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SID Planning
An Coimisiún Pleanála
64 Marlborough Street
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May 18th 2026

A Chara,

Re: Developer: Maughanaclea Ltd / Enerco: SID Application Submitted to An Coimisiún Pleanála

Ref No: ACP-324165-26 / 324165 **Description of Development:** 10-year planning permission for Maughanaclea Wind Farm consisting of 14 no. wind turbines, a 110kV substation and 110kV underground cabling connection and associated work.
Location: Maughanaclea, in townlands of Ardrah, Maughanaclea, Ballynamought, Gortloughra, Cousane, Coomclogh, Derragh, Glanycarney, Keenrath, Derrynacaheragh, Shiplough, Coolsnaghtig, Mallabracka, Derrylahan, Derreens, Demesne, Dunmanway North, Milleenanannig, and Ballyhalwick, Co. Cork.

I refer to the above planning application and wish to make an objection to the proposed development based on the points outlined below. I believe it to be completely inappropriate for this location, resulting in loss of scenic and recreational amenity, habitat, biodiversity, rich archaeological heritage value and also impacts the lives of inhabitants and communities in the area. I will be particularly impacted by the siting of the turbines on the Cousane site with the closest turbine being 819 metres from the back of my home, while the turbines on the Mealagh site will be visible from the front of my home, less than 2km away.

I am in favour of clean energy, but consider that the burden is being placed too heavily on rural areas in west Cork without enough consideration for its impact, or that enough serious, urgent consideration and long-term planning for the energy sector has been taken by the government. There should be a greater contribution from other sources of clean energy production such as nuclear power, offshore windfarms, solar, and also from other locations in Ireland currently contributing very little.

The government's approval for the rapid expansion of electricity guzzling data centres is also putting huge pressure on offsetting gains in renewable energy generation. The CCAC warns that 10% of renewable energy is wasted through inadequate grid capacity and that the data centre industry has used up all gains in renewable energy since 2017. The government is sacrificing rural areas, small communities and tourism for largely foreign investors' financial gains through tax funded subsidies, tax breaks and curtailment payments.

Visual and Cumulative Impact

The R585 Regional Road is classified by Cork County Council's Development Plan 2022-2028 as a Scenic Route (S29 Table 5.1) stating that ***the route runs through or adjoins high value landscape*** *of type 4 rugged ridge*

peninsula and type 15a Ridged and Peaked uplands with a sense of remoteness. The Cousane Gap, recently given a tourist information sign, is considered an important gateway view of majestic, unspoilt views of hills and valleys down to the Sugar Loaf and Hungry Hill on the Beara Peninsula. The intrusion of 14 x 169-metre-high turbines spanning both sides of the route would be too dominant on elevated ridgelines and will be highly visible over a wide area in an area of outstanding beauty which is heavily dependant on tourists, walkers and cyclists. The turbines will also be seen from points on the R584, Kealkill to Gougane Barra, another tourist route and Scenic Route S28.

In MKO's carefully selected photomontages, only 2 images are shown from the Cousane Gap, at points most favourable to the appearance of the development, particularly at the junction of the L8777 and R585 beside the standing stone on scenic route, where a blade tip is partly obscured behind a hill.

Photo (ref. 1) is taken from the junction of the L8777 and R585 beside the standing stone with its far-reaching views of hills and mountains.

There is no viewpoint shown from further down the S29 route where the view to turbine site 1-6 opens up considerably, and would show the effect of the scale of the turbines on the dwellings closest to turbine 6. I have attached a photograph from the route (ref 2), approximately 300 metres west of the Cousane Gap. MKO gives a misleading impression to ACP that the turbine sites do not appear to have a substantial visual impact on this scenic route, on the houses visible from the route, or on the views of the landscape when driving east towards the Cousane Gap and Shehy Beg from Kealkill, where the turbines 1-6 will be almost entirely visible and rely for some small screening by intermittent hedging, and mature forestry likely to be harvested in the near future.

