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Tooreen,

Dunmanway,

Co. Cork.

28th April, 2026.

REF: Maughanaclea Ltd. Case PAX04 324165

SID application for 14 No turbines at Maughanaclea etc.

Dear ACP,

Before we begin my submission I want to remind ACP of the failure within successive governments to introduce updated guidelines for the wind industry, which have now been in place since 2006. In that time turbines have grown in height from 60m to over 180m, with blade sweeps of over 4 acres. Yet setback distances, concerns of the effects on human health and the natural environment have not been updated to reflect this exponential growth in turbine size and impact.

We are residents of the area and have many concerns about this SID application for an extensive wind farm made by Maughanaclea Wind Farm Ltd and we would like to make the following observations in relation to the application.

The most obvious concern with this proposed wind farm is the visual and cumulative impact that 14 turbines of 169m tip height would have. This is now the third application within the area of Shehy Mountain, one of the most iconic mountains in the area, which incorporates the well known Cousane Gap. The initial Shehy More wind farm was permitted with the condition of omitting the most westerly turbine, as it was feared that it would have an unacceptable visual impact on the Cousane Gap, the R585 and SR 29. Gortloughra wind farm which would be immediately adjacent to the northern portion of this application and sharing the same townland, was refused by Cork County Council on visual impact grounds (amongst others). This refusal is explained in the planners report as follows:

'there are particular concerns regarding the likely adverse visual impacts arising from the intended siting and height of the turbines. These concerns relate to the heights and siting of the turbines and their likely adverse visual impact on views and prospects from parts of the R585 / scenic route S29 in proximity to the Cousane Gap and the wider unacceptable impact(s) on the landscape / visual amenities of the area.'

Additionally, there are concerns that, notwithstanding the 'Local Importance' of the landscape, the degree of adverse landscape impact is excessive, particularly, by reason of the unprecedented height of the turbines in this area of the County. (P.41)

Since this decision was made by Cork Co Co a further two wind farms have been approved within the close neighbourhood, namely Curraglass to the north and Derreenacrinig to the south. This new application would only add to an already overburdened area. Why are the same areas and communities being hit continuously by ever more wind farms? Why have developers not made any applications within the 'normally encouraged' areas within the County Development Plan?

This application has the R585, scenic route S29 at its heart which is also an important entrance way to the Beara Peninsula and a popular section of the Wild Atlantic Way. Objectives GI 14-9, GI 14-13 and GI 14-14 in the current Cork CDP seeks to protect the character of those very special views and prospects obtainable from such scenic routes and to ensure that there are no adverse obstructions or degradation of such scenic views.

S29 is known not only for Shehy Mountain and the Cousane Gap but also for wide views over the Kealkill valley. The proposed wind farm would dominate views in all directions and completely alter the character and experience of this scenic route. This can be clearly seen in a number of the photomontages including numbers 8, 10, 11, 12, and 15. They give a clear impression of how dominated the eastern end of the Kealkill Valley, Shehy Mountain and the Cousane Gap would be by turbines, organised in a very incoherent and messy way. It would be reminiscent of the wind farm west of Drimoleague at Mount Kid, which the County Council is always holding up as an example of how NOT to site a wind farm.

This proposed wind farm will have an unacceptable visual dominance in what is a scenic part of West Cork. It will completely alter people's experience of SR29 and which is also an important entryway to the Beara and the Wild Atlantic Way, as well as local places of interest such as Kealkill stone circle and the nationally important attraction at Gougane Barra. There are also the Sheeps Head Way walking path and St. Finbarr's Pilgrimage Route which would be effectively lined with turbines from the Mealagh Valley to their completion at Gougane Barra. Tourism, based on landscape activities, is such an important part of the local economy and is recognised as such in the CDP.

The County Development Plan 2022-28 in its Tourism section, looks for

'Innovative tourism products that maximise the County's natural amenities.' 10.3.7

'Ensuring the protection of the natural, built and cultural heritage assets' (10.1) including 'important landscape and archaeological sites (TO10-5)

'The principal features of the areas tourism product include mountain and upland habitats including the Shehy Mts.' (10.6.1).

