially as Kestrels have already moved from the Amber List of medium concern to the Red List within the last five years. Bird Watch Ireland says the causes for the decline of Kestrel in Ireland are not clear cut, but is

---

[62] p.72. Appendix 8-5 Derryadd Wind Farm: Collision Risk Modelling Report (Fittings, 2025)

[63] NPWS Article 12 Reporting (2013-2018). Though MKO says they consulted with NPWS, there is nothing reported within their Birds Chapter. This is the only article that they use, and that is to gain the national figures which are now eight years old.

possibly due to prey availability, agricultural changes, reduced feeding opportunities and loss of habitat. Given the above quote from Fennelly, wind farms appear to be adding to this exponentially. Kestrels typically breed and forage in conifer plantation, dry heath, dry meadows, grassy verges, improved agricultural grassland, and scrub. Following the EU Habitats directives of a precautionary principle the natural habitat for the 'Maughanaclea' kestrels should be left undisturbed, and the three sites be deemed as unsatisfactory for development. This would also concur with EU Dir. 2024/1203, and CCDP 15.3.2, which cites the EU Birds Directive to provide for the protection of sites used (for breeding or feeding) by species of birds that are vulnerable.

• CHOUGHS. (Pyrrhocorax pyrrhocorax)

In carrying out their EIA function, the Inspectorate will need to continue to test the robustness of the 'Maughanclea' Monitoring Programme and subsequent reporting, by considering the many sightings of Red-billed Choughs which have been recorded in the MKO surveys.

This bird species is listed as a protected species on Annex I of the EU Birds Directive. In Ireland this Bird Species is listed as Amber (medium conservation concern) as they are in decline in many areas and their Amber Status is considered to be 'vulnerable'. At the moment, these highly acrobatic fliers are likely to be soaring around the rock coasts of Ireland, especially of Cork and Kerry. The fact that Choughs have been listed on all four WF bird surveys shows that this local area is unique in this protected bird species being found this far inland. The Gortloughra EIAR concurs with this, stating:

> *The regional Chough populations in West Cork has demonstrated a recent tendency to colonise inland upland ares, moving beyond their traditional habitat preference in Ireland for rock coastlands with short open grassland foraging areas....*

According to MKO, there needs only to be a regularly breeding population of two(2) pairs for a classification of County Importance. Both MKO and JoD consultants leave the classification there. However, given breeding pairs are recorded in all four sets of surveys: Maughanaclea, Gortloughra, Curraglass and Derreenacrinnig, the requirement for six(6) pairs can be easily substantiated and so qualifies this area of West Cork to be one of National Importance for Choughs, protected as an Annex I species.

If one only focuses on the proposed 'Maughanaclea' sites, Choughs were observed 186 times during the three years of vantage point surveys alone, and it must be noted that sometimes the birds were well within 300metres of proposed sites for turbines. Choughs have been recorded mainly from viewpoints in townlands of Ardrah and Maughanaclea: their behaviours are noted as flying, calling, foraging, roosting, clustering in numbers up to twenty five, and breeding pairs with young chicks. Twenty five is not the largest flock recorded: with Gortloughra, there was one recorded comprising of 59 individuals, both adults and juveniles, feeding.

MKO confirmed that a KOR was required for Choughs, assessing direct habit loss, disturbance/ displacement and collision risk; however, as soon as the tables are produced, everything begins to dissipate into very little or nothing:

> *Construction phase: direct habitat loss, Disturbance, low effect significance.*
> *Operational phase: direct habitat loss: No effect, low effect significance.*
> *Collision Risk: Breeding, Winter: very low effect significance.*

Nothing is said of, or quoted from, the informative Bird Watch Ireland report of 2015, which makes two very salient points, out of many:[64]

> *19.7 Site Fidelity:*
> *Choughs will remain in the same nesting site throughout their reproductive life, likely around 10 years though in some instances lasting up to 20. Indeed, some nests have remained active across multiple generations (Trewby, Carroll, Mugan, et al. 2010). A study on the habitat use of individual pairs also suggested that fidelity to areas may vary between breeding pairs (Robertson et al. 1995).*
>
> *19.8 Sensitivity to development of wind energy:*
> *This species is vulnerable to disturbance during feeding. For example, population viability on a French island was found to be compromised by relativity minor human induced disturbance (Kerbiriou et al. 2009). In this example, the location of paths for tourists was recommended to be kept at least 150m away from feeding areas. In addition, given this species' relatively narrow range along coastlines, its high site fidelity and the decreasing availability of suitable feeding ground, this species is also vulnerable to habitat loss.*

Even in the 2003 Percival 'Bible'[65], Choughs are deemed to be an ecologically sensitive species. With the 'Maughanaclea' sites, it may not be the risk of colliding with turbines that would decimate our local population of Choughs.[66] Instead it would be from the dramatic loss of habitat and disturbance whilst feeding, during the construction period and then beyond with maintenance crews. This is not tolerable for a protected bird species, listed in Annex I the EU Birds Directive, Amber-listed as of conservation concern and of National Importance for the area. One can only conclude that a genuine requirement exists once again for the Inspectorate to assess the actual data, and come to very cautious conclusions rather than merely accepting entries from MKO's desk-top study.

The Bird Ireland report of 2015, and subsequent research, needs to assessed constructively and the findings adopted. MKO's Bird Tables must be reassessed as to whether they are based on sound precautionary principles, if they are robust or complete enough, and if the stated

---

[64] Guidance Document, February 2015, Bird Sensitivity Mapping for Wind Energy Developments and Associated Infrastructure in the Republic of Ireland. Mc Guinness, S., Muldoon, C., Tierney, N., Cummins, S., Murray, A., Egan, S., & Crowe, O.

[65] All the reports submitted to ACP for ornithology refer to 'Percival 2003': Birds and Wind Farms in Ireland: A review of potential issues and impact assessment. Dr s.M. Percival. It is often cited to evaluate the sensitivity of species. It has actually been superseded by more recent guidance, such as McGuiness et al, 2015.

[66] Ireland holds a significant portion of the European population (~60%), specifically along the west coast, making their protection crucial.

magnitude/ significance of the effects are accurate. At the moment, there are so many entries that state the effects of turbines on various bird species will be no effect, very low, low, slight, negligible, and all below a threshold of '*not significant*'. Disturbance and direct habitat loss seems to gain even less attention. More importantly, where is the precautionary principle that must be present within such modelling to inform a correct assessment?

The assessments above, for Kestels and Choughs, leads to being fearful for other bird species on the Red and Amber Lists and the Annex I of the EU Birds Directive, as computer modelling and AI appears to fails them badly.

• WHITE TAILED EAGLES, (Haliaeetus albicilla).

In ending the section on birds, one species that calls for special attention, above all, is the White-Tailed Sea-Eagle. The species is not only heavily protected under the Irish Wildlife Act and the EU Birds Directive in Annex I, but also is now re-establishing itself in Ireland after two phases of a reintroduction programme which released birds from Norway. [67] The programme is presently at a very critical phase where numbers need to continue to increase for the project to succeed, and West Cork is lucky enough to have at least one established breeding pair at Glengarriff.

This highly protected Bird Species is of particular concern when it comes to considering wind farm applications. Looking for rising air when soaring, White-Tailed Sea-Eagles may actually be drawn to the air currents created by turbine blades, and so, like Kestrels, are particularly susceptible to collision with wind turbines. A number of collision fatalities have been recorded: three(3) in 2016 in the Co.Kerry- Co Cork area, though of course the ESB denied the deaths were anything to do them, and now three(3) in 2024/5 in Co. Donegal. When the 'Maughanaclea' study area was surveyed, White-Tailed Sea-Eagles were observed on two occasions. MKO notes, in the KOR for this bird species:

> *There were two observations of white-tailed eagle in the wider surroundings: one flying approximately 750m and one soaring high approximately 3.2km* [2022 at a height of 200metre] *from the Proposed Wind Farm site. White-tailed eagle were not found to be utilising the Proposed Wind Farm site and no suitable breeding sites are present.*
>
> *[For collision risk]: This species was not recorded flying at Potential Collision Height during the extensive vantage point survey work undertaken. Collision related mortality is not likely to significantly impact this species, based on available data. Chapter 7 p.7-47. There were no birds recorded flying at PCH within 500m of the proposed turbine locations during vantage point surveys, therefore a collision risk assessment has not been conducted.*

---

[67] White-Tailed Sea Eagle are articled in p.22 The Birds Directive: 40 years of conserving our shared natural heritage. Produced by Natura 2000, EU publication. 'White-tailed Eagle *Haliaeetus albicilla* population in Europe has been in steady decline since the 18th Century, and became extinct in several EU Member States as a direct result of persecution, which was further exacerbated by low breeding success caused by pesticides and other environmental pollutants. ….The species has begun to recolonise areas from which it had become extinct…[with] a number of successful reintroduction programmes,

*RESULTS: Construction phase: Direct Habitat Loss, **very low** effect significance. Disturbance, **low** effect significance. Operational phase: Direct Habitat Loss: No effect, Displacement and Barrier effect: low effect significance.*

Collision Risk: No Effect.[68]

There appears to have ben only two observations of White-Tailed Sea-Eagles; however, the bird-monitoring in either survey was not continuous enough to make cursory judgments. Certainly, the literature available on White-Tailed Sea-Eagles has been left on a shelf somewhere, as has an assessment as to whether our Eagles are of international importance given they are a re-introduced species. It has been highlighted by the Department of HLG&H in their reply of in April 2025, that :

> *Collision and mortality risk [for White-Tailed Sea-Eagles] must be fully assessed for the project and it should be borne in mind that assessment cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt. In terms of increasing the risk of collision the siting of turbines on locations on ridges above valleys where eagles are likely to use rising air currents to obtain 'orographic lift' to gain altitude would be an additional potential concern. It is not clear if turbine siting will be proposed in an area of higher 'orographic lift'. It should be assessed as part of the overall assessment whether models, such as that in Hanssen et al. (2020), are applicable at this wind-farm in detecting microsite susceptibility to generating 'orographic lift' which may attract eagles into the rotor-swept zones of these turbines. Existing and proposed adjacent wind farms could add to the cumulative risk of collision and narrow a potential corridor of flight activity (directional flight, social behaviour, and soaring). This factor should also be considered during the collision and mortality risk assessment for the project.*

In addition to the above requirements, it is worth returning to the ACP/MKO records of meetings in the pre-application consultation phase:

> *28/03/2025: The Board representatives advised the prospective applicant to ensure that their Biodiversity and Ornithology studies are robust.*
>
> *18/11/2025:... advised the prospective applicant that over 50% of exiting further information requests issued by the Commission are in relation to ornithology which necessities comprehensive and appropriate survey work is undertaken pre-application.*
>
> *18/11/2025. the prospective applicant advised that there was only one siting of a white-tailed eagle, identified over 2km away from the proposed site.*

So the pathway was clearly laid out by An Coimisiún Pleanála but to no avail, and certainly the Dept of HLG&H's requirements regarding the eagles have not been met by the KOR assessment. The assessment reads along the lines of 'they were not seen in our standard 500m surveys so why should we do any more? Given the Sea-Eagles' importance, their sheer size, and their long range of flight paths, this is not good enough. This particular study is beyond failing, as even the basic data on sightings of White-Tailed Sea-Eagles seems incorrect. The 'one' sighting of 2km given in

[68] NB From 2015 Bird Watch Ireland: Occurrence of White-tailed Eagle (Haliaeetus albicilla) and Willow Ptarmigan (Lagopus lagopus) collisions at the Smola Wind farm in Norway was investigated by Bevanger et al. (2010). This study reported 39 dead or injured White-tailed Eagles between August 2005 and December 2010, noting that certain turbines were responsible for a disproportionate level of mortality. The majority of White-tailed Eagle collisions at the Smola Wind Farm occurred in the spring, mainly involved adult birds (as opposed to sub-adults or juveniles).

the pre-consultation meeting doesn't match with the 'two' stated in the KOR, and there is only one sighting given within the Survey data[69]. In reality, of course, White-Tailed Sea-Eagles are not infrequent visitors to our local area, and each year have been flying over the Mealagh Valley and the proposed sites in question - it is just one has to live here to see and appreciate them, rather than making a quick visit one a month. In Appendix F are photographs where our neighbours in the Maughanaclea were lucky enough to have their camera handy, and they will be including more photos in their own submission.

I would offer that MKO's ornithology reports need to be looked at in the same light as above for all other bird species on the Red and Amber Lists and Annex I EU Birds Directive, to ensure the modelling provides that which is needed. Also, although a record appears of a few dusk surveys, no nighttime surveys have been carried out to record owls, night jars or migratory birds and fowl. It needs to be noted that County Cork's Ecology Office has advised that

> *'nocmig (nocturnal migration / Nocturnal flight call (NFC)) survey of the site* [needs to] *be undertaken to help inform a robust assessment that the proposed development may have of migratory birds gathering and flying through the area local to the site.*[70]
>
> (The lack of surveys for 'Maughanaclea' means that there is no assessment of birds potentially affected by a loss of dark skies - this point is covered further in a later section.)

Further, MKO states their report *'fully assesses potential cumulative effects of other projects'*,[71] all that was considered is offered conclusions. This entirely fails the request by the Department of HLG&H[72] in that it is data from surrounding sites that must be assessed. The Department's letter clearly states this a number of times, such as *'cumulative effects assessments must include data in terms of best scientific evidence of the area of displacement/foraging loss... and semi-natural habitat loss.* MKO's 'Maughanaclea' Bird Reports need to be rigorously assessed by ACP's Inspectorate as to whether the reports are robust or complete enough, and in which aspects they have substantially failed the requirements of the Dept of HLG&H. Certainly MKO's Project Ornithologist's constant assertions of a total lack of magnitude/ significance effects needs to be challenged as to whether it is in any way accurate. The ABPInspector for the original Ardrah application offers wise caution:

> *Full regard should be had to biodiversity considerations. Upland habitats are particularly vulnerable owing to their location in high rainfall areas with a short growing season. The extent to which birds will be impacted by wind energy developments will vary depending on species, season and location. These impacts may be temporary or permanent. Species groups most at risk are Raptors, Swans, Geese, Divers, breeding waders and concentrations of waterfowl.*

---

[69] only records one sighting which is in August 2022 at 4-5km from the viewpoint. It is stated in the report this is 3.2Km from the proposed wind farm site.The other observation was a single immature bird being mobbed by a raven approximately 750m from the Proposed Wind Farm site in February 2023.

[70] p14 of 16. Kieran Murphy, Ecology Primary Report CCC 13/05/2025

[71] p.7-1 Chapter 7 MKO Ornithology Report.

[72] p.9 07/04/2025 The letter from Dept of Housing, Local Government and Heritage also states for 'Annex 1 bird species under EU Bird Directive Article 4(4) of the Directive requires Member states to strive to avoid deterioration of habitats outside Special Protection Areas.

> *Potential impacts on migratory birds and local bird movements between breeding, feeding and roosting areas require careful consideration.*[73]

Only by the Inspectorate carrying out a comprehensive examination, analysis and evaluation of the EIAR's ornithology report and appendices will the potential significant impacts on our local bird populations be revealed, whether it is through collisions, displacements, or loss of semi-natural habitat and disturbance.

7. OVERALL ASPECTS: Biodiversity and the Kerry Slug Derogation Licence. As a last thought, it worth considering whether MKO did pay sufficient attention to the presence of the Kerry Slug on the proposed site, given it is a listed species in Annex II and IV of the EU Habitats Directive 92/43/EC.

Though bird surveys had been carried out since 2022, there was just one hand-search survey for this protected species very late on in the pre-application consultation period: 05/12/2025, with the licence granted on 26/02/2026. This seems somewhat lax considering the National Parks and Wildlife Service points out:

> *'It should be noted that the Minister can only issue such derogations in very limited circumstances and failure to obtain one or comply with the conditions of the Derogation could result in prosecution'.*

Of course, being so late in the design process MKO are unable to demonstrate that there are no other satisfactory turbine locations within the site, which would solve *'the problem... in a way that does not require a derogation licence'*. [74] The first alternative is always that the Kerry Slugs remain undisturbed, and evidential comparisons of alternative solutions is a requirement for Test2. Instead, MKO passes off generalities such as a do-nothing scenario stating: 'should the proposed development not proceed, the opportunity to construct a renewable energy development in a suitable location will be lost'. The vagaries continue that they will practice

> *'localised translocation to remove individuals from the working area'*, and the *'proposed Biodiversity Management and Enhancement Plan will result in a net gain in wet heath habitat and suitable breeding and foraging habitat for Kerry slug'.*

Why am I not convinced by this? My small natural woodland in Gortnacowly is fortunate in having Kerry Slugs and they are seen occasionally on the trunks of small trees. (See aside and Appendix F). However, it would take many hand-searches and traps to find them all, and MKO's ideas all seem to be a token gesture when the real imperative is to have their commercial venture up and running.

---

[73] p.20. of 46 (10) 11/318, PL04.240461 Conor McGrath: Inspection and Visit for Ardrah: 04 - 05/07/2012.

[74] See Derogation Licence included with MKO's EIAR. There is the same in CoolGlass's EIAR, so this is a standard format.

To summarise, this application reads almost as an epiphany on how to destroy invaluable wildlife habitat and biodiversity in one fell-swoop. The sites, as part of the wild uplands of Shehy mountains, Maughanaclea Hills and beyond, are a haven for wildlife, whether it is Kerry slugs or Birds, other protected wildlife, flora and fauna. This wonderful wildlife is celebrated on Information Boards presented at Enerco's open evening in November 2025, where apart from listing the birds of prey of Kestrel and Buzzard, and Choughs and other species found, it publicly stated:

> *A number of mammals including Badger, Irish Hare, Otter, Red Squirrel, Red Fox, Rabbit and Pine Marten have been recorded in the area previously, and seven of the nine species of bats found in Ireland have been recorded foraging in area around Maughanaclea, including Soprano pipistrelle, Common pipistrelle, Natterer's, Lesser noctule, Lesser Horseshoe bat, Daubentons bat, and Brown Long-eared bat. Soprano pipistrelle is Ireland's smallest bat, weighing as little as a €1 coin. Each bat can eat over 3000 midges in one night.'*[75]

The spectacle is complete, according to MKO, in this being:

> *...peatland, heath and forestry, and rivers which provides an array of supporting habitats, shelter and food sources for a variety of local faunal species. Also, Wet Grassland was frequently recorded throughout the Site, often grazed by sheep. These fields are dominated by rushes and provide important supporting habitat for ground nesting birds like snipe.*

Such idyllic a view: why would any developers and their contractors wish to disturb/ destroy this '*climate resilient, biodiversity-rich, environmentally sustainable*' haven, which of course meets the vision for Ireland's Climate Action Plan 2025? Of course, MKO's boards make no mention of how this biodiverse landscape could be irrevocably harmed by Enerco's proposed development, in pursuit of its formidable commercial aims. The damage to wildlife habitats of grasslands, peatlands and blanket bog as well as the potential impact to biodiversity and the high water quality[76] is incalculable, in both the short and long term.

7. OVERALL ASPECTS: Montages / Loss of Dark Night Skies.

A passing thought on montages in the EIAR, in trying to make sense of the few produced for our very long Mealagh Valley, it needs to be appreciated they are a static picture of a moving object in the landscape. The vision of one does not relate to the other. The tall static aerials on Nowen Hill, tipping out at 40-50metres, might be looked through or past or not noticed straight away. Moreover, with moving blades at different angles and sometimes slightly different speeds, as could appear at Gortloughra, turbines are visually distracting and disorientating- something that cannot be portrayed on a sheet of paper or in a photograph.

---

[75] see BioDiversity Information Poster as part of the 'Renewable Energy Development Public Information Exhibition' for Maughanaclea which was held on 29 /04/ 2025 at the Westlodge Hotel Bantry from 4.30- 8.30 pm. The information boards/posters can be seen the website: maughancleainfo.com.

[76] Under the Water Framework Directive it is not permitted to carry out works which will reduce this quality.

In MKO's pack for 'Maughanaclea', there are no montages showing a dawn, a dusk or a dark evening sky; so none illustrate the prevalence of night-time lighting of turbines. The 2006 guidelines for required montages, as part of the Landscape Impact Assessment, states that each viewpoint should assess the significant visual presence of the Wind farm development and its aesthetic impact.[77] It is offered that An Coimisiún Pleanála Inspector(s) ask for further montages, along both the north and south roads of the Mealagh Valley, built up from photographs taken in different light conditions including the starry night sky, and superimposed with the turbines' bright red aviation warning lights. These would then provide a far more accurate estimate of the significant impact on the landscape and receiving environment. The application, like others, pays too little attention to devastating losses that sudden light pollution can bring. The night photograph in Appendix F, and the next page, is a world away from the restful daytime montages in the application.

On many occasions the night sky in the Mealagh Valley is so dark and black one cannot see until it is lit up by celestial skies: our wonderful night skies will be permanently lost if ever this development went ahead with its bright red warning lights brazening the darkness. A personal letter to us from Brian Elsey, Chairperson of Dark Skies Ireland, perhaps explains our dark skies well *(copy of full letter is contained in the appendix):*

25th June 2025

Dear Terrie & Michael,
Thank you for bringing the potential impact of windfarm lighting to your local area to our attention. The Mealagh Valley has a near-pristine environment, close to the conditions in the Kerry Dark Sky Reserve and Mayo Dark Sky Park - Ireland's internationally accredited dark sky areas. Indeed, Ireland has the only Gold Tier (highest quality) Dark Sky Reserve in Europe...

Unless the lights are very directional, light falling on the ground (horizontal illuminance) has been shown to raise light levels above the natural background in dark locations such as the Mealagh Valley to kilometres distances, with the potential to affect ground-dwelling species. While the impact as seen from ground level is one aspect, these lights are obviously intended to be visible from the air where they can impact migratory birds who depend on their vision in the red part of the spectrum for navigation...

As turbine lights are not hooded, by design, the loss of the Dark Sky to a countryside environment disrupts the natural patterns of wildlife, confusing and disorientating not only birds, bats,[78] animals but even plants in the way they respond to the changing seasons.

---

[77] p98. 2006 Planning Guidelines [for Wind Energy] The Department of the Environment, Heritage and Local Government. Issued under Section 28 of the Planning and Development Act 2000.

[78] When asked for comment An Taisce has stated 'Wind turbines can be dangerous to bats, not only with regards to collisions, but also fatal barotrauma. If the project is approved conditions must be attached to prohibit the use of lights at night, as these will inhibit the foraging ability of the bats. See letter on application for Shehy More WF 10/10/2013.

If permission is ever granted, the red lights will appear above the hills horizon and be clearly seen from across the three valleys at night, where presently there are no other man-made lights

installed or in place, apart from of course the Shehy More site. With Dark Skies being lost all over Ireland,[79] Dark Skies are still a part of County Cork's attraction and *'Dark skies and unpolluted night skies are an asset to the County'*.[80] This is covered in two sections of the Development Plan, and does not just apply for urban settings:

> *Objective BE15-13 Seek the minimisation and control of light pollution associated with activities of development, having regard to relevant standards, published guidance and the receiving environment and Dark Sky principles. 15.11.3 the Council recognises the impacts light pollution (glare, shadow, light trespass, clutter and spillage) can have on the visual, wildlife, and residential amenities...*
>
> *Objective 10.6.3 It is also important to recognise the night sky as a tourism asset for the county and should be protected from night pollution...* [81]

One can also turn to the many technical/scientific studies illustrate the huge detrimental effect of turbine lights at night: and, as an example, two small extracts are also included from an extensive article available from sciencedirect.com, in relatively simple-speak. Its Abstract reads:

> *'Wind farms are a conspicuous feature in the nocturnal landscapes. Their presence is a source of light pollution for residents and the environment, severely disrupting in some places the aesthetic, cultural, and scientific values of the pristine starry skies. In this work....we quantify the impact of individual light sources by comparing their perceived brightness with the brightness of stars... It shows medium-intensity turbine lights can be brighter than Venus up to ~4km distance, brighter than a (the brightest star on the nighttime sky) up to about ~10Km, and reach the standard stellar visibility limit for the unaided eye at(mv=+6.00) ~38km.'*[82] *These results suggest that the visual range of wind farms at nighttime may be significantly larger than at daytime.'*

Within the study, it is stressed that,

---

[79] See Appendix F for Ireland's Maps between 1997 and 2015.

[80] County Cork Development Plan 2022-2028. Volume One, Main Policy Material, 15.11.3 Noise and Light Emissions, p.346.

[81] Ibid. p.346 . Ibid .10.6.3 p.215.

[82] ScienceDirect.com Article from the Journal of Quantitative Spectroscopy and Radiative Transfer Vol. 329 December 2024: Quantifying the visual impact of wind farm lights on the nocturnal . Salvador Bara /Raul Lima.

'Unlike public street-lamps, which are designed to illuminate public spaces but do not require to be seen themselves, the wind-farm light beacons are purposely installed to be seen from long distances in a broad range of directions.'

This study firmly concludes that turbine lights are brighter and more obtrusive than those of the brightest street lights, of stars, and of Venus. Whilst such brilliant sky-lights may be fine for a city's night-life, where light-pollution exists from other sources, it is certainly not acceptable for beautiful dark valleys hills and mountains. It matters little if the turbines are offset from or in the opposite direction to main aspects of scenic amenity: their lights will have no directive cowling. Travelling along the road R585, it will certainly feel that you have suddenly entered a highly lit motorway, with wind-turbine lights lighting up both sides of the sky. All that will remain is a distant memory of complete darkness for the Mealagh Valley, and the Maughanaclea Hillls, as the baseline shifts to a far poorer place.

7. OVERALL ASPECTS: Archeology.

Sitting permanently within the landscape, in day and night skies and all seasons, are the archeological reminders of an Ireland past. The archaeology for the three proposed sites of 'Maughanaclea' has been covered in MKO's surveys, though apparent anomalies have occurred, being inherent in predominately desk-top studies. However, fortunately one only needs to turn to David Myler's book: An Archeological Survey of the Mealagh Valley[83] for an authoritative source on the Valley, itself, and I understand he is also making a submission on the 'Maughanaclea' proposals. So, this adds just three additional points to consider.

- Wind farm developments along the ridge lines tracking along the R585, should not be happening at all, given the nature of its heritage landscape. Dr William O'Brien MRIA, Emeritus Professor of Archaeology, University College Cork, in his recent observations for Gortloughra, states:

  I am writing to express concern about a proposed wind farm on the southern slopes of Shehy Mountain, one of the important scenic features of West Cork...'

  'Given this wealth of archaeology, I would urge caution in allowing any windfarm development to proceed in Shehy Beg townland'.[84]

- There were occasions, not so long ago, that applications for West Cork were flatly refused in order to protect the local area's archeology and monuments, especially if they were part of the

[83] An Archeological Survey of the Mealagh Valley. Also, Walking with Stones: Exploring the Ancient Sites of West Cork.

[84] See Dr O'Brien's Letter of 21 April 2025 addressed to Cork County Council Planners, in the Gortloughra objections.

cultural heritage landscape, One example is Farranahinneeny, which is just along from the Shehy More wind farm.[85] It is noted that:

> *'The site is an area with a rich archeological heritage and the row of standing stones on the site dating back to the Bronze Age a national monument is a very important feature of the landscape....I would accept that the placement of the individual turbines [100m tip height] will not or is highly unlikely to physically impact on the monument but this, I consider, is not the entire issue. The row of standing stones is in an alignment, which dates back to the Bronze Age. They would appear to relate to other rows of stones in the area and are part of an overall archaeological landscape...[86]'*

It is worth noting that any subsequent scoping plans for wind farms in the area did not bring this site of rich archeological heritage into their equations.[87]

- There seems to be a view in more than one consultant's report that a landscape can return to what it once was when decommissioned, and even the County Cork Archaeologist in her report for Gortloughra/Shehy Beg notes that its proposed development:

> *'will result in a range of long term, indirect negative effects of a visual nature on the wider setting of the archaeological sites within the environs of the proposed development, which will range from slight to significant in their significance. Given the nature of the wind farm turbines, there are no mitigation measures that can address these indirect visual impacts, and it is noted that these impacts <u>will be reversed</u> following decommissioning.' [88]*

Exploring this in more detail for 'Maughanaclea', it is stated the fourteen(14) individual hardstandings will be 25 metres in diameter and to be 'buried'. The excavations will be 4 metres or 13 feet deep into the rock, first removing the top-lying peat. Excavation craters that are this large and this deep would severely disturb any archeology as yet undiscovered.

If the site is ever decommissioned, in essence the turbines would be taken down but everything else remains: the roads, sub-station, and parts of hardstandings that *'protrude above ground level will be backfilled with soil'*[89] so, in effect, making humps in the landscape. Nothing is said as to whether or not the central short shafts will still be sticking up in the air. One thing is certain: the visual nature of the wider setting will be significantly impaired forever and relationships will be permanently lost between aligned monuments as seen and those yet to be found. The 'permanency' of a wind farm is vastly understated in the EIARs and one can only trust that these points will be addressed in An Coimisiún Pleanála's EIA examination and assessments.

---

[85] 05/1024 Refused by CCC. PI 04.215968 : submitted to ABP 16/01/2006. Inspectors report: Derek Daly, 18/07/2006... Se also Dooneens (within 5Km of Shehy More WF) withdrawn application due to insurmountable concerns relative to archeology (CCC 10/545)

[86] Appellant noted the stone row alignment is 8.1 metres long and 3 metres at its highest, and the alignment is based on an alignment with the sun, which has changed in the last 3000 years (!)..

[87] p.2-29 EIS 25/05/2013 for Shehy More: *'An additional site at Farranahineeny was discounted from consideration due to previous refusal of permission for a wind farm at that location.'*

[88] p.11 of 16. Archaeologist 's Report. Annette Quinn 06/05/2025. Standing stones are considered very tall if they are 3meters in high, many are far less than this.

[89] p.8. Appendix 4, 2.4.2.1.

7. OVERALL ASPECTS: Scenic Routes.

> ***GI14.9, County Development Plan Objective: Landscape.*** *(a). Protect the visual and scenic amenities of County Cork's built and natural environment. (GI) 14.9,1 Scenic routes highlight the quality of the overall environment and landscape experienced within Cork County. It is important to protect the character and quality of those particular stretches of scenic routes that have special views and prospects, particularly those associated with High Value Landscapes.*

This Objective and others highlight the purpose of a Scenic route designation, in acting as a protection against adverse obstructions or a degradation of the scenic views. Several objectives are contained within CCDP 2022-28 and sets out clearly that scenic routes highlight the quality of the overall environment and experience within Cork County. The protection is therefore in the round: all that can be seen, near and far, which explains why route designations stretch far beyond an actual 'high value' landscape itself. Scenic routes are protected from intrusions as to what can seen whilst traveling either by car, bicycle or walking: that is the point of a scenic route. [90]

It is hard to dismiss that the proposed Maughanaclea development will impact both sides of Scenic Route S29. A wind farm site to the north of this national road (the R585) will obstruct views of unique, rugged uplands as they wend their way towards the Shehy Mountains. A wind farm site to the south of the R585 will degrade the special views and prospects of the Maughanaclea hills and beyond. This is a major route and a regional road from Keakill via Cousane Gap and so unlike local scenic routes located on remote roads, and the adverse visual effects will be of significance. Though now on appeal, it is useful to note that part of CCC's refusal for Gortloughra WF was that it would *'seriously detract from the views and prospects from parts of the S29 scenic route'*. The proposed turbines would equally change and degrade the views of S30 from Dunmanway being so tall.

For both scenic routes, the 'Maughanaclea' turbines would be a defining feature along established looped walking trails and represents a marked increase in the intensity of built development here. Walking trails and wind farm developments are complete opposites: and being honest if a seasoned walker has seen one wind farm up close they are hardly likely to develop a perverse passion to seek out another, they are pretty much of a muchness! The popular past-time of hill walking is about exploring and experiencing a remote undisturbed quiet scenic area unspoilt by large intrusive man made structures. Hikers do not walk on routes over hills to skirt around wind turbines, they walk to shake away modern life and enjoy the peacefulness and remoteness they find. The essence of walking in a scenic landscape is the

[90] GI 14-9: 14.9.2, 14.9.3. GI 14.3 CCDP 2022-2028. Theses objectives are copied in full in Appendix C(i)

feeling it instills: a connection to nature by experiencing a sense of stillness and distance gained by walking through it.

A wind farm of (14) Fourteen 169metre high turbines is an intrusion, and is significant in the way it degrades a landscape by dominating its skylines, both day and night. In whichever way agents dress it up this is an industrialisation of our rural areas by large concentrations of extremely overbearing structures. A route is an element of West Cork's attractiveness for tourism, both from Ireland and Internationally. Tourists and visitors come to this part of Ireland for the natural beauty and peacefulness, to come away from modern daily life, and certainly not to be reminded of it by seeing massive wind turbines.

7. OVERALL ASPECTS: Tourism and Economic Considerations.

The 2006 Wind Energy Development Guidelines on Tourism and Recreation[91] states quite clearly:

> *The effect of wind energy development on tourism and recreational activities must be assessed. In this regard, it is desirable that the relevant regional tourist authority should be consulted. In many areas in Ireland, tourism and recreation underpin the local economy and can depend to varying degrees on the quality of the environment. Wind energy developments are not incompatible with tourism and leisure interests, but care needs to be taken to ensure that insensitively sited wind energy developments do not impact negatively on tourism potential...*

The chapter on Population and Human Health hides a chapter on Tourism. It appears to recognise this as a huge income stream for County Cork, whilst discarding such notion for the local area. As usual, MKO also tries to make a concerted effort in showing tourism is not affected by the presence of wind farms. An authoritative letter from Fáilte Ireland from April 2025 makes interesting reading. It can be seen that the organisations objections to the proposed wind farm development of Gortloughra are carefully nuanced: however, it is from the Manager of Environment and Planning,[92] and the words chosen and its subtle references should not be ignored. The letter opens with:

> *'...The Irish Landscape is one of the primary assets for tourism in the country and has been the cornerstone of international tourism marketing campaigns for decades. International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore, as the Irish Landscape is one of the primary reasons for visiting the country, it is essential that the quality, character and distinctiveness of this valuable resource is protected...'*

The R585/ Scenic Route S29 passing the proposed site of Gortloughra, and the proposed sites of 'Maughanaclea' is then described as a Calling Card, [an invitation] to the coast and the Wild Atlantic Way which:

---

[91] p. 3.9. Chapter 3.

[92] See Shane Divan's Letter, on behalf of Fáilte Ireland, dated of 31 April 2025 addressed to Cork County Council Planners. Copy of the Full letter is in Appendix F.

'...gain[s] the attention of the visitor and acts as a device to entice people to the west of Ireland'. Once there, visitors are encouraged to further explore and engage with tourism experiences and communities in wider geographical area.
.... From a tourism perspective the key impacts arising from the proposed developments are likely to arise due to: construction related impacts and impacts from the operations stage...'

Key impacts are explored in the Fáilte Ireland letter, from the preponderance of heavy vehicles during the construction phase, to biodiversity, ecology and visual impacts. It is not without intention the Environment and Planning Manager points out that arising from the operational stage, key impacts that affect tourism in the receiving environment are visual impacts. He delves into the CCDP quoting the Landscape Character Assessment of LCT15a as being '*Ridge and Peaked Upland*' and classified as having both 'High' Landscape sensitivity and 'High Landscape Value. For good measure, the Shehy Mountains are mentioned by name. he then states'

'Therefore the protection and management of the character becomes as much about protecting an economic and cultural asset, as it about the physical context of the features'.

The letter ends that sustainable developments should be at appropriate locations and in accordance with proper planning and asks the (above) observations are considered '*including the likely impact of the proposed development on the tourism and amenity receptors within the area*'. These amenity receptors refer to our hospitality sector: a major employer for West Cork, which generates considerable income for local businesses by providing reposeful activities and holiday destinations not offered elsewhere.

The points made in the letter are consistent with the contents of *Fáilte Ireland's West Cork Coast Destination and Experience Development Plan*, of December 2022, which is still current. In finding new revenue streams for tourism, market segments, the Plan identifies what motivates visitors to travel to Ireland, and ways to encourage them in every way to come to West Cork. One key segment, to grow substantially, is

> *'GREAT ESCAPERS: who want to get away from it all, renewing family bonds and spending time together in a beautiful place: feel connected to nature, travel in the autumn and/or spring when nature is going through a transformative phase... [venture on] real touring holidays with promise of local, authentic communities, and activities'*[93]

In encouraging international and local tourists to come, and to return, to the Shehy Mountains or Cousane Gap or Gougane Barra, [94] this key segment stream of Great Escapers is very dependant

[93] West Cork Coast Destination and Experience Development Plan, of December 2022 p.11 and p.27

[94] Mentioned specifically in the Draft Cork County Landscape Strategy, 2007, in respect of tourism. LCT 15a 'Recognise the scenic value of the Cousane Gap as a valuable tourist attraction in this LCT. Recognise the value of the upland areas (Shehy Mountains) in this LCT particularly as a tourism resource for hill walking."

on protecting our beautiful, natural and unspoilt landscapes: the impact of this development is to add to the likelihood of a ever progressing 'wind farm industrial corridor' that would totally disconnect these potential visitors from the natural landscapes that they seek. One needs only to consider what has happened with the 2020 Curraglass proposal close to beautiful Gougane Barra: if receptors (people) are not bothered by wind farms, which are supposedly now a familiar feature, why did the petition against the proposal for replaced turbines at Curraglass exceed 10,000, and included many from abroad: tourists and visitors, and even future residents? [95]

Despite MKO's protestations,[96] the proven and substantial tourist industry of West Cork has a major economic driver in the shape of Bantry and its wide surrounding area.[97] First to mention are the regular cruise ships, twelve in number, from which its passengers expect to see on arrival into Bantry Bay, the beautiful unspoilt mountains and hills surrounding the town for miles. Second, are Gougane Barra's visitors, which are growing in exponential numbers in that they are not all day visitors, but also stay in the local area. Third, is Bantry's three international festivals, in just three weeks of the year, produces 7.67 million euros, with 53% of attendees coming from outside the Bantry area or from abroad. On top of tickets purchased for the festivals, tourists spent more than €4.8m on local accommodation, catering, and services. A full planning application has just been submitted for a dedicated West Cork Music venue, which will bring even more visitors to Bantry and its hinterland, fifty two weeks of the year. Given there is no rail link at all, most will travel by road so traffic will naturally increase exponentially along our beautiful 'Calling Card' road: the R585 / Scenic route S29. It is not a vain hope that tourists will go to a concert or three and then want to spend additional time enjoying the beautiful scenic landscape surrounding our town.