I have also attached a number of photomontages produced by a local resident showing the real impact on this area between the two sites (Refs 4-5) with distance and turbine scale carefully calculated, in order to reflect the deficiencies of MKO's submitted photomontages. Cork County Council's development plan regarding the siting of windfarms emphasises the importance of high value landscape and visual quality as well as the **cumulative impact of saturation**. EU directives also state that windfarms must be sited in appropriate locations – this is not an appropriate location.

This area is covered by the Fáilte Ireland West Cork Coast Destination and Experience Development Plan (DEDP) - a government-mandated tourism strategy. Tourists are also drawn to this area not only for its peace and beauty, but also for the quality of its dark skies. With so little artificial light, the dark skies of both valleys are becoming a rarity. The Mealagh Valley community is actively pursuing Dark Sky Community accreditation, has met with representatives of County Cork Council, and has formal, written support for the project from Deputy Christopher O Sullivan TD, Minister for Nature, Heritage and Biodiversity. At night, there would be light pollution from the turbine safety lights. We value our dark skies, and this would be another loss for residents and those visitors staying here for this very reason. West Cork has a reputation for Slow Tourism, a place to stay and relax in peace, solitude, and dark skies. ACP must give this issue serious consideration.

In CCDP vol. 1 Ch. 14, 13.6.3 Policy considerations regarding the location of wind farms includes:

- *The location of all existing and proposed wind energy developments and their cumulative impacts.*
- *Important or high value landscapes*

CCDP ET 13-7 Commercial wind energy development **must avoid adverse impacts** on:

- *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.*
- *Visual impact of ancillary development, such as grid connection and access roads*

The consideration of the visual impact of this development is a key factor in my objection, as is the cumulative effect and burden of the number of existing windfarms and those in planning for this area.

MKO claim: CH13-26 The well-defined ridgelines and landforms of the Maughanaclea Hills and Shehy Beg Mountains, and the undulating nature of neighbouring ridgelines effectively encloses the proposed turbines within these distinctive topographical features, and limits visibility from very large areas. Please see photomontage references x-y to test the veracity of this statement.

As illustrated in **picture ref 3 map** there is an immediate visible saturation in this area of west Cork of existing and proposed windfarm development within 25km of Maughanaclea.

The updated guidelines for Wind Energy Development have still not been adopted and published, though the consultation period for revision closed over five years ago. Since 2006, turbines have increased from 60 metres to 175 metres in height with greater spans, noise and vibration. The current 2006 guidelines are no longer fit for purpose, and because of this I feel strongly that a moratorium on windfarm development should be actioned.

There are significant contradictions in MKO's EIAR as shown here: **Statement A:** Chapter 13, Section 13.8 (Conclusion), page 13-130*: "The overall landscape value and sensitivity of the Site is deemed to be 'Medium' and the overall residual effects upon the landscape of the Proposed Wind Farm site itself are deemed to be 'Moderate'... No significant cumulative visual effects are deemed to arise."*

As CCDP recognises this landscape as High Value status, I would ask ACP to require the developer to explain how they arrived at 'deemed to be Moderate' as a description.

Statement B: Chapter 13, Table 13-17 (Summary of Viewpoint Impact Assessment Results), pages 13-106 to 13-107: ***Significant residual visual effects*** *recorded at VP6, VP11, VP12 and VP16.* ***Substantial magnitude of change*** *recorded at VP16 with turbines comprising 44% of all landscape views.* This directly contradicts Statement A.

Regarding High Value Landscape, the CCDP designates the landscape adjacent to the site as HVL (LCT4: Rugged Ridge Peninsulas) with *High Landscape Sensitivity: vulnerable landscapes with the ability to accommodate limited development pressure.*

Again, the developer states two contradictory statements regarding this sensitivity:

Statement A: Chapter 13, Section 13.4.1.1.3, pages 13-20 to 13-21: The Cork County Draft Landscape Strategy defines High Value Landscapes as *"vulnerable landscapes with the ability to accommodate limited development pressure... landscape quality is at a high level, landscape elements are highly sensitive to certain types of change."* LCT4 (Rugged Ridge Peninsulas, immediately adjacent to the site) is confirmed as an HVL.