Bord Fáilte made a long submission on the adjacent Gortloughra wind farm which included their own appraisal of the importance of this area for tourism-

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;

- Mountain ranges including: the Slieve Miskish and Cahal 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.

ARCHAEOLOGY

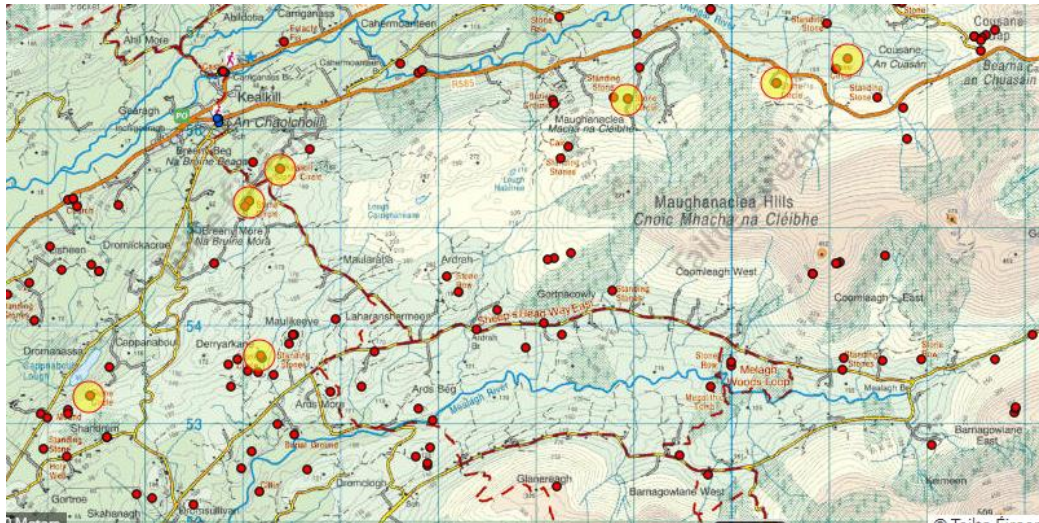
As an archaeologist myself (Tony Miller), who has recorded a large number of the newly recognised monuments in the area of this proposed wind farm, I was disappointed to note that there was no discussion of the relative importance of the area in terms of an 'archaeological landscape'. This is considered a key part of the Cork County Development Plan 2022-2028 and Shehy Beg, an immediately adjacent townland, is referenced as a potential example-

Archaeological Landscapes

- 16.2.29 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. These landscapes have not been specifically identified and will be assessed on a case by case basis. Any archaeological assessment should take this into consideration. These landscapes have not been specifically identified,

The large number of stone circles, stone rows, standing stones, hut sites and enclosures in and around Shehy Mountain, all indicate a potential Bronze Age landscape. These are all merely listed in Table 14-6 and are not considered as a group or as a landscape.

Stone circles are of especial interest as they indicate a high level of social organisation, population density and ritual activity in the area. There are seven stone circles within close proximity to the PDS (including two National Monuments,), three multiple stone circles and four 5-stone circles.



Stone circles in yellow. (www.archaeology.ie)

These are from west to east-

Cappanaboul- multiple stone circle- CO105-029

Derryankarne-5-stone circle- CO106-019

Breeny More –multiple stone circle CO106-005 & National Monument

Kealkill- 5-stone circle- CO106-003 & National Monument 450.