Even now, it estimated that 14 million euros alone are generated each year from out-of-town local walking trails and out-of-doors recreation within the Bantry area. The local area is designated as a Category One cycling hub under Fáilte Ireland's Irish Cycle Tourism Strategy which has resulted in many looped cycling routes.[98] It is so important that complementary facilities are provided in both the town and in the quietness of the surrounding countryside. Any large scale industrial renewables development, whether in its construction, operational or decommissioning phrase, would have a significant adverse effect on this vital economic driver.

---

[95] The Southern Star article of 22/02/2025 says: the battle against the proposed wind farm by locals garnered global attention and a petition attracted more than 10,000 signatures in one week'.

[96] Not having read Failite Ireland's letter of 23 April 2025 MKO consultant states the impact on the tourism value of the R585 between Kealkill and Cousane Gap is considered to be not significant for a number of reasons, one being the low level of tourism in the area as most activity is along the coast. This completely ignores how people will reach Bantry direct, or reach the Wild Atlantic Way at this point.

[97] In Jan 2025, under the "Destination Towns" project, the new tourist signage for Bantry cost approx. €670,000: of this, €500k came from Fáilte Ireland and €170k from Cork County Council .

[98] p. 2.7.21 Vol. 5 CCDP 2022.

By the very nature of the beast, this huge 14 turbine wind farm in particular can only detrimentally alter the area's visual amenities, peacefulness and even its quaintness. It is to be noted that adverse changes to tourist and visitor experiences of our local area is in direct conflict with the many County Cork's Development Plan Tourism policies and objectives, such as TO10-1 and TO10-2, and these are worth listing here:

> ***TO10-1 COUNTY DEVELOPMENT PLAN OBJECTIVE, PROMOTION OF SUSTAINABLE TOURISM IN COUNTY CORK****: a) Ensuring the protection of the natural, built and cultural heritage assets of the county, including Natura sites, which are in themselves part of what attracts visitors to the county.*
>
> ***TO 10.2 COUNTY DEVELOPMENT PLAN OBJECTIVE: WILD ATLANTIC WAY:*** *Continue to actively engage, invest, encourage and promote the development of the Wild Atlantic Way and Irelands Ancient East regional brands through sustainable tourism ...*
>
> ***TO 10.10 COUNTY DEVELOPMENT PLAN OBJECTIVE: TOURISM FACILITIES*** *c) Support sustainable environmentally sensitive small-scale tourism enterprises including Agri-tourism enterprises and other initiatives that are developed in conjunction with established rural activities such as, fishing, walking, cycling, mountain biking, surfing, equestrian sports and other activities where these are compatible with environmental legislation.*
>
> ***For further objectives/policies: see, Appendix C:*** *Tourism, Introduction, TO10.4, Failte Ireland Regional Brands, 10.5.2: the principle features of the area's tourism product include mountains and upland habitats, TO10.6 Protection of Tourist Assets, including Shehy Mountains - mentioned by name, 10.6.2 ensure other development generally, and tourism, does not have negative impact or cause harm to the environment, 10.6.3 protect rural areas to contribute to tourism growth, recognise night skies as a tourism asset and it should be protected from light pollution.*

Along with all these Tourism objectives and policies, An Bord Pleanála Inspectors reports and previous Board decisions have demonstrated that significant weight is attached to the protection of tourism assets where scenic unspoilt landscapes form the baseline for a thriving local hospitality industry.[99]

As a last thought for this section, an aspect often overlooked is that sometimes tourists 'stay' and decide to live here. We may be of different nationalities, but we all buy homes and bring substantial incomes of our own to Bantry's local economy. Like many blow-ins, we personally have retired here after many decades of visiting as a tourist as we are still enchanted by West Cork's unspoilt shore-lines, hills, valleys and mountains. We would not have chosen even to visit this area, as a tourist, if it was just too full of industrialised wind farms. Certainly, hospitality venues are not cheap; the weather can be wet and cold; but we came for the silence, the peacefulness and the dark skies which are extraordinary, just like Bantry's beautiful landscape - at the moment.

---

[99] ABP-305350-20: Inspectors Report attaches significant weight to submissions from Failte Ireland, recognising that landscape quality is fundamental to the tourism economy of West Cork,
See also Hazel McCarthy's professional Planning Report on Curraglass Application 25/6398.

Granting permissions to too many wind farms in rural areas, such as the Mealagh Valley or Shehy Mountains, causes a toxicity as apparent and as measurable as any other pollution you may name.

7. OVERALL ASPECTS: Cumulative Effects and a Corridor of Wind Turbines.

There is a complete dismissal by the agents of the worries[100] most people would have concerning the cumulative effect proposed for this area. In a bland voice of non-reassurance, they offer a destruction of the natural beauty, remoteness and wildlife of an increasing wide area of West Cork, and the daunting prospect of another wind farm adding to the 'corridor effect' taking place along the R585 valley. As a previous ABP inspector, specifically notes: *Cumulative impact must be assessed not merely numerically but in terms of perception, saturation and loss of rural character.*[101] The proposal of fourteen turbines is being offered as one entity, where given there are three sites they should be gauged as having a cumulative effect in themselves given the area size, the scale, height and rotor diameters of the turbines on the differing hills, and the huge infrastructure contained within site roads, bridges, borrow pits, and compounds. It needs to be noted that no alternatives have been put forward to offer a proposal of say three or five turbines and to be on one site. Certainly, absolutely no comparative assessment has been undertaken as to how much more this threesome site will be visually dominant and disproportionate within the receiving landscape, especially as the National Territory Mapping exercise has already paired 'Open to Consideration' areas with 'Low Capacity Area'.

The Wind Energy Strategy in the CCDP 13.6.3 indicates: *'The location of all existing and proposed wind energy developments and their cumulative effects' should always be taken into account.'*

If permission was given for this 'Maughanaclea' project, there is a possibility of two hundred and eighty seven (287) individual wind turbines in this tiny area of West Cork. In anyone's imagination, outside of a wind-energy factory, this number would be past the tipping point for an acceptable density of wind turbines within a 25Km radial area. Even more so, this staggering figure is well past an acceptable density for such a highly valued scenic landscape: our natural rugged and moorland will be overshadowed and dominated by an industrialised wind farms, whichever way is turned.

As far back as 2012/3 there were grave concerns regards the cumulative effect of the number of wind farms in this localised area. When planning consent was given to Shehy More for twelve (12) turbines at a max. tip height of 131metres, the An Bord Pleanála Inspector's report raised the issue of a concentration of wind farms in the area:

---

[100] p.41 Non-Tech. An assessment of potential cumulative effects was also undertaken, taking into consideration proposed or permitted developments within 5km of the proposed turbines, and permitted or proposed wind farms within 20km of the proposed turbines. No significant negative cumulative effects have been identified.
13-102 The proposed turbines do contribute to the cumulative number of turbines within the landscape. However, the landscape is of large scale, comprising marginal upland and a sparse settlement pattern. The large-scale, expansive landscape is effectively capable of accommodating the Proposed Wind Farm, as well as other wind energy developments.

[101] Hazel McCarthy's report quoting ABP-305350-20 Curraglass .

> *'The main concern I would have is the cumulative impact of so many existing wind farms in this one area…While in many respects the area is ideal for wind farms, like any it has its limits before the number of turbines fundamentally alters the qualities in an unacceptably negative way. To a large extent this is a subjective judgement as there is no clear guidance nationally as to when it can be concluded that enough is enough. Clearly the appellants believe that they have been asked to accept too many turbines in one area, and I have a lot of sympathy for their concerns. ..... I would conclude that for this appeal, the has not yet reached its limits for capacity for windfarm developments, <u>although it is quite close to a reasonable limit for what it can take before any further developments result in a strongly negative impact'.</u>* [102]……

So thirteen years ago the ABPInspector was stating there was already little room for more turbines. One more wind farm before the cumulative effect would reach a tipping point. It illustrates clearly that with Shehy More Wind Farm already in operation, enough <u>is</u> enough. Yet An Coimisiún Pleanála is being asked to consider the SID application, along with not one but three appeals for wind farm within 5 km of each other, and all in the same mountainous and beautiful landscape. One can sometimes slightly despair as developers and consultants seem to know no limits: even when their maps like Figure 13-16 (see appendix F) show that a saturation point has long been overreached, the present EIAR abounds with statements like this one: .

> *However, the landscape is of large scale, comprising marginal upland and a sparse settlement pattern. The large-scale, expansive landscape is effectively capable of accommodating the Proposed Wind Farm, <u>as well as other</u> wind energy developments.*[103]

In the mind's eye, one can see a proposed string of wind farms going from the Shehy Mountains, taking a line across the Cousane Gap from Coomclogh, to the Maughanclea hills, and Derreenacrinnig West, with the Mealagh Valley in between. The first wind-farm site, at Shehy More is Enerco's; Gortloughra is proposed by Statkraft; the Maughanaclea's proposal is again Enerco, and Statkraft has its eye on Goulacullin (if it can find a transport route wide enough). It wouldn't be unreasonable to question whether Statkraft and Enerco Energy, along with their agents, have strong networking contacts given the commercial goals they share? The strings consist of individual wind farm developments, being potentially from two companies, but within an overall umbrella or framework of around forty (40) turbines.[104] This huge framework needs to be considered by An Coimisiún Pleanála as a somewhat dystopian entity to be any way convinced of the merits of this, or not. The utterly devastating effect on the receiving environment, our local landscape and the visual amenity of our area, will be far far greater than if the turbines proposed are situated in different parts of County Cork, or alternatively older turbines were re-powered.

---

[102] PL 88.240070 - Philip Davis - report dated 4th May 2012. 13/0051 The underlining is mine.

[103] p.13-102. Chapter 13.

[104] There is an application currently with Cork County Council for a further three: to be located at Deereencrinnig West, that may also have connections with Enerco, sharing the same consultants, Jennings O'Donovan, as the one used by Statkraft. See Appendix F for a map of the devastating effects that wind farms would have to the local area. Acknowledgment: This was hand-drawn by Mr I Collins - Thank you.

This is all diametrically opposed to previous planning refusals, at both CCC Planning and at An Coimisiún Pleanála levels, and against the Objectives within County Cork Development Plans, such as ET 13-3: Wind Energy Strategy 13.6.3. In assessing the most appropriate and suitable locations for wind farm, the objectives state that an accumulation of more wind farms could have a '*more intolerable visual impact in the future*'. It adds in this and other sections: *'The location of all existing and proposed wind energy developments and their cumulative effects'* [105] should always be taken into account.

Further, if we return to the 2006 WEDG, and the time before turbines grew exponentially; the guidelines provide a authoritative definition of cumulative effect as;

> *'the perceived effect on the landscape of two or more wind energy developments visible from any one place'.*
>
> *'In terms of character, additional wind energy developments might contribute to an increasing sense of proliferation. A new wind farm might also contribute to a sense of being surrounded by turbines with little relief from the view of them'.*

If [consultants] lines of argument were acceptable at all to An Coimisiún Pleanála, further proposals would most certainly follow for a whole line of wind farms along the R585 route to Ballylicky, and further into West Cork and its coastlines. One of the defining features of West Cork is the ever-opening views as one travels west from Coppeen and start to come upon the hills and mountains growing tall in the distance. Already noticeable is the 'Wind Farm Corridor Effect' beginning to appear along the valley of the R585: one of the main gateways into Bantry and the Wild Atlantic Way, and Failte Ireland 's Calling Card. Wind farm developers such as Enerco and Statkraft seem to have singled out this part of West Cork for excessive wind farm developments. This area cannot be turned into an industrialised rural landscape, where visitors and tourists will quickly drive through not wishing to stop amongst a wind farm dominated landscape. It's time to say, 'Enough is Enough'.

8. ANSWERING THE APPLICATION: MKO's Omissions and Misinterpretations. This section could cover a multitude of misinterpretations, sometimes it is when MKO is analysing it own data, as with the ornithology, and oft times it is a mix of omissions, platitudes and slants on arguments. In addition, the agents use the same words over and over again so that one starts to believe that what they say must be so, without question. These are a few examples, of the many that could be assessed:

- One of the most important appendices: Appendix 11.2 - Carbon Calculations, has too many omissions to be able to gain factual understanding of the amount of carbon that will be released to the atmosphere in the course of constructing the complex. Ie. where are the figures for peat losses due to the turbine hardstandings? Where are the carbon figures for the

[105] p.296. (CCDP) Cork County Development Plan 2022 -2028 Volume 1 Main Policy Material : Objective 13.6.3.

manufacture and transportation of turbine parts? The carbon costings for the necessary grid change appear to have been omitted. However, I am sure within the Inspectorate, there are some with far more understanding of this and will need to list the additional figures requirement, as well as seriously challenging some of the assumptions made, such as the capacity factor used.

- The second item to address is the total omission of the planning history for the Ardrah site (part of the area which MKO called the 'southern site') and An Bord Pleanála's refusal to grant for planning permission. One would expect to see full disclosure of this in the EIAR: Chapter 2: Background to proposed development, as in the Curraglass application. Both EIARs are noted as being overseen by the lead: Mr Alan Clancy MIPL of MKO, and were prepared within months of each other. It is useful to compare the different preambles and information provided in the two applications:

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

The lack of information for the Ardrah site seems to be a very calculated step.[106] The omission is significant in that many sections: population and health, biodiversity, land, soil, water, air, and climate, cultural heritage and landscape, are assessed in the 2014 ABPInspector's reports. MKO's lead consultant should have acknowledged the findings from the report in his present EIAR and the Planning Report, just as for Curraglass. To be totally clear: substantive previous documentation exists for the site containing three turbines T14,T13,T12, to show they would have

[106] The entry on the table is not the only occurrence: p.13. MKO Planning Report 3.3 Planning History reads: 'A planning search was carried out through national planning application database and An Coimisiún Pleanála's (ACP) online planning portal in March 2026 for planning applications that fall within the planning application boundary of the Proposed Project within the past 10 years. The relevant planning applications are outlined in Section 2.7.2 of Chapter 2 of the EIAR and in Table 1 below.'

direct significant (negative) effects especially in regards to landscape. Further, the previous EIAR, montages and reports indicate that indirect significant effects would occur if turbines T11,T10,T09,T08,T07, were built further along the ridges.

When An Coimisiún Pleanála Inspectors carries out their examination, analysis and evaluation for 'Maughanaclea' this more than serious omission clearly will lead them to decide that the EIAR has failed to meet the satisfactory standard required in Articles 4 to 11 of the Environmental Impact Assessment Directive.

- The EIAR seems to refer constantly to this area as being sparsely populated, which is not only incorrect as to be very misleading. MKO's maps clearly show are 69 houses within one kilometre of one or more turbines, alone. Then a further 147 houses between one and two kilometres, and another 30 houses within three kilometres, without considering the seats of Keakill town and outlying houses to the west that will have significant visual sight of turbines left and right... There are 24 identified as 'involved landowners' but as there are only 7 consent letters for people living locally, we can not assume the other 17 landowners know they have been 'tagged' as such. So misapplying the 7, there are 239 houses within 3 kilometres, which is below the 275 theoretically tested by MKO as potential 'noise-sensitive receptors'. Taking statistical figures from the documentation, MKO uses a (2022) estimated occupancy rate of 2.72 people.[107] Doing the maths, there are between 659 and 748 people that could be living within 3km for their turbines. So, the potential affected population not sparse by any statistical calculation, such as comparing this with the whole of Bantry town which grew to a 'huge' population of 2929 from 2722 in 2016.[108]

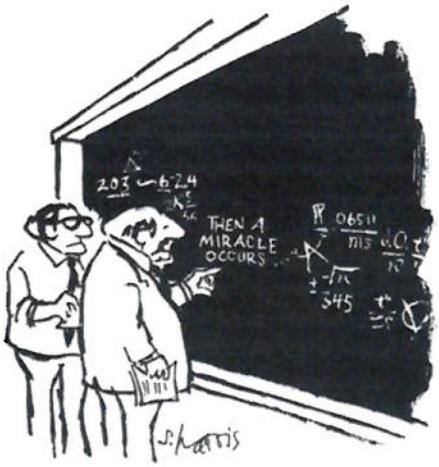
It has been found in surveys that between 25-15% of people will live with a constant feeling of annoyance seeing and hearing these turbines and this may not diminish over time causing it to affect people's health. Renewables advocates say this is simply because they are not accepting the shifting baseline of their environment. This is not a fair judgement on anyone. The immediate negative response expressed in the survey report by the community is evidence of people's discontent being higher than the percentages offered. The consequences of building wind farms in the wrong location are becoming more and more apparent - such as the peat-sliding Enerco wind farm in County Donegal - and one would hope this would have shown the way to insisting on a far more robust EIAS - but, they have actually become massive exercises of paper shuffling and desk exercises unable to scope properly in order to find an appropriate location that meets the criteria for proper development as set out in County development plans.

---

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

[108] 2022 census reveals 2929, CCDP Volume 5 West Cork gives the figure for 2016.

- Moving on, the EIAR proceeds along the usual lines of mitigation measures that will be introduced to solve any problems - without specifying whether they have proved effective in their actual performance. In theory, there are now sufficient wind-farms in Ireland to provide ample evidence as to precisely how, why and and what mitigation measures have worked, and have not, as well as Enerco Energy Ltd itself having more than sufficient construction and operational experience of their own wind farms to provide clear statistics and concrete evidence of previous mitigation measures and their effectiveness. Instead, often An Coimisiún Pleanála is provided with the same vague assurances simply repeated from previous applications. It is offered that the Inspectorate requests once again for more robustness in EIARs, and especially in the area of mitigation measures, adding a severe caution to refrain from generalisations or theories.



"I THINK YOU SHOULD BE MORE EXPLICIT HERE IN STEP TWO."

- The pre-application work, and now the documentation presented with this application is full of misinformation, that could be pulled out at length. These are just a few examples of these:

  - In MKO's first pre-application presentation, ET13-2 Objective is stated as being *'wholly supportive of wind energy'*, when the Objective is just encapsulating a concept of facilitating the development of <u>all</u> renewable energy sources <u>at suitable locations</u> in support of *'Ireland's renewable energy commitments as outlined in Government Energy and Climate Change policies'*[109]. The next slide informs the meeting that CCDP WES's states applications for policy area 'Open To Consideration' will be considered on their merits. The strategy doesn't state this.

  - The second presentation slides stretch this further: *Wind energy projects in these [OtC] areas are acceptable <u>if impacts can be managed</u>, particularly in relation to Noise, shadow flicker and visual impact on residential areas, etc.* In Wind Energy Strategy for County Cork, Objective 13.6. it is perfectly clear in that commercial wind energy development is open to consideration in areas where proposals <u>can avoid adverse impacts</u> on residential amenity in respect of noise, shadow flicker and visual impact etc etc. There is no 'merits' or 'management' involved, areas of adverse impacts <u>are to be avoided</u>. The positive spin that MKO placed on the presentation, rather than quoting policies and objectives accurately, is misleading, and quite frankly unprofessional.

---

[109] ending suitable locations with the words 'within the county where such development has satisfactorily demonstrated that it will <u>not have adverse impacts on the surrounding environment</u> (including water quality), landscape, biodiversity or amenities'.

- In the EIAR documentation now presented as the main part of the application, where it suits MKO only part of aims within policies are quoted, and not the CCDP Objectives themselves. Just one example of many:

> *"The Proposed Wind Farm site is located in an area deemed 'Open to Consideration' (OTC) under the CCDP's Wind Energy Strategy, as illustrated in Figure 3-1 below. Areas that are OTC are "locations that may have potential for wind farm developments but there are also some environmental issues to be considered. Wind turbines located in OTC areas are therefore open to development, subject to conformance with the Wind Energy Strategy and the proper planning and sustainable development of the area."*[110].

The quote is taken from a large paragraph (13.6.7) setting out the aims of the policy for 'Open to Consideration'. However, the aims in such statements are always honed, tightened and styled into the actual Objective, ie. County Development Plan Objective: ET13-7 Open to Consideration states far more firmly and clearly:

> *Commercial wind energy development is open to consideration in these areas where proposals can avoid adverse impacts on:*
>
> *Residential amenity particularly in respect of noise, shadow flicker and visual impact; ...Natura 2000 Sites (SPA's and SAC's), Natural Heritage Areas (NHA's), proposed Natural Heritage Areas and other sites and locations of significant ecological value; Architectural and archaeological heritage; Visual quality of the landscape and the degree to which impacts are highly visible over wider areas. In planning such development, consideration should also be given to the cumulative impacts of such proposals.*

This ET13-7 Objective is far more difficult to achieve than simple 'some environmental issues'.

- A further example is where MKO provides a a whole list of Energy and Climate Objectives from the CCDP , and then ET13-6, ET13-7, ET13-8 are conveniently placed in a table and the actual text of the objectives are simply identified as 'description'.[111] This negates the fact that these Objectives are an integral part of County Cork's development plan, which in adhering to the P&D Act 2000 as amended, have a legislative basis, ie:

> *The Act sets out the mandatory requirements which must be included in a Development Plan and these include objectives for inter alia: the zoning of land; the provision of infrastructure; the conservation and protection of the environment; and, the integration of planning and sustainable development with the social, community and cultural requirements of the area and its population.* [112]

Just quoting bits of CCDP's aims or policies instead, changing headlines, is all quite subtle - but then MKO has been doing this for many a year. Sometimes in the paperwork, objectives

---

[110] p.3-8 Alternatives chapter: Planning Policy

[111] p.9 Non-Technical Summary Table 2-2 Cork County Council wind energy strategy area designations.

[112] p.13 CCDP Chapter 1 Introduction, Vision and Context.

are quoted as policy and visa versa, and it is exceedingly worrying if MKO does not understand the difference? The few-ish times when CCDP Objectives appear to be headed and quoted correctly are the energy ones between ET13-1 and ET13-10 or ET21/22 from Chapter 13, and these of course suit MKO's driving purpose to 'get this wind-farm built'. I would ask that ACP inspectors be carefully aware of this misnaming and shifting of policies and objectives as they work through the agent's paperwork. To assist, Appendix C contains both the CCDP policies and the CCDP Objectives that relevant to this wind-farm proposal.

- A serious omission from the EIAR is the lack of a full environmental impact scoping exercise, and is particularly poor when it comes to alternative sites and locations. A fine example that could have been copied is that of Shehy More's application, and illustrated by the map of site selection constraints[113] which shows a final six (6) possible sites well away from other planning permissions/applications, and well away from 'Strategically Unsuitable' areas. The 2022 guidelines[114] require that an EIAR contains a description of reasonable alternatives, and it suggest that this includes alternative locations so that a comparison of environmental effects may be made. In addition, 2006 guidelines sets out quite clearly:

> *...a step-by-step approach is proposed. This ordered approach involves a sieve mapping analysis of the key environmental, landscape, technical and economic criteria which must be balanced in order to identify the most suitable location for wind energy development.*

Certainly no alternative County Cork locations have been assessed, which would seem essential for the next step of comparing options and effects. However, MKO's way of scoping has managed to pick the 'Maughanaclea' sites, which is in a crowded area of possibles and has major environmental and ecological implications. [115]

Further, it not satisfactorily explained in the EIAR how the scoping picked out this part of the LCT15a area. It is of High Landscape Value, has High Landscape Sensitivity, and turbines would be within 250m and 400m of lands within the highest category, (HVL) High Value Landscape. It is further protected by CCDP landscape policies and objectives: GI14.9.1, GI14.9(a)-(e), GI14-10, GI14-11, GI14-12 and indirectly by Landscape/Scenic Routes: GI4.9.2, GI12.9.3. GI14-13, GI14.14 and GI14.15. Agreed, that the lands are 'Open to Consideration', but this only means it is has been assessed on two criteria: it has variable wind speeds but is without having good proximity to the grid. Certainly any half decent scoping exercise would have removed the suggestion of the

---

[113] A copy is attached to these observations.. The Map is entitled: Site Selection Constraints in 2-28, just before 2.8.2.2 of Shehy More Wind Farm - Environmental Impact Statement 110520 EIS 25/09/2013. The EIS was carried out by McCarthy Keville O-Sullivan ltd.

[114] p.33 Section 3 Consideration of Alternatives. Annex IV(2) of the amended EU Directive Guidelines on the information to be contained in the EIARs. Environmental Protection Agency Published May 2022. The objective is for the developer to present a representative range of the practicable alternatives considered.

[115] One Objective which has cropped up a number of times is ET13-7 'Open to Consideration' from the Wind Energy Strategy. To just leave here the two other designations: ET13.8 Normally Discouraged, and ET 13.9 Acceptable in Principle which appear quite clear cut and tie up nicely and neatly with their LCA designations. However, the vast 'Open to Consideration' areas can be anything from Medium to (what was) very High Landscape Value and from Medium to (what was) very High Sensitivity, and either Local or County Importance.

three sites very quickly, and at least the consultant would not now be performing verbal gymnastics to illustrate how black is white.

If a scoping exercise is carried out properly and in a comprehensive manner some of the delays, barriers, difficulties and problems of wind farm applications would be easily avoided. This of course would be a rational approach now there is the urgency imposed for RED III applications. It would have excluded sites that may have already gone through the planning process, and where documented history shows that permission has been refused as the location is inappropriate. This happened already for Ardrah, which was discounted in the Gortloughra application because it had been refused at An Bord Pleanala, and the Ardrah documentation states its site was only chosen in the first place because it was owned by the applicants.

As a short conclusion: with MKO's EIAR, it must be rigorously examined as to whether it is a fair assessment of the direct and indirect effects that this proposal would have on its environment and surrounding landscape. Going through page after page, the EIAR's whole raison d'être is to gauge virtually nothing as having 'significant effects' and for the few aspects that are, to propose (but not prove) it is of little consequence, or mitigation measures would easily solve them. For MKO the impacts of the proposal on this 'utopian' site are never 'significant' - the criteria set out in Articles 4 to 11 of the EIAR. Instead the effects are nothing but medium, moderate, all the way down to being slight or imperceptible; even though its character landscape assessment is one of having High Sensitivity to Change. Though MKO's comprehensive data is usable, evaluations appear either complimented or completed by desk-top studies - the industry's euphemism for AI - to make everything 'perfect'. By purposeful intention, it seems, there is a skewing of the data to form poor illogical conclusions on the significant effects on the environment of the proposed project. Using the precautionary principle, the effects should be seen as being higher than the gradings given by MKO, to at least some significance, and permission for this proposal should be refused as it is the only proper outcome.

8. ANSWERING THE APPLICATION: Public Consultation.

This section tries to be brief and is provided in bullet points.

- The one map that the communities have studied for months, from Enerco/MKO's information website, has formed no part of the application. An A3 copy is attached in the appendix. It shows all our 239-275 sensitive receptors and their distances from turbines: the maps provided to ACP either have no 'receptor numbers' or have a much larger distances encircled, such as 5km. These new MKO maps have a certain distorted reality, and displace just how close our 'receptors' are.

- The consultation effort of the Quille's 'personal' letters sent, and the many information boards at two 'open PIE evenings' held, were nothing more than generic copies of those found time and

again on Enerco websites for other applications in Ireland. The sense of this all being so impersonal is palpable.

- Serious genuine concerns were expressed at these exhibitions in April and in November 2025, and yet have not made one iota of difference. To say, *'this feedback has continued to inform all the refinements to the project design and all concerns have been fully addressed'*[116] is just incredulous. In all the documentation, only a tiny token alteration exists that can be attributed to having been at one of these professed public consultations.

- We can read in Chapter 3 of alternative turbine layouts, alternatives in renewables technologies; however, these were never muted at or illustrated at either of Enerco's 'consultation efforts'. These have been simply pure unalterable information on 'what we will be building': end of. Whilst something may have taken placed behind closed doors with 'landowners consenting', two local communities have been totally excluded from providing 'recommendations and comments' on these alternatives, at what would have been the appropriate time in the communication process.[117]

These bullet points are just these few examples to illustrate how MKO's public airings ignore the very raison d'être of the Aarhus Convention which extols that: *'public participation in decision-making enhances the quality and the implementation of decisions'*. This is a serious matter which undoubtably ACP Inspectors will take up in their examination, analysis and evaluation of the submitted EIAR.

9. WIDER ASPECTS: Alternatives to be considered in the way of renewable energy.

This first sub-section actually addresses a recent criticism from one of our County Cork planners, concerning objections to another proposal for a wind farm in the Mealagh Valley:

> *What is clear is that the national policy and the County policy is that renewable energy must be provided. In perusing all the letters of objection they are simply aimed at the problem of wind turbines and nowhere in any submission is there any suggestion as to how climate change should be tackled and how renewable energy can be otherwise may available and be developed.*

This criticism is uncalled for, and will be part of an appeal going forward, but it is worth considering this perception, just in case is a little more widespread than our local planning office. In the recent Supreme Court ruling for Coolglass, it was stated in 82 and 84.

---

[116] 2.1.1.5 Appendix 2-1 Community Engagement Report

[117] 3.2.5.2. Alternative Turbine layouts and development design.

82. [The Climate Action Plan] *'does not purport to describe in any more detail how that target (9GW) is to be achieved...or how proposals for wind power are to be reconciled with other planning consideration'*

84: 'The climate objectives set out in s.15(1) operate at a much higher level of generality than <u>any planning decision</u>, even for a large-scale project such as this'.

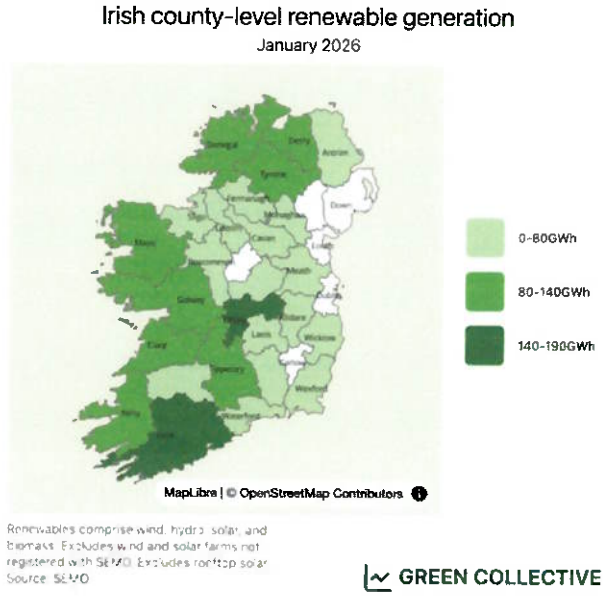
So if it is not incumbent upon the CAP document, the ACP or CCC Planning to say how climate objectives will be achieved, it is hardly equitable to expect members of public to try and fill in the details as part of their objections to a wind farm? However, with good heart, let's satisfy the CCC planner's wishes and set out *'how renewable energy can be otherwise may available and be developed'*. First, a Solar PV Array is a viable alternative, and some of its advantages already having been set in MKO's chapter of alternatives. So taking MKO's own words and expanding on them:

- <u>Output:</u> To produce the same electricity output, MKO states 'the solar farm's footprint would be 9.15% of a site'. This could be on a small part of degraded lands unsuitable for further grazing, growing crops etc, creating a Wet Habitat. This moist microclimate can support ground birds, amphibians and wetland plant species: a win for biodiversity and soil health. The main solar panels could replace the Sitka conifers : two of the forests have already reached their harvesting date and will be removed anyway. The outer conifers could easily be replaced by sensitive screening around and 'hedgerows' to form buffer zones to ensure continuity for wildlife.
- <u>Far less impact on Population and Health</u>: Once operational, (in stark contrast to turbines) no potential for noise and vibration effects, far lower potential for visual obstruction in the skyline, no potential for shadow flicker. Once constructed, solar panels create a minimal level of AM and other hidden forms of intrusive noise impacting on sensitive receptors nearby.
- <u>Landscape and Visual: Minimal visibility</u> to the surrounding area due to purposeful screening, With strategic placing, the panels would not to be seen from receptors within the 2Km, adjacent High Value Landscape areas, scenic routes, Bantry Bay and the Wild Atlantic Way.
- <u>No aviation lights</u> are required with solar panels so the complex would not be destroying the wonderful dark skies of the Mealagh valley.
- <u>No potential for collision risk for bats and birds</u>, so rescuing populations of birds of prey and other species on the amber and red lists of conservation concern and EU's Birds and Habitats Directive. No collection of rotting corpses would be required once a month.
- <u>Soil and Water:</u> Far shallower excavations so reducing volume of spoil to be excavated, solving the risk of peat slippage and silt-laden runoffs entering receiving waterbodies.

- Climate: Less of a carbon offset, but initially set off by less disturbance of soils, minimal removal of peat and so lessening by far the release of carbon.
- Possibly a larger volume of transport movements, which as MKO constantly assures everyone, is only ever short-term and therefore of little 'significance'. Bridge/ structural collapses have a lower risk of structural collapse due to lighter project components.
- Far more in keeping with the prevailing ethos of the local area east of Keakill and in the Mealagh Valley, where receptors increasingly have solar panels, to the extent that some families are totally off-grid.

A similar analysis of advantages can be done for solar panels on buildings, off-shore wind energy, bioenergy and biomethane, geothermal, hydroelectricity, tidal/wave energy, and of course, nuclear power - the most 'green' renewable energy of all and muted by the Taoiseach recently. Offshore wind is obviously the most logical alternative to onshore wind and other renewables on this long list; but MKO likes to argue against this saying there is no firm next auction date and only one offshore project in early development so onshore?[118] This is stated as a negative but at the same time they insist on a ten(10) years planning permission, so their developers may build their onshore complex at their own commercial convenience? Above all discussions on renewables sits the most obvious: Ireland badly needs a concerted and mandatory drive to reduce rather than grow our energy needs.

It is worth finishing this section with noting that the EU climate objectives, set out in Directives and overall Targets, have one immediate intention: to drive the move away from fossil fuels to renewable energy. But, the actual mix of these energies, the setting of each source's target, and moderating the targets for onshore wind in favour of offshore, are within the remit of Ireland's government.



9. WIDER ASPECTS: County Cork.

County Cork, and County Offaly, are the only two counties that achieved between 140-190Gwh of renewable energy in January 2026. In the year 2025, just three counties: Cork, Kerry and Offaly represented 30% of the whole of the Island of Ireland's renewable electricity generation. This was 4600GWH, far more than other fifteen(15) Counties produced together. For Cork and Kerry, like many counties, wind energy is the overwhelming

[118] Contrary to this claim, there are six offshore wind applications with ACP at the moment.

renewables source within the County. Despite the high number of wind farms operating in County Cork it needs to be noted that the professed economic benefit of this only amounts to 5.52% of the total county rates received.

County Kerry now has so many wind-farms that in formulating its CKDP2022-2028 the County ensured its 'Open to Consideration' areas were vastly reduced, in effect saying 'enough is enough'. In contrast, County Cork still has 55% of its County designated as 'Open to Consideration' for wind energy development, even though the county produces so much wind energy already. However, the people who live here are feeling the strain. Ireland's other counties have lagged far behind wind energy production, even though counties like Sligo have the same 'precious' resource of westerly winds in abundance.

9. WIDER ASPECTS: Wind Energy Association, and the onshore wind energy industry at large.

The preferred option of Irish Wind Energy Association is possibly unfettered development. However, as recent as 2023, the Association itself highlights how their Industry Stakeholders note two difficulties:

- *'Access to good quality sites for renewable energy generation is becoming increasingly challenging for developers as the most "optimum" sites are already secured'.*

- [Part of Conclusion] *While acknowledging that the ambition will be dependant on the timeline of offshore delivery (which was not the focus of this consultation) over 95% of industry experts believed that the 80% RES-E target for 2030 will not be achieved and is out of reach as c.6 years to deliver is too short a timeframe.*[119]

This reveals quite a bit: first the 'low-lying' quality fruit (Land) has gone. Second, this explains why the industry is turning back to previously refused and unsuitable sites that are not appropriate for the super-tall turbines now produced. The commercially competitive incentive is so strong that few lands are turned away in present generic scoping exercises by the onshore giants of industry. The main target of 80% RES-E, quoted in many a wind-farm application, cannot be met according to 95% of the Industry stakeholders. Does this explain why when the target is only c.6 years away, applications are always asking for a construction period of ten(10) years, even where they illustrate that providing an infrastructure would be easy? It needs to be recognised more widely that the achievement of Ireland's targets for wind energy is first and foremost at the bidding and behest of the wind industry. One needs only to turn back to County Cork and the recent extension of permission for Coomatallin wind farm. Of the original permitted seven turbines, only four were ever erected some 20 years ago by SSE Renewables.[120]

---

[119] Frontispiece and Conclusion in Act Now, Accelerating onshore renewable energy in Ireland. An industry stakeholder consultation on behalf of Wind Energy Ireland 2023.

[120] An opportunity lost? To meet climate objectives, did CCC planners consider letting the current permission lapse instead? A fresh application could then have submitted by the developer/operator to increase the MW output by erecting the 'missing' turbines at 119.3m tip height, given this is an ideal and appropriate site for a wind energy complex..