Statement B: Chapter 13, Section 13.8 (Conclusion), page 13-130: The LVIA states the Proposed Wind Farm is *"not considered to significantly affect the character and special qualities of this HVL."*

The developer is aware of the sensitivity of the landscape, but chooses to suggest that 14 massive turbines, strongly lit at night, each spanning 4 acres at a height of 169 metres, across an area of 1175 hectares will not significantly affect the character of this special HVL.

Residential Amenity

I am concerned about how the scale, dominance, movement and noise will affect our home and lifestyle. We chose our home for its open views of the rural landscape, biodiversity and peace. We enjoy walking in the local area, birdwatching, stargazing and gardening. Our enjoyment of the outdoors will be severely impacted visually, both north and south of the house, visually and through constant noise from the turbines.

There have been many reports of 'Turbine Syndrome', of residents close to turbines being affected by infrasound, low frequency noise, flashing lights and vibration. A court case in Waterford found that a resident's quality of life was impacted by the nearby windfarm. Whilst health risks are still not medically recognised, researchers (Baliatsas/Yzermans 2025) in the Netherlands for the VWS conducting an epidemiological study over a period of 10 years, found that some people suffer tension headaches and depressive feelings over a long period of time. As a migraine sufferer, I have concerns that not enough medical research is being conducted about the effects of newer, larger turbines.

In Irish and EU law, we have the right to enjoy our home. This right would be materially affected by this development: ECHR Protocol no. 1, art 1. *By recognising that everyone has the right to the peaceful enjoyment of his possessions, Article 1 is in substance guaranteeing the right of property.*

According to MKO data, local homes would not be affected by flicker, but also expects us to accept that without updated guidelines, that its own assessment of flicker and noise is adequate?

5.3.5.3 Residential Amenity flicker and noise: *Without benefit of the revised wind energy development guidelines for onshore wind, it is considered that since noise emissions and shadow flicker are controllable via inbuilt turbine technologies, therefore, the Proposed Wind Farm is capable of compliance with any future guideline limits in this regard*.

Construction noise is going to be a considerable problem for residents and visitors during the tourist season. Noise and sound reverberate around these very quiet hills and valleys, which should have been explored. The developer claims that noise levels will fall within acceptable limits based on averaged measurements, but that is not the reality we will experience, and it is likely to be of an intermittent nature, with rock breaking, machinery and heavy vehicles for a long period of time, up to 2 years, 6 days a week. I am not convinced that that the impact of construction noise on residential amenity has been fully explored and assessed.

Standard modelling is less reliable in terrain where noise can be amplified and channelled, increasing impact for some receptors (Van Renterghem,2016)

I would ask that ACP require the applicant to fully assess the impact of construction noise on residential dwellings with regard to wind direction, valley settings and the combined noise impact on the dwellings situated between the 2 turbine sites: of which my home would be one of those affected. ACP should ensure that robust assessment has taken place, as no mention of the terrain of this area, hills or valleys is made within the Noise and Reverberation section of the EIAR, or the potential cumulative impact of noise from the Gortloughra 8 turbine windfarm to the north-east,

which is currently being appealed at ACP. Noise during the construction phase, estimated at 18-24 months, is likely to be highly intrusive, and construction to take place 6 days a week. This needs to be looked at carefully to ensure the local community amenity value is not impacted during this phase. The number of accommodations which are being proposed along the turbine delivery route are also significant. This will cause major disruption locally affecting both local and tourist traffic.

Environment and Ornithology

This site targeted for development will require the removal of a large quantity of forestry, and the disturbance of heath and peatland habitats, resulting in unquantified carbon losses in an area described as one of the few remaining areas of upland peatland and heath in the area.

Chapter 6, Table 6-24 (EIA Classification Summary), page 6-131: Admits *"Permanent, significant residual effect" on Upland Blanket Bog even after mitigation.*

The developer claims that the project contributes to positive climate action while admitting that damage caused during construction - excavation, drainage - cannot be fully mitigated. We must also include the materials used in turbines, particularly the hundreds of tons of not very ecologically friendly concrete to be poured into the hills, and it would seem, never removed.