Maughanaclea- 5-stone circle-106-014

Maughanaclea- multiple stone circle- CO106=016

Cousane- 5-stone circle- CO092-051

The views and outlook from such monuments, as well as the direct alignments from them, are very important and an integral part of their design and site location. Yet these have not been specifically discussed or assessed to any degree within the EIAR. Kealkill stone circle- a National Monument- will be most clearly affected by this proposed development as it is open to the public and is a magnificently sited monument with far reaching views from it. It is part of a Bronze Age ritual complex, including a stone pair and radial stone cairn, and gives a clear impression of the importance of these uplands to the people of the Bronze Age. As such it is a very popular visitor attraction with a unique atmosphere. The alignment from the stone pair as well as the circle would be especially dominated by the proposed wind farm. Photomontage 4 gives an impression of the considerable visual impact this development would have on the stone circle and but still does not include the additional turbines, now approved, close-by to the north in Cappaboy.



Kealkill stone circle and stone pair, cairn in foreground, and Maughanaclea beyond.

This section of the EIAR appears to be simply a list of monuments and their location. The judgment on the impact this development would have on them is made without any real explanation or discussion.

HABITATS AND BIODIVERSITY:

One justification for such a large development in a scenic and relatively unspoilt area, is as a response to the recent declaration of a Climate Emergency. However, at the same time, and of equal importance, was the declaration of a Biodiversity Emergency which is all too often forgotten about. As the CDP states, preserving biodiversity is an important part of combating climate change. Unfortunately Ireland is now close to the bottom of most European 'league tables' for environmental health and protection.

15.4.1. '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.' CDP

The new development plan for the County now includes a requirement for wind farm development to avoid sensitive environments. Much of the land for this proposed wind farm is such a sensitive area. It is made up of upland bog and heath, home to many species of birds and plants etc. I have been a recorder for Biodiversity Ireland for many years now and the loss of habitat and species in the last few years has been very noticeable. This area has been home to Hen Harriers and I have recorded their presence long before any wind farms were planned.

In Ireland 22 percent of all bird species are red-listed and 63% of all Irish bird species are now threatened. This is especially true of birds that are found in the uplands and within farm land:

In relation to upland habitats, Gilbert et al. (2021) outline that half of the breeding bird species associated with upland habitats are Red-listed, which is the highest proportion by habitat. These include species associated with unenclosed moorland like Red Grouse, Golden Plover, Dunlin, Snipe, Ring Ouzel and Twite, and Amber listed Hen Harrier, river valley species like Grey Wagtail, enclosed farmland birds such as Curlew and birds of cliffs or sloping and broken ground such as Northern Wheatear, Whinchat and Golden Eagle.

agricultural improvement, overstocking of sheep, and erosion and drainage, while wind energy development and climate change present further threats.

Birdwatch Ireland, submission to the Citizen's Assembly on Biodiversity Loss'

There are clearly Hen Harriers nesting in the very close vicinity to the proposed wind farm, if not within its actual boundaries. This has been shown by the presence of pairs and of juveniles, seen by those compiling data for this wind farm and also for Gortloughra WF. Hen Harriers are of national concern and even a single breeding pair is of great, national importance as they are now both red listed and an Annex 1 species.

Other protected species recorded in this EIAR include Kestrels, Choughs, Peregrines, Sparrowhawks and Red Grouse. Many of these are even confirmed as breeding within the study area. Despite the presence of so many bird species of high conservation value, the EIAR persists in classifying the threat level as being 'not significant'. How can this be when other wind farms have been refused due to the excessive potential impact on such bird species?

The bird team working for the authors of the EIAR also state that they follow best practice in their field surveys, based on those developed by Scottish Nature. However, it is stipulated in these guidelines that night time surveys for nocturnal birds should be carried out. This has evidently not been done. Species targeted by this would include Whooper Swans, Barn and Long-Eared Owls, Snipe and Woodcock. These were noted during the VP surveys and a night time survey would show their range, status and numbers.

3.7.6 Nocturnal species, especially owls

Species which are exclusively or largely nocturnal pose particular problems for survey as activity and use of the site occurs mainly during restricted visibility. Nocturnal activity may pose greater hazards for birds at wind farms therefore nocturnal species should be surveyed. Breeding survey should be undertaken and should extend out to 500m beyond the proposed site for non-owl species and 1km for owls.