The whole output for the wind farm is only 6-megawatt(MW) installed generation capacity, which is in the midrange for just one Enercon turbine.' The chosen option by SSE is to have a 'free' twenty years using the turbines already there. This is even though the wind farm is in an appropriate ideal location, which is the basis of good planning practice, and has capacity to be extended or re powered. Climate objectives are a long way from being their first priorities.

Lastly, there even though it would benefit both the industry and planning organisations, there seems no discussions between wind energy companies re-evaluate their scoping exercises. It would of course be far better for the industry to find really appropriate locations in the first place. Instead, the companies try to juggernaught their way through the planning process, within the 'licence of REDIII regulations'. Looking to build in very scenic areas and/or on peatlands, is looking to have permission granted for totally inappropriate locations, where the receiving environment and its biodiversity can be destroyed forever. This is also an anathema in terms of hard figures: the peat removal is always 'up front', so all the tons of carbon being released, as a result, would actually move Ireland further and further away from its legally binding target of a 51% reduction in carbon emissions by 2030. Sounds daft? Any wind farm to be permitted to built on peatlands would still take a year in planning and two years in construction, so will not be operational to 'pay back' the carbon emissions until after 2030. We live in interesting times.

10. SUMMARY AND CONCLUSION

SUMMARY.

The Supreme Court Judgment has given its endorsement to the strategic place of County Development Plans within Ireland's planning processes. EU Directives, cascading though the levels of legislation, national policies, regional strategies, to County Development Plans all offer a straight forward and mandatory order that new installations must be at appropriate locations.

This summary is therefore just one of bullet points to answer whether this 'Maughanaclea' project would be in an appropriate location? The litmus test lies within CCDP's ET13.2 objective, in that County Cork will facilitate renewable energy development:

> *at suitable locations within the county where such development has satisfactorily demonstrated that it will **not** have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or amenities.*

Just to consider again, two words within this Objective:

Adverse decisions, conditions, or effects, are things which are unfavourable to you.

The Impact that something has on a situation, process, or person, is a sudden or distinct effect that it has. (Note, words like '*significant*' or the phrase '*if impacts can be managed*' do not appear in the Objective ET13-2 — as much as MKO would like them to!)

So, summarising in this submission in a few words:

- PREVIOUS PLANNING HISTORY: over 25 years it has been concluded that the eastern part of the Mealagh Valley is an unsuitable and inappropriate location for wind energy projects. The words used most often are: *Landscape: elevated, unspoilt,*
  Turbines: visually obtrusive, out of character, seriously injuring nature.
- DESIGNATION: *Open to Consideration - BUT,*
  Part (east) is LCT 15a: High Landscape Value, High Landscape Sensitivity.
  Pre 2014 County Importance, now Local Importance.
  Most of the Maleagh valley and beyond CC's highest designation, LCT 4: Very High Landscape Value, Very High Landscape Sensitivity, National Importance.
  Additionally: High Landscape Value(HVL).

(The Difficulty MKO has here is that LCT4 is within 250/400 metres of their proposed development.

- INTRODUCTION TO THE MEALAGH VALLEY:
  Geologically the Eastern Part once contained a Pleistocene-Holocen Glacial Lake, which formed the Drumlins in the Valley and in Bantry Bay.
  A quiet, tranquil place to live: its funnelling produces the silence, but also turbulent winds and heavy rain storms.
  The Community respect and enjoy the valley's natural environment: its wildlife, biodiversity and heritage.
- ARDRAH: (T14, T13, T12 Turbines)
  Already assessed rigorously for wind farm development and was refused by ABP in 2014, due to being *strategically unsuitable a wind energy project, and its significant negative impacts on the visual amenities of the area.*
  (this planning application was not included in MKO 's EIAR for ACP to evaluate).
- MAUGHANACLEA HILLS within the Mealagh Valley: (T11,T10,T09,T08, T07 Turbines)
  CCDP's Objective GI14-9: d) <u>Protect Skylines and Ridgelines from Development</u>.
  (The proposed development fails objective GI14- 9, as well as other GI14-9 sub-sets)

  Potential of Significant Negative Visual Impact of Turbines.
  Noise Pollution during Construction/Enerco's detritus, and then Turbine Noise Nuisance.
  Ground Water. Severe Vulnerability as geologically it is Karst, Rock and Peat.
  Pollution of Deep-Bore, Shallow, and Streamed Wells. No Mains Water Supply within Valley at all , as well as some parts East of Kealkill.
  (MKO skirting over this insolvable problem as contamination of Water is a reason for refusal in itself.)

- EAST of KEALKILL: (T14, T13, T12, T11,T10,T09,T08, T07 Turbines. T06, T05,T04,T03,T02,T01)
  An industrialised complex. All the construction noise for people less than 1Km from 'Maughanaclea' sites and less than 2Km from Coomclogh site. Adverse Visual Impacts and households feel surrounded by huge turbines.

- MASSIVE LOSS OF PEAT AND ITS HABITAT.

  Across the three sites: Total Volume of Peat to be removed due to WF construction: Expected: 92,950 cubic metres. What of Interdependency of Wildlife and biodiversity?

  NB. Gortloughra proposal next to Coomclogh was refused permission by CCC for excess peat removal: expected peat loss was 24, 677 cubic metres across its 8 turbine site.

- OVERALL ASPECTS: BIRDS AND BIODIVERSITY.

  KESTRELS, red listed conservation concern - collision risk modelling questionable.

  CHOUGHS, Annex 1 EU Birds Directive. Disturbance, ecologically sensitive, tiny area here has sufficient numbers to be Nationally Important.

  WHITE TAILED EAGLES, Annex 1, Internationally important, even basic sightings data incorrect.

  KERRY SLUG DEROGATION, poor monitoring, precautionary principle not applied.

- OVERALL ASPECTS: LOSS OF DARK SKIES. Significant adverse effects on the Valley/ visual impact of bright red aviation lighting/ fails CCDP Objectives / research of effects of Wildlife.

- ARCHEOLOGY: Loss of rich heritage and also loss of relationships between monuments.
- SCENIC ROUTES: R585 /S29. A Calling Card for the Wild Atlantic Way.
- TOURISM AND ECONOMIC CONSIDERATIONS:

  Fáilte Ireland's Great Escapers/ thriving substantial Tourist Environment, both locally and Bantry.
- SPARSELY POPULATED? 275 houses within 2Km/

  Between 659-748 people living within 3Km of proposed Turbines. Bantry town pop. 2929.
- SCOPING ALTERNATIVE OF POTENTIAL SOLAR FARM, carried out then ignored.
- CUMULATIVE EFFECT OF WIND TURBINES, AND A CORRIDOR OF TURBINES:

  A possibility of 287 individual turbines, when the local area is already passed the tipping point.

Enough is Enough.

Taken direct from this submission, even this very truncated list has satisfactorily demonstrated that this 'Maughanaclea' Development WILL have adverse impacts on its surrounding environment (including water quality), landscape, biodiversity or amenities.

MKO has failed in its endeavours to demonstrate it will NOT have adverse impacts, and instead their EIAR has highlighted the sites chosen have innate difficulties. Permission should be refused for this development to go ahead.

WAY FORWARD:

Now is an opportunity for An Coimisiún Pleanála and its Inspectors to ensure new on-shore wind farms for County Cork are only built where a location is deemed appropriate in accordance with the objectives of the CCDP, which in turn meet the regional, national and EU Climate objectives. This would have to begin with addressing the scoping exercises, which have not been carried out in a comprehensive and meaningful manner for any of the four applications current with ACP's Inspectorate. Other sites are to be found within, and outside of, County Cork, which will meet the

objectives for Visual Amenity, Tourism, Environment, and Heritage, as well as Wind Energy, in order that proper planning and sustainable development will be achieved. Targets for renewable energy will be met in a way that will not destroy our beautiful Irish countryside, mountains and hills. To grant planning permission to this particular application, and (God forbid) the three others currently with An Coimisiún Pleanála, would throw West Cork rural areas away to become industrial playgrounds.

11. REQUEST FOR REFUSAL of PERMISSION.

As with other SID decisions in 2025[121] I would ask the Board, in making a reasoned decision, to consider the following:

- The appropriateness of the three 'Maughanaclea' sites for a renewables development, and also the wider area beyond the site.
- The pattern of existing, permitted and proposed development with a 25km radius of the sites.
- The distance between the turbines and surrounding dwellings/other sensitive receptors from the proposed development, and the direct and indirect effects caused by their proximity.
- The EIAR and NIS submitted by the consultants, which must also be consistent with the Environmental Liability Directive (2004/35/EC) which is concerned, to great degree, with environmental damage as in respect of "protected species" and "natural habitats", and prevention [also EU Dir. 2024/1203].

Returning to the Climate Action and Low Carbon Development (Amendment) Act 2021, an amendment of section 15(1) has been the subject of both a High Court and a Supreme Court Judgement. The actual amendment is worth studying first: *' a relevant body shall, in so far as practicable, perform its functions in a manner constant with (a) the most recent climate action plan....*[122] On reading the 2025 Climate Action Plan there are many references, of course, to climate change and renewable energy sources, but also the environment.

Chapter 1, of the 2025 Climate Action Plan: The Critical Nature of the Challenge reads as follows:
<u>1.5 Taking Action in Ireland</u>

> *'Under the Climate Action and Low Carbon Development (Amendment) Act 2021, Ireland's national climate objective requires the State to pursue and achieve, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable, and climate-neutral economy.'* [123]

---

[121] see Board's Order ABP-319448-24 which seems to give the criteria. Though there has been some transformative aspects of the Abp to become now the ACP, this reasoning would still hold.

[122] This amendment is encouraging all relevant bodies to be practical in its decisions.

[123] p15. Climate Action Plan 2025. Prepared by the Department of the Environment, Climate and Communications. Government of Ireland.

In the above statement each of the four descriptive phrases have equal importance: an action that, say, could bring about climate resilience, does not have precedence over environment or biodiversity. So, builders of commercially-built industrial renewables must show they can achieve all four in the proposed 'appropriate' location they have chosen. The An Coimisiún Pleanála already encompasses this within its ethos, noting that it now works within '*an increasingly complex planning regulatory environment with an emphasis on environmental protection, including protection of habitats and biodiversity.*'[124] Climate action wrapped in Environmental objectives, starting out in high-sounding National Policies and Acts and European Directives, all disseminates down into County Development Plans, such as CCDP, and it is here that the practical work begins.

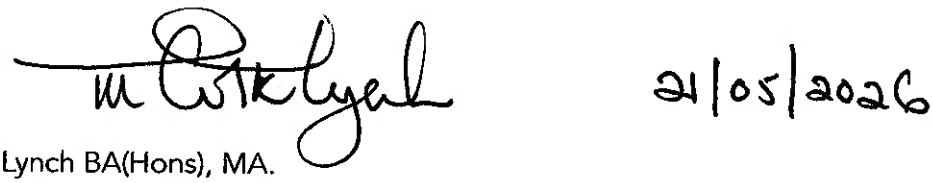
The Climate Objective must be achieved through proper planning and appropriate development, and my submission has shown that for a multitude of practical reasons this application would not achieve the four parts of the above Climate objective in the location the developer has chosen. An Coimisiún Pleanála can be satisfied that a refusal of permission, in this instance, is consistent with the Climate Action Plan 2025, and for a whole raft of reasons. Based on practical assessments, the reasons range from a potential significant loss of the peatlands, habitats and biodiversity to the visual/scenic/ impacts that would diminish the beautiful Mealagh Valley and the grandeur of the Shehy Mountains, resulting in negative effects on the local economy and the well-being of people in this area of West Cork.

Two final thoughts remain:
First, to grant permission for this particular application would undermine consistency in the Board's decision-making if viewed against its precedents, and be contrary to the principles of proper planning, legal certainty and fairness as endorsed by the courts.

Second, thank you for reading this submission, and I trust my observations will be taken forward into your decision-making. In this, I would ask that a mindful approach is taken and the precautionary principle is followed. I am hopeful of this, in the light of An Coimisiún Pleanála's recognition of being guided by values of Respect. The declared statement on your web-site appears two fold:

> *We recognise the value and dignity in everyone. We are clear on the right of fair, accessible participation for all in the planning system.*

Mise le Meas



21/05/2026

Teresa Colk Lynch BA(Hons), MA.
The Gathering, Gortnacowly, P75 V065 Bantry, County Cork.

[124] Information Booklet of ACP: Open competition for appointment to the position of Senior Planning Inspector.

AN COIMISIÚN PLEANÁLA
LDG- _____
ACP- _____

25 MAY 2026

Fee: € _____ Type: _____

Time: _____ By: _____

Submission Ref: PAX04.324165

Maughanaclea Ltd Wind Farm

Submission from:

Teresa Colk

Gortnacowly

Bantry

P75 V065

County Cork

THERE ARE 2 FILES

Main Submission

Appendices

Applications, Appeals and Decisions made by Cork County Council Planning and Board Members of An Bord Pleanala

The first part of this Appendix is in regard to past applications for the North side of the Mealagh Valley.

ARDRAH TOWNLAND: Ardrah is the townland immediately on the West of the Maughanaclea Hills. It is important to note that these lands have now been gathered into the application for Enerco's Maughanaclea Wind Farm.

- 30/05/2011: an application for a wind farm at Ardrah was made for 5 wind turbines, with a hub height of 64 metres and a rotor diameter of 71 metres. (Tip height is 99.5metres). It included an Electrical tail station compound, a Sub Station and ancillaries.[1] Pre-planning meetings with CCC had been held on 02/08/2009 and 23/03/2011. After submitting the application, the developers were allowed six more months and re-submitted reports containing significant further information on the 18/01/2012. Forty (40) objection letters had been received against both applications. Planning permission was granted by Cork County Council on the 15/03/2012[2], subject to 22 conditions.[3]

- 10/04/2012: Third Party Appeal was made to An Bord Pleanala, to rescind Cork County Council 's decision to grant permission for a wind farm at Ardrah. On 13/12/2012, Atkins Consultants were informed that they were required to submit the following to ABP by 15/10/2013:

  - 'A revised noise assessment for baseline monitoring to quantify background noise levels.
  - A revised Landscape and Visual Impact Assessment taking into consideration cumulative impacts of other permitted and proposed developments, particularly those within the Mealagh Valley.
  - Further surveys of habitats, flora and fauna.
  - Proposed sub-station should be relocated to achieve sufficient separation from tributary of Mealagh River.
  - Outline, for all stages of development, the purpose and scope of Ecological Site Management Plan, including particular actions to protect water quality.
  - Assessment of impact on known alignment of certain monuments, including the stone row (Co-106-008) with the summit of Seen, 29km to the northeast.

---

[1] PA ref.11/318.

[2] These papers are no longer available one the Cork County Council planning web-site or An Bord Pleanala's.

[3] They included removing the foundations of the turbines if fully or partially decommissioned.

- In acc. with Article 111(2) of the Planning and Development Regulations 2001-2011, a description of the likely significant effects of the proposed development on air and climate factors.'[4]

- 08/07/2014: An Bord Pleanala gave their decision to REFUSE permission for the above proposed development based on the reasons and considerations set out below.

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

2. The proposed development, which would by itself be visible over a wide area, would in conjunction with permitted and proposed development in the area, give rise to an undue concentration of wind energy development with significant negative impacts on the landscape character and visual amenities of the area, and in particular the Mealagh Valley, and it's amenity, tourism and recreational potential. The proposed development would, therefore, seriously injure the visual amenities of the area and be contrary to the proper planning and sustainable development of the area.'[5]

No appeal was given to / made by the First Party to the High Court regarding this refusal.

COOMLEIGH EAST/WEST *townlands/hills, immediately on the East of the Maughanaclea Hills, and South East of the Ardrah, Maughanaclea site being proposed.*

- 06/05/1999. Permission granted by Cork County Council, to E.F. Energy (Developments) Ltd. for a wind monitoring mast at Coomleagh: address given was Cousane.[6]

- 03/06/1999. Permission refused by Cork County Council to E.F. Energy (Developments) Ltd for a wind farm at Coomleagh East to include 20 no. turbines and ancillary works. The application included a meteorological mast. [7]

- 22/12/1999 Permission refused by CCC, to E.F. Energy (Developments) Ltd. for a wind farm to include 7 no. turbines, Hub Height 40m with Rotor Dia 48m + ancillary works etc on Maughanaclea.[8] The notification of decision to refuse permission reads as follows:

---

[4] Letter from Executive Officer, dated 13/12/2012, held on An Bord Pleanala site. PL88.240461.

[5] Decision 08/07/2014, held on An Bord Pleanala web site. Ref PL 88.240461.

[6] PA ref. 99/1228 (Papers no longer available)

[7] PA ref. 99/1708 (Papers no longer available)

[8] Papers no longer available for PA ref. 99/5557. The decision is therefore taken from Inspector's report of 04.117606.

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

4. Proposed development, in conjunction with existing and proposed wind farm development would constitute an unacceptable density of this type of large scale development in a sensitive and scenic area. Proposed development would, therefore, be contrary to the proper planning and development of the area.'[9]

- 23/06/2000. This application, for 7 turbines+ ancillary at Coomleagh East, was refused on appeal by An Bord Pleanala. The reasons for refusal were as follows:

  'Having regard to the Guidelines for Wind Farm Development as issued by the Department of the Environment and Local Government in September 1996, and the location of the site in a remote, elevated and unspoilt exposed upland area in a rural scenic landscape of amenity, tourism and recreational potential, and visible from a public road which is a designated scenic route S30 in the current Cork County Development Plan, it is considered that the proposed wind farm development would be visually obtrusive and out of character in the rural scenic landscape and would seriously injure the amenities and natural beauty of the area. It is considered that the proposed development would be contrary to the objective of the planning authority, as set out in the current development plan for the area, to preserve the views from such roads and would be visually obtrusive and conflict with this objective, which objective is considered to be reasonable. The proposed development would, therefore, be contrary to the proper planning and development of the area'.[10]

- 06/03/2006. The application was from Pat & Catherine O'Leary for the erection of a 50m high wind monitoring pole at Coomleagh East . Permission refused by An Bord Pleanala, on appeal. Reasons given were:

  1. 'The proposed site is located in an elevated, prominent and unspoilt upland area in close proximity to a designated scenic landscape and which is also readily visible from the designated scenic routes A80 and A81 as defined in the Cork County Development Plan, 2003. It is an objective of the said Development Plan as indicated in ENV 3-5 to preserve the character of those views and prospects obtainable from scenic routes identified in the Plan. The Development Plan also provides, in objective INF 4.4(b), to have regard in assessing wind energy projects to the visual impact of these projects on scenic routes and scenic landscapes.

---

[9] p.7 of 23 PL04.117606

[10] p.1 of 1. 2000 An Bord Pleanala PL 04. 117606

These objectives are considered to be reasonable. It is considered that the proposed development would contravene the stated objectives of the Development Plan, would visually impact on the unspoilt nature of the area and landscape and would, therefore, be contrary to the proper planning and sustainable development of the area.

2. The Cork County Development Plan, 2003 sets out policies and objectives in relation to wind farm development including identifying areas in broad strategic terms for the location and siting of these developments and identifying "Strategic Search Areas" and "Strategically Unsuitable Areas". The overall strategic approach as set out in the said Development Plan is considered to be reasonable. The proposed development, which is not located within a "Strategic Search Area", is located in or proximate to "Strategically Unsuitable Areas", which are areas considered generally to be unsuitable for wind energy projects and where such projects would normally be discouraged. In the context of these provisions, it is considered that the erection of a meteorological mast in relation to the measurement of wind speed would be inappropriate in an area where it is likely that there would be a presumption against wind energy development. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.'[11]

GOULACULLIN & BARRBOY: *townlands/hills next to Coomleagh West/East, again East of the Maughanaclea Hills.* This site has a true history of try, and try again, by George O'Mahony, a farmer from Drimoleague.

- [97/1802] application by Innis Glas Energy for erection of a 40m wind monitoring mast and retention of a 10m wind monitoring mast. Permission granted with conditions.

- 01/10/1998 [97/4390] George O'Mahony applied for permission for a wind farm at Goulacullin (site1) comprising of 12 no. 660 Kw wind turbines with ancillary equipment for generation of electricity & control building. Permission refused by Cork County Council. Refused by An Bord Pleanala, on appeal [04.108973] on 25/05/1999. The Board Direction/ reason was given as follows:

  Having regard to the Guidelines for the Wind Farm Development as issued by the DoE and the location of the site in a remote, elevated and unspoilt exposed upland area in a rural scenic landscape of amenity, tourism, and recreational potential and visible from a public road which is a designated Scenic Route in the current CCDP, it is considered that the proposed large scale wind farm development would be visually obtrusive and out of character in the rural scenic landscape and would seriously injure the visual amenities and natural beauty of the area.... The proposed development would, therefore, be contrary to the proper planning and development of the area.

- 14/12/1999. [99/5076. PL04.117428] Permission refused for erection of a wind farm at Goulacullin, comprising 12 no. wind turbines (height not stated) & ancillary development.[12]

---

[11] p.5 of 35, Inspector's report PL 88.239767 18,19/01/2012, referencing out to 05/6090 PL 04.215033 06/03/2006.

[12] Information from CCC Planning website. PA ref. 995076, ABP ref. PL04.117428 decision date 13/04/2000. No papers can be found under this reference on the An Bord Pleanala site.

Appealed to ABP and refused 13/4/2000. A later An Bord Pleanala Inspector states the reason for refusal was the same as for Coomleigh West, above.

- 22/10/2003. Permission granted on the same site as above for five years, this time for a wind farm of 5 no. turbines, (height of 76 metres not stated in Order) + ancillary: control buildings, substation & 40m wind monitoring mast .[13] There were two subsequent revisions to the plans. The decommissioning conditions included removal of all above ground structures and foundations.

- 20/10/2008. Application to extend permission submitted, then withdrawn. A wind monitoring mast had been erected but no construction work would be started until grid connection offer had been achieved. The permission above expired on 21/10/2008.

- 01/12/2008. New application submitted, with grid connection offer for 2009 (Gate 3).

- 12/03/2009. Permission granted for this new application on the same site at Goulacullin for the erection of wind farm comprising 5 wind turbines with towers up to 46m height and rotor diameter up to 62m (Tip height 76metres) and ancillary development.[14] No objection letters are recorded as being received. Twenty-eight conditions were imposed, including:

    - The identified mitigation measures, including measures to avoid slope instability and hydrogeological hazards, shall be implemented in full.

    - An assessment of vibration impacts from rock breaking on the borrow pit, spoil stockpile area, in-situ peat, to include comprehensive mitigation measures.

    - Archaeological monitoring of topsoil removal and of all clear felling of forestry and subsequent field walking of that area.

- 16/04/2014. An extension to this same permission was granted by Cork CC. No Observations were accepted from the public. No construction of the wind farm still took place. The extension was granted up to the 11/03/2019. [15]

- 11/04/2019. A further extension request by Mr O'Mohany's new consultants, Jennings O'Donovan, was submitted in the February, to extend the period for a further five years. This application for Goulacullin Wind Farm was refused by Cork County Council Planning as being against planning legislation.a

The part of this Appendix is in regard to past applications for the Head of the Mealagh Valley. This begins in the Goulacullin townland, on the upper reaches of the Maughanaclea Hills, and then goes across to the Nowen Hills .

---

[13] PA ref. 02/5124. The permission as granted on the 21/11/2002, and then revised by details 18/02/2003 and 25/07/2003.

[14] PA. 08/2119.

[15] PA ref 14143.

GOULACULLIN (Site2). The majority of this new site is across the way from the old proposed Goulacullin wind-farm site and stretches towards Nowen Hill. The time line is as follows:

- 29/06/2023 A request for Pre- Application Consultation (for Goulacullin/Maughanaclea/Nowen) on behalf of Statkraft was made. The application, via their consultants, provided all initial paperwork and appendices. The project consists of 9 Wind turbines, 89.5 Hub Height, 155m Rotor, Tip Height 167metres, each with output of 6.6MW, plus a 38Kv sub-station and ancillaries. The total proposed site is 379.25 hectares. The consultants, Fehily Timoney, were proposing that the turbine blades and parts would be brought to site via the R585 and then the L4612-0 which is up and over the main ridge of the Hills, and is virtually a goat track towards the top. NB: whilst this was a formal pre-application submission, there had been no public consultation, and copies of the paperwork were only available because of a public access request made. ABP-317478-23 is the given reference by the Board. An entry for this pre-application can only be found on the ABP web-site if this reference is used: no entry can be found by location or description. The papers supplied gave the following timeline:

- 11/08/2023 Ashling Doherty provides a meeting date of 25 August.

- 14/08/2023 Consultant asks for deferment of the meeting whilst the Applicant is re-assessing the type of turbine used due to access issues. They stated that as a result, the development may not be deemed SID unless alternative lands are secured. They will be in contact once a decision is made on the overall development approach for the lands.

- 18/08/2023 Applicant given option to withdraw by ABP, and resubmit once they are ready to move forward.

- 07/03/2024 Applicant formally withdraws request for pre-consultation and fee is refunded.[16]

NOWEN HILL - *at the Head of the Mealagh Valley, across from Goulacullin.*

This hill is where Radio and Communications masts are situated- a necessity for the Mealagh Valley, Shehy Beg, and for the Drimoleague area. The four masts are of varying height, the tallest having a maximum height of 42 metres. The original permissions granted were not permanent ones: temporary permissions were granted for five and seven years until 2016 when retention of the masts were made permanent when applications submitted. Details are as follows:

(PA ref. 97/3467): Permission granted to East for a 24m antennae support structure. (PA ref. 99/4604): Permission granted to Irish Multi-Channel for retention of communications mast &

[16] Following a Public Access request, this information is also verified by emails between An Bord Pleanala and Fehily Timoney.

ancillary buildings. (PA ref. 99/5804, ABP ref. 04.118746): Permission granted to East for retention of existing tower & equipment building. (PA ref. 01/1139): Permission granted to Skylink Communications to remove 2 no. 10 masts & erect 42m tower with 8 no. antennae dishes. (PA ref. 05/6831): Permission granted to O_2 for retention of a 300m section of track. (PA ref. 08/0053): Permission granted to O_2 for retention of permitted base station. (PA ref. 08/0535 PL 88.229423): Permission granted to Vodafone for retention of 15m support structure, associated development and access track. (PA ref. 08/1812): Permission granted 11/2008 to Skylink Communications for retention of 42m tower with associated antennae dishes and ancillary development. (PA ref.15/625): permanent retention granted 07/01/2026. (PA ref. 15/707): Permanent retention granted 02/02/2016.

The next part of this Appendix is in regard to past applications and decisions for the South side of the Mealagh Valley.

DERREENACRINNIG WEST. Coming round to the south side of the valley, *Derreenacrinnig East is next to Nowen Hill, and then there is Derreenacrinnig West, next. In orientation, it is opposite Coomleagh East and West, and just short of being opposite the Maughanaclea Hills site where Enerco is proposing to place its turbines.*

The planning permissions for Derreenacrinning West are best considered in two parts, given there was an identified problem with project splitting. The tortuous planning route for the grid connection hasn't been detailed here: suffice to say that the development in its entirety has failed.[17] A judicial review was accepted and decisions regarding the grid connection were annulled or quashed on the 08 March 2021, confirming that the development had failed to correctly transpose the requirement of European Directive 2011/92 EU as amended. A Senior Executive Planner for CCC, notes that[18] .

'Given the quashing of these decisions clearly the developer, if the permitted wind farm is ever to be fully constructed and operational, must seek a further planning permission or Substitute Consent to obtain the cable route from the permitted wind farm to the Ballylickey substation. It is pertinent to note that the developer has indicated that they have "explored a number of options" but had concluded that' :

"The Section 34 process is the most prudent way to proceed ..... since ESP notes the issues raised in the Judicial Review in relation to splitting the two consenting processes into different applications and has decided to proceed on the basis of a singular Section 34 application." (Paragraph 1.8 of the Submitted Planning Report dated October 2021) .

[17] See Cork CC planning: p.3 of 16: report from Phil O'Sullivan. 22/00153.

[18] p.3 of 16. Senior Planners Report 28/04/2022.

An Bord Pleanala formalised this annulment regarding the grid connection in September 2024.[19]

A first wind farm application at Derreenacrinnig West was approved by CCC planners on 03/10/2011 with 28 conditions.[20] There had only been one known objection, consisting of a single line of correspondence, from someone living in Co.Kerry. The Derreenacrinnig West wind farm, for seven(7) turbines, was permitted by An Bord Pleanala who turned down the co.Kerry appeal on 05/12/2012. The turbines were to have a hub height of 55 metres and a rotor diameter of 52 metres + ancillary including a sub-station.[21] This permission was subject to 16 conditions. The Board, as formed at the time, decided not to accept their own Inspector's recommendation to refuse permission. They considered the scale of the development proposed would be acceptable at this location, whilst noting it would impinge to some extent on views from scenic route s30 and might form a backdrop to certain views of the castle at Castledonovan: 'it was not felt that these impacts were so negative as to warrant a refusal of permission'. It is important to note there is nothing in the Board's statement to show that they considered the Mealagh Valley and how the scale of turbines, at height of 81metres, could negatively impact the visual amenity of the valley's landscape. The technical specification for the turbines was later amended, and agreed as the hub height or tip height remained the same.

An extension to this permission was granted by CCC on the 03/05/2022, with an end date of 29/04/2024.[22] This permission has now lapsed. An open information evening was held by Jennings O'Donovan in Drimoleague in November 2024 to reintroduce the 'wind farm project' to local people living on that side. It was said at that time the intention was to double the height of the turbines whilst reducing the number to three. This entails breaking up the old hardstandings that had been poured for the smaller turbines, though at the open evening there was nothing to show they had yet considered the ecological and environmental damage caused by these actions. The overhead wires and poles, to make a grid connection to Ballylickey, were not part of this 'public consultation', although they have now been included in the subsequent application.

A new application was submitted to Cork County Council on the 08/09/2025[23] but then invalidated as the development descriptions in the press notice and application form did not match. The application was for a wind energy complex with three (3) turbines having an overall ground to blade tip height of 119.3m, with a rotor diameter of 82m and a hub height of 78.3m. The same application was resubmitted by Jennings O'Donovan on 29/09/2025, and CCC has since received fifty five (55) objections and one observation. The current status of the application is one of deferment awaiting 'further information' which must be submitted within six months of 21/11/2025. The further information required includes a complete appraisal of the

---

[19] ABP-315059-22.

[20] The decision papers, with the set out conditions are no longer on CCCC planning's website, nor are the planning reports.

[21] PA ref. 10857, PL88.239767.

[22] PA ref. 22/153.

[23] 25/5826

collision risk for birds at the proposed site, and scaled plans showing the precise location of both new proposed poles and those of existing poles which are to be removed.

Planning permission was given by Cork County planners 06.05.2006. Appeals have now been submitted the ACP, ref: PL-5012243-WC-26.

MULLAGAMESHA. *These are the highest and longest hills of the Mealagh valley, on its the South side, and directly opposite the Maughanaclea Hills.*

Permission refused by CCC Planning on 01/10/1998, so appealed.[24] Refusal by ABP on 25/05/1999, to grant permission to Green Power Ltd of Macroom[25] for a wind farm comprising 20 no. turbines, generating 12mw, ancillary works etc at Coomanore South, Mullaghmesha and Glanaclougha. The County's decision was upheld by An Bord Pleanala, following an appeal from developer, for the following reasons:

> 'Having regard to the Guidelines for Wind Farm Development as issued by the Department of the Environment and the location of the site in an elevated and unspoilt exposed upland location in a rural scenic landscape of amenity, tourism and recreational potential and visible from a public road which is a designated Scenic Route in the current Cork County Development Plan, it is considered that the proposed large scale wind farm development would be visually obtrusive and out of character in the rural scenic landscape, and would seriously injure the visual amenities and natural beauty of the area. It is considered that the proposed development would be contrary to the objective of the planning authority as set out in the current Development Plan for the area to preserve the views from such roads and would be visually obtrusive and conflict with this objective, which objective is considered to be reasonable. The proposed development would, therefore, be contrary to the proper planning and development of the area'.[26]

[24] CCC 98/1166. PL 04.108995.

[25] might this be a forerunner of the Craydel / Enerco Empire?

[26] CCC 98/1166. Pl 04 108995 ABP.

Précis of Inspectors' and Planners' reports.

Please note that not all Planners' and Inspectors' reports are available on the websites, especially those pre-2016 - but there are sufficient to show a true consistency that runs through all the reports, especially in regards to the visual impact that industrialised wind-energy complexes would have on the Mealagh Valley, and far beyond. No turbines considered in these reports have a hub height higher than 64 metres or a tip height higher than 109 metres, so the very tallest one proposed is some 60metres **check** shorter than the ones Enerco wishes to install on the ridges of the Maughanaclea Hills.

ARDRAH TOWNLAND: starting with past applications for the North side of the Valley, Ardrah is the townland immediately on the West side of the Maughanaclea Hills. These lands have now been gathered into the application for Enerco's Maughanaclea Wind farm.

23/03/2011. Pre Planning Meeting with Cork CC Planners. Kevin Irwin, CCCPlanner, requested

- photomontages (looking towards Ardrah site) for any scenic roads within a 15km radius, and suggested views along Castle Donovan Road, and the Castle. He noted that the Drinagh, Drimoleague, Dunmanway triangle as being a very sensitive impact area.
- Residential Properties Assessment was necessary of visual, noise, and shadow flicker for all houses in close proximity, in particular the Mealagh Valley which was sensitive in terms of visual amenity for visitors, water courses, and existing residential properties.
- Environmental issues around ecology, archaeology, access and surface water around turbines bases...likely to be issues.

- 30/05/2011. [CCC11/318] An application was submitted for a wind farm at Ardrah, consisting of 5 Wind turbines, with a hub height of 64 metres and a rotor diameter of 71 metres,[1] plus Electrical Tail Station compound, Sub Station and ancillaries. Planning permission was granted by Cork County Council (CCC) on the 15/03/2012 and was subject to 22 conditions.[2] The CCC planning reports are no longer available. However, the ABP Inspector has summarised some of the points in that further information was sought by CCC planners prior to granting permission. It appears the reason for CCC granting permission was 'having regard to the fact there were no scenic or other designations relating to the site and the enclosing

[1] The Tip height is 99.5metres: p.8 2922DG04 Appeal document Atkins.

[2] PA ref.11/318. These papers are no longer available one the Cork County Council planning web-site or An Bord Pleanala's.

topography, the development would not have significant adverse visual impacts'.[3] The ABP Inspector has purposefully quoted the CCC Planner's note that the proposed mitigation measures, including screening around residential boundaries, would not be effective, are questionable and difficult to implement by condition. CCC's Senior Planner seems to have simply concurred with CCC's Area Planner, whilst adding she/he was aware of the sensitivity of the landscape and that the extent of wind farm is modest and the height is not excessive. The ABP Inspector also noted that no response to the third party appeals (discussed next) had been received from the planning authority.

- 10/04/2012. The application/ permission, for a wind farm at Ardrah, was the subject of a third party appeal to An Bord Pleanala. The first report, dated 13/07/2012, is by Mr Conor McGrath, from its Inspectorate. His assessment and conclusions included the following extracts:

  - 'The appeal site occupies an elevated position (approx. 190-220m OD) at Ardrah at the western end of the Mealagh Valley, approx. 10.5km northeast of Bantry and approx. 2.5km southeast of the village of Kealkill. The site lies on the lower, western end of the Maughanaclea Hills on the northern side of the Mealagh Valley. The ridge of Mullaghmesha / Nowen Hill lies on the southern side of the valley. The site is irregularly shaped and comprises a stated area of 42.27ha. The main area of the site slopes to the south. A ridge or series of hummocks trends NE / SW across the northern section, while the topography of the central and southern sections of the site are more even.

  - ....I note that walking trails have been developed through this area in recent times, which connect the Sheep's Head Way with the Bearagh Way. There are a number of existing wind energy developments within the surrounding area. There is an existing wind monitoring mast on the site, which does not comprise part of the development the subject of this appeal. I cannot identify any planning permission granted in respect of this mast and the exemptions under Class 20A may apply . An existing overhead powerline also crosses the northern section of the site.' [4]

  - 'The proposed development comprises the erection of five wind turbines on these lands. The turbine type is identified as Enercon E-70's, having a hub height of 64m and a rotor diameter of 71m, giving a tip height of 99.5m. The turbines have a rating of 2.3MW each such that the overall development would have a total potential output of approx. 11.5MW. Turbine base heights vary from 190m to 228m elevation. A borrow pit is to be created within the site, adjacent to the most northerly turbine, T1, measuring approx. 30m x 26m x 5m deep. The application indicates that in a worst case scenario, the development will require the excavation of 3,870metres/sq. of rock from the pit.'[5]

  - 'The site is understood to be in the developer's ownership and the EIS does not identify any alternatives examined with regard to site location. The selection of this site appears therefore to

[3] p.8 of 46. Pl 04.240461.

[4] p.2 of 46 Inspector's report 13/07/2012.