As stated by MKO: Chapter 11, Section 11.4.2, pages 11-23 to 11-24: Acknowledges that *"carbon losses associated with the removal of other carbon-fixing vegetation... have not been quantified"* and that the carbon model *"has been prepared on the basis that restoration will not occur upon decommissioning."*

We are fortunate in this undisturbed area to experience a wide and rich variety of wildlife: hares, otters, red squirrels, a huge variety of birds, insects, Sika deer, long-eared bats, and pipistrelles. This is also an area which is home to many species of birds, in a country where 22% of all bird species are red listed and 63% are now threatened. It is concerning that MKO recognises that buzzards, sparrowhawks and hen harriers will possibly suffer disturbance and displacement. The windfarm site is within range of the recently successfully reintroduced white-tailed sea eagle: adults will range 30-70 kms, while in the non-breeding season can roam 100km plus, youngsters will travel considerably farther. Large raptors are likely to use rising air currents, so the positioning of turbines on high ridges makes them highly vulnerable. All raptors and small migrating birds are at danger of collision with wide sweeping wind rotor blades, particularly in poor weather when visibility is low, as it often is in these parts.

This is also a site where skylarks can be found, and are ground nesting around turbines 1-6. This bird for some reason did not warrant a mention in the report, though is on the CCDP list of conservation concern, as were other birds in this locality: Robin, woodcock, swallow, swift, starling, cuckoo, goldcrest, greenfinch, grey wagtail, house sparrow and kestrel.

At a time of climate crisis and biodiversity loss, the CCDP states that preserving biodiversity is an important part of combating climate change. It's a pity that Ireland is so lowly ranked in European tables for environmental health and protections.

Bats: While MKO states that: *'a search for roosts was undertaken within 200 m plus the maximum rotor radius (i.e. 66.5 m) of each proposed turbine location (NatureScot, 2021). No structures, building or trees and therefore no Potential Roosting Features (PRFs) were identified within the 266.5 metres roost search buffer, therefore a broader 500 m roost search area was completed around each proposed turbine location to identify any features that could support roosting bats.'*

While no bat roosts were recorded within the proposed wind farm site in 2024*, (MKO A*ppendix 6-2 Bat Report - F - 2026.03.26 -240225), roosts were unlikely to be found within 500 metres of the turbine sites, as these creatures mostly roost in roof spaces and stone barns. They will range for feeding 1-2 km from their roosts, using forestry for foraging and commuting, particularly soprano pipistrelles. (Kirkpatrick, Oldfield, Park 2017) My immediate neighbours and my home have 3/4 roosts for pipistrelles and long-eared bats. I expect there are many more roosts at buildings within the 1-2 km zones.

Bats which fly high and fast, were recorded at the site area surveyed: Leisler's bat (15%), the common pipistrelle (61%), and the soprano pipistrelle (11%), made up 87% of the bats surveyed. In Ireland, Leisler's bats are considered one of the most at-risk species around wind farms. Bat Conservation Ireland specifically classify them as 'high collision risk' with high population vulnerability. Ireland is a global stronghold for this species, so impacts should be taken seriously.

Both pipistrelles' species are grouped as 'high collision species' in Irish windfarm assessments (ACP) and are known to be attracted to turbines in low wind conditions (Bat Conservation Ireland). Leisler's and pipistrelles are also at risk from barotrauma and low wind nights when bats are most active and turbines spin slowly, feathered or not.

Whilst mitigations are offered, the numbers affected, or potentially lost, may be much greater than suggested in the EIAR research.

Water

According to MKO's application, 9.3.14.2 *Private Domestic Wells A search of private well locations on GSI well database (www.gsi.ie) reveal no mapped private wells within 5km of the Proposed Wind Farm site.* I find this incredibly concerning, when most residents in this area have shallow or deep private wells. As far as I am aware, no effort was made by the development company to contact residents to verify actual numbers of private wells. The majority of the windfarm site is also located within the drinking water abstraction catchment for Zone1 Kealkill Water Supply, with the site located 1.3km from the abstraction point in the Owengar River (Owengar (Cork)_10). MKO also state: *The Proposed Wind Farm site is* ***extensively*** *drained by a network of natural watercourses and manmade land drains.* These networks ultimately supply our drinking water.

