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An Coimisiún Pleanála
64 Marlborough Street
Dublin 1, D01 V902

Re: Planning Reference ACP-324165-26

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

A chara,

I am writing to object to the proposed Maughanaclea Wind Farm, Ref: ACP-324165-26.

I have grown up in the Mealagh Valley and have lived here for most of my life. I care deeply about climate change and fully support the transition away from fossil fuels. However, support for renewable energy cannot mean that every landscape becomes suitable for industrial-scale development. I do not believe Maughanaclea is an appropriate location for a wind farm of this scale.

The Mealagh Valley is not an empty upland site. It is a lived-in landscape with ecological, cultural, residential, and tourism value that has been built over generations. I am deeply concerned that the long-term environmental and social costs of this development have been underestimated within the EIAR.

- BIODIVERSITY + ECOLOGICAL IMPACT -

One of my strongest concerns relates to biodiversity and habitat fragmentation. Growing up here, I have seen first-hand the richness of wildlife within the valley and surrounding uplands. Swallows return to our home every summer, birds of prey circle above, frogs are found throughout the boggy patches of Maughanaclea, as well as hares, pine marten, white tailed sea eagles, and other species that depend on quiet habitat corridors and functioning peatland ecosystems.

There is also clear evidence from local wildlife monitoring done by Sioned Jones and trail cameras within Maughanaclea that the area functions as an active ecological corridor. This directly contradicts any suggestion that the site is of limited ecological sensitivity.¹

The EIAR itself identifies Annex I bird species within the wider study area.² Under Article 4(1) of the EU Birds Directive, Annex I species are required to receive special conservation measures concerning their habitats.³

As consultants engaged by the developer, MKO's ecological assessment should in my view be independently reviewed by ecologists appointed separately from the applicant. At the very least, I implore the Commission to request GPS tracking data and flight records relating to sensitive species such as the White-tailed Sea Eagle from NPWS in order to independently assess whether protected birds frequent the proposed development area.

In general, I am not satisfied that the EIAR adequately addresses the cumulative effects of habitat disturbance, displacement, collision risk, drainage alteration, forestry clearance, and long-term operational disturbance on wildlife.

- PEATLAND, CARBON, + HYDROLOGY CONCERNS -

I am particularly concerned by the contradiction at the heart of the proposal's climate narrative. The development is presented as a positive climate action project while simultaneously acknowledging permanent impacts on upland blanket bog, extensive excavation, drainage works, spoil movement, and unquantified carbon losses associated with

¹ Please see Sioned Jones' full submission documenting the wildlife she has recorded within the nature reserve on Maughanaclea

² EIAR Chapter 6 Biodiversity & Ecology

³ EU Birds Directive (2009/147/EC),

peat disturbance. The EIAR itself acknowledges a “Permanent, significant residual effect” on upland blanket bog habitat.⁴

Peatlands are among the most important terrestrial carbon stores in Ireland and are also functioning hydrological and ecological systems. It is not environmentally responsible to characterise a project as sustainable while accepting permanent degradation of sensitive peatland habitat.

The EIAR further confirms that roads, hardstands, and buried turbine infrastructure may remain in situ following decommissioning, highlighting the permanent nature of the destruction of this habitat.⁵

- LANDSCAPE + CUMULATIVE IMPACT -

The landscape impacts would also be profound. The proposed turbines, at approximately 169m in height, would introduce industrial-scale structures into a quiet upland valley currently defined by open ridgelines, dark skies, and uninterrupted mountain views.

The Cork County Development Plan emphasises the importance of protecting ridgelines, skylines, High Value Landscapes, and the cumulative impact of wind energy developments.⁶ In my opinion, the scale and siting of this development is fundamentally inconsistent with these objectives and must be refused.

I am especially concerned about the cumulative industrialisation of the wider West Cork uplands. Taken together with Gortloughra, Curraglass, Dereenacreenig, and other proposed developments, there is a real danger that the mountains surrounding Bantry Bay and the peninsulas will become dominated by large-scale turbine infrastructure - forever altering that character of this region. The Cork County Development Plan specifically requires consideration of cumulative impacts associated with existing and proposed wind energy developments.⁷ These landscapes are not only environmentally sensitive, but form part of the identity, tourism value, and cultural character of West Cork itself.

⁴ EIAR Chapter 6, Table 6-24

⁵ EIAR Chapter 11 Climate, Section 11.4.2; EIAR Chapter 13 Landscape & Visual Impact Assessment, Section 13.7.4

⁶ Cork County Development Plan 2022–2028, Section 13.6 Wind Energy Development.