[5] pp.2/3 of 46.

have been based on its availability rather than its suitability for development over other locations. The Development Plan identifies Strategic Search Area for wind energy development and areas that are determined to be Strategically Unsuitable for such development. While the appeal site is not located within either category of lands, lands immediately adjoining the site to the north, west and southwest are identified as Strategically Unsuitable for wind energy development. The plan indicates that areas not identified as either search areas nor strategically unsuitable will be considered on their merits having regard to normal planning criteria including landscape sensitivity, visual and environmental impacts.'[6]

- 11.2.2 Scenic routes: 'The R584 and R585 to the north are identified as Scenic Routes in the development plan. The hub height of the proposed turbines is 64m and the rotor diameter is 71m. Turbine base heights vary from 190m to 228m elevation. Lands to the north of the site rise to between approx. 220m and 260-272m, while the Maughanaclea Hills to the east rise eventually to approx. 450m. The sub-station compound is located at the southern end of the site such as to be generally screened from external views. Separation from the site and intervening topography reduce the visibility of the development from Scenic Route S28 (R584) to the north. Topography also provides significant screening from the R585 (S29) and there will be only limited views from the R585 to the development. While the development will be visible from locations along these routes, it is not considered that the development would have significant negative impacts on the character of, or views from, these designated scenic routes. The development will be visible from a number of locations on the N71, scenic route. Views from this route are, however, primarily directed toward the coast and Bantry Bay, and having regard to the separation distance involved it is not considered therefore that the development would detract from the character of this scenic route in a significant adverse manner.' **[Note; tip height of proposed turbines was 99.5 metres, only.]**

- 11.2.2. Scenic Routes cont/ 'In addition to the designated scenic routes in the development plan, other tourist / amenity routes in the area include the Beara Gougane Barra Cycle Route to the north and walking routes through the Mealagh Valley. The development would feature prominently features in views from these routes. The orientation of the site is such that the development would also feature widely in views from the surrounding road network to the south and west. While such roads are not designated scenic routes, they are generally within the area identified as unsuitable for wind energy development. Other wind energy developments also feature in such views.' [7]

- 11.2.3 Mealagh Valley. 'The appeal site is located at the western end of the Mealagh Valley, on an east-west trending ridge. The valley comprises a distinct landscape unit, enclosed by hills on three sides. In recent times, a number of marked walking routes have been developed locally, within the valley and linking the Sheeps Head Way and the Beara Way. Within the Mealagh Valley, there are two permitted and/or proposed windfarm developments at Barrboy and Derreenacrinnig West.

- 11.2.3 cont/ In contrast to other existing and proposed wind energy developments in the area, the subject development, notwithstanding its lower elevation, would be visible over a wider area,

---

[6] p.23 of 46.

[7] p.24 of 46.

while also having local visual dominance. This is reflective of the zoning of immediately adjacent lands as unsuitable for wind energy development. The primary visual impacts arise on views from the west and south. In particular, views from the public roads along the southern side of the Mealagh Valley would be dominated by the development. As one travels east from Drumbrow Lough along this road toward Barnagowlane, turbines would assume greater skyline prominence. Views from this road are located largely within the area identified in the development plan as Unsuitable for Wind Energy Development. I note also that the existing wind monitoring mast is visible along sections of roads on the northern side of the valley. I consider that the development of a third wind energy development within this enclosed landscape unit would significantly erode the remote rural character of the valley and negatively impact on views therein. As one travels through the valley, there would no point at which wind energy developments were not visible, thereby undermining the tourism and recreational potential of the valley. The cumulative effect of the development in this regard has not been considered in detail in the application or by the planning authority. I consider, however, that the overall impact of the development would be significant adverse and would lead to an excessive concentration of such development within a distinct landscape element.

- 11.2.4 Residential amenity: There are a considerable number of houses within the Mealagh Valley, particularly at its western end. The visual and landscape assessment contained in the EIS acknowledges that a number of residential properties will experience moderate or significant visual impacts from the proposed development. There are approx. 20 no. houses on the southern side of the valley which face toward the appeal site, which number is not reflected in the visual impact assessment of the EIS. Having regard to the elevation of the proposed development and the aspect of such houses, it is considered that the development would comprise an unduly dominant feature in the landscape and would negatively impact on their residential amenities. There are also properties to the southwest of the site, which would be significantly impacted on by the proposed development. I consider that the assessment of impacts on the amenities of properties to the southwest of the site and on the southern side of the valley, are underestimated in the assessment. Mitigation measures identified in the EIS include the erection of fencing and screen planting around dwellings, however, such measures are regarded as inappropriate and unenforceable.

- 11.2.5 Wider Cumulative Impacts. Cumulative landscape and visual impacts arise in respect of inter-visibility of such developments, but also arise where one views or experiences a number of such developments as one moves through a landscape area. I have already made reference to two proposed wind energy developments within the Mealagh Valley, while there are other existing and proposed wind energy developments within the wider area.

- 11.2.5 WCI cont/ 'I have previously raised concerns regarding the overall concentration of such development in this wider area and its encroachment into more upland areas (under appeal ref. PL04.239767), with consequent impacts on the perception of landscape character and quality. There is an issue of conflict between national renewable energy targets and the further erosion of the rural and upland character of this area. In this regard, I note that the map of indicative Strategic Search Areas and Unsuitable Areas was produced originally in the 2003 Cork County Development Plan and remains unchanged in the current (2009) plan. Since its original publication, there has been a considerable level of wind energy development in areas identified as neither Strategic Search Areas or as Strategically Unsuitable. Similarly, as noted by the third parties, technology and turbine height has increased in recent years. The 2007 Draft Landscape

Strategy noted the potential cumulative impact further wind energy development could have on the character of this landscape type. It is not apparent that an assessment of the overall impact of constructed and permitted wind energy projects, or an assessment of the capacity of this landscape to accommodate further development, has been carried out.

- 11.2.5 WCI cont/ As identified earlier, the National Renewable Energy Action Plan Progress Report identifies that sufficient quantities of wind generation are already scheduled to meet national targets for 2020. In this regard, the imperative giving rise to proposals for the further development of wind energy projects in areas of high landscape sensitivity would appear to be reduced.'[8]

- 11.3 Soils and Geology: 'The potential for the failure and movement of peat soils has been highlighted by a number of events in recent years, however, such events are also known to have occurred historically. Recorded bog failures have occurred on slopes ranging upwards of 2 degrees and such failures are usually associated with human interference. In general, it has been suggested that natural failure in peat bogs is unlikely in slopes below 3 degrees. Failures generally occur during or immediately after periods of heavy rainfall. Best Practice guidance

  produced by the Scottish Executive in 2006 identifies two broad types of peat landslide, "peat slide" generally occurring in peat up to 2m depth on steeper slopes (5 -10) and "bog bursts" generally occurring in deeper peat (>1.5m) and on shallower slopes (2 -10). The EIS notes that data collected on the site includes peat depths, un-drained peat shear strength and visual observations of bedrock, soil, topography, land use, drainage and ground conditions. The site comprises a mixture of soil types with peat arising in basins generally bounded by shallow NE – SW trending bedrock ridges. The terrain is generally undulating with slopes of 2 to 6 degrees, with higher elevation slopes of 6-8 degrees generally, locally steeper. While peat depths are generally shallow, between 0.1m and 0.4m depth at turbine locations, two areas of deep peat are identified. The first area, to the south of Lough Nabirree, is to be crossed by the temporary northern access road, by means of a floating road. The prevailing slope in this area is such that the risk of failure in this area is identified in the EIS as not significant. The second area occurs within the extent of excavation at T4, wherein peat depth of 1.7m is identified. The EIS indicates that this area cannot be avoided, however, slope is not a significant factor in this area. Shear strength is noted to vary across the site. ....It is indicated that total peat excavation across the site will be 9,919 metres square bulking up to approx. 11,900m . Three peat storage areas are identified, while peat from the northern access track will be side cast. The storage areas comprise an area of disturbed ground currently used for stockpiling rock at the south-western end of the site, an area of cut- over bog adjacent to T4 confined by peat banks and the proposed borrow pit, such that no loading of peat soils from such storage will arise.

- 11.4 Water: 'Upland areas of this type usually experience rapid run-off following sustained rainfall events and a high rate of overland flow. A site water management plan was submitted at further information stage, which classifies site soils as having very low winter rainfall acceptance potential with minimal soakage potential. The main site development area and southern section of the site drain to the Mealagh River to the south via two watercourses, which combine to form the Ardsbeg waterbody. This tributary is noted to have potential for salmonid species and has an objective to protect its High Status. The Mealagh River, itself an important salmonid river flowing toward

[8] p.25 of 46.

Bantry Bay, is identified in the RBMP as being of High Status, with an overall objective to Protect Water Quality. The river is identified as being Not At Risk, while the tributaries are rated as Probably Not At Risk. The northern sections of the site, accommodating the northern access road, drains via two tributaries to the Owengar River to the north, another important salmonid river. The Owengar flows to Bantry Bay via the Owvane River. This is also of High Status, with an overall objective to Protect Water Quality. Both the Owengar and the Mealagh Rivers have been identified as accommodating populations of Freshwater Pearl Mussel, downstream of the appeal site. Site works have the potential to increase the volume of run-off due to excavation and removal of ground cover. The most significant hydrological risk arising from the development, however, is considered to be the risk to surface water quality due to increased silt / suspended solid loading to receiving waters. There are also risks to surface water quality from hydrocarbon leakage, wastewater leakage or other pollutants...'[9]

- 11.5 Noise ...'The adequacy of the noise impact assessment, and in particular the measurement of background noise levels, has been the subject of detailed third party submissions. Based on the submitted results and notwithstanding the separation of houses from the development, the queries raised would appear to be valid and first party correspondence on the file has not adequately addressed those issues. The Board may wish to request the first party to address these issues by way of a request for further information in order to ensure that satisfactory baseline data is used in the assessment of noise emissions from the proposed development.'[10]

- Conclusions on the Ardrah application, from Conor McGrath's first report, 13/07/2012, on behalf of An Bord Pleanala's Inspectorate: 'I have identified a number of deficiencies in the submitted EIS. I have also identified other areas where further information would be required in order to adequately assess the impacts of the development. Notwithstanding these matters, and the provisions of Article 108 as amended, I consider that there are fundamental issues in the consideration of this proposal, relating particularly to the landscape and visual impacts of the development. The Mealagh Valley comprises a distinct landscape element, recognised in the county landscape character assessment as being of high sensitivity... The site is exposed to views from a relatively wide area to the south and west, notwithstanding its relatively low elevation. Notwithstanding its relative scale, I consider that the proposed development, by reason of its overall exposure and cumulative impact on the character and amenities of the Mealagh Valley, would have significant negative impacts on the landscape and visual amenities of the area and its potential as a tourism and recreational resource'. [11]

- Recommendation: 'Having regard to the foregoing, <u>I recommend that the decision of the Planning Authority be overturned in this instance</u> and that permission be refused for the proposed development...[12] In the event of the above recommendation not being accepted by the Board, the following items of further information would be required. [Mr McGrath listed seven points, the last point being]:

---

[9] p.27 of 46.

[10] p.33 of 46.

[11] p.43 of 46.

[12] p.44 of 46. might need to expand on this - there is more.

- 7. 'The EIS, and supplementary further information submitted to the planning authority and to the Board, is considered to be deficient and fails to comply with the requirements of Articles 94 and 111 of the Planning and Development Regulations, 2001-2011 and in particular the requirements of paragraph 1 and 2 of Schedule 6 of the Regulations. In this regard, in accordance with Article 111(2) of the regulations as amended, you are requested to submit the following:

a) A description of the air and climatic factors likely to be significantly affected by the proposed development and a description of the likely significant effects (including direct, indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative) of the proposed development on air and climatic factors resulting from: the existence of the proposed development, the use of natural resources, the emission of pollutants, the creation of nuisances and the elimination of waste.

b) An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the developer in compiling the EIS.

c) The developer should identify and outline the main alternatives studied by the developer and an indication of the main reasons for his or her choice, taking into account the effects on the environment. [13]

The ABP Board decided at that time to request further information from the consultants, to be sure of their final decision. Atkins engaged MosArt Ltd, which provided additional information to ABP in Oct 2013, stating the following:

'Cumulative impacts of windfarms tend to be adverse rather than positive as they relate to the addition of moving made made structures in a landscape and viewing context that already contains such development... A new wind farm might also contribute to a sense of being surrounded by turbines with little relief from the view of them. The term 'skylining' is used in SNH [Scottish National Heritage] *Guidelines to describe the effect "where an existing windfram is already prominent on a skyline the introduction of additional structures along the horizon may result in development that is proportionally dominant. The proportion of developed to the non-developed is therefore an important landscape consideration."*

MosArt continues: *In terms of visual amenity, there is a range of ways an additional wind farm might generate visual conflict and disharmony in relation to other wind energy developments. Some of the most common include visual tension caused by disparate extent, scale or layout of neighbouring developments. A sense of of visual ambivalence might also be caused by adjacent development traversing different landscape types. Turbines that seen stacked in perspective against the turbines of nearer or further developments tend to cause visual clutter and confusion.* [14]

---

[13] p44 of 46

[14] NB this report is in the Ardrah file. I think MKO and Jennings uses the same criteria and tables: Magnitude of cumulative impact, but do not Draw the same conclusions as MosArtLtd. Mozart says its rigorous methodology draws DoEHLG Wind Energy Guidelines (2006) but principally based on SNH Guidance relating to the Cumulative Effects of Wind Farms (2005). This was absorbed into guidelines for Landscape and Visual Impact Assessment (2013) produced by the Landscape Institute and the Institute of Environmental Management and Assessment.

[this is relevant to both the proposed Northern Maughanaclea site, and the Southern Site. Turbines 4,5,6,2,3,1 will be seen in the same viewpoint as proposed Shehy Beg site and the operational site of Shehy More. Likewise, though Maughanaclea is being courted as one proposal there are three different sites: The cumulative effects of these mean that turbines 14, 13, 12 will be seen on the same skyline as turbines 4, 5, 6, 2, 3 and 1, but at different heights.}

- 15/10/2013 Conor McGrath provided a thirteen-page supplementary report on Ardrah which related to the further information received back from the first party, and their consultants, subsequent to the request by the Board under section 132 of the Act. His conclusion is as follows:

  - 'It is stated that the "steep and meandering nature of the Mealagh River Valley aids the visual absorption of the modest scale wind farms that are located on the ridges above the valley." ...It is clear from documentation submitted with the planning application and at further information stages, that the development will be visible in conjunction with other existing and permitted wind energy developments along almost the entire southern side of the Mealagh Valley. While I note the analysis submitted, I consider that the cumulative impact with other permitted development within the area would be significant adverse rather than medium as suggested. I do not consider that the succession or sequential nature of such views, as opposed to a combined view, significantly mitigates the landscape character impacts of the development. The concentration of three wind energy developments around this valley, notwithstanding their modest scale, would significantly alter and erode its character. In this regard, I remain of the opinion that the permission for the development should be refused for the reason previously recommended.' [15]

- The ABP Inspector's recommendation is as follows:

  - I consider, based on the information submitted with the planning application and associated further information responses, and the information subsequently submitted to the Board in October 2013, that there is sufficient information before the Board on which to make a determination in this instance. I have previously raised concerns with regard to the overall landscape and visual impacts of the proposed development, particularly on the character of the Mealagh Valley, when taken in conjunction with other permitted developments in the area. I do not consider that the submissions received have addressed there concerns and remain of the opinion that permission should be refused on these grounds:

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

[15] p.11 of 13. PL88.240461 Supplementary report.

> wind energy development with significant negative impacts on the landscape character and visual amenities of the area, and in particular the Mealagh Valley, and it's amenity, tourism and recreational potential. The proposed development would therefore be contrary to the proper planning and sustainable development of the area. [16]

This conclusion formed the reasons given in the final order made by the Board, on the 08/07/2014. There was no appeal/ application for a Judicial Review.

COOMLEAGH EAST/WEST: the townlands/hills, immediately East and South East of the Maughanaclea Hills site being proposed.

- 23/06/2000. Permission refused by CCC for a wind farm, and again on appeal by ABP. Application was from E.F. Energy (Developments) Ltd. for the industrialised complex to include 7 no. turbines, Hub Height 40m with Rotor Dia 48m + ancillary works etc.[17] Mr Dermot Kelly, from the Inspectorate of An Bord Pleanala, included maps and 27 photographs[18] in his 23 page report and the following extracts give an indication of his extensive and forthright assessment on placing a wind farm on ridges and hills surrounding the Mealagh Valley:

  - [Under "Visual Impact", Mr Kelly first considers the suitable placement of wind farms:] I note the comments in the Guidelines (para 2.3) in regard to "areas of the midland bogs" with "substantial energy infrastructure" and "flat landscape", which areas would be less critical from the viewpoint of visual impact of proposed wind farm development than the present appeal site which is an "exposed upland" site in my opinion - in this regard, see photographs attached in Appendix B of this report. There is also reference in Para 2.3 of the Guidelines for Wind Farm Development to "coastal" sites as "Areas of high wind energy". In this regard I note recent proposals for offshore wind farms, notably a proposed 200 megawatt wind farm on the Kish bank in Dublin Bay about 10 kilometres off Dublin, and again I consider that the visual impact of such offshore wind farm developments - with very significant generating capacity - in appropriate and sufficiently offshore locations would be less critical than in "exposed upland" locations such as the present proposed wind farm development above the Mealagh Valley to the west, noting the number (7) and the blade tip heights of the proposed turbines (at circa 64 metres, or over 200 feet) - which, for comparison purposes I note exceeds the height of the landmark building, Liberty Hall (59 metres) in Dublin City, and also exceeds the approximately similar height of the landmark building Cork County Hall in Cork City. [19]

  - [In referring to the Coomleigh East application, he adds]: as such, consideration of the visual impact of wind farms on "exposed upland sites" such as the appeal site is particularly critical (which visual impact for all potential wind farm sites is stated to be "among the more important

[16] p.13 of 13.

[17] Papers no longer available for PA ref. 99/555. ABP ref. PL04/117606.

[18] Maps and Photos no longer attached to this report on the ABP web-site.

[19] p.14 Of 23.

considerations to be taken into account in arriving at a decision on a particular application" - para 4.8 of the Guidelines[20]). In regard to visual impact considerations re such exposed uplands sites, I note that proposed radio communication towers on upland sites to service mobile telephone networks have been refused permission on many occasions by reason of visual obtrusiveness in the landscape, e.g. Ref PL 04.100370 re a proposed mast in the Kealkill area to the northwest of the appeal site, and that such proposed single structures - generally of lattice work construction - rarely exceed 30-35 metres in height, which heights are much lower than the 64 metre heights of the proposed seven turbines... [21]

- [He further notes]: that the Irish Planning Institute's Guidelines for Wind Energy considered in regard to wind farm developments that "the Irish landscape is generally small and compact and has limited capacity to absorb large wind farms... except in exceptionally suitable landscapes which are already blighted by development and have low amenity value". I concur with such an assessment and I consider that the proposed wind farm on a scenic exposed upland site within an attractive rural scenic landscape should be refused permission, by reason of visual impact. [22]

- [In referencing to his site inspection and photographs]: I consider that the proposed wind farm development [at Coomleigh East] by reason of its scale and location on this exposed upland site above the Meelagh Valley to the west would dominate landscape features in the area and be "prominent when seen against an elevated skyline background from public roads" in the area... and, as such, would be contrary to the above Guidelines for Planning Authorities (Para 4.9) issued by the Department of the Environment in regard to Wind Farm Development – which Guidelines are considered reasonable – and as such be contrary to the proper planning and development of the area. In this regard, I concur with the planning authority's appeal response that the appeal site is located within a surrounding landscape that is "of an attractive scenic character", and in particular I consider that the scenic Meelagh Valley to the west (see Photos in Appendix B) qualifies as "an adjacent area of high landscape quality" which should be considered in the "assessment of visual impact" (Ref. Para 4.9 in Wind Farm Development – Guidelines for Planning Authorities).

- [He then states]: in my opinion the proposed wind farm development on this exposed site on the upland slopes of Coomleagh Mountain overlooking the Meelagh Valley to the west would result in a significant adverse visual impact on the receiving landscape both in the immediate Coomleagh and Meelagh Valley area and in views from a distance...and as such would contravene Section 4.9 of the above Guidelines that "turbines should not dominate landscape features..."[23]

- [In turning to the Cork County Development Plan that was current in 2000, Mr Kelly from the ABP Inspectorate states:] I concur with the planning authority that the visual character of "the surrounding landscape, while not designated as such, is of an attractive scenic character", and as such would be incapable of assimilating the proposed wind farm without significant adverse

---

[20] Visual Impact in the Wind Farm Development Guidelines for Planning Authorities

[21] p.14 of 23.

[22] p.15 of 23.

[23] p.15 of 23.

visual impact by reason of the exposed and elevated location of the proposed wind farm and the scenic quality of the area – see Photos in Appendix B of this report…

- The proposed wind farm comprises 7 three-bladed turbines (with hub- heights of 40 metres and blade-tip heights of circa 64 metres as per submitted drawings), which would include rotating blades in a 'static landscape' of high scenic quality, including the adjoining Meelagh Valley area to the west and also the adjacent semi-wilderness areas to the south of Barragowlane and to the northeast of Barrboy – see Photos 3 and 19 in Appendix B. I consider that the proposed development close to the summit of Coomleagh (see contour lines and base levels of proposed turbines as per submitted Site Layout Map, Scale 1:2500) – on a scenic exposed elevated mountainous site – would be widely visible in the surrounding attractive scenic landscape, and would be visible from designated Scenic Routes in the area, including from Scenic Route A80 and the Scenic Area B20 to the south of the Pass of Keimeinagh and, as such, should be refused permission on grounds of visual obtrusiveness.[24]

- West Cork Volume, Para 2.38 re Inland Areas: 'many inland areas in West Cork have attractive scenery and good access to mountain and coastal areas, and may represent suitable bases for touring holidays. Small scale development of tourism accommodation on working farms could be attractive to tourists as well as helping to support the agricultural sector. The quality of such development, and in particular its ability to fit into the landscape, and make use of existing or traditional type buildings, is likely to be critical for its acceptability and success…I consider that the appeal site above the Mealagh Valley similarly lies within such an Inland Area with "attractive scenery" and tourism potential, as stated. In this regard, I note that long term employment in the proposed wind farm development would involve few persons. While I accept the first party appellant's E.I.S. submission (Para 2.4) that wind farms may have some tourism interest, on balance I consider that the proposed wind farm development in this scenic exposed upland area would result in a significant adverse visual impact which would detract from such tourism development potential as identified in Section 2.38 of the Development Plan, which "small scale development of tourism accommodation on working farms" I consider could "fit into the landscape" unlike the present proposed wind farm development adjoining the Mealagh Valley area, which area is promoted in tourism literature as the 'Valley of the Rushing Streams' or the 'Valley of the Standing Stones'.[25]

- Other interesting aspects also come into play in the ABP Inspector's assessment regarding this industrial wind-energy complex being built on the Coomleagh Mountain overlooking the Mealagh Valley :

  - I do not consider this appeal site is a 'secluded area' site which, as such, would warrant consideration for a 'large scale wind farm'… as I do not consider that its visual impact could be minimised'…achieved on this elevated site at Coomleagh.

  - I concur with the planning authority that the proposed development should be refused permission by reason of visual obtrusiveness on this exposed upland site of high scenic amenity,

[24] pp.16/17 of 23.

[25] pp.18/19 of 23.

and that the surrounding landscape is incapable of assimilating the proposed development without 'severe' adverse visual impact.

- I do not consider that the Noise Impact of the proposed wind farm development would be significant noting the distance from the nearest house, though I would consider that noise can travel extensively within such areas as the Meelagh Valley.

- I consider that the proposed wind farm would involve significant disturbance of the upland area including areas of blanket bog (and areas of potential archaeological interest, noting in particular the comments re same in Para 9.5 of the Environmental Statement), particularly in the construction of the proposed access roads within the site, and there would also be an impact on the fauna of the area (and it is noted that the Birds Survey indicated the presence of Ravens in the area) and also that disturbance of birds may occur at "upland wind farm sites" (Para 8.5.5 in the Environmental Statement).

- I also consider that the visual impact of the proposed wind farm turbines would be significantly much greater than afforestation of the appeal site (which afforestation would form natural growth in a static landscape) whereas the proposed wind farm turbines - with moving parts - would represent "man-made" industrial type structures with vertical elements of significantly increased height (64 metres or 200 feet) in a static landscape with blade tip height ranging up to 470 m AOD above the summits of Barrboy (453m) and Coomleagh (450m).

- Noting the provisions in the Development Plan (Para 2.38) re further tourism potential in areas such as the Meelagh Valley area beneath the site, I consider that the proposed wind farm development by reason of visual obtrusiveness would seriously detract from such tourism potential in the Meelagh Valley area...and particularly noting that the proposed wind farm would be widely visible from houses and public roads in the Meelagh Valley area, and particularly visible across the Meelagh Valley from the far side of the valley in the Barnagowlane area (see Photos in Appendix B); and in this regard I note that movements at great distances in the natural static landscape can be detected; and that wind farms form highly visible elements in the landscape. I note that the case is often made that such levels of visibility of wind turbines within the landscape may be regarded as "positive", though I would not accept this argument by reason of the scale and elevated location of the proposed seven turbines with moving parts within the static landscape, and the subsequent extent of visual impact. Nor would I accept that such a "negative" assessment of the visual impact of the proposed wind farm is "subjective" but rather a matter of objective fact by reason of the scale and elevated location of the proposed wind farm development within the natural landscape, and the subsequent extent of visual impact of such large scale wind farm development in the landscape.

- Any required fitting of aircraft navigation safety lights on the proposed tall turbines (which if fitted as close to the top as possible would be on the moving blade tips) would result in a visual impact from the proposed wind farm <u>even at night-time</u> within the Meelagh Valley area below. In this regard it is noted that Para 8.5.8 in the Environmental Statement noted that "the site will not be illuminated at night (apart from a low-intensity flashing light)".

- [Mr Kelly begins the conclusion of his report by saying:] 'though noting the Guidelines promotion of wind farms as an alternative energy source, on balance, I consider that the proposed large scale wind farm development at Coomleagh should be refused permission by reason of visual

obtrusiveness in a scenic landscape area, noting that blade tip heights of the proposed wind turbines range up to 470 m AOD and that "the sites are located at the eastern end of the Meelagh Valley and are part of the Maughanaclea Hills, which separate the Meelagh Valley from the Cousane Gap to the north. This is largely unspoilt mountain range. The ridge levels vary between 440 and 453 MOD" as stated in the Area Planner's Report dated 09/11/1999; and noting the provisions of the Cork County Development Plan re "Renewable Energy" (in particular re stated reluctance to sanction large scale commercial wind farms) and re "Amenity and Preservation" (in particular re Scenic Route A80 and Scenic Area B20); and noting also the provisions of the Guidelines for Planning Authorities re "Visual Impact", which include stating that "the visual impact is among the more important considerations to be taken into account in arriving at a decision on a particular application" (Para 4.8).'[26]

- 'In conclusion, further to the above assessment of matters pertaining to this appeal, including consideration of the submissions of each party to the appeal, and including the site inspection, I consider that the proposed development would be contrary to the proper planning and development of the area, having regard to the relevant provisions of the Cork County Development Plan, and to the Guidelines for Planning Authorities re Wind Farm Development, which are considered reasonable.'[27]

- 06/03/2006. Coomleagh East: Permission refused, on appeal, to Pat & Catherine O'Leary for erection of a 50m high wind monitoring pole.[28] Derek Daly, from the Inspectorate of An Bord Pleanala, produced the report following a site visit, and having taken many photographs (which are not now on ABP's site). He noted the following:

  - Site location and description: the proposed development is located in the townland of Coomlagh East in an upland / mountainous area... The site located on the upper reaches of the Maughanaclea Hills, which are a visually very prominent area and visible from a wide area. The Maughanaclea Hills are between the Mealagh Valley to the south and the Owvane and Owngar River Valleys to the north. The site is also in close proximity to the Cousane Gap two kilometres to the northeast on the R585 regional route between Kealkill and Dunmanway / Macroom and also overlooks lands running northwards to the Pass of Keimaneigh on the R584 regional route between Kealkill and Gougane Barra / Inchigeela.

  - The site is located near the ridge of the mountain at an altitude of approximately 450 metres in an open and exposed area. The upland area is characterised by open areas interspersed with relatively new plantations of conifer afforestation...The proposed development as submitted to the planning authority is for the construction of a temporary 50 metre high wind monitoring pole for the collection of wind data. Four cable guy wires support the pole.

---

[26] pp.21/22 of 23.

[27] p.22 of 23. (Dermot Kelly, Inspectorate ABP April 2000)

[28] PA ref. 05/6090 ABP ref. PL04.215033 06/03/2006.

- Assessment: The proposal as submitted to the planning authority is for a temporary 50 metre high wind monitoring pole for the collection of wind data. The applicants' agent in the response to the grounds of appeal has indicated that it is necessary to locate such a development in the area to investigate potential wind resource and that It is unreasonable to suggest a wind monitoring programme would be followed by a large scale wind farm application and also that such a proposal would be the subject of a separate planning application. The applicant is correct that it is necessary to build up data in relation to investigating the potential wind resource of the area and in this regard taken in isolation the erection of a single monitoring mast in itself is unlikely to have a major visual impact on the area. [29]

- In considering the proposal, however, broader strategic issues also require to be considered. The site although not a designated scenic landscape is located in a very open, prominent and vulnerable area. The site is in close proximity to a designated scenic landscape around the Cousane Gap and is readily visible not only from the nearest designated scenic routes A80 and A81 but from a much wider area.

- The appeal site and / or the area immediate to it have also been the subject of two applications for wind farm developments, which were refused. The reason for refusal in both planning applications refers to the natural beauty of the area, the visual obtrusiveness of the development and to the preservation of views along designated scenic routes. In the period since these developments were refused a new county development plan was adopted, which retains the scenic routes and an area of scenic landscape in the locality of the Cousane Gap and in this context the issue of visual impact for which the applications were refused remains.

- ...The site it can be stated is not within a strategic search area, which are areas favoured for windfarm developments but a large area of this part of the county in which the appeal site is located are within the designation of strategically unsuitable areas and it is possible that the appeal site itself is within this designation or proximate to this designation.

- In this context it is therefore questionable whether it is appropriate to permit a mast for the collection of wind data particularly in the context of paragraph 4.2 of the Draft Guidelines where it is indicated that it would be inadvisable to grant permission in an area where there would be a presumption against wind energy development either in the wind energy strategy or the development plan. It is also questionable whether there is a need to gather data specific to this site as there a number of windfarm developments in operation in the Drimoleague / Dunmanway / Drinagh area of West Cork. The site and immediate area were also the subject of previous planning applications for twenty wind turbines and seven wind turbines, which were refused and it would be reasonable to presume that these applications were made on the basis that the area and site has a wind resource.

- Recommendation: I would therefore recommend that permission be refused.

GOULACULLIN (SITE 1) AND BARRBOY: the Townlands of hills next to Coomleagh West /East, so again East of the Maughanaclea Hills. No planning reports are available for Site 1 on the

[29] p.6 of Inspectors report.

Cork CC Planning site or An Bord Pleanala. However, someone in the valley has kept a history of previous objections and has been able to provide the following:

- 11/04/2000: [CCC99/ 5076 PL04.117428] Dermot Kelly, ABP Inspector's Report[30] for Goulacullin, for 12 Turbines:

I recommend that permission is refused for the following reasons:

1. Having regard to the Guidelines relating to Wind Farm Development which were issued by the DoE to planning authorities in 09/1996, it is considered that the proposed development by reason of its scale and prominent elevated location and visual impact on the scenic exposed upland slopes of Barrboy Mountain above the Mealagh Valley, would constitute a visually dominant and prominent obtrusive feature within a sensitive scenic rural landscape of amenity, tourism and recreational potential and would seriously injure the amenities and natural beauty of the area, particularly when seen against the elevated skyline background from the public roads in the area, and as such would be contrary to the Guidelines and contrary to the proper planning and development of the area.

2. The proposed wind farm does not conform to the small local based project (of less than 1MW) which the CCDP(Para6.24) considers may be acceptable on carefully selected sites, but is rather a large scale commercial wind farm on an exposed uplands site which is not considered to be secluded or capable of minimising the visual impact of the proposed wind farm development (and in this context noting also the designated Scenic Routes and Scenic Areas to the north and and east from which scenic routes are designated in the CCDP as views to be preserved) and would be contrary to the stated Renewable Energy Policy (Para.6.26) in the CCDP re wind farm developments in the County, which policy is considered reasonable, and as such would be contrary to the proper planning and development of the area.

GOULACULLIN (Site2) 29/06/2023. The majority of this new site is across the way from the old proposed Goulacullin wind-farm site and stretches towards Nowen Hill. A request for Pre-Application Consultation (for Goulacullin/Maughanaclea/Nowen) on behalf of Statkraft was made at this time, and then withdrawn (temporarily?) on 07 /03/2024. No CCC planning reports or ABP Inspectors reports have been produced so far, as the Applicant is re-assessing the type of turbine used due to access issues.

NOWEN HILL - at the Head of the Mealagh Valley, across from Goulacullin. The eight planning permissions granted between 1998 and 208 have been for a limited period of either five or seven years and the actual location of each mast was strictly controlled. In February 2008, with 4 existing masts in place. Olivia McGeough, CCC assistant planner, notes that

- 'the purpose of the 5 year lifespan was to allow for a review of the technology to see if more environmentally friendly systems had emerged during the interval'. 'the [Nowen Hill]

[30] p.22 of 22.

> site contains up 4 existing telecommunications stations which are not clearly visible in the wider rural landscape'. The development being considered for retention was the tallest mast and 'it is considered that the site would benefit from additional natural landscaping'.[31]

By 2016, however, it was recognised that there were gaps and the temporary permissions had lapsed. Using Circular PL07 12 dated 19th October 2012, planners were able to sign off the four masts with permanent permissions:

> 'Such masts have now become a feature of the landscape given that they have been in situ for a number of years (8-15 years) the removal of such structures is not a realistic proposition. Furthermore it is considered that such an approach would also have required to have been underpinned by a policy objective contained within the County Development Plan 2014 that had require the closure and the removal of existing mast site(s) and for other alternative sites to be examined. However there is no such policy objective in force but rather continued support for digital broadband and telecommunications services'.

DERREENACRINNIG WEST. Looking at the south side of the Mealagh Valley, Derreenacrinnig East is next to Nowen Hill, then Derreenacrinnig West, which is opposite Coomleagh East and West, and just short of being opposite the Maughanaclea hills.

In considering the wind farm application alone, Conor McGrath's report, following his site visit for the Inspectorate in January 2012, makes many useful observations regarding the height of the turbines and the Mealagh Valley.

- Referring to Cork County Council's senior planner's observations of 16/02/2011, the ABP Inspector copies the following from the Planner's report:

> The development is not located within a Natura 2000 site or a designated amenity area and would be significantly lower than more contemporary turbine models. The recommended minimum separation from dwellings is exceeded. The site is partly screened by adjoining hills and would be visible (long distance) from the Dunmanway - Drimoleague Road. The EIS considered the use of alternative turbines and a less obtrusive model was selected. The Mealagh Valley has significant visual qualities. On balance the height and location of the turbines would not have an adverse visual impact on the qualities of the area. The development would be a significant distance from the majority of existing wind farms, which are largely concentrated close to Dunmanway / Drimoleague. The development will result in the loss of peat habitat and details of compensatory habitat creation measures are required. Mitigation measures should also be incorporated into the construction plan. Proximity to Nowen Hill is a concern; however, contacts indicate that no impact on transmissions networks are anticipated. Recommend [from CCC senior planner] grant of permission.[32]

---

[31] 15/707 Planners Report 7/01/2016.

[32] p.9/10 of 35

- The ABP Inspector noted responses from the developers's consultants, to the grounds of the third party's appeal, include: Elevated positions are necessary to capture high winds; proposed turbine dimensions are quite small; layout of turbines was chosen to limit impacts on views and landscape character; having regard to the location etc there will be no major adverse landscape impacts.

- After quoting various current policies, the ABP Inspector begins his own extensive assessment of the Derreenacrinnig Wind Farm proposal, parts of which are usefully given here:

  - The development plan landscape character map indicates that the site straddles the boundary between Landscape Area no. 72: Mealagh Valley (Serrated Ridge and Upper Mooreland Valley) located within Landscape Type 15: Ridged and Peaked Upland to the north, and Landscape Area no. 52 Drimoleague- Skibbereen (Basin of Moorland Ridge and Semi-Marginal and Mosaic Farmland) located within Landscape Type 9 (Broad Marginal Middleground and Lowland Basin), to the south. The boundary between these areas runs along the ridge of Derreenacrinnig West (note: looking at the site plan, the seven turbines were all to be placed in landscape area no 72) . The Draft Cork Landscape Strategy identifies Landscape Type 15 as being of High Landscape Value and High Landscape Sensitivity and notes that an accumulation of more windfarms could have a more intolerable visual impact in the future. Walking routes have been developed through these hills in recent times[33].

  - Permission has been refused for a number of wind energy developments on the surrounding hills in the past. Permission was refused on the western slopes of Mullaghmesha, under ref. PL04.108995 on grounds of visual and landscape impacts. That site is now located within a Strategically Unsuitable Area. Permission was refused at Coomleagh East and Goulacullin to the north under ref. PL04.117606 (and subsequently under 99/1708) and PL04.117428, on grounds of landscape impacts and impacts on views from a scenic route. There was a subsequent refusal in 2006 for a wind monitoring mast under ref. PL04.215033 at Coomleagh East. Notwithstanding these decisions, permission was granted under PA ref. 08/2119 for a wind farm at Goulacullin at the eastern end of the Mealagh Valley. [34]

  - It is not considered that the mitigation measures identified in the EIS would be sufficient to overcome the impacts of the development on the landscape character and visual amenities of the area.[35]

---

[33] p16 of 35

[34] p16 of 35.

[35] p.18 of 35.