HSE: The proposed development has the potential to have a significant impact on the quality of both surface and ground water. All drinking water sources, both surface and ground water, must be identified. Public and Group Water Scheme sources and supplies should be identified in addition to any private wells supplying potable water to houses in the vicinity of the proposed development. Measures to ensure that all sources and supplies are protected should be described".

The four photographs below are from natural pristine streams below the proposed windfarm site at Ballynamought and Coomclogh that drain into a tributary of the Owengar river.

Another issue is that the rivers within the proposed Maughanaclea development are classified as **HIGH STATUS OBJECTIVE RIVERS**. These rivers (Owengar, Mealagh and Gortloughra) are rare and require sensitive protection and under the *Water Framework Directive* it is not permitted to carry out works which will reduce their quality. Whilst the development company can claim mitigation will

mean there will be no negative change in status at all, this would require belief that all measures would be actioned on a construction site without any outside agency enforcement measures or supervision. We are expected to trust the construction companies to mark their own homework, ensuring that ground water, streams and rivers are not impacted at all by peat excavation and new drainage culverts from the turbine sites, creation of new access roads, and the pouring of tons of concrete, regardless of consequences. How can ACP ensure that independent supervision and inspection will take place?

The best mitigation for these rivers and water sources would be rejection of this planning application.

Property Values

We all invest financially in our properties: as homes and some as home and tourist businesses. I note that the section on property values (5.3.5.1), much of the research was conducted over large areas in the US within 10 miles radius of a windfarm being 16 kilometres as an equivalent distance here. The findings are broadly inconclusive, Gillespie/McHale (2023) suggests factors such as residential sorting and increased mobility is more commonplace than in Europe making this research less relevant to Irish property owners.

Looking at some of the closer European research cited by MKO: The Scottish research by CEBR in 2014 was commissioned by Renewable UK. CEBR did not have sufficient data for homes within 2km of a windfarm, so extended to 5km as the low volume meant it was not possible to create a reliable house price series for the 1km and 2km areas. Houses that remained unsold were not included. Graham Lang of Scotland Against Spin, said of the research: *"A house near a wind farm may be harder, even impossible, to sell, as the researchers would have found out if they had sought qualitative evidence from wind farm neighbours or estate agents."*

Stephen Gibbons of the LSE researched also in 2014, the Visual Impacts of wind turbines on house prices and found that on average, **the sale price of a house is reduced by -5 to -15% if a windfarm is visible from it.** On average, the turbines referred to were 90 metres in height.

Droes and Koster (2021) examined turbine height comparing turbines taller than 150m with shorter turbines, up to 2.5km distance, finding that house prices remained significantly lower within 2km post construction.

In Ireland, hedonic research by CERIS at the University of Galway (Gillespie/McHale2023) concluded: The analysis finds ***a robust and significant reduction in property value of approximately -14.7% within 1km of a turbine*.** The effect increases with turbine height, number of proximal turbines and level of urban influence, but may reduce in 10 years.

Locally, and most importantly, an auctioneer tells of the financial reality facing residents:

Denis Harrington, Auctioneer of Harrington Estates, Bantry stated: *The handling of property for sale in the Kealkill/Mealagh Valley region has been significantly impacted by the matter pertaining to the proposed windfarm developments. The uncertainty and negative market sentiment has seen some properties removed from the market due to lack of interest and others lingering on the market due to the public concerns.*

I cannot agree with MKO'S opinion when in the face of their own inconclusive research evidence they state that *there is the potential for short-term slight negative impacts on property values, which is not significant, located within 1km of the proposed turbines during the construction phase of the Proposed Wind Farm,* or their firm conclusion: *It can be concluded that there is the uncertain potential for a short-term negative imperceptible residual effect on property values from the construction phase of the Proposed Project*.