⁷ Cork County Development Plan 2022–2028, Section 13.6.3

- DARK SKIES + TOURISM IMPACT -

I work with Wild Hideaways, a tourism business built around the tranquillity, darkness, and natural beauty of the Mealach Valley. Visitors from cities around the world travel here specifically to experience silence, nature, remoteness, and exceptionally dark night skies – qualities that are becoming increasingly rare.

Brian Espey, Chairperson of Dark Sky Ireland, described the Mealach Valley as having 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.”

The proposed development includes 28 aviation warning lights across the ridgeline. Research by Barra & Lima (2024) found that turbine aviation lighting can exceed the brightness of prominent stars and even Venus under certain atmospheric conditions. Their study concluded that “the visual range of wind farms at nighttime may be considerably larger than at daytime” and that these impacts “should be taken into account in environmental impact assessments”.⁸

This is not simply an aesthetic concern. Dark Skies are an increasingly important environmental and tourism asset, and their protection is consistent with broader national objectives to promote and expand Dark Sky initiatives in Ireland.

The Programme for Government 2025 includes commitments to “promote and encourage an expansion of Dark Sky Ireland national parks and reserves”.⁹

If this development goes ahead, it will have a very real impact on me, my clients, and many others in the valley who rely on eco-tourism and the preservation of the area’s natural qualities.

- NOISE + RESIDENTIAL AMENITY -

I also have concerns regarding the adequacy of the noise assessment. Only one Noise Monitoring Location (NML4) is located within the Mealach Valley despite the complex glacially-carved topography of the area.¹⁰

⁸ Barra & Lima, Quantifying the visual impact of wind farm lights on the nocturnal landscape 2024. <https://www.sciencedirect.com/science/article/pii/S0022407324003108>

⁹ Programme for Government 2025, pages 57-58

¹⁰ EIAR Chapter 12 Noise & Vibration

The assessment relies heavily on averaged data and standard modelling approaches, which do not appear to adequately account for terrain, cumulative effects, or the real-world characteristics of turbine noise in quiet, rural valleys.

Research regarding wind turbine acoustics in hilly and valley terrain has demonstrated that topography and atmospheric conditions can significantly influence how turbine noise propagates and is experienced at receptor locations.¹¹

The Commission should require further noise monitoring at multiple locations throughout the Meagher Valley, including receptors on the opposite side of the valley where sound may travel unusually long distances due to the bowl-shaped terrain.

NML4 was the only noise monitor placed within our valley and it was located in an active agricultural area that is not representative of quieter residential properties such as ours. I am concerned that this may result in an artificially elevated baseline noise environment that does not accurately reflect quieter residential areas within the valley.

- CONSULTATION + COMMUNITY IMPACT -

Finally, I do not believe the level of community consultation has been adequate. Many residents feel that they have not been meaningfully engaged or properly informed throughout the process, despite the scale and permanence of the proposed development. I have already seen the stress and division this proposal has caused within the community. Neighbours who have lived peacefully alongside one another for years are now placed in opposition to each other. That kind of damage is difficult to reverse.

As someone who grew up in the Meagher Valley, I worry deeply about what this place will become if developments of this scale continue across the surrounding mountains. The quietness, dark skies, sense of openness, and connection to nature are part of what makes this community special and make it a meaningful place to grow up and live. It's all at risk of being lost.

I would ask the Commission to consider not only the physical impacts of this development, but also what may be permanently lost socially and culturally if the character of the valley is

¹¹ Van Renterghem, T. et al. (2014) "Wind Turbine Noise Propagation Over Complex Terrain and Wind Conditions" Acoustical Society of America / Wind-Watch archive.
https://docs.wind-watch.org/Van-Renterghem_wind-turbine-noise-hills-valleys.pdf

fundamentally altered. Communities like this are increasingly rare, and once changed in this way, they cannot easily be restored.

- CONCLUSION -

I support renewable energy and recognise the urgency of climate action. However, I do not believe sustainability can be achieved through the industrialisation of ecologically sensitive upland landscapes and the erosion of the environmental qualities that make areas like the Meagher Valley unique.

Ireland's future energy needs, including growing demand associated with large-scale infrastructure such as data centres, should not automatically outweigh the protection of biodiversity, peatland ecosystems, dark skies, landscape character, and rural communities. Climate action must be genuinely sustainable and should not come at the cost of permanently degrading sensitive environments that also play an important ecological and social role.

I believe the cumulative environmental cost of this development has not been adequately justified and that the long-term loss to biodiversity, landscape, tranquillity, and community wellbeing would outweigh the claimed benefits of the proposal.

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

Yours sincerely,

Annika Ahles