- The Recommendation from the An Bord Pleanala's Inspector in 01/2012 was to refuse permission for the proposed development at Derreenacrinnig West. The reasons and considerations were set out as follows:[36]

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

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

As stated in Appendix A, the An Bord Pleanala's members at that time decided not to accept Conor McGrath's recommendation for refusal. It is interesting to note, however, there is nothing in the Board's statement to show that they considered the Mealagh Valley separately, and how the scale of the seven turbines, at heights of 107metres, would visually impact its landscape.[37]

The disconnect between the inspector's recommendation and the decision of CC Planning and the Board resonates through subsequent paperwork. Even ten years later, the CCC Executive Planner notes in his report of 28/04/2022, for Derreenacrinnig:

- 'It is observed that whilst Cork County Council had resolved to grant permission the appointed inspector Conor McGrath, following a site visit on 18/19 January 2012 had recommended refusal on the grounds of the adverse impact upon the S30 Scenic Route and views towards the castle at Castledonovan. At the time of the decision in December 2012 the proposed wind farm was not located within a Strategic Search Area for wind energy development....[but it is now in an area 'open to consideration']. '[38]

---

[36] p.35 of 35. An Bord Pleanala, Inspector's report. Conor McGrath Report dated January 2012

[37] PL88.239767 - ref 10/857,

[38] Planners Primary Report 22/00153

MULLAGHAMESHA; The highest and longest hills, on the South side of the Mealagh valley, and opposite the Maughanaclea hills.

There are no planning reports available for this application on Cork CCC planning website or An Bord Planning website. Refusal from ABP is dated 25/05/1999. However, someone in the valley who has kept a history of previous objections has been able to provide the following:

- Dermot Kelly, ABP Inspector's Report for Mullaghamesha, 13/05/1999[39]: to consider a wind -energy complex consisting of 20 Turbines:

- I do not consider that locating the proposed development on the skyline would 'reduce visual impact', as suggested in the appeal grounds [*this was a suggestion by the first party appellant - the developer*].

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

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

- ....Accordingly I recommend that permission be refused for the following reason: Having regard to the location of the site in a very elevated and unspoilt exposed upland location in a rural scenic landscape of amenity/tourism/recreational potential and highly visible from a a public road which is a designated Scenic Route in the current CCDP. it is considered that the proposed large wind farm development would be visually obtrusive and out of character in the rural scenic landscape, and would seriously injure the visual amenities and natural beauty of the area. It is considered that the proposed development would be contrary to the objective of the planning authority as set out in the current development plan to preserve the views from such road and would be visually obtrusive and conflict with this objective, which is considered to be reasonable. The proposed development would, therefore, be contrary to the proper planning and development of the area.

[39] pp.19/20 of 20. 13/05/1999: [CCC98/ 1166 PL04.108995]. (Acknowledgment: Appendix provided as a courtesy by T Colk Lynch - thank you)

This Appendix is an extract of Relevant policies and objectives from County Cork Development Plan 2022-28.

As well as setting out some of the objectives of the CCDP 2022-28, accompanying sub-sections are included, which are designed to enrich and expand on the objectives, providing clarity and further direction as to the meaning of statements and actions intended. These fourteen pages show how objectives for Energy/ Renewable Energy - both for existing and proposed developments, sits within a whole raft of others. There is no indication that at county level development of renewable energy complexes have a precedent to override other policies and objectives to be met in the lifetime of the plan. In fact, mention of renewable energy development tends to be followed by: as appropriate' or 'at suitable locations' or 'where such development will not have adverse environmental impacts', similar to objectives within EU, National, and Southern Assembly policies.

DEVELOPMENT PLAN AIMS: ***Our aim in this Plan is to deliver sustainable urban and rural communities across the county to ensure a better quality of life <u>for all</u> making Cork County the most attractive place to live, work and invest in.***

AIMS: CHAPTER 1: 1.9.1 p.23+ The Development Plan presents an opportunity to shape the future growth of County Cork to plan for and support the sustainable long term development of the County. The Plan aims to build on our previous successes and to strengthen our strategic advantage as a County, to ensure that we utilise the **strengths of our citizens, communities, built and natural heritage, infrastructure, economy and tourism to their full potential.**

BE: BIODIVERSITY AND ENVIRONMENT. CHAPTER 15: p.335+. Ensure that the natural environment, biodiversity and ecosystems are **protected**, delivering benefits essential for all sectors of society and that Cork County contributes to efforts to reverse the loss of biodiversity and the degradation of ecosystems and the environment.

(BE) ***15.1. Introduction.*** 15.1.3 Biodiversity is threatened globally and locally by the ever increasing demands of people for space, fuel, food and other resources. Loss or damage to sites and places of biodiversity value caused by changes in landuse practices and pressure for development, disturbance of places inhabited by wild plants and animals, pollution of watercourses and the spread of invasive alien species all affect the extent and quality of our natural environment.

(BE)15.1.4 The link between biodiversity loss and climate change is becoming better understood. Changing climate increases pressure on habitats and species, while the protection of biodiversity helps to mitigate some of the impacts of climate change. The extent of damage to our biodiversity has been acknowledged by the Dáil, which declared a Climate and Biodiversity Emergency in 2019.

(BE) 15.1.5 As land use policy makers, development managers... Cork County Council has an important role to play in ensuring the protection of biodiversity. This chapter sets out Cork County Councils key objectives

for protection and enhancement of biodiversity resources in the areas of Policy, Land Use Planning, Consenting development and other activities, supporting community led biodiversity initiatives.

BE15.1 COUNTY DEVELOPMENT PLAN OBJECTIVE: SUPPORT AND COMPLY WITH NATIONAL BIODIVERSITY PROTECTION POLICES. a) Support and comply with the objectives of the National Biodiversity Plan 2017-2021 (and any future National Biodiversity Plan which may be adopted during the period of this Plan) as appropriate, b) Implement the current County Biodiversity Action Plan and any future updated Plan...

(BE) 15.2 Policy Context: 15.2.2 At European level, the 2030 EU Biodiversity Strategy sets out a long term plan to protect nature and reverse the degradation of ecosystems...

(BE) 15.2.3 At national level, biodiversity policy is set out in the National Biodiversity Action Plan 2017-2021 (NBAP) which identifies habitat degradation, climate change...as significant factors negatively impacting on biodiversity in Ireland today.

BE15.1 COUNTY DEVELOPMENT PLAN OBJECTIVE: PROTECT SITES, HABITATS AND SPECIES.

a)...b) Provide protection to species listed in the Flora Protection Order 2015, to Annexes of the Habitats and Birds Directives, and to animal species protected under the Wildlife Acts in accordance with relevant legal requirements. c) Protect and where possible enhance areas of local biodiversity value, ecological corridors and habitats that are features of the County's ecological network. This includes rivers, lakes, streams and ponds, peatland and other wetland habitats, woodlands, hedgerows, tree lines, veteran trees, natural and semi-natural grasslands as well as coastal and marine habitats. It particularly includes habitats of special conservation significance in Cork (Volume 2 of the Plan).

(BE)15.3 Protecting Sites, Habitats and Species – Legislative Context.

(BE) 15.3.2 The Birds Directive provides for the protection of sites used (for breeding or feeding) by species of birds that are rare, or vulnerable or in danger of extinction.

(BE) 15.3.8 Nature Conservation legislation provides for the protection of sites and species of national and international importance. However, sites and species benefiting from statutory protection do not alone represent the full extent of our natural heritage. In fact, most of our biological diversity occurs in the wider landscapes. Rare and protected sites and species cannot survive independently of their surroundings. Features of our landscape can be of high natural value and often provide the vital links and corridors to allow the movement of plants and animals between protected sites.

BE15.10 COUNTY DEVELOPMENT PLAN OBJECTIVE: SOILS.*a)...b) Identify areas of poorer soil in the County* ***acknowledge their potential value for wildlife,*** *and respect their limitations, particularly in terms of their* ***assimilative properties to prevent pollution.***

(BE)15-11 Noise and Light Emissions: 15.11.3 While artificial lighting is essential for a safe and secure night-time environment, the Council recognises the impacts light pollution (glare, skyglow, light trespass, clutter and spillage) can have on the visual, wildlife and residential amenities of surrounding areas. **Dark**

skies and unpolluted night skies are an asset to the County. The Planning Authority will explore how best to identify and manage areas of dark sky/unpolluted sky in the County during the lifetime of the Plan....

BE15.11 (13) COUNTY DEVELOPMENT PLAN OBJECTIVES: NOISE AND LIGHT EMISSIONS

Seek the minimisation and control of noise pollution associated with activities or development, having regard to relevant standards, published guidance **and the receiving environment**.

a) Ensure noise-sensitive developments are adequately protected from potential source of noise (e.g. national roads). New developments should take account of, and mitigate against, any existing noise sources.

b) Support the implementation of Noise Action Plans prepared for the Cork County Area

c) Seek the minimisation and control of light pollution associated with activities of development, having regard to the relevant standards, published guidance and the receiving environment and **Dark Sky principles.**

d) Review and update Cork County Council Policy Guidelines for Public Lighting to take account of impacts of public lighting on **wildlife and night skies**.

CS: CORE STRATEGY. CHAPTER 2: p.27+.

(CS) 2.14 STRATEGIC PLANNING AREAS IN CORK/ WEST CORK STRATEGIC PLANNING AREA/ CS2.6 COUNTY DEVELOPMENT PLAN OBJECTIVES: p.52+.

CS2-6: West Cork Strategic Planning Area, can be *defined from the Map on p.48, the area goes from Clonakilty to Skibbereen, to Bantry, Dunmanway, and the island peninsulas).*

There are twelve objectives set out in this planning strategy for West Cork. They include:

(d) Recognise the international importance and the importance to the region's **tourism economy**, of the **scenic and landscape qualities of the coastal and upland areas,** particularly along the peninsulas in the southwest and **to protect these landscapes from inappropriate development.**

(f) Support a vibrant and well populated countryside, recognising the need to strength and protect rural communities of the area by encouraging sustainable and balanced growth in both urban and rural populations, maintain traditional rural settlement patterns in rural areas and the islands, protecting agricultural and fishery infrastructure and productivity and **focusing other employment development** in the main towns and key villages;

(g) Recognise the need to encourage **diversification of the rural economy by promoting a stronger tourism and leisure economy through the protection of the area's natural and**

built heritage. This will also be achieved by recognising opportunities arising from wildlife tourism in the area...[1]

(h) Prioritise the adequate provision of water services and transport infrastructure to meet current needs and future population targets **while protecting the areas environment**;

(j) Protect and enhance the natural and built heritage assets of the towns and villages (Kealkill) from inappropriate development.

(l) Facilitate the development of renewable energy projects in support of national climate change objectives. [NB This is broad brush statement that appears for all four strategic areas of County Cork: Metropolitan Cork, Greater Cork Ring, West Cork and North Cork. It is a simple confirmation for supporting projects at suitable sites. Also, Renewables in the CCDP 2022-2028 include solar panels for houses, car parks etc. as well as industrial solar complexes, and development of hydro-electric. **This objective must not conflict directly with the other stated strategic objectives of this plan.** For wind-energy, potential suitable sites are those already assessed as being 'acceptable in principle' areas in West Cork].

ET13: ENERGY AND TELECOMMUNICATIONS CHAPTER 13: p.292+. Facilitate and support investment in sustainable energy production and infrastructure in Cork to meet the future local, regional and national needs, while transitioning to a low carbon economy, addressing the climate change challenge with greenhouse gas emissions and **protection** of the environmental, cultural and heritage assets of the county...

ET13.1 COUNTY DEVELOPMENT PLAN OBJECTIVE FOR ENERGY: p.294. a) Ensure that County Cork fulfils its potential in contributing to the sustainable delivery of a **diverse** and secure energy supply and to harness the potential of the county to assist in setting renewable energy targets and managing overall energy demand.

(ET)13.2.7....It is acknowledged that the development of new infrastructure to support the energy transition can give rise to community concerns, and the active engagement of communities in the development of such infrastructure is critical. Community led projects will also have an important role to play in the transition process. [2]

(ET)13-2 COUNTY DEVELOPMENT PLAN OBJECTIVE FOR RENEWABLE ENERGY:

a) Support Ireland's renewable energy commitments as outlined in Government Energy and Climate Change policies by facilitating the development of renewable energy sources such as wind, solar, geothermal, hydro and bio-energy and energy storage **at suitable locations** within the county **where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or amenities.**

d) To promote the potential of micro renewables where it can be demonstrated that that it will not have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or

---

[1] p.52. Core Strategy. CCDP 2022-2028 Volume 1 Main Policy Material.

[2] p.292. Energy and Telecommunications. CCDP 2022-2028 Volume 1 Main Policy Material.

amenities.

ET13.3: COUNTY DEVELOPMENT PLAN OBJECTIVE FOR HYBRID ENERGY SYSTEMS: p.296.

Support and facilitate proposals for hybrid energy systems and /or co-location of renewable energy where applicable where **such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or amenities.**

(ET)13.4.2 In terms of renewable energy County Cork currently has 38 commissioned wind farms with capacity to produce 603 MW of electricity and 43 permitted solar farms with capacity to produce 358MW of electricity. **[How many of these are in this local area of West Cork?]**

(ET)13.4.4 Energy generation in [County] Cork is likely to evolve significantly over the next number of years as the move towards a low carbon economy increases and the need to produce more energy from renewable sources. Cork is well positioned to become self-sufficient in renewable energy and contribute to the achievement of national energy targets outlined above.

(ET)13.4.5 Other aspects of energy use are also likely to change over the life of this plan .... The need to reduce overall energy demand is also acknowledged.

ET13.4: COUNTY DEVELOPMENT PLAN OBJECTIVE FOR WIND ENERGY: p.296. In order to facilitate increased levels of renewable energy production consistent with national targets on renewable energy and climate change mitigation as set out in the National Energy and Climate Plan 2021-2030, the Climate Action Plan 2021, and any updates to these targets, and in accordance with Ministerial Guidelines on Wind Energy Development, the Council will support further development of on-shore wind energy projects including the upgrading, repowering or expansion of existing infrastructure, at appropriate locations within the county in line with the Wind Energy Strategy and objectives detailed in this chapter and other objectives of this plan in relation to climate change, biodiversity, landscape, heritage, water management and environment etc. **[It is stressed here that support for on-shore wind energy projects must be in line with objectives set out in other chapters of the Development Plan]**

ET13.5 COUNTY DEVELOPMENT PLAN OBJECTIVES FOR WIND ENERGY PROJECTS: p.297.
a) Support a plan led approach to wind energy development in County Cork through the identification of areas for wind energy development. The aim in identifying these areas is to ensure that there are **minimal environmental constraints**, which could be foreseen to arise in advance of the planning process.
b) Onshore wind energy projects should focus on areas considered 'Acceptable in Principle' and 'Areas Open to Consideration' and generally avoid "Normally Discouraged" areas **as well as sites and locations of ecological sensitivity.**

(ET)13.6.4 The Strategy identifies three categories of 'Wind Deployment Area' for large scale commercial wind energy developments - Acceptable in Principle, Open to Consideration and Normally Discouraged.

(ET)13.6.6. 'Acceptable in Principle': These areas (River Ilen basin north of Skibbereen and an area south of Macroom) are an optimal location for wind farm development with minimal environmental impacts. They

have **viable wind speeds (>7.5m/s) and good proximity and access to the grid**. These areas exclude urban areas and town green belts, avoid Natura 2000 Sites (SPAs and SACs), high value landscapes and Natural Heritage Areas (NHAs).

(ET)13.6.7 Open to Consideration': This area comprises almost 50% of the County area. Within these areas there are locations that **may** have potential for wind farm developments but there are also some **environmental issues** to be considered. **This area has variable wind speeds and some access to the grid.** Urban areas, metropolitan/town green belts, and Natural Heritage Areas (NHA's) within this area are not generally considered suitable for wind farm developments. Any proposals within Freshwater Pearl Mussel Sub Basin Catchments or in other sensitive catchments must be able to demonstrate that they have been designed in a manner which prevents any risk of peat slippage or erosion; and ensures the ongoing protection of water quality and the maintenance of natural hydrological processes. The **cumulative effect** of wind energy developments with regard to landscape and visual impacts and also impacts on Natura 2000 sites will also **be a consideration**. High design standards in terms of environmental protection measures are likely to be required to be included in projects located in sensitive catchments.

(ET)13.6.8. Normally Discouraged: These areas (coastal areas, some areas in North Cork, Cork Harbour, and the Lee Valley) are normally **not suitable** for commercial wind farm developments due to their overall **sensitivity arising from ecological, landscape, amenity, recreational and settlement, considerations**.

(ET)13.6.10 The Councils Wind Strategy has been reviewed in light of the requirements of the Draft Revised Wind Energy Development Guidelines 2019, particularly the sieve mapping exercise outlined in the Draft Guidelines. It is considered that the strategy remains applicable and appropriate. The strategy facilitates commercial wind energy development in approximately 55% of Cork County with the remaining 45% unlikely to be suitable.

ET 13.6 COUNTY DEVELOPMENT PLAN OBJECTIVE: ACCEPTABLE IN PRINCIPLE. Commercial wind energy development is normally encouraged in these areas subject to protection of residential amenity particularly in respect of noise, shadow flicker, visual impact and the requirements of the Habitats, Birds, Water Framework, Floods and EIA Directives and taking account of protected species of conservation concern.

p.298. **ET 13.7 COUNTY DEVELOPMENT PLAN OBJECTIVE: OPEN TO CONSIDERATION.** Commercial wind energy development is open to consideration on these areas where **proposals can avoid adverse impacts** on:

- **Residential amenity particular in respect to noise, shadow flicker and visual impact**;
- Nature 2000 Sites,Natural Heritage Sites, proposed Natural Heritage Areas and **other sites and locations of significant ecological value.**
- **Architectural and archaeological heritage**;
- **Visual quality of the landscape and the degree to which impacts are highly visible over wider areas.**

In planning such development, consideration should also be given to the **cumulative impacts** of such proposals.

p.299. **ET 13.8 COUNTY DEVELOPMENT PLAN OBJECTIVE:NORMALLY DISCOURAGED.** Commercial wind energy developments will be discouraged in these areas which are considered to be sensitive to adverse impacts associated with this form of development (either individually or in combination with other developments). **Only in exceptional circumstances where it is clear that adverse impacts do not arise will proposals be considered**.

ET 13.16 Transmission Network/ Electricity Network: 13.16.1. The provision of a secure and reliable electricity transmission infrastructure and transmission grid is essential to meet the growth in demand and ensure that a reliable electricity supply is available. Cork has a very strong electrical grid and substation network and this network will be instrumental in supporting the development of the renewable energy industry in the county.

ET 13.21/22 COUNTY DEVELOPMENT PLAN OBJECTIVE: ELECTRICITY NETWORK. p.308. a)-c) d) Proposals for development which would be likely to have a significant effect on nature conservation-sites and/or habitats or species of high conservation value will only be approved if it can be ascertained, by means of an Appropriate Assessment or other ecological assessment, that the integrity of these sites will not be adversely affected.

Gi14.8.5 Encourage a more integrated and coherent approach to managing the Green Infrastructure assets of the County which will **protect** and enhance biodiversity, provide for recreational and amenity facilities, maintain and **enhance landscape character, protect** architectural and archaeological heritage, improve ecological connectivity, provide for sustainable water management and facilitate climate change adaptation and mitigation by requiring the retention and strengthening of substantial networks of green space in urban, urban fringe and into the wider countryside leading to improved quality of life and better economic opportunities for communities across the County now and in the future.

(GI) 14.7: LANDSCAPE. 14.7.1: The coastal and countryside landscapes of County Cork are a key green infrastructure asset not only for their intrinsic value as places of natural beauty but also because of their importance in terms of recreation, tourism and other uses. They are also a source of pride and inspiration for many residents and visitors alike. All aspects of our natural, built and cultural heritage come together in the landscapes we experience every day. Landscapes are an important part of people's lives, giving individuals a sense of identity and belonging, contributing to our wellbeing.

(GI) 14.8 LANDSCAPE CHARACTER ASSESSMENT OF COUNTY CORK. P.329.

(GI) 14.8.2: Based on the Guidelines, Cork County Council prepared a Draft Landscape Strategy in 2007 (precis) 76 landscape character areas reflecting the complexity and diversity of the county, amalgamated into a set of 16 landscape character types.

(GI) 14.8.3: The Value of each landscape character type is defined as the environmental or cultural benefits...which are derived from various landscape attributes.

(GI) 14.8.4: The Sensitivity of each character type is defined as the ability to accommodate change or intervention without suffering unacceptable effects to its character and values. Sensitivity is evaluated using criteria ranging from Very High to Low. A highly sensitive landscape is likely to be vulnerable to change whereas a landscape with a low sensitivity is likely to be less at risk to change.

(GI) 14.8.5: In order to indicate the correlation between the sensitivity of a landscape and the degree to which it can be changed by development:

> **Low sensitivity landscapes** are robust landscapes, which are tolerant to change, and which have the ability to accommodate development pressure.
>
> **Medium sensitivity landscapes** can accommodate development pressure but with limitations in the scale and magnitude. In this rank of sensitivity, landscape elements can accept some changes while others are more vulnerable to change.
>
> **High sensitivity landscapes** are vulnerable landscapes with the ability to accommodate limited development pressure. **In this rank landscape quality is at a high level, landscape elements are highly sensitive to certain types of change. If pressure for development exceeds the landscape's limitations the character of the landscape may change.**
>
> **Very high sensitivity landscapes are extra vulnerable landscapes** (e.g. seascape area with national importance) **which are likely to be fragile and susceptible to change.**

(GI) 14.8.6 The Importance of a landscape character type is rated as Local, County, or National. The LCA will inform decision making in relation to the protection of the environment, natural resources and heritage and will be used to guide development. (NB. Up to 2014, LCA15a was designated as County Importance up to 2014; the creation of 'High Value Landscapes' as a new simpler term, separated some LCTs as being County and others being Local Importance)

(GI) 14.8.8 Landscape Character Types which have a very high or high landscape value and high or very high landscape sensitivity and are of county or national importance are considered to be our most valuable landscapes and therefore are designated as High Value Landscapes (HVL), highlighted in green in the Table in Appendix F Landscape Character Assessment attached and shown in Figure 14.2.

(GI) 14.8.9 Within these High Value Landscapes considerable care will be needed to successfully locate large scale developments without them becoming unduly obtrusive. Therefore, the location, siting and design of large-scale developments within these areas will need careful consideration and any such developments should generally be supported by an assessment including a visual impact assessment which would involve an evaluation of visibility and prominence of the proposed development in its immediate environs and in the wider landscape. **(NB. The Maughanaclea 'Southern Site' is within 240Metres[3] of areas designated as High Value Landscapes!)**

(GI) 14.8.10. The key role of the Draft Landscape Strategy of Cork County is to assist in the achievement of sustainable development, by promoting an approach to landscape planning and management, which links objectives and recommendations for landscape character to existing planning policies. To recognise that

[3] ref and check

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

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

(GI) 14.8. 12. Seascape Assessment is an extension of landscape character assessment and with 1,100km of coastline; seascape is a crucial element of the County's history, identity and culture...

(GI) 14.9: LANDSCAPE VIEWS AND PROSPECTS.

(GI) 14.9.1 The County contains many vantage points from which views and prospects of great natural beauty may be obtained over both seascape and rural landscape. This scenery and landscape are of enormous amenity value to residents and tourists and constitutes a valuable economic asset. **The protection of this asset is therefore of primary importance** in developing the potential of the County Therefore, the Plan identifies specific Scenic Routes consisting of important and valued views and prospects within the County.

(GI) 14.9.2 Each of the Scenic Routes was examined individually and their location related to the landscape character type (15a and 4a) and some of the features lending themselves to the attractive nature of these particular routes identified. Scenic routes highlight the quality of the overall environment and landscape experienced within Cork County. It is important **to protect the character and quality** of those particular stretches of scenic routes that have special views and prospects, particularly those associated with High Value Landscapes.

(GI) 14.9.3 All proposals should be assessed on their merits taking into account the **overall** character of the scenic route including...the Landscape Character Type through which the route passes.

p.331 ***GI 14.9. COUNTY DEVELOPMENT PLAN OBJECTIVE: LANDSCAPE.***

a) **Protect** the visual and scenic amenities of County Cork's built and natural environment.

b) Landscape issues will be an important factor in all land-use proposals, ensuring that a pro-active view of development is undertaken while **protecting** the environment and heritage generally in line with the principle of sustainability.

c) Ensure that new development meets high standards of siting and design.

d) Protect skylines and ridge lines from development.

e) Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments.

GI 14.10 COUNTY DEVELOPMENT PLAN OBJECTIVE: DRAFT LANDSCAPE STRATEGY. Ensure that the management of development throughout the County will have regard for the value of the landscape, its

character, distinctiveness and sensitivity as recognised in the Cork County Draft Landscape Strategy and its recommendations, in order to minimise the visual and environmental impact of development, particularly in areas designated as High Value Landscapes where higher development standards (layout, design, landscaping, materials used) will be required. (and those landscapes within close proximity where wind turbines will negatively impact High Value Landscapes, whether it is Visibility, Noise/sound, Shadow Flicker, Heritage, Ecology, or Biodiversity)

GI 14.12. COUNTY DEVELOPMENT PLAN OBJECTIVE: GENERAL VIEWS AND PROSPECTS. Preserve the character of all important view and prospects, particularly sea views, river or lake views, unspoilt mountains, upland or coastal landscapes, views of historical or cultural significance... and views of natural beauty as recognised in the Draft Landscape Strategy.

GI 14.13. COUNTY DEVELOPMENT PLAN OBJECTIVE: SCENIC ROUTES. Protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that have very special views and prospects identified in this Plan.

GI 14.14. COUNTY DEVELOPMENT PLAN OBJECTIVE: DEVELOPMENT ON SCENIC ROUTES. a)Require those seeking to carry out development in the environs of a scenic route and/or an area with important views and prospects, to demonstrate that there will be no **adverse obstruction or degradation of the views towards and from vulnerable landscape features.** In such areas, the appropriateness of the design, site layout, and landscaping of the proposed development must be demonstrated along with mitigation measures to **prevent** significant alterations to the appearance or character of the area.

GI 14.15. COUNTY DEVELOPMENT PLAN OBJECTIVE: DEVELOPMENT ON THE APPROACHES TO TOWNS AND VILLAGES: Ensure that the approach roads to towns and villages [Kealkill] are protected from inappropriate development, which would detract from the setting and historic character of these settlements.[4]

HE16: BUILT AND CULTURAL HERITAGE CHAPTER 16: p.353+. The Plan recognises the importance of identifying, valuing and safeguarding our archaeological, architectural and cultural heritage for future generations through appropriate protection, management and enhancement measures or via the sensitive development of this resource.

(HE) 16.1 Introduction. (HE)16.1.2: The National Planning Framework is the Government's high-level strategic plan for shaping the future growth and development of the country up to 2040. It includes a strong focus on enhanced amenities and heritage by highlighting how our built, cultural and natural heritage has intrinsic value in defining the character of urban and rural areas and adding to their liveability, attractiveness and sense of place. It also emphasises how Ireland's built heritage assets are a non renewable resource that merit being nurtured in a manner appropriate to their significance as an aid to understanding the past, contributing to community well-being and quality of life as well as regional economic development.

(HE) 16.2.1 Archaeological heritage consists of the material remains left behind by past societies from earliest times up to the post- medieval period and includes all structures, places, caves, sites, features and portable objects, whether located on land, underwater or in the inter-tidal zone. In general, those parts of the archaeological heritage that are part of or attached to the landscape are referred to as monuments. Cork has a rich archaeological heritage, which has left its traces across its urban and rural landscape. The

[4] p.332 CCDP 2022-2028 Volume 1 Main Policy Material

Council fully recognises its role in protecting this resource for future generations to enjoy.

(HE) 16.2.29: ARCHAEOLOGICAL LANDSCAPES Where a concentration of archaeological sites of a similar period but not necessarily so, occur they should be seen as a collective group. Within County Cork there are varied archaeological landscapes such as Allihies Copper mining landscape, fortifications at Cork Harbour, upland prehistoric settlement in Shehy Beg. Where these collections of monuments occur, their protection will be based not only as an individual site but as part of a wider archaeological landscape.

(HE)16.2.33 UNDISCOVERED ARCHAEOLOGICAL SITES. The Planning Authority is aware of the potential to identify previously unrecorded archaeological sites as part of development proposals across the County. To date these have particularly been identified in upland areas or as a result of Archaeological investigation on large scale development but not exclusively so. Development management need to factor this potential when assessing planning applications. There should always be a presumption in favour of avoiding developmental impacts on the archaeological heritage and preservation in situ is the recommended approach. Preservation by record will only be considered in exceptional circumstances.

(HE) 16.3.27 HISTORIC LANDSCAPESThe landscape of County Cork contains various layers of historic fabric which are a valuable contribution to the appearance of the countryside, are an intrinsic element of place, are tangible tourism assets and are significant as archaeological, architectural, historical, cultural and ecological resources. The Council recognises the value of the various and diverse historic landscapes of the County and seeks to protect them from destruction or inappropriate development.

HE16.11. COUNTY DEVELOPMENT PLAN OBJECTIVE: ARCHAEOLOGICAL LANDSCAPES. To protect archaeological landscapes and their setting where the number and extent of archaeological monuments are significant and as a collective are considered an important archaeological landscape of heritage value.

HE16.13. COUNTY DEVELOPMENT PLAN OBJECTIVE: UNDISCOVERED ARCHAEOLOGICAL LANDSCAPES. To protect and preserve previously unrecorded archaeological sites within County Cork as part of any development proposals. The Council will require preservation in situ to protect archaeological monuments discovered. Preservation by record will only be considered in exceptional circumstances.

HE16.20. COUNTY DEVELOPMENT PLAN OBJECTIVE: HISTORIC LANDSCAPES. a) Recognise the contribution and importance of historic landscapes and their contribution to the appearance of the countryside, their significance as archaeological, architectural, historical and ecological resources. b) Protect the archaeological, architectural, historic and cultural element of the historic/heritage landscapes of the County of Cork.

RP: RURAL: CHAPTER 5 P.105 +. Ensure that the housing needs of all rural communities including island communities, which have many distinctive needs from those in urban areas are identified, and that policies are put in place to ensure that the type and scale of development in rural areas, at appropriate locations, necessary to sustain rural communities is accommodated.

RP 5.4 IDENTIFYING RURAL AREA TYPES: (RP) 5-4-5 TOURISM AND RURAL DIVERSIFICATION AREA. These parts of rural and coastal County Cork exhibit characteristics such as evidence of considerable pressure for rural housing, in particular higher demand for holiday and second home development. These rural areas are more distant from the major urban areas and the associated pressure from urban generated

housing. These areas also have higher housing vacancy rates and evidence of a relatively stable population compared to weaker parts of the County. **These areas have higher levels of environmental and landscape sensitivity and a weaker economic structure with significant opportunities for tourism and rural diversification.**

RP 5-5 COUNTY DEVELOPMENT PLAN OBJECTIVE: TOURISM AND RURAL DIVERSIFICATION AREA.

'This rural area has experienced high housing construction rates and above average housing vacancy rates which has led to concerns that a higher demand for holiday and second homes is depriving genuine rural communities the opportunity to meet their own generated housing needs, Therefore, in order to make provision for the genuine rural generated housing needs of persons from the local community based on their social and/or economic links to a particular local rural area and to recognise the significant opportunities for tourism and rural diversification that exist in this rural area, it is an objective that applicants must demonstrate that their proposal complies with one of the following categories of housing need'. [5]

> *NB: Seven categories are then listed- essentially, the applicant is one who is returning to reside near other immediate family members or have spent a substantial period of their lives (i.e. over seven years), living in the local rural area in which they propose to build a first home and/or linked to working full time in farming, forestry, inland waterways...or rural based sustainable tourism.*

Further, **COUNTY DEVELOPMENT PLAN OBJECTIVE:RURAL** RP5-25 covers Occupancy Conditions which are imposed in the form of an indenture, usually for seven years, under Section 47 of the Planning & Development Act 2000. (Ireland's government is at last talking of relaxing this stricture because of some of the real problems that occur with such a long period, from mortgage scarcity to a change in people's circumstances)

TO: TOURISM. CHAPTER 10: p.209+. Promote a sustainable and well managed tourism industry which protects the environmental and heritage assets of the County while delivering economic benefits throughout the County. Identify and **develop** new and diverse tourism products - particularly those associated with **heritage and environment, arts and culture** and acknowledge the need to spread appropriate tourism growth and tourist related enterprises beyond established resorts and larger towns to rural areas.

(TO) 10.4 FAILTE IRELAND REGIONAL BRANDS: 10.4.1 the Wild Atlantic Way and Irelands Ancient East are evident in Cork County and are making a significant impact to our tourism industry. The Council intends to continue to support the growth of these regional brands. 10.4.2 The development of the 'Wild Atlantic Way' along the west coast from Donegal to West Cork has been a major contribution to the tourism industry. There are 188 Discovery Points along the route with 27 of these in County Cork alone. They are offering the best views of the Irish Landscape.

TO10-1 COUNTY DEVELOPMENT PLAN OBJECTIVE, PROMOTION OF SUSTAINABLE TOURISM IN COUNTY CORK: a) Ensuring the protection of the natural, built and cultural heritage assets of the county, including Natura sites, which are in themselves part of what attracts visitors to the county.

---

[5] p.114. CCDP 2022-2028 Volume 1 Main Policy Material This same policy appears in the CCDP for 2014 under RC14-3.

TO 10.2 COUNTY DEVELOPMENT PLAN OBJECTIVE: WILD ATLANTIC WAY: Continue to actively engage, invest, encourage and promote the development of the Wild Atlantic Way and Irelands Ancient East regional brands through sustainable tourism, which will enable visitors to have enjoyable experiences while having regard for the **cultural, built and natural heritage, and environmental impacts**, including the protection of Natura 2000 sites.

(TO) 10.5.2 Tourism in County Cork is based on its rich natural and built heritage. The principle features of the area's tourism product include mountains and upland habitats; rivers and lakes, over 1100 km's of scenic rugged coastline and peninsulas with long stretches of sandy beaches, fertile agricultural land and many upland peatlands and forest/woodland areas. These natural assets combined with a rich heritage of archaeological and historical sites, built environment including manor homes and gardens, attractive towns and villages offer a unique tourism product.

(TO) 10.6 PROTECTION OF TOURIST ASSETS: 10.6.I County Cork has a wide range of nationally significant tourism assets (including): Mountain ranges including: - the Slieve Miskish and Caha Mountains, the Galtee Mountains, the Shehy Mountains, and the Ballyhoura Area –important centres for , cycling, and adventure related activities. - The Gaeltacht areas which are of significant cultural heritage value and frequently visited by tourists. - The West Cork Peninsulas (Beara, Mizen, Sheep's Head) – with their unique visual amenity and landscape character offer potential for and cycling and other outdoor activities. - Cork has rich fertile agricultural land and many bogs and peatlands with a higher than national average land mass of forest and woodland area; - A wide range of archaeological monuments that occur across the County;. -Opportunities to observe wildlife particularly in terms of bird and marine life.

(TO)10.6.2...It is important to ensure that other development generally and tourism development in these areas does not have a negative impact on the overall character of such areas and does not cause harm to the environment, designated sites or protected species.

(TO) 10.6.3. Many areas that are important to the tourist industry of County Cork owe their attraction to the **exceptional quality of the landscape** or particular features of the built environment. It is important to recognise the valuable role of natural assets such as lakes, rivers and forests as economic resources for tourism, particularly **in rural areas, and to protect and enhance the qualities of such areas** so that they can continue to contribute to the growth in tourism visitors into the County as a whole. It is also important to recognise the **night sky as a tourism asset** for the county and it should be **protected** from light pollution in sensitive areas.

TO 10.10 COUNTY DEVELOPMENT PLAN OBJECTIVE: TOURISM FACILITIES b) Carefully consider tourism-related developments outside settlements at an appropriate scale and balance having regard to the pertaining environmental conditions and sensitivities, scenic amenity, availability of services and the cumulative impact of such developments on the environment. c) Support sustainable environmentally sensitive **small-scale tourism enterprises** including Agri-tourism enterprises and other initiatives **that are developed in conjunction with established rural activities such as, fishing, , cycling, mountain biking, surfing, equestrian sports and other activities where these are compatible with environmental legislation**.

WM: WATER MANAGEMENT. CHAPTER 11: p.226+. Introduction: Water is a fundamental building block of life and therefore the quality of the water we use in our daily lives is of huge significance to, not only our physical wellbeing but is also critical to our economic wellbeing...The Planning and Development Act 2000, as amended, seeks to integrate the development plan process and water management...to support the protection and enhancement of water quality, and compliance with environmental standards and objectives regarding water quality.

11.2. The Water Framework Directive (WFD) is a key initiative aimed at protecting and improving water quality throughout the EU. The WFD was adopted in 2000 and requires governments to implement management measures in their waters (rivers, canals, lakes, reservoirs, groundwater, protected areas (including wetlands and other water dependent ecosystems), estuaries (transitional) and coastal waters up to 1 nautical mile) so as to achieve good ecological status or restore high status.

WM11-3-18. Groundwater Protection: Groundwater is a natural resource with both an ecological and economic value. It is of vital importance for sustaining life, health, agriculture and the integrity of ecosystems. This is particularly true...where 90% of the water supply comes from groundwater sources. Groundwater also contributes to our rivers, lakes and sea and therefore influences their amenity and recreational value. The quality of groundwater is threatened by worsening pollution levels, directly attributable to human activities...Once contaminated, groundwater is difficult and expensive to clean. (b) Prevent or limit, as appropriate, the input of pollutants into groundwater and prevent the deterioration of the status of all bodies of groundwater.

WM11-3-26 In all cases where groundwater is being used as a water supply source or where effluent is being discharged to ground, or both, a report on the impact of the proposed development on existing infrastructure will have to be provided....It should be borne in mind that the development must respect the existing land uses and developments on adjoining sites. While karst regions generally yield hard water in abundant quantities, their vulnerability is generally extreme and this needs to be properly considered in abstracting and treating groundwater for consumption.