If their evidence is so inconclusive, then independent research should be carried out on the effects of windfarms in Irish rural settings on house values. I currently prefer to listen to local auctioneers, who think -15% is an average figure, and that 20-25% is more realistic; these negative figures are definitely not 'imperceptible'. This is an area of the developer's application that should not be overlooked by ACP as a planning issue, as developers look increasingly at more populated areas to industrialise.

I hope that I have made my objection to this windfarm very clear. As a resident, voter and taxpayer in Cork, I am also disappointed that this application bypassed Cork County Council and was able to avoid scrutiny by elected local representatives, where we as residents would be heard, and have a right of appeal process outside judicial review. Large wind farm developments often create long-term divisions within rural communities. Financial benefits accrue to a limited number of landowners, while negative impacts are experienced by neighbours and the wider community.

The whole process of objection/observation is both costly and overwhelming for individuals and small communities. Heavily financed and tax subsidised developers, investors, and their consultant companies produce several thousand pages of carefully selected, highly technical information, opinion and obfuscated photomontages to persuade ACP that our peaceful environment, health and wellbeing will not alter, that our beautiful, culturally significant scenic hills are of little value other than for industrialisation, that industrial scale turbines will be hardly visible, that the effects of massive construction and polluting materials on sensitive rivers and the pristine environment will be negligible, that biodiversity will not suffer, that our financial investments in our homes and businesses will be unaffected, and that the tourists and tourism so important to the area are almost non-existent. None of this will be our reality and lived experience should the planning be granted.

I ask you to seriously consider the rejection of this application.

Mise le Meas

Brid Collins (Mrs)

Referenced Photographs attached:

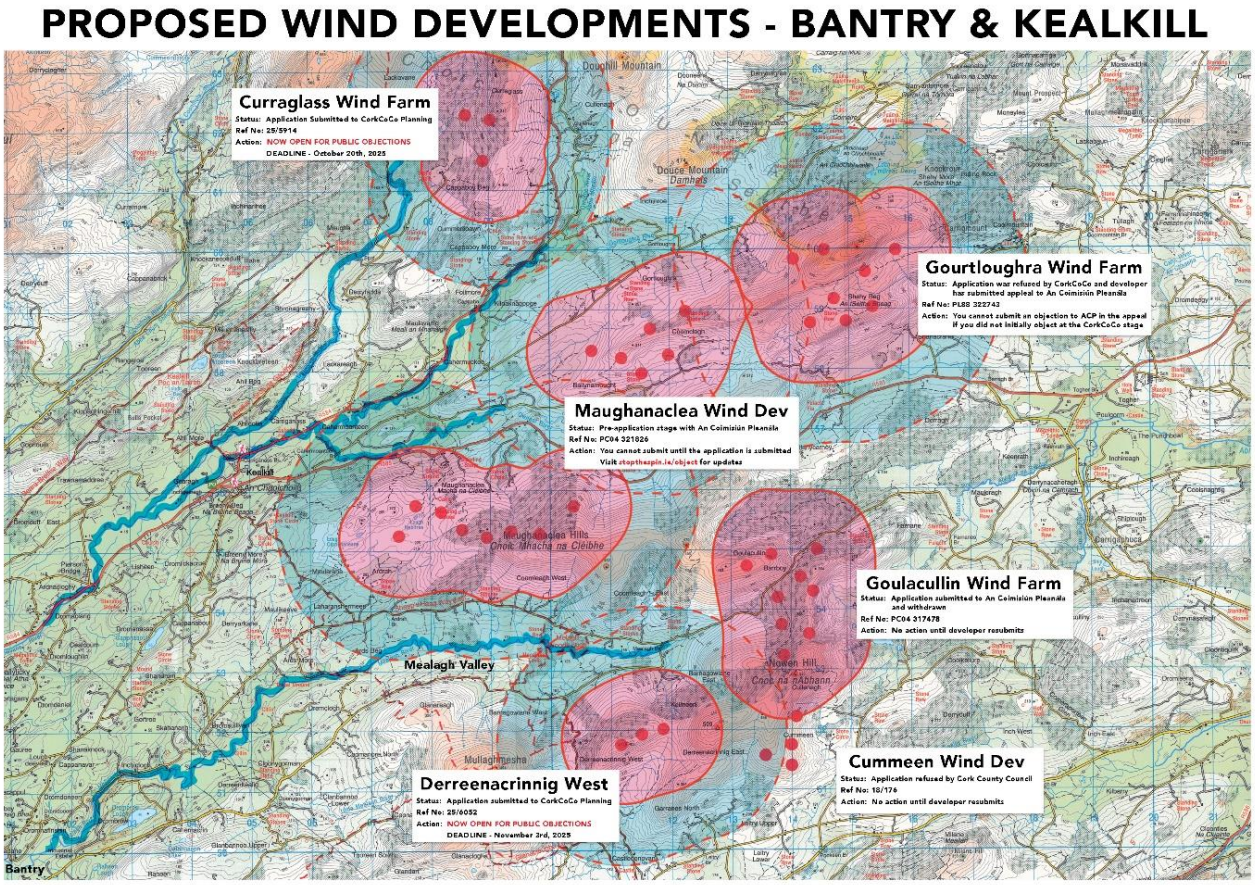
Ref 1: View of houses with proposed turbines 1-6 omitted by MKO of traditional farmhouses from R585 CCDP Scenic Route S29. There are 3 houses: 2 are close together and one in line but just out if the photograph on the right.