Survey methods have been published for owls (Hardey *et al.*, 2009) and nightjar (Gilbert *et al.* 1998). In Scotland, nightjars are largely restricted as a regular breeding bird to a few areas of Dumfries & Galloway (D&G) and are unlikely to be encountered elsewhere. A radio-tracking study on nightjars in D&G showed that home range size was variable, ranging from approximately 90 to 600ha (Spray, 2007). Owls and nightjar can be surveyed by listening for calling birds around dusk at appropriate times of year: early spring from February onwards for owls and May-July for nightjar.

For owls, late evening survey for calling juveniles in May-July can also be useful to detect successful pairs. Adults may also be active during this time. Surveys for owls can be complemented by signs of occupation, such as moulted feathers and pellets.

Scottish Nature wind farm guidelines.

Considering the amount of habitat loss and threats to so many fragile and endangered bird species, I believe it would be a failure under the Habitats Directive if this development were to be permitted. Additionally, the amount of peat that would have to be removed and allowed to dry out has surely been underestimated within the EIAR. Peat bog is by far the best store for CO₂, many times even that of woodland. Once the peat is disturbed it will dry out and rapidly release carbon into the atmosphere.

AMENITY:

This proposed industrial development covers a large area and spans two valleys- the Mealagh and Kealkill Valleys- which are important recreational areas. Many local businesses and enterprises have been developed in the area to cater for these visitors and would now be adversely impacted by the construction of this intrusive development. A number of these initiatives are centred around walking trails in the area including the Sheep's Head Way and the popular St Finbarr's Pilgrimage Path. The proposed wind farm would be built very close to the routes of these walking paths and walkers would be dwarfed by turbines for much of the routes.

In support of such initiatives, the County Development Plan 2022-28, in its Tourism section, looks for

'Innovative tourism products that maximise the County's natural amenities.' 10.3.7

'Ensuring the protection of the natural, built and cultural heritage assets' (10.1) including 'important landscape and archaeological sites (TO10-5)

'The principal features of the areas tourism product include mountain and upland habitats including the Shehy Mts.' (10.6.1).

Finally, 'there is a need to identify more walking routes (TO10.11.3)



Carrigerierk wind farm. Examples of the amount of infrastructure required.

The above photos were taken at nearby Carrigerierk wind farm which show the amount of habitat that is lost and the scale of visual intrusion involved with these wind farms. There are just too many wind farms now in this part of West Cork, creating a huge cumulative visual impact. A list of wind farms in a 25km radius was provided in the inspectors report to inform ACP. However, even this list is incomplete and at least three wind farms have been omitted- Curraglass, within a 2km to the north, Derreenacrinnig immediately to the south and Ballingearry to the northeast.

In 2013 the area planner involved in the Shey More application already said that the area was reaching saturation point for wind farms. Since that time many more applications have been made and approved.

In conclusion, I would urge ACP to refuse this application It will have an unacceptable impact on biodiversity, especially endangered bird and bat species, on the water systems of the area, on the rich archaeological heritage and on the visual amenity and business opportunities for the local residents and visitors alike.

A serious look is needed at the current energy policy. A recent study in UCC has shown that despite all the investment in renewable in this country there has been no reduction in domestic carbon emissions. The amount of gas required for electricity generating has also not been reduced despite the apparent share of renewable electricity growing each year. Something is clearly wrong here and it needs to be looked at critically instead of funding wind farms which are increasing habitat and biodiversity loss. 'Behind the meter' schemes in America, largely for data centres energy security, and now potentially approved for use in this country, has led to a massive increase in gas power stations as they recognise that reliance on renewable energy above a certain scale is not secure.

Finally, we would ask if you consider it appropriate to approve such a development which is quite clearly two distinct wind farms built some kilometres apart with no direct connection between them? The two halves are so different in topography and environment. I do not believe that two housing developments in different parts of a city would be considered as one application simply because they were given the same name and backed by the same company?

We would please ask that you reject this application for Maughanaclea Wind Farm,

Yours sincerely,

Tony Miller & Kristin Laubach.