(WM)11-5 Sensitive Water Catchments, 11-5.9: The issue of discharges from the Dunmanway Wastewater Treatment Plant...is directly into the Bandon River within the SAC and within an area known to support a population of Freshwater Pearl Mussel. Cork County Council is working with other stakeholders in particular Irish Water and the National Parks and Wildlife Service to address this issue. Pending resolution of the issue, and in compliance with the requirements of Various European Directives and the River Basin Management Plan any new development in Dunmanway which discharges into the Bandon SAC will have to be put on hold.

WM11-3 COUNTY DEVELOPMENT PLAN OBJECTIVE: GROUNDWATER PROTECTION AND ZONES a) Preserve and protect groundwater and surface water quality throughout the County. b) Prevent or limit, as appropriate, the input of pollutants into groundwater and prevent the deterioration of the status of all bodies of groundwater. c) Protect, enhance and restore all bodies of groundwater...

ZU: ZONING AND LAND USE: CHAPTER 18: p.391+. 18.2.2. Transitional Lands: While the zoning objectives indicate the different uses permitted in each zone, it is important to **avoid abrupt/ disconnected transitions in scale and use** in the boundary areas of adjoining land use zones. In dealing with development proposals in these contiguous transitional zonal areas, it is necessary to avoid developments that would be detrimental to the amenities of these zones and in particular the more environmentally sensitive zones. For example, regard should be had to the use, scale and density of development proposals in zones abutting residential or rural areas in order to protect residential or rural amenity, as appropriate. **(This statement is regarding Land Zoning in the broadest sense so equally applies to wind energy developments?)**

CA: CLIMATE ACTION. CHAPTER 17: p.226+. (CA) 17.2.2 MITIGATION AND ADAPTION: Measures in this plan include the following:

- Promoting energy efficiency;
- Promoting new renewable energy technologies and enterprise;
- Enhancing and protecting biodiversity; note how the three are hand in hand

(CA) 17.2.3 Climate adaptation refers to actions taken to reduce the negative effects of climate change or to take advantage of emerging opportunities. Adaptation measures in this plan include the following:

- Flood risk management;
- Promotion of nature-based systems for water management services;
- Enhancement and protection of green infrastructure and biodiversity;

(CA) 17.7 CLIMATE ACTION STRATEGY: 17.7.9 ENERGY: [The vision from Chapter 13] is to facilitate and support investment in sustainable energy production and infrastructure in Cork to meet the future local and national needs, while transitioning to a low carbon economy, addressing the climate change challenge with greenhouse gas emissions and **protection of the environmental, cultural and heritage assets** of the county.

(CA) 17.7.10 In relation to renewable energy an objective is outlined to facilitate the development of renewable energy sources **at suitable locations where such development will not have adverse environmental impacts, a**nd to support and facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community. It also outlines an objective that will promote building energy efficiency and conservation.

(CA) 17.7.17 [The vision from Chapter 15] of this plan contains a range of objectives that aim to **protect the natural environment, biodiversity and ecosystems**, delivering benefits essential for all sectors of society, and contribute to efforts to halt the loss of biodiversity and the degradation of ecosystems and the environment.

(CA) 17.7.18 [The vision from Chapter 14] is an important element of an overall aim **to enhance biodiversity**. Green Infrastructure is commonly defined as an interconnected network of multi-functional green space, urban and rural, that is capable of delivering a wide range of environmental and quality of life benefits for local communities and wildlife. Green infrastructure is based on the principle that **protecting**

and enhancing nature and natural processes, and the many benefits human society gets from nature, are consciously integrated into spatial planning and territorial development...

Implementation and Delivery The Planning Authority will improve on reporting by establishing a strong, frequent and ongoing monitoring system for the Plan as a permanent function in line with the Draft Development Plan Guidelines for Planning Authorities issued by the Department of Housing, Local Government and Heritage August 2021. The Planning Authority will place particular focus on biodiversity monitoring during the lifetime of the Plan which will be predominately delivered through the Strategic Environmental Assessment (SEA) monitoring process (see Paragraph 19.3.1). In light of this, the biodiversity monitoring targets and indicators in Volume 6 of the Draft Plan have been reviewed and revised with a focus on more tangible measurements and accounting methodologies (see addendum to SEA).

A Case in Point.

p.35 of MKO Planning Report typically plucks out part of a statement to prove its own point. Just one of example of this, it states: In relation to renewable energy and climate action, the relationship between increased renewable energy production and a reduction in GHG emissions is recognised. Objective 17-2 states:

" 'In order to achieve a reduction in greenhouse gas emissions, an increase in renewable energy production, an increase in energy efficiency and enhanced biodiversity, support the transition to a low carbon, competitive, climate resilient and environmentally sustainable economy by 2050 through implementation of the polices of this plan...' "

They have purposefully foreshortened the quote. Objective 17-2 should have been state in full for the reader, as actually states how the reduction in greenhouse gas emissions will be achieved, with renewable energy **only being part of the mix**:

- **CA 17-2:** In order to achieve a reduction in greenhouse gas emissions, an increase in renewable energy production, an increase in energy efficiency and enhanced biodiversity, support the transition to a low carbon, competitive, climate resilient and environmentally sustainable economy by 2050 through implementation of the polices of this plan that seek to deliver the following:
    - compact growth,
    - integrated land use and transport,
    - sustainable transport choices,
    - liveable settlements,
    - renewable energy production and reduced energy consumption,
    - enhanced ecological biodiversity and

18 May 2026

Applications, Appeals and Decisions made by Cork County Council Planning and Board Members of An Bord Pleanala, past applications from Keakill eastwards.

25/03/2025: PA **25/00142 GORTLOUGHRA:** The townlands of Shehy Beg, Gortloughra, Cloghboola, and Inchinroe. This proposed site is immediately East of the 'northern site' of the proposed Maughanaclea site - there is a question of wind-stealing if both sites were granted permission, given the closeness of Turbines on the two sites - would this be permissible even under the WEDG guidelines?

14/05/2025. This application was refused by Cork County Council On the 14/05/2025 for the following reasons:

1. The proposed wind farm development would be located in an elevated, exposed, open unspoilt landscape, on land where the proposed wind farm would give rise to the removal of wet heath, blanket bog and wet heath mosaic, which are considered as 'habitats of special conservation significance' as set out in Volume 2 of the Cork County Development Plan 2022, and can be considered as Annex I habitats. Given the extent of peatland habitats to be removed to facilitate the proposed wind farm development, and notwithstanding the biodiversity enhancement measures proposed, the Planning Authority considers that to permit the proposal would give rise to a net loss of biodiversity, which would lead to the significant loss of habitat of special conservation significance, thereby materially contravening Objectives ET 13-7 and BE 15-2 of the Cork County Development Plan, 2022 which seeks to protect and where possible enhance areas of local biodiversity value, ecological corridors and habitats that are features of the County's ecological network and to avoid adverse impacts on locations of ecological value. Accordingly, the proposed development would have a permanent, significant and negative impact on the biodiversity of the area, lead to the excessive loss of habitat of special conservation significance and materially contravene the above stated objectives of the Cork County Development Plan, 2022. The proposed development would, thus, be contrary to the proper planning and sustainable development of the area.

2. The proposed wind farm development would be located within a Landscape Character Type of Ridged and Peaked Upland, within an area of open unspoilt landscape, of wilderness terrain, within an area where commercial wind energy developments are 'Open to Consideration', as designated in the Cork County Development Plan 2022, subject to compliance with normal planning and environmental criteria, as set out in the specific Objective ET 13-7. The proposed wind farm site would also be sited in an area of High Landscape Value, High Landscape Sensitivity and Local Landscape Importance and would be visible from scenic routes S29 and S28. On the basis of the information submitted and having regard to the siting and excessive height of the turbines proposed, the Planning Authority considers that the proposed development would seriously detract from the views and prospects from parts of the S29 scenic route, would seriously detract from the visual quality of the landscape and visual amenities of the area and would be visually obtrusive when viewed from therein. The proposed development would thus materially contravene Objectives ET 13-7, GI 14-9, GI 14-12 and GI 13-13 (GI14-13) of the Cork County Development Plan, 2022 which seek to protect the landscape and visual and scenic amenities of the area, including the views attainable from Scenic Routes, the character of such views and prospects and those with very special views. Accordingly, the proposed development would be contrary to the proper planning and sustainable development of the area.

18 May 2026

An Appeal from Statkraft's consultants to overturn this refusal for Gortloughra Wind Fram is currently with An Coimisiún Pleanála,[1] which had requested that further information was provided by 05/05/2026. The deadline appears to have been missed by the consultants, and has been extended to August: 05/08/2026. The information required of Jennings O'Donovan is for the following areas:

- **Biodiversity (including Ornithology):** an update habitat map, an updated vegetation map, an updated table of habitat loss/damage and an assessment of confidence as to the effectiveness of restoration of habitat.
- **Bats (and other survey data):** robust justification of ecological surveys.
- **Invasive Species:** an Invasive Management Plan required.
- **Birds:** provide scientific justification on the lack of need for nocturnal surveys in view of whooper swans at Lough Nambrackderg, [above Kealkill].
- **Other protected Species:** Kerry Slug: An Coimisiún Pleanála will require sight of a valid derogation licence.
- **Soils and Geology:** the Commission has concerns regarding the adequacy of the geotechnical investigations. Trial pits to be excavated as tubing locations, borrow pits, etc to investigate the underlying mineral soil lithology and subsoil/bedrock interface. Also, groundwater/surface water monitoring and sampling.
- **Slope instability:** from proposed settlement ponds. Laboratory tests required. Likewise a question on the volumes of peat requiring excavation and storage, especially at hardstands where peat depths of >1.6m recorded.
- **Hydrology and Hydrogeology:** complete revision /rationale of site layout drawings required, also reassessments of Water Course Crossing no.1, settlement ponds, infills, drainage, elevated levels of ammonia etc.
- **EU Water Framework Directive:** Assessment for this is queried as Bandon 20 is 'At Risk', and clarification that Lough Nambrackderg has been considered using the EPA Guidance for Undesignated (unmonitored) water bodies.
- **Temporary Spoil Management Areas:** plans to include measures to protect surface water quality.
- **Noise**: clearly specify mitigation measures if Amplitude Modulation (AM) should arise. Discrepancies in assessment of noise and of affected receptors.
- **Air and Climate:** discrepancies in measurement of CO2 losses.
- **Roads and Traffic:** drawings for Site entrance and boundary treatment.
- **Cultural Heritage:** Standing Stones not identified in EIAR, and misidentification of location for a wedge tomb.
- **General:** 1) inconsistencies in counting wind farms in the area, when assessing cumulative effects. 2) inconsistencies in identifying, omitting and miscounting receptors within 2km of proposed Gortloughra wind farm. All errata/ corrections with the EIAR, NIS and other documentation must be clearly annotated.
- This is now on appeal with ACP, with a decision date now to be 5.30pm 05/08/2026.

Farranahineeny Wind Farm.

2006: Application for five (5) wind turbines, towers of 60 metres in height, with a blade diameter of 80 metres, plus ancillaries: Address is Dunmanway 05/1024. The site is an upland area on the southern slopes of Carrigariek, with an elevation of 200-220metres. There are very few houses, however the area is rich in archaeology. The Farranahineeny Stone Row is a listed national monument. It is about 5.5

[1] ABP -322743-25

kilometers (3.4 miles) south of Inchigeelagh. The stones stand to the east of the Shehy Mountains. Because of the proximity of this Stone Row to the proposed turbines, the application was refused by CCC planning.

16/01/2006: Appeal to ABP. 215968. It was offered to exclude the National Monument from the development area.

Refusal by ABP 29/08/2006 for the following reason: Having regard to proximity of the proposed development to a hilltop stone row, which is a designated National Monument (no. 374) it is considered that the proposed development would have a detrimental impact on the setting of the National Monument and on the overall context of the cultural heritage landscape of which the hilltop National Monument forms part. Therefore, the proposed development would interfere with a historic monument and would be contrary to the proper planning and sustainable development of the area.Table: Operating, Permitted, Proposed, Refused and Withdrawn Wind farm applications. within the same range of Shehy Mountains as the proposed sites of Maughanaclea.

Ref nos.	DEVELOPMENT	SITE: Orientation to Maughanaclea	More recent OUTCOMES
25/142 ACP 322743-25	Developer: Statkraft 8 Turbines: Blade tip height of 175 metres. 40 years operational life.	**SHEHY BEG, GORTLOUGHRA,** Cloghboola, and Inchinroe. Relatively Close Proximity: c.1.5Km to North East (northern site) and 4.40km southern Site.	Refused by CCC, its Party Appeal to ACP. Status: Further information: Decision pending was due by 05/05/2026. Now extended to 05/08/2026.
13/00551 16/256 16/453 17/431 PI 301563-18 PI04.243486	Developer: Shehy More Windfarm Ltd/ Enerco 11 Wind Turbines up to 131 metres in Blade Tip Height with an operating life of 25 years.	**SHEHY MORE** Relatively Close Proximity: c.2Km to North East Distance from proposed Gortloughra WF c.550m. Montages will show these as all one wind farm if permitted, with Maughanaclea Turbines among the tallest.	Granted by An Bord Pleanála 29/12/2016 following a decision to grant by CCC.
PA15/730 PI04.246353 ABP 313261-22	5 wind turbines up to 140 metres for 25 year life. (The height may be 150metres - the permission in 2015 for 150 meters was at that time considered likely to be the limit!)	**CARRIGARIERK** Wind farm 8km to North East	Granted ABP 01/11/2016.
PA 21/5372	Developer: Keel Energy ltd. Extension: 3 wind turbines up to 140metres for 25 year life.	**CARRIGARIERK (2)** Wind farm Distance from Gortloughra measured at c.4.5km to the east so c.5.1km from Maughanaclea Northern.	Granted ABP 31/10/2021.

18 May 2026

West of Proposed site of Maughanaclea (upper) Wind farm.

Ref Nos.	DEVELOPMENT	SITE: Orientation to Maughanaclea	More Recent OUTCOMES
PA00/6590 PA03/6910 PI04.127297	2002/6: 10 Wind Turbines tip height 75metres, granted on appeal 30/05/2002. Late height modifications refused 06/04/2005	**CURRAGLASS,** Derrenadonee c.5km to North West	Permission granted. 2018 10 Turbines taken down - wind farm defunct.
	2019: Substation/Battery.		2019 Refusal for substation to remain and battery storage.
PA 20/350, ABP 308244-20 315656-23 PA 25/6052 ACP 500665	2020: 7 Wind turbines tip height 178.5metres for 30 year life, Refused CCC, Refused ABP. Developer: Wingleaf /Enerco. 2025: 3 Wind Turbines 156.5metres, presently on appeal by WingLeaf/ Enerco.		2020- Refused by CCC, Permitted by ABP, Quashed and returned by High Court, Refused by ABP 13/05/2024. 2025. Decision to grant by CCC, Appeal by third parties to ACP, decision due 25/05/2026.

This section is in reference to some of the past planning applications for Mealagh Valley.

Coomleagh East/West.

01/03/2022. 21/567: This application was for a one and a half high dwelling on the parents' land for a daughter who wished to return. A letter, dated 06/10/2021 to the consultants had stated there were

- Serious concerns with regard to the form, height, and layout of this dormer dwelling house and its ability to assimilate in this elevated landscape. [The drawings show the dwelling at 6.112 meters high].
- Uncertainty with regard to the ability of the resultant development to assimilate into this elevated landscape.
- Uncertainty with regard to the potential for wholesale site clearance, tree felling and the failure to protect trees of amenity value at the site.

Mr Phil O'Sullivan, a CCC Exec. Planner also notes in his report: There is an overriding requirement to underpin any development within this scenic area, part of the "Sheeps Head Way East' with convincing ties to the area ... and the onus is on the applicant to demonstrate the compelling case.

PERMISSION was granted for a dwelling to Flora Weiler with the normal caveat that the proposed dwelling, for a minimum period of 7 years from the date of completion, shall be used solely as the place of permanent residence of the applicant and/or members of his/her immediate family.

28/09/2005. 05/4570 PERMISSION was granted to Francis Keane for a dwelling in the townland of Coomleigh East, part of the Maughanclea Hills. Concerns for development in the Mealagh Valley has a long history: the planner at the time writes to the consultant:

> I recommend deferral as follows: ..the planning authority are however, concerned about the level of development in the area north east of Bantry generally, and while the site conditions in this particular instance appear reasonable, the applicant should be prepared to sign a section 47- 5 year sterilisation agreement indicating that no further development will take place on the landholding map submitted to the planning authority on the 25/05/2005. Please submit your response in this regard.

There are other examples of residential applications within the Mealagh Valley that bring up the questions of visual amenity, people being able to meet the housing needs criteria, and those permissions granted having the normal caveat /indenture of residing in the property for seven years: 23/774, 24/670, 24/525, 24/670, 07/400, and more.

30/04/2018 18/111 Gortnacowly. This time an application for retention of shed for keeping sheep, up to 120 ewes, and a new cattle shed. It was split decision where the proposed cattle shed was refused, as follows:

> As stated in the Cork Development Plan 2014 it is the Councils stated policy Objective EE 8-1 to promote the agricultural economy whilst other Objectives GI 13-1 and GI 13-2 are geared towards protecting residential amenity. Given the proposed siting, scale and use of the proposed cattle house and associated activities which are located within 100 metres of two nearby third party dwellings such development is likely to result in nuisance from odour and noise to the residents and future occupiers of those dwellings. The proposed development would therefore contravene materially established objectives of the County Development Plan 2014 and would therefore be contrary to the proper planning and sustainable development of the area.

The Planning Officer states that in his opinion 'siting the proposed cattle shed at this location will result in a new odour and noise nuisance to the residents of the nearby third party dwellings within 100 metres of the proposed cattle house.' The Planners were very mindful that the Cattle Shed should not be within a certain distance - though I would add the residents in question are part of the same farming family and may be used to the odour and noise of cows?

Mr O'Sullivan further states that the distance between a storage facility and a public/private water supply source, either surface or ground, be increased up to 300 metres, in vulnerable situations. 'GSI mapping shows that there are high vulnerability aquifers in the area'[1]. Likewise, in the permissions for the sheep shed, there are restrictions on baled silage to prevent water pollution:

> *Where field storage is used for baled silage, the bales shall not be stacked greater than 2 rows high. Baled silage shall not be stored, opened or fed to animals within 20m of a watercourse, or within 50m of a drinking water abstraction point.*

This section is in reference to some of the past applications for townlands East of Kealkill, along the R585.

Maughanaclea Townland which runs across from the Mealagh Valley to the R585, leaving Kealkill.

10/10/2023. Ref: 23/469. REFUSAL of permission to build a single-storey property that would have abutted the R585, East of Kealkill and within the Maughanclea Townland. Mr J O'Mohony had met the criteria of housing needs, having been born and raised in the local area, demonstrated a local genuine housing need and offered that helped his mother on the family farm. The given reasons for refusal were as follows:

- As stated in the Cork County Development Plan 2022, it is the Council's policy, as defined by Objectives TM 12-8 and 12-13 to support the upgrading of the R-585 Regional Road between Keakill and Cork City, to improve road safety, to restrict the generation of increased traffic from existing accesses onto Regional Roads and to ensure that all vehicular access provide standards of visibility to ensure the safety of other road users. The proposed vehicular access for a dwelling house directly on to the R-585 Regional Road would not be sustainable and would endanger public safety by reason of traffic hazard since it would involve the making of a further access point on to a heavily trafficked and unimproved section of the R-585 Regional Road and where the traffic movements likely to be generated by the development would interfere with the safety and free flow of traffic. The proposed development would, therefore, constitute a traffic hazard and would materially contravene stated objectives as set down in the Cork County Development Plan 2022. Accordingly, the proposed development would be contrary to the proper planning and sustainable development of the area.

- As stated in the Cork County Development Plan 2022, it is the Council's 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.

27/03/2025. Ref: 24/517. A new location for the above proposed dwelling was found. Mr John O'Mohony offered for his single storey house to be off a minor cul-de-sac road (L-95853-7) and away from the R585, the scenic route. The Planning Authority still had concerns regarding the location of the proposal, and potential visual impact of the dwelling on the surrounding landscape and scenic route, so before the permission was granted, the applicant was required to:

- Erect a ridge pole representing the proposed position of a standard 6m high dwelling on the site. Please arrange a distinctive coloured marked such as florescent or red to the top of the ridge pole for the inspection of the Planning Officer.

[1] p.3 of 13. Phil O'Sullivan CC Exec Planner 17/04/2018

A physical visit by the Area Engineer confirmed that there would be no significant visual impacts to the scenic route. PERMISSION was therefore granted, for a dwelling in the Maughanaclea on the 27/03/2025, with the normal caveat:

> 'The proposed dwelling, when completed, shall be first occupied as a place of permanent residence by the applicant, members of the applicant's immediate family or their heirs, and shall remain so occupied for a period of at least seven years thereafter, unless consent is granted by the Planning Authority for its occupation by other persons who belong to the same category of housing need as the applicant. '

Ballynamought, Kealkill.

21/11/2022. Ref: 22604: this application was for a property that would have been sited just off the Old Butter Road, immediately West of where the proposed road would be for the Maughanaclea (Upper) wind farm. The location of the site for this dwelling, in the townland of Ballynamought, can be seen on the map that was provided: a red cross where the blue line crosses the L-8777-0.

21/11/2022: REFUSAL by Cork CC for the construction of a new single storey dwelling house, detached domestic garage, wastewater treatment system and all associated site works. The ridge height of the house would be maximum of 5.770 meters. The applicant, Cliona O'Sullivan, may be a daughter but it wasn't stated as such on the owner's consent. The Decision Maker's Order and Schedule of Refusal reads:

'Permission is hereby REFUSED subject to the provisions of Section 34 of the Planning & Development Acts, 2000 – 2010 as amended, on the grounds… set out hereto':

> 'The proposed development at Ballynamought is located within the 'Tourism and Rural Diversification Area' as identified in the Cork County Development Plan 2022-2028 and is also highly visible from the R-585 Regional Road and designated Scenic Route running above the valley floor to the south. The policy objectives RP 5-5, GI 14-12, GI 14-13 and GI 14-9 seek to prevent inappropriate development except within established villages unless there is an acknowledged local rural generated housing need and where new development meets a high standard of siting and design and does not result in an adverse impact upon the scenic qualities of the landscape and views obtained. Based on the information submitted with this application, which fails to substantiate any local rural housing need, with no other lands held identified, the Planning Authority is not satisfied that the proposed development constitute an exception to the restriction on new dwellings within this 'Tourism and Rural Diversification Area' and is not satisfied that this is the optimum site available and the proposed development would result in the erection of a dwelling house that is devoid of shelter and screening set within a highly elevated, exposed and unspoilt landscape that would form an unnecessarily intrusive feature from various vantage points in the wider landscape setting, including the Scenic Route, resulting in unnecessary injury to the visual and scenic amenities of the area. The proposed development would therefore contravene materially stated objectives of the Cork County Development Plan 2022-2028, would seriously injure the visual amenities of the area and would therefore be contrary to the proper planning and sustainable development of the area'. Signed by Mac Dara Ó h-Icí, Senior Executive Officer.[2]

CCC's Senior Executive Officer takes his lead from the Senior Executive Planner, T Twomey, and the Executive Planner, Mr P O'Sullivan. They both expressed a number of significant concerns including those 'regarding the visual impact of the proposed dwelling on this elevated and exposed site, which would be highly visible from the scenic route from Kealkill to the Cousane Gap located to the south'[3] The following is noted from the Exec Planners report:

> The subject site lies within the mapped High Value Landscape and a Tourism and Rural Diversification Area as mapped within the mapped the County Development Plan 2022 - 2028 which came into force on the 6th June 2022. The site is within the High Value Landscape Area. [4]

---

[2] As per Order on CCC Planning website.

[3] P.1. T Twomey Senior Executive Planner 18/11/2022

[4]

Amongst other policies of the CCDP 2022-2028, Objective RP5-5 and 5-25 (as above) are quoted by the Exec. Planner. There is a question if she can meet the family connections criteria:

- What is also unknown is whether the applicant has any intrinsic local ties to this immediate local area since exactly no details whatsoever have been submitted. The SF1 form has not been completed and without such information it would not be possible to suggest the development is complaint with Objective RP5-5 of the County Development Plan 2022 -2028 cited above, the local housing needs is again unknown and thus has not been satisfactorily demonstrated... [5]

- (The Exec Planner then returns to the question of visual impact): 'As noted above the last dwelling house (Ref 18/ 781) approved in this area was over 1.8 km away, further to the west. These subject lands have no affinity with such lower lying lands but are rather exposed and elevated and further to the east the lands extend out into moorland type terrain. There is a small longstanding dwelling house approximately 820 metres further to the east, see photograph in appendix, however, this is on the downslope of the land and relatively inconspicuous from the public road the dwelling being sat well below road level unlike the subject site which is set well above it and which will be readily apparent from the R-585 Regional Road and Scenic Route across the valley.

- So to reach any positive conclusion, given such deficiencies, that the development of this elevated site is acceptable in principle to accord with policy objective cited above and including "site selection" advice set out in the 'Cork Rural Housing Design Guidelines 2003' as amended 2012, would be highly problematic. Simply this is not be supported by any particular fact or logic and the site selection appears to have ben dictated by maximisation of expansive views across the valley rather than being absorbed and integrated within the landscape and settlement pattern. Consequently given the inadequacies of the application, there is little, if any, alternative, but to recommend refusal of the application.'[6]

26/09/2024. Ref:24524. A new planning application was submitted - it is noted by the agent that a pre-planning meeting had been held and the new site chosen. This was still adjacent to the L-8777-0 and less than 1km East of the previous site (22604), but that site was at a higher level. It was also confirmed that Cliona O'Sullivan was the daughter of the owner of this land. The permission was granted this time, on the 18/12/2024, with the normal caveat ' that the proposed dwelling, for a minimum period of 7 years from the date of its completion, shall be used solely as the place of permanent residence of the applicant and/or members of his/her immediate family. [7]

To note: this new site, having gained planning approval, is within 2km of the proposed Maughanaclea wind farm, and likely to have full view of all the 14 turbines.

Cahermuckee, Kealkill In the adjoining townland nearer Kealkill, Mr Teddy McCarthy was refused planning permission for a dwelling house in January 2006 (Ref 05/8143). The grounds of refusal were as follows:

> As stated in the Cork Development Plan 2003, it is the Councils stated policy that new buildings should respect the character, pattern and tradition of existing places and built forms that fit appropriately into the landscape. The proposed dwelling, of significant scale and mass, would be positioned on a raised platform where views from the south would provide for a visually raised and discordant dominant dwelling that would be out of character with the existing settlement pattern due to the prominent and visually intrusive position when viewed from the public road. Accordingly the proposed development would

[5] p.6 of 13.

[6] p.7 of 13.

[7] p2 of 9. 24524 CCC Planning Final Grant and Agreements. 18/12/2024.

> therefore materially contravene Objective ENV 5-8 of the current Development Plan and seriously injure the scenic amenities of the area and be contrary to the proper planning and development of the area. [8]

However, other permissions on lower geographical levels have been granted to members of local farming families, such as that for Seamus McCarthy 18/781, on the 08/05/2019, where CCC Planner notes:

> The site lies at Cahermuckee a remote area set around 4km to the north east of the village of Kealkill. The lands are served from the road (L-8777) and are part of a farm with the parental dwelling house located directly opposite. The lands are quite level and down to pasture. There are a very limited number of dwellings in the much wider vicinity of the geographical area. Further to the west a dwelling house was permitted to a family member Gene McCarthy in 2016 /2017 (Ref 17/223 and 16/275) with a dwelling house originally permitted in 2002 along the same road to the applicants' brother Michael McCarthy (Ref 02/3274). [9]

The Order denotes: that once built, 'this is to be a place of permanent residence by the applicant, members of the applicant's immediate family or their heirs, and shall remain so occupied for a period of at least seven years thereafter, unless consent is granted by the Planning Authority for its occupation by other persons who belong to the same category of housing need as the applicant'. [10] Note, the seven years are to 'ensure that the proposed house is used to meet the applicant's stated housing needs and that development in this rural area is appropriately restricted to meeting essential local needs'.

---

[8] p2. Of 13. Planners report for 22604

[9] p.1 of 13. Planners Primary Report

[10] p.1 Final Grant and agreements 18781

Appendix F,

Photos and Letters relevant to the Submisision:

Mealagh Valley, looking West. Photo of Lough Carrignanaeane.

Photo of Quinten's woods - the Mealagh River and where our children go.

Photos of White Tailed Sea Eagles, over Mauaghanaclea. Photo of Lough Naibree.

Photos of Kerry Slug - from my small woods in Gortnacowly

Carrigdangan Extension Wind Fram, County Cork.

Map of Bantry Drumlins.

Map of Kestrels Flights - from MKO's bird surveys.

GSI Maps showing Rock at or near the Surface or Karst.

MKO Map of cumulative effects of ZTV for 25 Km of the proposed wind farm

Local Map of Mealagh Valley: Cumulative Effects of all the proposed, those on appeal and and existing Wind farms.

A3 'Maughanaclea' Maps of receptors within 1Km and 2Km of turbines, this was the map given to the public on MkO's Nov 25 Open Evening, and appears on the publicity Website.

NB. This map does NOT appear amongst the maps ofMKO's EIAR, which usually show a radial lines of 500m or 4x tip height, or 3km. This give false impressions.

Article by Ivor MacCarthy. of Pliestocene- Holocene Lakes - (& the Mealagh Valley.Lake)

Letter from Dark Skies Ireland - a personal letter.

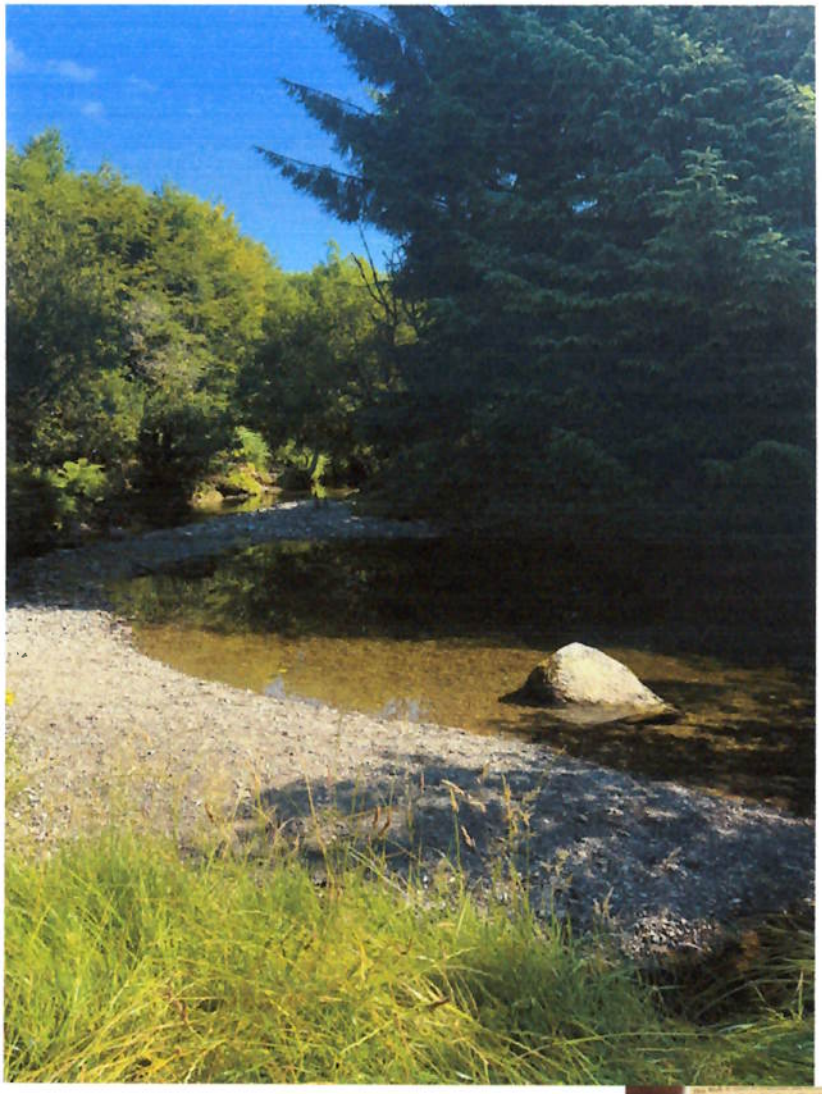
LETTER FROM FAILTE IRELAND.
regarding the route through Shehy Mountain townlands being a *'calling card'* to gain the attention of the visitor, and acting as a device to entice people to the Wild Atlantic Way and the West of Ireland.

MAUGHANACLEA WIND TURBINE DEVELOPMENT: COMMUNITY SURVEY RESULTS

2024 Community Survey carried out by Mealagh Valley Community Centre Ltd,

Mealagh Valley looking West.

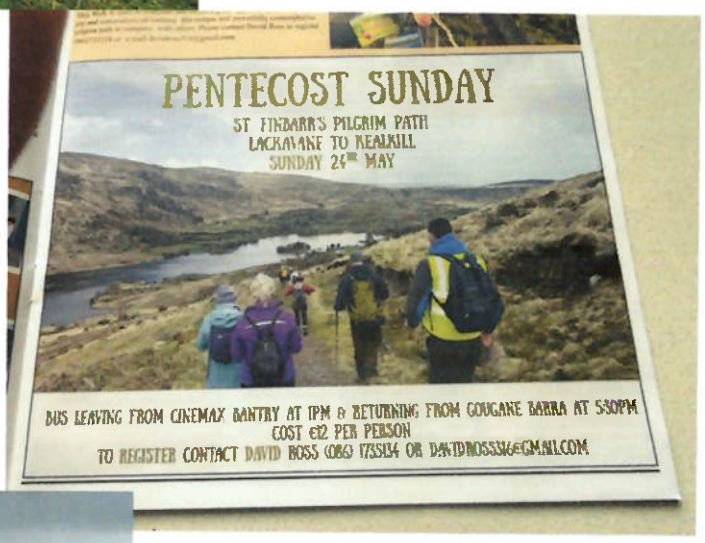
Lough Carrignanaeane, in Ardrah townland, the site of T14 would be less than 1KM away..



(Aside) Our natural swimming pool in Quinten's Mealagh woods.

Below: St Finbar's Pilgrim's Path from Drimoleague to Gougane Barra.

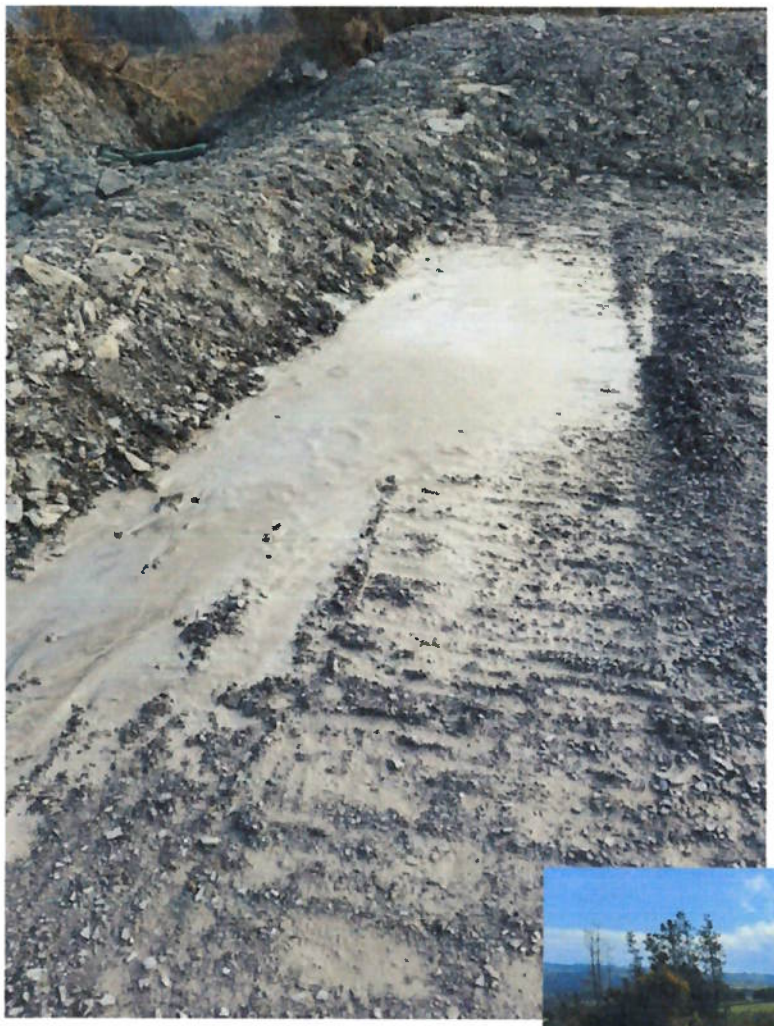
A cloudy day in the Mealagh



White Tailed Sea Eagles, flying over our neighbouring properties: H013, and H19, H031, 800metres away from proposed T10, T09 sites.

Lough Naibree in Ardrah townland, right in the middle of the sites for T14, T13, T12. These turbines will sit in a triangle around this Lough. In the distance you can see the 'Derrenacrinnig West' poles and wires that have remained even after the ABP refusal in 2024.

Wonderful Kerry Slugs enjoying our trees covered in moss in our own woodland. Such a rarity.