Coordinates: LAT 51.7665 DEGREES DMS 51˚ 45’ 59” N LONG -9.3238 DMS -9˚ 19’25” E

Ref 2: Gateway view on the R585 from entrance to L8777 on Scenic Route S29 towards Beara, Sugarloaf and Hungry Hill.

Coordinates: LAT. 51.77337 DMS 51˚ 46’ 24” N LONG.-9.31686 DMS -9˚ 19’ 0” E

Ref 3: Map illustrating the cumulative effect of wind farms surrounding Maughanaclea



Ref 4: 5 Photomontages from R585 Scenic route S29

View of proposed turbines from R585 Scenic route S29 close to house 036

View from the R585 scenic route S29 of proposed turbines on Maughanaclea, heading towards Kealkill and the Beara Peninsula

View from R585 /S29 heading towards the proposed north site at Cousane from Kealkill

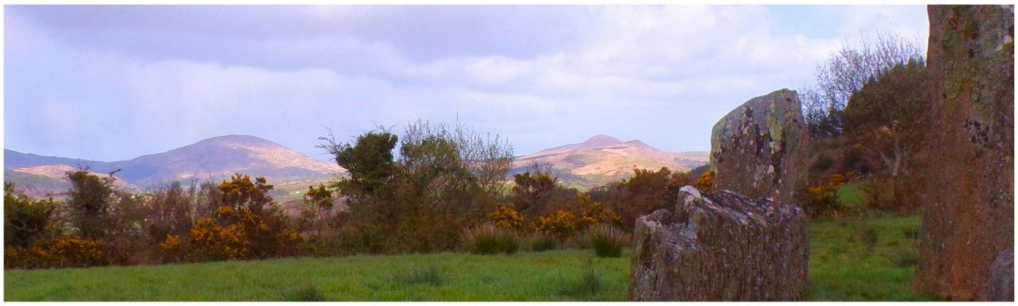
View of proposed turbines 01-06 from beside the R585 / on the S29

View from house 031 of scale of proposed turbine 09 at Maughanaclea above the ridge line.

Ref 6: View of proposed turbines 1-6 at the north site from the ancient monument at Kealkill.

The Kealkill Stone Circle complex is subject to a Preservation Order (PO 69/1938) — the developer's own Cultural Heritage assessment admits that visual impacts on its setting cannot be mitigated.

Kealkill Stone Circle
(for inllustration purposes only)



Viewpoint:	51 degrees 44'45"N 9 degrees 22'08W, elevation 129m. Distance to nearest turbine 6029m
Photo taken:	17 April 2016 at 16.45, 146 degrees SE
Camera:	Kodak PIXPRO AZ401, 71 degree horizontal FOV
Note:	Located within **High Value Landscape HVL**, clearly visible when approaching the stone circle from the side of the gate

End