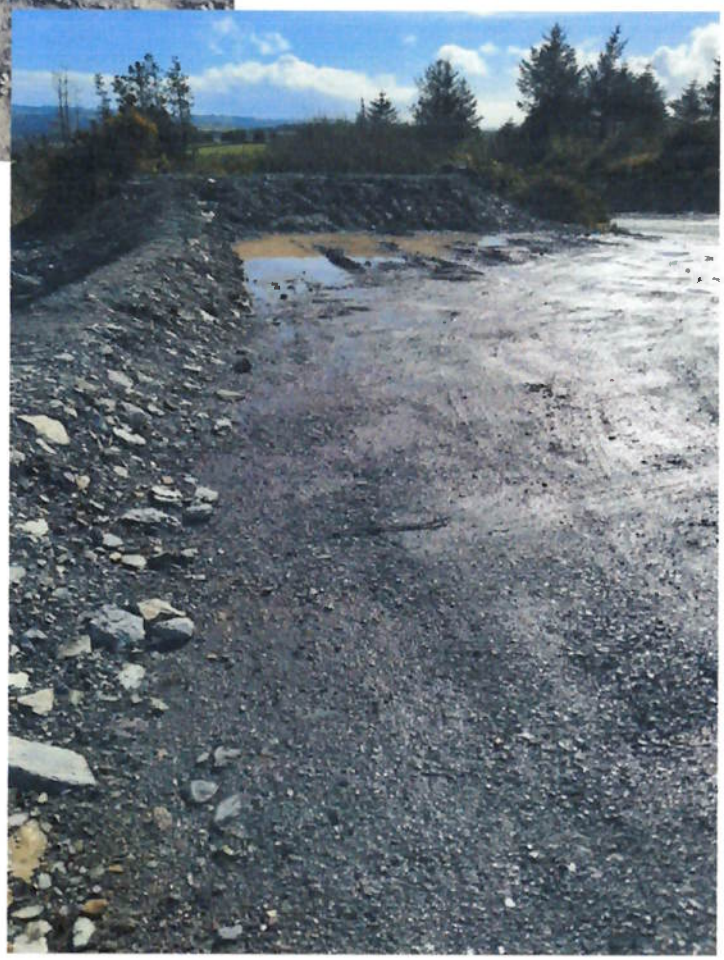


Carrigdangan Extension Wind Farm
County Cork.

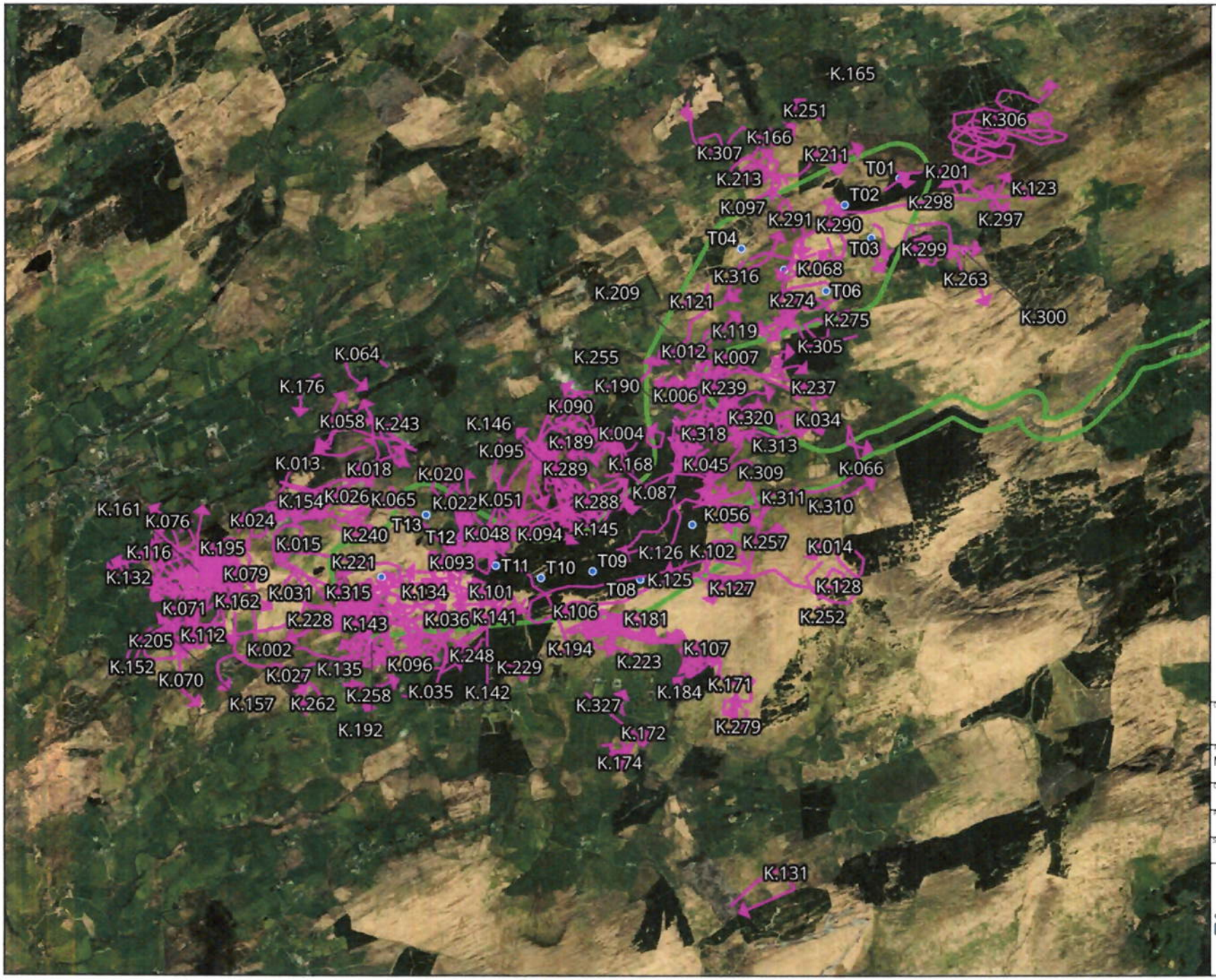
Currently being constructed by contractors for ENERCO, Consultants MKO.

On the day of visiting, this site seems to be unsupervised by Enerco's representatives.

The water may contain more than soil?




Bantry Drumlins
WHIDDY ISLAND
Faoide
BANTRY
Beaintraí
Glengarriff Harbour
N



Drawing Title
Kestrel
Vantage Point Survey

Project Title
Maughanaclea Renewable Energy Development

Drawn By	Checked By
CMc	SD
Project No.	Drawing No.
240225	Fig. 7-4-26
Scale	Date
1:46,000	11.03.2026

MKO

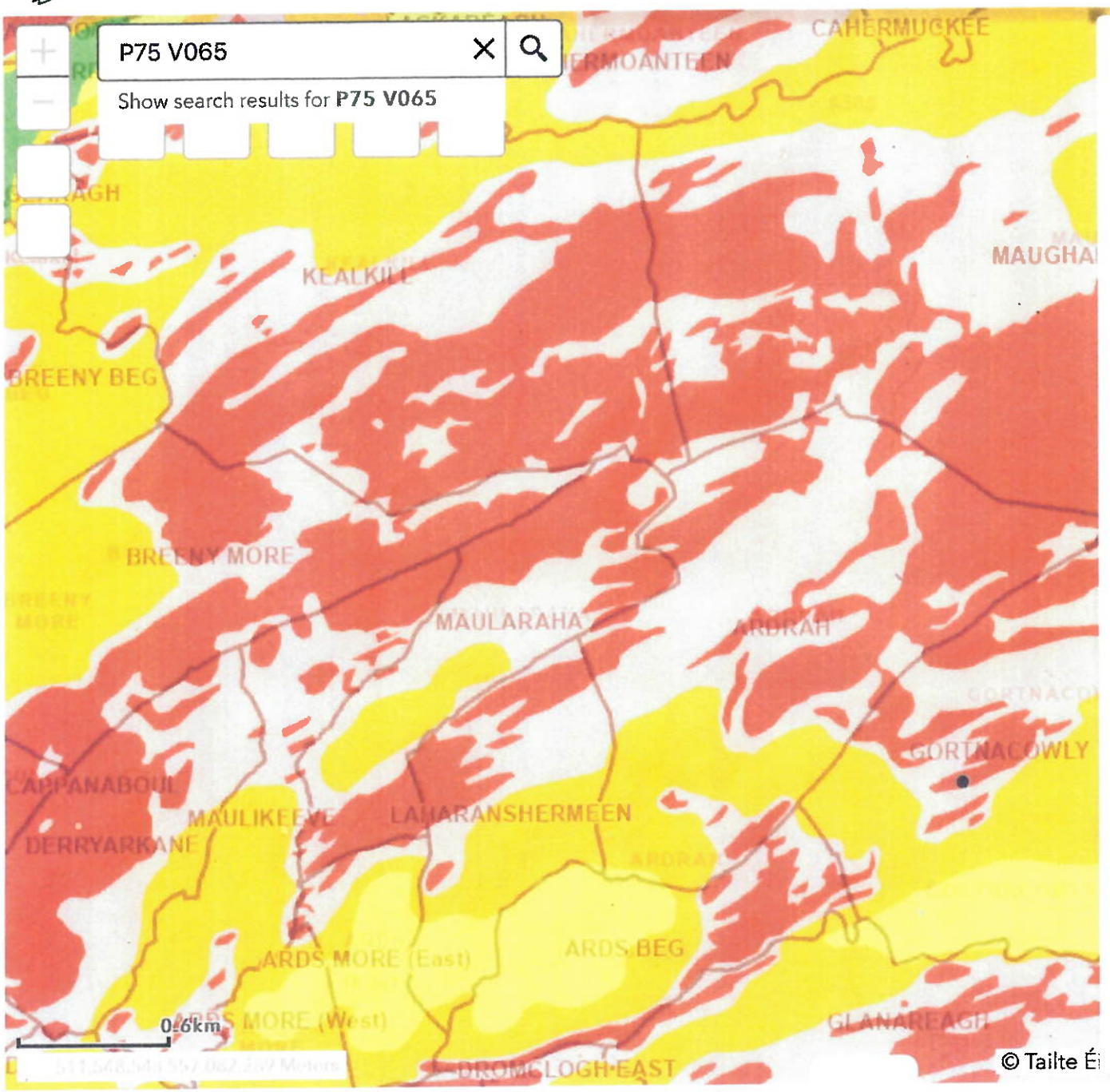
IE GSI Groundwater Data Ireland ITM Viewer

Display Issue Help Data Download Groundwate

P75 V065

Show search results for **P75 V065**

IE GSI Groundwater Data Ireland ITM Viewer



Legend

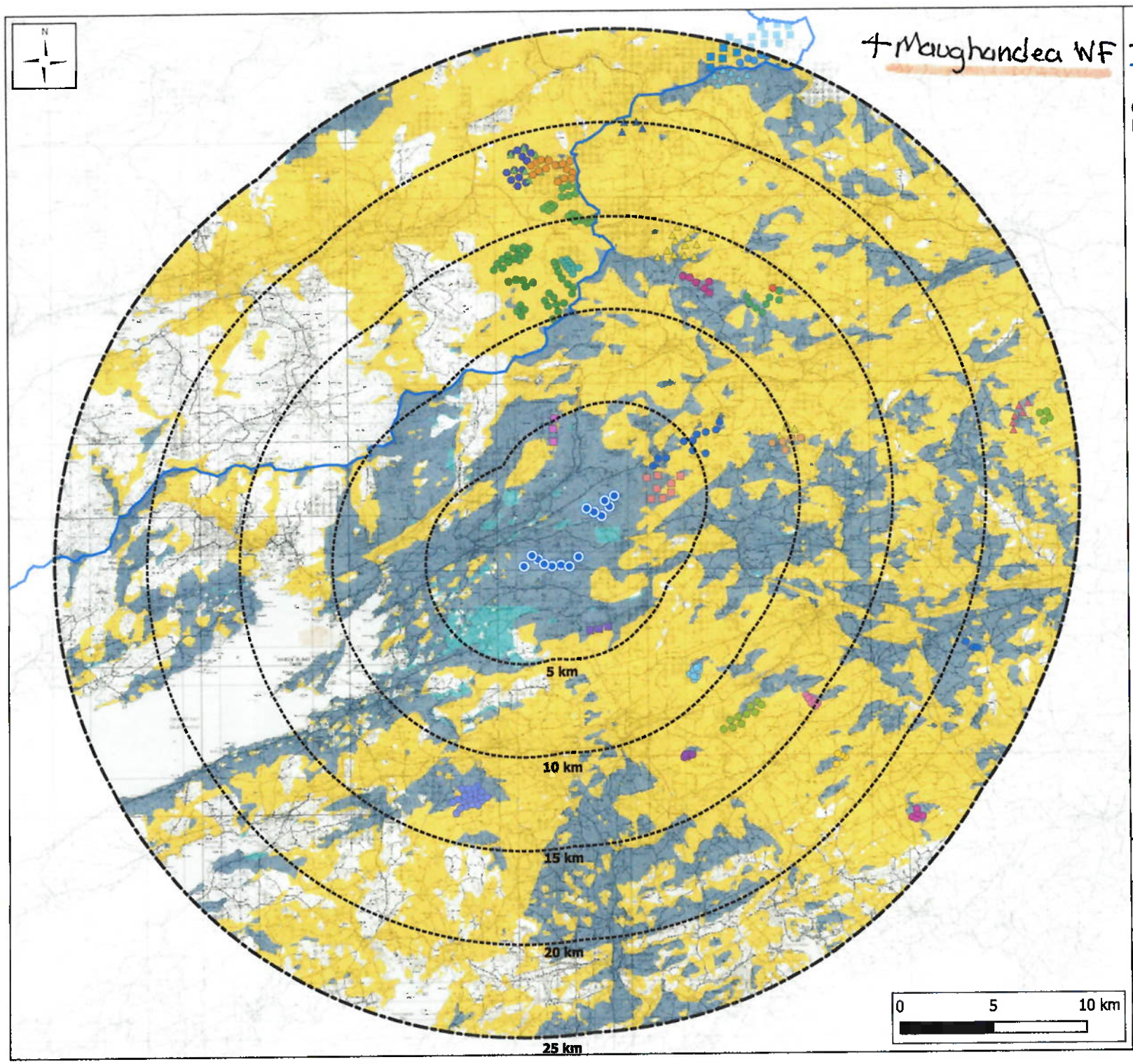
Groundwater Vulnerability

IE_GSI_Groundwater_Vulnerability_40K_IE26_ITM

- Rock at or near Surface or Karst
- Extreme
- High
- Moderate
- Low
- Water

Townlands

IE_GSI_Tailte_Eireann_Townlands_IE26_ITM



Map Legend

- LVIA Study Area
- County Border
- Proposed Turbines

Cumulative Wind Farms within the LVIA Study Area

- Ballybane WF (existing)
- Barnadivane WF (permitted)
- Carrigarierk Extension WF (permitted)
- Carrigarierk WF (existing)
- Cleanrath WF (existing)
- Cleanrath WF (existing)
- Clydraghroe WF (existing)
- Coomatallin WF (existing)
- Cummeenabuddoge WF (proposed)
- Curaglass WF (proposed)
- Currabwee WF (existing)
- Dereenacreenig West WF (proposed)
- Derragh WF (existing)
- Garranereagh WF (existing)
- Gortloughra WF (proposed)
- Gortyrahilly WF (permitted)
- Grousemount WF (existing)
- Inchamore WF (permitted)
- Kilgarvan II WF (existing)
- Kilgarvan Repower (permitted)
- Kilgarvan WF (existing)
- Killaveenoge WF (existing)
- Kilvinane WF (existing)
- Knocknamork WF (permitted)
- Lahanaght Hill WF (existing)
- Midas WF (existing)
- Milane Hill WF (existing)
- Reenascreena WF (existing)
- Shehy More WF (existing)
- Sillahertane-Coomagearlaghy II (existing)

Cumulative Comparative ZTV

- Only Proposed Turbines Theoretically Visible
- Only Cumulative Wind Farms Theoretically Visible
- Both Proposed Turbines and Cumulative Wind Farms Theoretically Visible

Drawing No.

Figure 13-16

Drawing Title

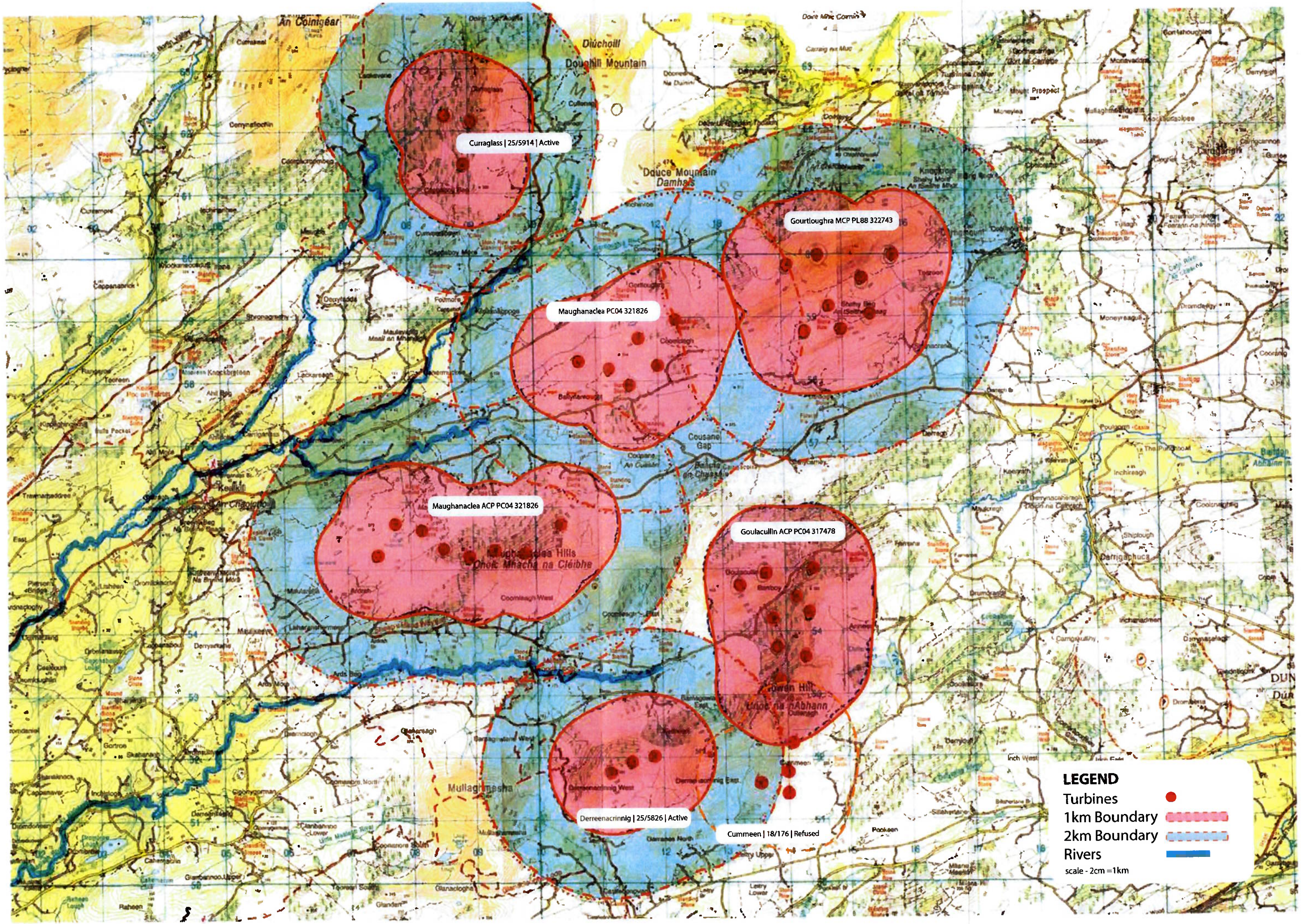
Cumulative Context

Project Title

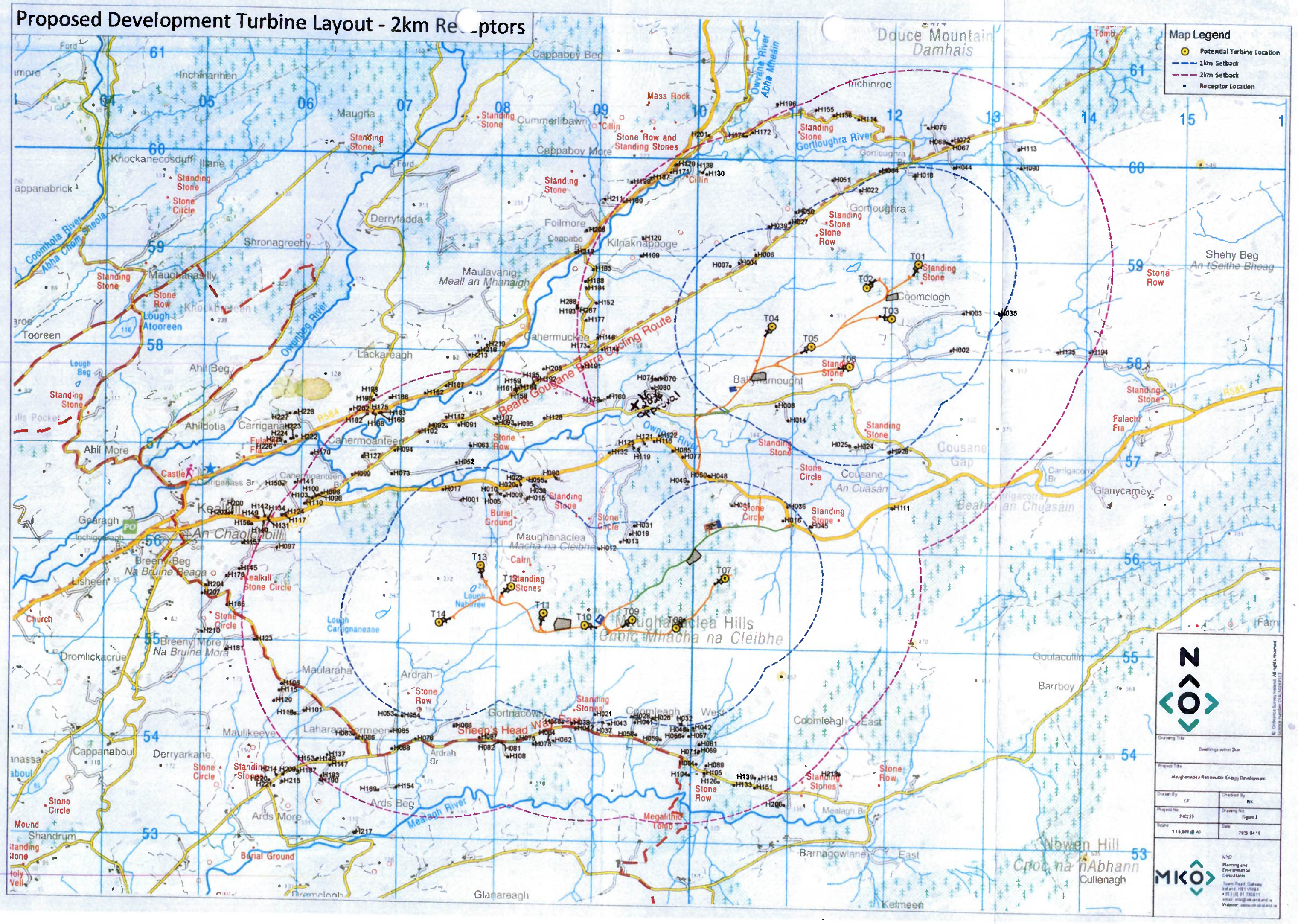
Maughanaclea Renewable Energy Development

Scale	Project No.	Date	Drawn By	Checked By
1:195,000	240225	09.03.2026	GL	JW

MKO


Curraglass | 25/5914 | Active
Gourtloughra MCP PL88 322743
Maughanaclea PC04 321826
Maughanaclea ACP PC04 321826
Goulacullin ACP PC04 317478
Derreenacrinnig | 25/5826 | Active
Cummeen | 18/176 | Refused
Doughill Mountain
Douce Mountain
Cousane Gap
Mullaghanasha
LEGEND
Turbines
1km Boundary
2km Boundary
Rivers
scale - 2cm =1km

Proposed Development Turbine Layout - 2km Receptors



Journal Cork Geological Association, 2002, 5. 8-18.

Pleistocene-Holocene Lakes in the Bantry Valley, County Cork.

by

Ivor A. J. MacCARTHY,
Department of Geology,
University College Cork.

Introduction

The Pleistocene Epoch has been considered to have commenced about 2.4 million ago and to have ended about 10,000 years ago at the beginning of the present warm epoch, known as the Holocene. It was a time, which witnessed the introduction of repeated glacial and interglacial conditions across much of the northern hemisphere. The alternation of these contrasting conditions has had a major environmental impact on the landscape of Ireland, which has included episodes of extensive erosion and deposition of glacial sediments. Typically, such deposits have a very low preservation potential as they are susceptible to erosion and reworking during subsequent glacial and interglacial periods. Consequently, the bulk of the glacial deposits in southern Ireland are probably the result of the most recent glacial events.

The last major glacial phase which affected southwest Ireland, commenced about 70,000 years BP in the Late Pleistocene and ended about 10,000 years BP (Mitchell, 1976; 1987; Warren, 1985). This resulted in a local ice cap known as the Kerry-Cork Ice Sheet centred in the Kenmare area. Farrington (1936) suggested that ice moved southwards from the Kenmare Valley across the Caha Mountains into the Bantry Valley where it was partially dedirected towards the southwest and northeast resulting in the deposition of a drumlin field within the valley. Part of the ice mass continued to move southeastwards across the hills on the south side of the Bantry Valley towards Skibbereen (Farrington, 1936). The landscape of the Bantry Bay and Valley area of southwest Ireland contains extensive deposits associated with this glaciation (Farrington, 1936; Lewis, 1977). Analysis of these deposits and the topography in the Bantry Valley provides a means of reconstructing the evolving environmental conditions associated with the final stages of this last glacial phase here. This paper presents a brief description of the glacial features and deposits of the Bantry Valley and attempts to use these to reconstruct the changing environmental conditions during and immediately following the decline of the last major episode of glaciation in this region.

Topography and Glacial Features

Bantry Bay occupies a northeast-southwest trending ria which opens in a southwestly direction to the sea. It's northeastern end is rimmed by a range of mountains with summits ranging from about 400m to about 700m altitude. A series of prominent v-shaped valleys separate these mountains (Fig. 1). These include the Pass of Keimaneagh, 'Doughil Pass', 'Gortloughra Pass', Cousane Gap, 'Barrboy Pass' and 'Derreenacrinig Pass'. A further four passes are located on the southeastern side of the valley (Fig. 1). Two are located each at Gortacloona and Trawlebawn. A distinctive glacial spillway is located at Cummerlibawn (Fig. 1) and adjacent to this is another v-shaped valley and associated 'fossil' waterfall, which is now almost completely dry, here termed 'Cappaboy Waterfall'. This was first observed by Jukes (1864). Farrington (1936) and Jukes (1864) recognised the development of glacial spillways on the northeastern end of the Bantry Valley and suggested that the valley was partially occupied by a glacial lake.

The mountains in the area are generally of a rounded form testifying to extensive erosion probably during successive glaciations. The northern side of the Bantry Valley contains smaller tributary valleys known as the Borlin, Coomhola, Owenbeg and Cooleenlemane Valleys. These are essentially u-shaped valleys and combine and discharge into the sea at Snave. The head of the Borlin and Cooleenlemane Valleys exhibit the form of corries which suggests that these valleys may have been occupied by localised mountains glaciers (Figs. 2 & 3).

Glacial Deposits

Drumlins

Farrington (1936) presented the most detailed description of the deposits and features of this area to date. He mapped the distribution of over one hundred drumlins, which are superbly preserved in the Bantry Valley (Fig. 1). The drumlins are best seen along the shoreline at Reelane Point, Beach, Bantry beach, Reendonagan, Ardnamanagh and Ballylickey where they have been extensively eroded by recent marine processes. They are composed of diamict, which comprises cobbles and boulders set within a matrix of stiff bluish grey clay. Typically, this is gradationally overlain by a roughly 1-2m thick intensely weathered surface zone, which exhibits a distinctive brownish colour. The drumlins, which are exposed along the southern shore of the bay, contain a conspicuous array of large limestone boulders. The general absence of this type of limestone within the exposed bedrock of the Bantry region promped Sevastopulo and Naylor (1981) to carry out an analysis of the erratics in order to determine their age and source. They concluded that the boulders may have been derived from the Kenmare Valley where the nearest known limestone bedrock is exposed, though they could not explain the absence of limestone boulder erratics on the north side of the Bantry Bay which otherwise contains extensive non-carbonate erratics. Farrington (1936) suggested that the boulders were derived from limestone outcrops within Bantry Bay. The recent discovery of substantial limestone bedrock in the subsurface south of Whiddy Island (Sevastopulo *et al.*, 2000; see MacCarthy, 2002 for location) now provides a more likely source for the limestone boulder erratics.

Fluvioglacial Outwash and Lacustrine Deposits

Farrington (1936) also described the distribution of fluvioglacial outwash deposits in the area (Fig. 1). These are best seen on the northern side of the Maughanaclea Hills and at Maulavannig and consist of waterlain gravels, sands and silts. At Maulavannig sand pits, the deposits consist of cm to mm thick alternations of silt/clay with sand, comparable to those seen in lacustrine varves. Other evidence for lacustrine conditions is suggested by thick accumulations of dark grey to black clays which are preserved between drumlins at Cappanaloha (located about half way between Knocknaveagh and Knockboolteenagh) and immediately to the north of Knockbooltenagh. These deposits, however, await detailed analysis which may well provide important information on the environmental history of the area.

Stillman (1968) described the results of an analysis of deposits partially overlying the 'boulder clay', which are located beneath the seabed in the area of the jetty on the northwestern side of Whiddy Island. These deposits are 27m thick and comprise interbedded clay, sandy silt and fine sand. A finegrained black lacustrine deposit occurs at the base of these deposits, the base of which lies at a depth of -57m OD. This contained fresh water diatoms and herbaceous pollen, which suggest an age of 11,000-12,000 years BP (Stillman, 1968).

Palaeoenvironmental Reconstruction of the Glacial Lakes

It must be remembered that at the time of the maximum of the last glaciation, sea level was about 130m lower than it is today so that the coastal zone was located well to the west of Sheep's Head. Temperatures during this last major glacial phase (70,000-10,000 years BP) varied considerably with the result that there were two warm periods known as interstadials, which alternated with three colder periods known as stadials.

Analysis of the geographical distribution and altitude of the various spillways/outlets, the distribution and type of glacial deposits and the topographical form of the landscape in the Bantry Valley and its surrounding uplands indicates that a number of proglacial lakes became established in the valley towards the end of the last glaciation. The contained lake waters must have been impounded by a decaying ice mass in the Bantry Valley to the west and by the mountains lying to the south, east and north of the valley (Figs. 2 & 3). The present interpretation indicates that three distinct lakes became established in the area and they developed and amalgamated at different times. These lakes are here termed Glacial Lakes Bantry, Owenbeg and Maolagh. The interpretation of the history of these lakes is difficult because the present topography is clearly not the same as that which prevailed when the lakes existed. The landscape must have endured extensive erosion and modification during the Holocene so that the contours would have been quite different compared to those of today. The models for the glacial lakes, which are presented here are largely based on the present day contour

patterns. The history of the development and evolution of these lakes during the glacial phase is interpreted as having taken place in the following stages;

1. The extensive evidence from glacial erratics, glacial striae and the orientations of the drumlins indicates that initially ice moved from the Kenmare Valley into Bantry Bay through Glengarriff Harbour. Part of this was diverted southwestwards and part towards the northeast where it crossed the eastern margin to the valley. Glacial striae provide clear evidence for ice movement through the Cousane Gap and across the hills to the east of the Maolagh Valley (Fig. 1). Ice also moved across the southern side of the Bantry Valley towards Skibbereen.

2. The subsequent decay of the eastern margin of the ice mass resulted in southwesterly retreat of the ice front. This led to the development of a lake in the Maolagh Valley, Glacial Lake Maolagh. The level of this lake was 340m+. It drained through Barrboy Pass cutting it down to 340m, at which point the pass was abandoned.

3. A separate lake, Glacial Lake Bantry, developed to the north of the Maolagh Valley. The level of this lake must have been higher that 275m which is the altitude of Doughil Pass, the highest pass in this part of the valley. At this stage, the lake may have been discharging through Keimaneagh, Doughil, Gortloughra and Cousane Passes, though at higher levels than today. It is difficult to interpret the altitude of these outlets in the past or indeed if and when they may have been active. Subsequent to this, the level of Lake Bantry fell gradually and its eastern outlets were successively abandoned.

4. Doughil Pass was abandoned at 275m. The level of Lake Bantry fell from 275 to 260m and then discharged through Gortloughra Pass at 260m+.

5. Gortloughra Pass was then abandoned. As the level of Lake Bantry fell below 240m, Glacial Lake Owenbeg developed as a separate lake from the larger Lake Bantry. This led to the development of two spillways, Cummerlibawn and Cappaboy Spillway and Waterfall, which drained out of Lake Owenbeg.

6. Lake Bantry level fell to 230m as it discharged through the Cousane Gap.

7. The Cousane Gap was abandoned at 230m. The lake waters fell to 200m and discharged through Keimaneagh Pass. This stage is shown in Figure 2. At this stage, Lake Bantry was the source of the ancestral River Lee.

8. Ice retreated to the west of Whiddy Island (Fig. 3). Lake Owenbeg finally drained into Lake Bantry through Derryfadda Pass.

9. The retaining ice front to the west retreated further resulting in the amalgamation of Lakes Bantry and Maolagh. This led to the successive abandonment of Keimaneagh, Barrboy and Derreenacrinnig Passes.

10. As the level of Lake Bantry fell further, drainage out of the lake switched to Trawlebawn Pass at 160m.

11. Drainage through Trawlebawn Pass was abandoned and the lake level fell to 90m and drained through Gortacloona Passes. At this time, the lake depth may have been at its deepest.

12. The surface of the drumlins must have been reworked as the lake level continued to fall. Infiltration of water into the drumlins must have taken place when they were exposed to the elements. This has resulted in extensive alteration of the upper part of the drumlins resulting in a widespread brownish weathered rim which is seen today.

The Age of the Glacial Lakes

There is no known evidence for the date of the inception of the glacial lakes described above. However, the last thick ice mass which occupied the Bantry Valley probably melted during the last interstadial warm phase known as the Woodgrange Interstadial (13,000-11,000 years BP) which

effectively marks the end of the glacial history of the region. It is, therefore, likely that the initial development of the glacial lakes took place during the early part of this interstadial. The age of of the Whiddy Island lacustrine muds (12,000-11,000 years BP) indicates that they accumulated during the latter part of this interstadial when the climate of southern Ireland may have been almost as warm as it is today. Little of no ice would have remained in the Bantry Valley at this time and Glacial Lake Bantry contracted to a small area located to the north of Whiddy Island. This marked the ending of its history as a purely 'pro-glacial' lake (Fig. 4).

The Post-Glacial History of the Bantry Valley

The melting of ice in the valley resulted in unrestricted access from Lake Bantry to the open sea during the Woodgrange Interstadial. As the base of the lake deposits lies at –57m, sea level at the time must have been much lower than this taking account of the gradient of the valley floor. The Bantry Valley was occupied by a southwesterly flowing river system possibly draining out of the remnant of Lake Bantry towards the southwest (Fig. 4). The ancestral rivers to those in the region today probably developed at this time and minor lateral tributaries drained the margins of the valley. The river system reworked earlier glacial deposits in the valley. As the gradient within the valley was low, the river was probably of a high sinuosity type and it discharging into the sea beyond the present mouth of the bay where the sea bed lies beneath -60m. The tidal regime would have been comparable to that of today. Hence, it is likely that the rivers would have discharged through sinuous macrotidal estuaries (Fig. 4).

There was a final brief cold spell known as the Nahanagan Stadial, which lasted from 11,000 to 10,000 years BP. It is likely that no ice occupied the valley during this last cold period. Localised remnants of mountain glaciers may have occupied some of the corries in the region. The melting of the last of the ice about 10,000 years BP was followed by a gradual rise in sea level from below -57m to its present level (Mitchell, 1987) known as the Holocene rise in sea level. This resulted in an erosive transgression of the sea, which sheared off the upper layers of earlier glacially and fluvially deposited sediments within the valley. It also brought about the termination of the remnants of Lake Bantry, which by now had shrunk considerably in size. However, the timing of the ending of the lake is not known. It may have persisted well into the Holocene before the marine transgression finally flooded the lake.

The erosive Holocene marine transgression continues today and is manifested in the contemporary marine erosion of the coastal drumlins in the bay. This process has removed the finer matrix from the drumlins and transported it offshore where it has been accumulating on the sea floor as a finegrained marine shelf deposit. The coarser cobbles and boulders from the drumlins have remained close to where they fell following the removal of the supporting matrix. This must have resulted in a layer of concentrated boulders and cobbles, which now extends offshore from the eastern shoreline of Bantry Bay.

References

FARRINGTON, A. 1936. The Glaciation of the Bantry Bay District. *Scientific Proceedings Royal Dublin Society, 21, 37 345-361.*

JUKES, J. B. 1864. *Explanation to accompany Sheet 192 and part of Sheet 199 of the maps of the Geological Survey of Ireland illustrating parts of Counties Cork and Kerry.* Dublin, 51pp.

LEWIS, C. A. 1977. In: Bowen, D. Q. (Editor) *Guidebook for Excursion A15 South and Southwest Ireland.* International Union for Quaternary Research X Congress 1977, 52pp.

MacCARTHY, I. A. J. 2002. *Geology of the Devonian-Carboniferous South Munster Basin, Ireland (western part).* National University of Ireland, Cork.

MITCHELL, F. 1976. *The Irish Landscape.* Collins.

MITCHELL, F. 1987. *The Shell Guide to the Irish Landscape.* Country House.

SEVASTOPULO, G. D. & NAYLOR, D. 1981. Erratic Carboniferous Boulders in Bantry Bay, County Cork. *Bulletin Geological Survey Ireland, 3, 79-84.*

SEVASTOPULO, G. D. , NAYLOR, D. & SLEEMAN, A. G. 2000. *In situ* Dinantian carbonates on Sheep's Head, County Cork. (Abstract) *43rd Annual Irish Geological Research Meeting, University College, Cork.*

STILLMAN, C. J. 1968. The Post Glacial change in sea level in southwestern Ireland: New evidence from fresh-water deposits on the floor of Bantry Bay. *Scientific Proceedings Royal Dublin Society. A, 3, 11, 125-127.*

WARREN, W. P. 1985. Stratigraphy. In: K. J. Edwards & W. P. Warren (Editors). *The Quaternary of Ireland*.. Academic Press. pp. 39-63.

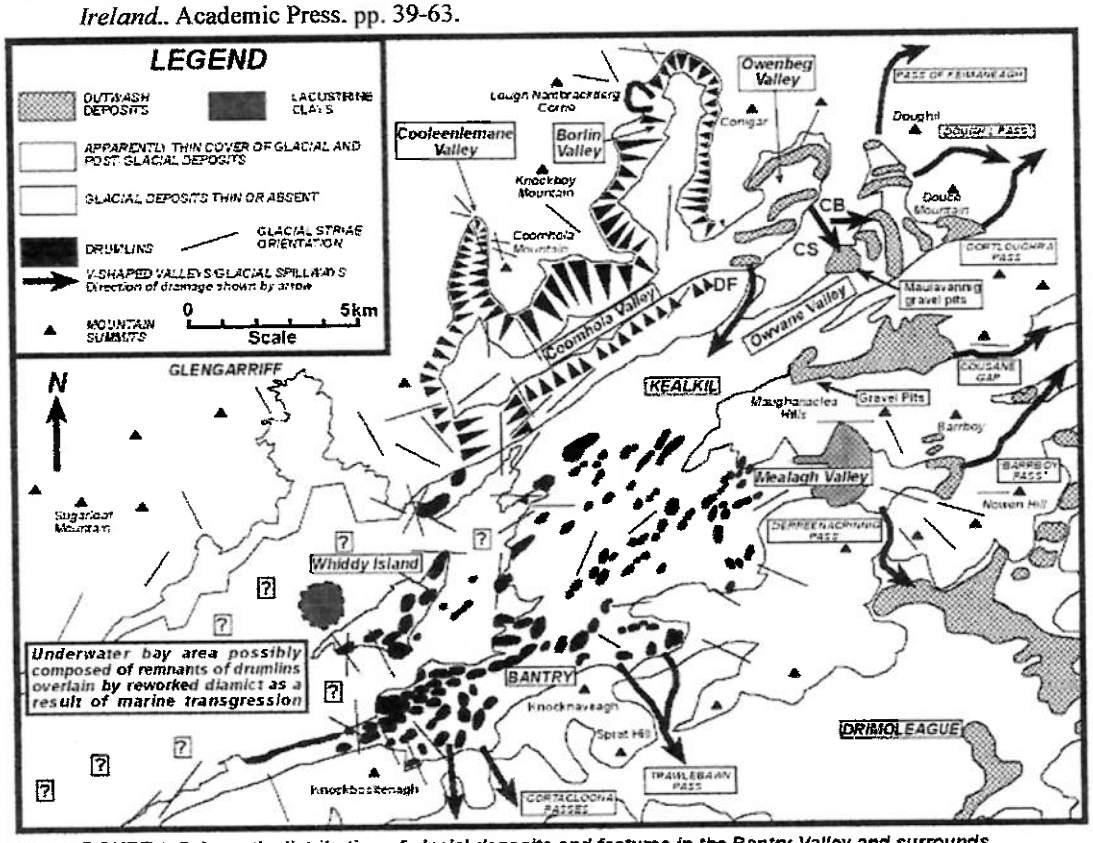


FIGURE 1. Schematic distribution of glacial deposits and features in the Bantry Valley and surrounds (modified after Farrington 1936). CB-Cappaboy dried valley and waterfall, CS-Cummerlibawn Spillway, DF-Derryfadda outlet.

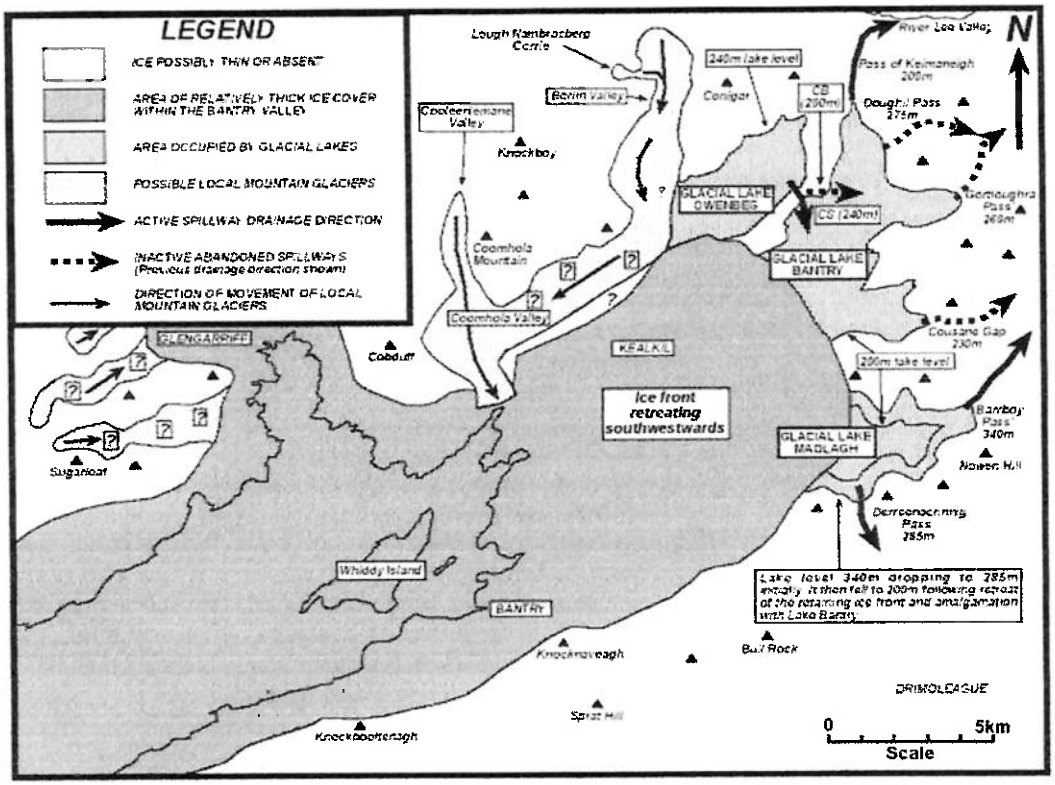


FIGURE 2. Reconstruction of glacial lakes in the Bantry Valley towards the end of the last glaciation. The level of the lakes at this time were; Lake Bantry-200m. Lake Owenbeg-240m. Lake Maolagh-340m. The lake waters were contained to the west by the southwesterly retreating ice mass. The lake was the source of the River Lee at this time. CB-Cappaboy Spillway and Waterfall, CS-Cummerlibawn Spillway.

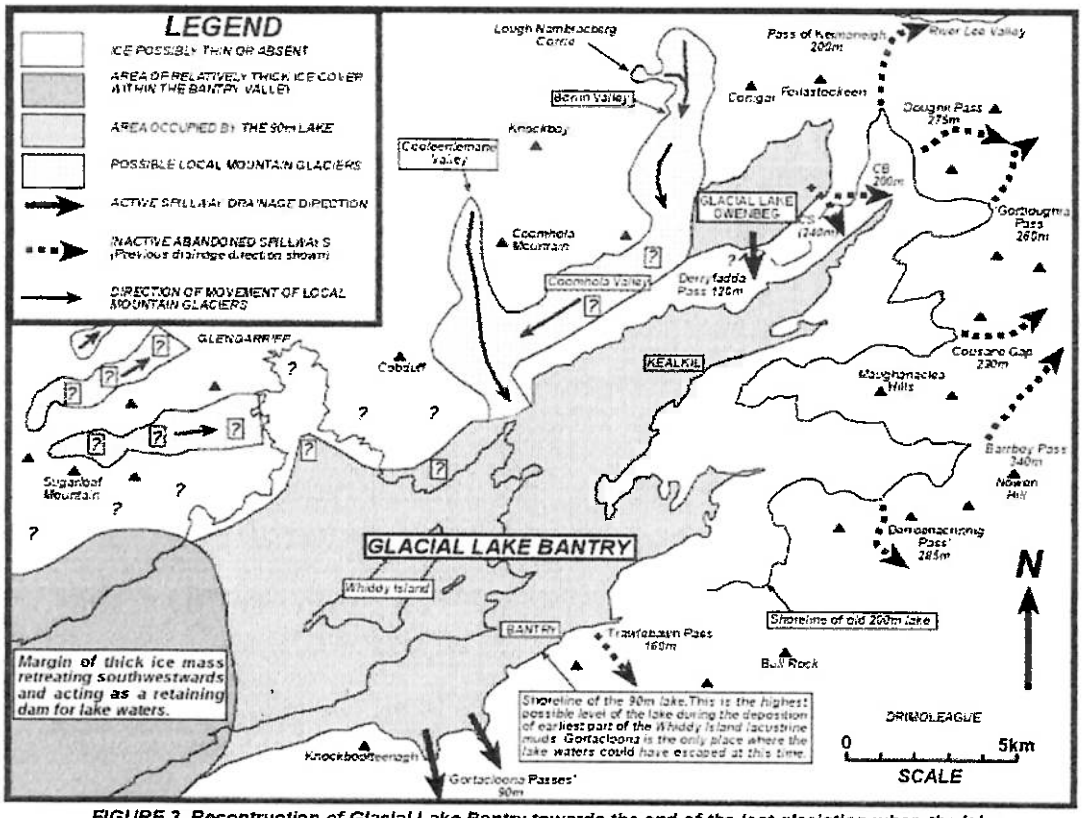


FIGURE 3. Reconstruction of Glacial Lake Bantry towards the end of the last glaciation when the lake waters had fallen to 90m OD. At this time, the southwesterly retreating ice sheet was located somewhere to the west of Whiddy Island and the dammed lake waters were only able to escape through the Gortacloona Passes. CB-Cappaboy Waterfall, CS-Cummerlibawn Spillway.

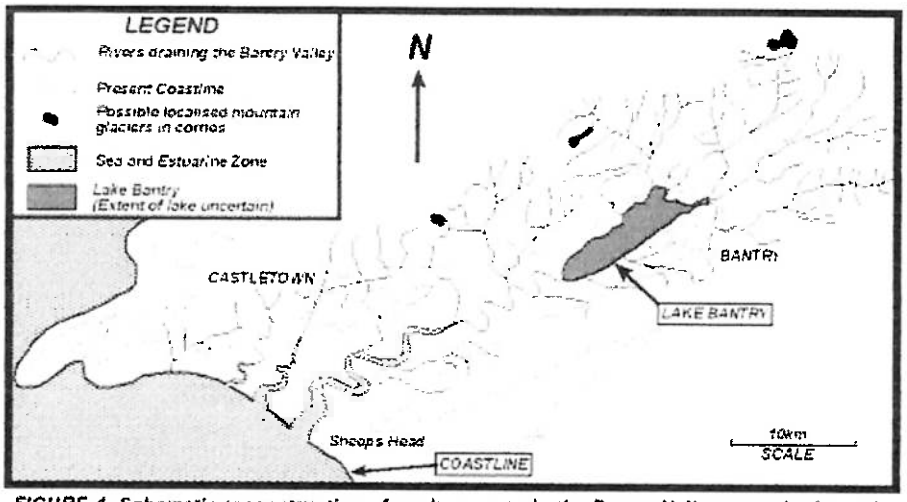
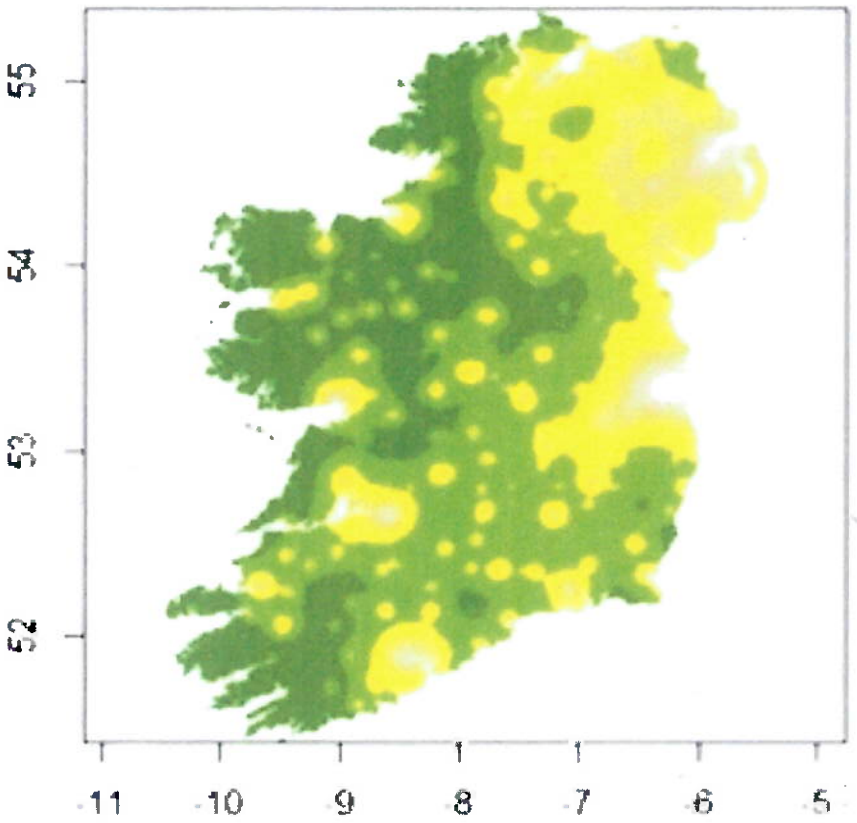


FIGURE 4. Schematic reconstruction of environments in the Bantry Valley towards the end of the last glaciation, during the deposition of the Whiddy Island muds (12,000-11,000 years BP). This corresponded to the latter part of the Woodgrange Interstadial. The position of the coast is highly speculative. The position shown is probably the closest it could have been to the mouth of the Bantry Valley at this time.

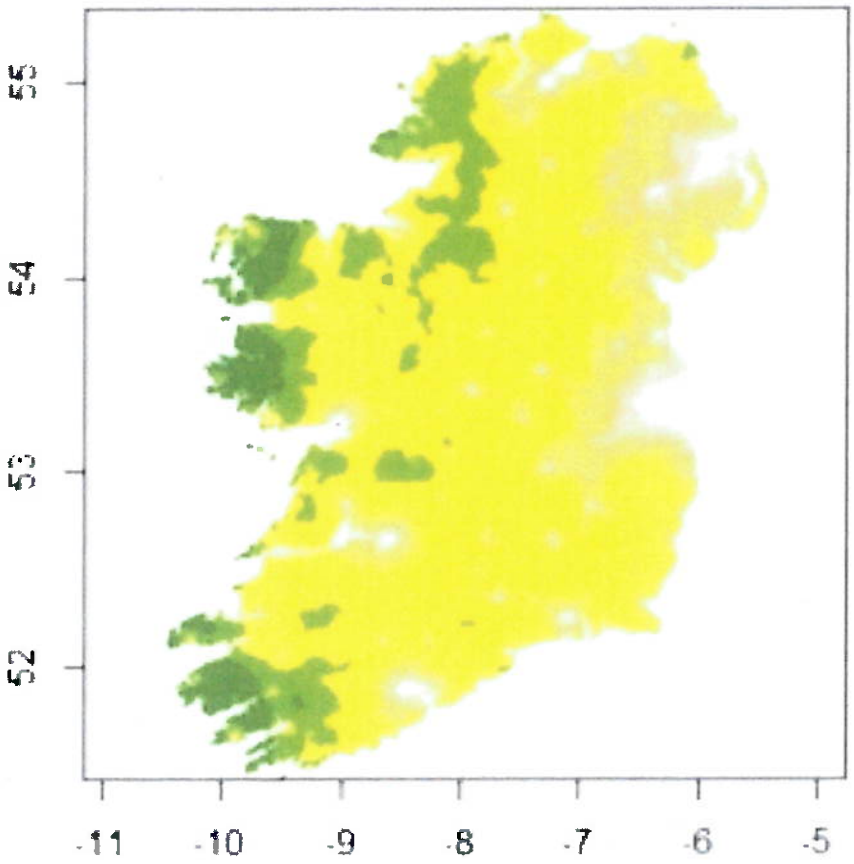
Dark Skies

1997



Dark Skies

2015



- 1 – 1.11 natural
- 1.11 – 1.33 natural
- 1.33 – 2 times natural
- 2 – 4 times natural
- 4 – 10 natural
- > 10 times natural

Brian Espey
Chairperson, Dark Sky Ireland
2 Acres Grove Newport F28 YD74
info@darksky.ie
25th June 2025

Dear Terrie & Michael,

Thank you for bringing the potential impact of windfarm lighting to your local area to our attention. The Mealagh Valley has a near-pristine environment, close to the conditions in Kerry Dark Sky Reserve and Mayo Dark Sky Park – Ireland's internationally accredited dark sky areas. Indeed, Ireland has the only such Gold Tier (highest quality) Dark Sky Reserve in Europe, maximising its tourist potential and leading to promotion by Failte Ireland, Discover Ireland and Wild Atlantic Way advertising, amongst others. Dark sky areas have been shown to provide a significant boost to local economies, providing an extra strand to environmental holidays and leading to extra income in shoulder and off-season for local B&Bs and guesthouses. As such, the area should be protected for future tourism development.

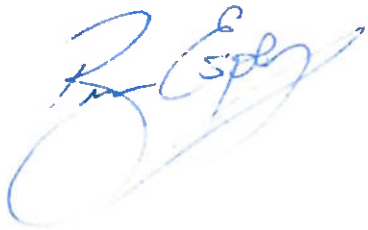
Research shows that even a single aviation warning light can impact on the visual amenity of the surrounding area, particularly given their siting on wind turbines over 100 metres tall. Calculations show that medium intensity lighting can be appear brighter than Venus – the brightest planet – out to distances of 4 km or so and, against a dark sky, such lights can be seen up to distances of tens of kilometres. The visual effect is, of course, multiplied by the combined effect of all the lights of the entire farm, including those sited on high ground 400 metres high.

Unless the lights are very directional, light falling on the ground (horizontal illuminance) has been shown to raise light levels above the natural background in dark locations such as the Mealagh Valley to kilometre distances, with the potential to affect ground-dwelling species. While the impact as seen from ground level is one aspect, these lights are obviously intended to be visible from the air where they can also impact migratory birds who depend on their vision in the red part of the spectrum for navigation and can cause more harm in overcast or foggy conditions. We are endeavouring to engage with the Irish Aviation Authority on the topic of windfarm lighting and note that representatives have taken part in European meetings regarding the environmental impact.

Dark Sky Ireland notes that preservation of biodiversity as required by recent EU actions. Although the night-time environment has been given insufficient attention to date, this is changing as it is becoming more recognised as being important for the well-being of all species – terrestrial, airborne and aquatic. This has also been recognised in the current Programme for Government's plans to "Promote and encourage an expansion of Dark Sky Ireland national parks and reserves" under the "Protecting Heritage and Nature" section of the document.

I hope that this is of use to you. Please let us know if we can be of further assistance.

With best regards,



Brian Espey
Chairperson, Dark Sky Ireland

References

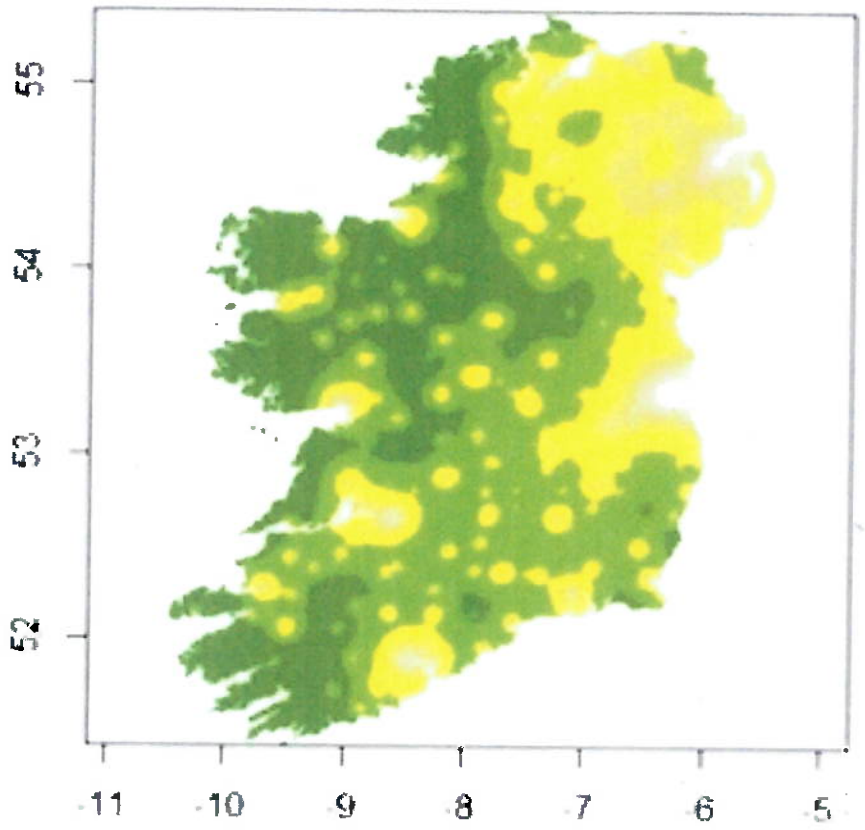
Salvador Bará, Raul C. Lima, "Quantifying the visual impact of wind farm lights on the nocturnal landscape," Journal of Quantitative Spectroscopy and Radiative Transfer, Volume 329, 2024, 109203, ISSN 0022-4073, https://doi.org/10.1016/j.jqsrt.2024.109203

Programme for Government 2025 – Securing Ireland's Future https://7358484.fs1.hubspotusercontent-na1.net/hubfs/7358484/Programme%20for%20Government%20-%20New.pdf

Nature Scot Information note - The Effect of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures https://www.nature.scot/doc/information-note-effect-aviation-obstruction-lighting-birds-wind-turbines-communication-towers-and

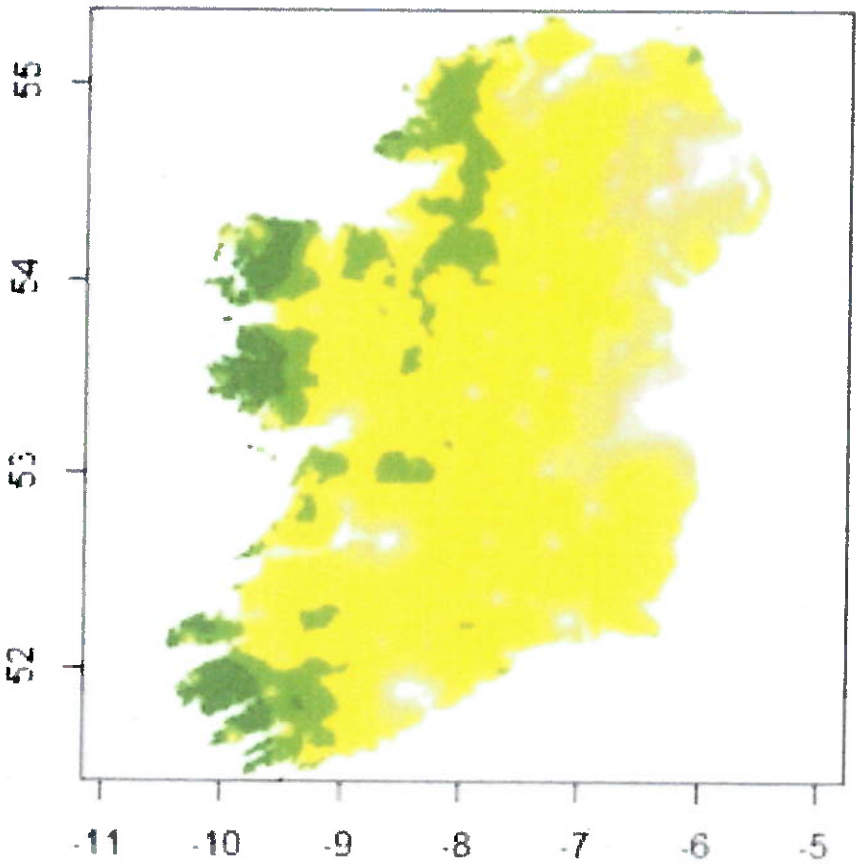
Dark Skies

1997



Dark Skies

2015



1 – 1.11 natural

1.11 – 1.33 natural

1.33 – 2 times natural

2 – 4 times natural

4 – 10 natural

> 10 times natural

Fáilte Ireland | Turasóireacht Náisúnta An tÚdarás Forbartha
National Tourism Development Authority

Cork County Council.
Planning Department,
Norton House,
Cork Road,
Skibbereen,
County Cork.

REG. No.
PLANNING (WEST) DEPT
23 APR 2025
CORK COUNTY COUNCIL
NORTON HOUSE, SKIBBEREEN, Co. CORK

By email: westcorkplanninginfo@corkcoco.ie

23rd April 2025

Ref: Planning Application 25/142 - Erection of eight wind turbines with an overall ground to blade tip height of 175m consisting of a rotor diameter of 150m; and a hub height of 100m, Construction of permanent Turbine hardstands and Turbine Foundations, Construction of one temporary Construction Compound with associated temporary site offices parking areas and security fencing, Installation of meteorological mast with a height of 100m, Development of one on-site Borrow pit, Construction of new permanent internal site access roads and upgrade of existing internal site access roads to include passing bays and all associated drainage infrastructure, Development of a permanent internal site drainage network and sediment control systems, All associated underground electrical power and communications cabling connecting the wind turbines to the on-site substation, Biodiversity enhancement measures. Recreational community improvements including the erection of 4 no. permanent information boards relating to cultural heritage and upgrades to amenity tracks across the site, all associated site development works.

Location: tSeithe Bheag (Shehy Beg), Gortloughra, Cloghboola & Inchinroe, Co. Cork

A Chara,

I refer to the above planning application which is currently registered with Cork County Council.

As a prescribed body in the planning process, one of the main objectives of Fáilte Ireland is to advocate for the protection of key tourism assets and amenities. The Irish landscape is one of the primary assets for tourism in the country and has been the cornerstone of international tourism marketing campaigns for decades. International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore, as the Irish landscape is one of the primary reasons for visiting the country, it is essential that the quality, character and distinctiveness of this valuable resource is protected.

It is the policy of Fáilte Ireland to support sustainable development and we acknowledge that there is a requirement to provide for and develop renewable energy, at appropriate locations and in accordance with proper planning and sustainable development. In considering the proposed wind farm development Fáilte Ireland acknowledges the requirement at a national level to reduce dependence on fossil fuels and to increase support from renewable sources, including wind. Notwithstanding, Fáilte Ireland is also aware of the significant effect that wind farms can have on the local and wider landscape, including the landscape as a major asset in support of national and international tourism.

The site of the proposed Gortloughra Wind Farm development is located in the townlands of Shehy Beg, Gortloughra, Cloghboola & Inchinroe and is situated in West Cork. The proposed development would be situated in a mountainous and scenic area of West Cork within the Wild Atlantic Way Region. While the immediate catchment of the WAW is the coastal zone, the route itself acts as a calling card to gain the attention of the visitor and acts as a device to entice people to the west of Ireland. Once there, visitors are encouraged to further explore and engage with tourism experiences and communities in a wider geographical area.

Commentary on Proposed Development

From a tourism perspective the key impacts arising from the proposed development are likely to arise due to:

- Construction related impacts
- Impacts arising from the operational stage of the development

Construction Related Impacts

These impacts are temporary impacts arising directly from the construction of the windfarm. They include increased traffic movements by heavy goods vehicles in the locality and 'on-the ground' impacts arising from construction and ground works. These impacts may have a short-term negative impact on tourists and other users of the local area. These impacts can be mitigated by the implementation of appropriate construction management strategies which will reduce the nuisance associated with the construction phase. During construction of each of the major infrastructure elements and the installation of the wind turbines there is potential for impacts on the biodiversity and ecology of the area.

Impacts Arising from the Operational Stage of the Development

Arising from the operational stage of the development the key impacts that may affect tourism in the receiving environment are visual impacts, and those impacts arising from the operation of the facility.

The Landscape Character Assessment of County Cork which forms part of the Cork County Development Plan 2022-2208 classifies the subject area within the Landscape Character Type '15a

Ridge and Peaked Upland', which is classified with a; 'High' landscape sensitivity; 'High' Landscape Value.

A number of general recommendations are outlined in the Draft Cork County Landscape Strategy regarding LCT15a, some of which relate to the Proposed Development:

- *Protect the unique setting and character of villages like Ballingeary and Inchigeelagh.*
- *Recognise the scenic value of the Cousane Gap as a valuable tourist attraction in this LCT.*
- *Recognise the value of Lough Allua as a valuable amenity for tourism and recreational activities.*
- *Recognise the value of the upland areas (Shehy Mountains) in this LCT particularly as a tourism resource for hill walking.*

In addition to the existing amenity and landscape character value of the area, it is important to consider the significance of the visual impacts on the potential amenity value. From a recreational perspective, we note the following commentary of the EIAR which acknowledges that there are several notable tourism and recreational features that pass through the area.

Due to the elevated and rolling nature of the Study Area, numerous walking trails and cycling trails criss-cross the Study Area. The most notable of these include the Sli Gaeltacht Mhuscrai, the Beara Way and the Sheep's Head Way national waymarked walking trail, all of which occur throughout the northern, western and southwestern extents of the Study Area.

A selection of other local walks and looped trails also occur within the wider surrounds of the Study Area. Some of the most notable of these are the Gougane Barra Loop trails, which are located throughout a dense conifer forest to the west of the Gougane Barra Lake. The Gougane Barra complex itself is also a notable tourism and recreation receptor within the Study Area and St Finabarr's Church and notable heritage feature located along a small island on the lake.

It should also be noted that the site encompass several new looped walking and hiking trails (Shehy Trails) that emanate from a newly constructed car park located to the southwest of the westernmost turbine in the array. Some of these trails will follow existing tracks that traverse the site, whilst others will follow new trails along elevated sections of the upland terrain that characterises much of the site.

Having regard to the continued and increased use of the upland landscape for leisure and recreational use, potential changes in landscape character perceived from views of the proposed development should be considered. The profile of recreational activities in the area is undoubtedly 'landscape based' – walking, cycling, and outdoor pursuits. This is reflected also in section 10.6 of the Cork County Development Plan 2022-2028 which states that the county has a wide range of nationally significant tourism assets namely;

Fáilte Ireland | Turasóireacht Náisúnta An tÚdara Eorbartha National Tourism Development Authority

- Mountain ranges including: the Slieve Miskish and Caha Mountains, the Galtee Mountains, the Shehy Mountains, and the Ballyhoura Area –important centres for walking, cycling, and adventure related activities;

Therefore, the protection and management of the landscape character becomes as much about protecting an economic and cultural asset, as it is about the physical context of those landscape features.

Cumulative Impacts
We note that the EIAR has included the projects and proposals for other wind farms that are either at planning stage, operational and consented/permitted. We request that the planning authority considers, assesses and satisfies itself that the proposed Wind Farm development will not result in significant effects, either on its own or cumulatively, on the landscape or visual environment.

Conclusion
It is the policy of Fáilte Ireland to support the sustainable development of electricity generation by sustainable and renewable sources and support its contribution towards a sustainable energy supply in the region at appropriate locations and in accordance with proper planning and sustainable development.

We therefore ask that the planning authority to take our observations into consideration when deciding on this application including the likely impact of the proposed development on the tourism and amenity receptors within the area.

Yours sincerely,

Shane Dineen

Manager of Environment and Planning, Fáilte Ireland

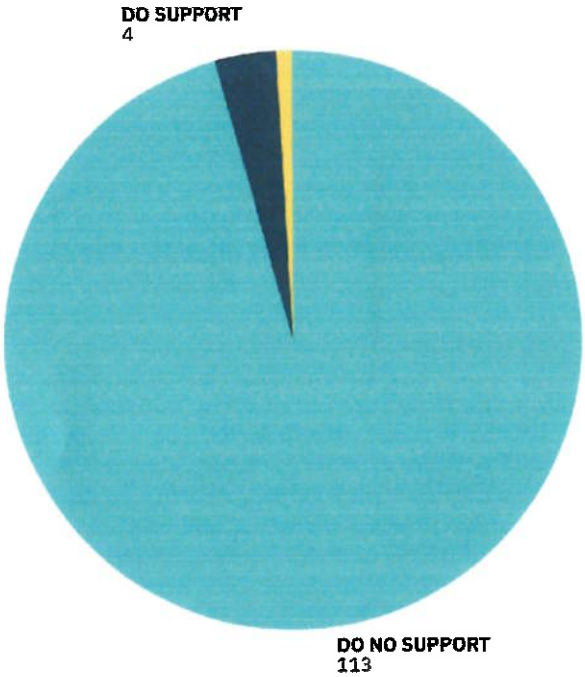
MAUGHANACLEA WIND TURBINE DEVELOPMENT
COMMUNITY SURVEY RESULTS

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

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

SUPPORT

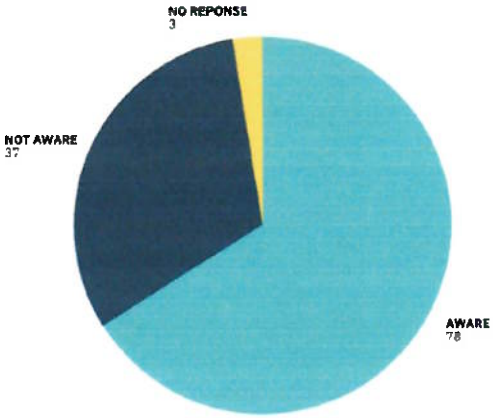
DO YOU SUPPORT THE PROPOSED WIND TURBINE DEVELOPMENT?



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

AWARENESS

WERE YOU PREVIOUSLY AWARE OF THE WIND TURBINE DEVELOPMENT?



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

PROXIMITY

How far do you live from the proposed wind farm?

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

A CONCERNED COMMUNITY

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

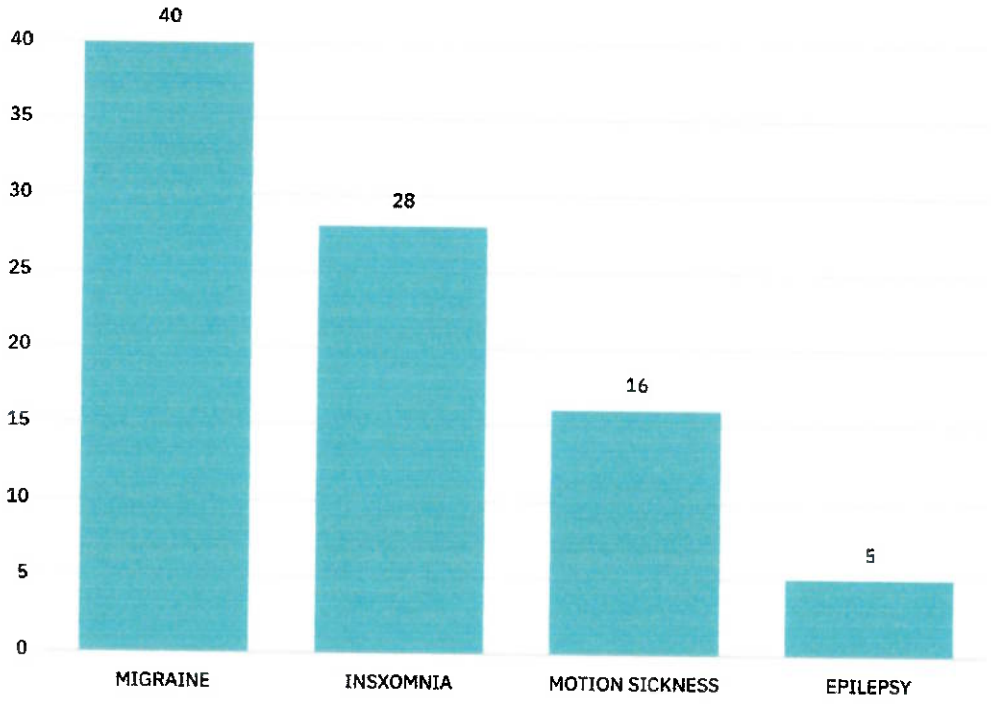
Issues where respondents were most divided were EMF, decrease in property values (a suspected renters vs homeowners divide), fire & safety issues, tourism, and shadow flicker from blades.

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

HEALTH ISSUES

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

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



COMMUNITY COMMENTS

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

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

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

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

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

Mealagh Valley Community Centre Ltd.

Ards Beg, Mealagh Valley, Bantry, Co. Cork P75 K253
contact@mealaghvalley.com
086 2055327

in partnership with:

Comhpháirtíocht Forbatha Tuathas Chorcaí
West Cork Development Partnership

VALLEY SURVEY REPORT 2024

Our community, our future, together.


SMILE
YOU ARE ON
CCTV


SOULCAL & CO