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10 May 2026

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AN COIMISIÚN PLEANÁLA	
LDG-	<u>087897-26</u>
ACP-	_____
18 MAY 2026	
Fee: €	<u>100</u> Type: <u>Cash</u>
Time: <u>9:15</u>	By: <u>Post</u>

An Bord Pleanála

64 Marlborough Street

Dublin 1

DO1 V902

Re: Observation/Objection to Planning Application ACP-324165-26/324165 Proposed Wind Farm at Maughanaclea, Co. Cork by developer Maughanaclea Ltd/Enerco

Dear Board Members

I write as a resident and business operator in the area directly affected by the above referenced application for the proposed Maughanaclea Wind Farm. I strongly object to this development and respectfully request that An Bord Pleanála refuse planning permission on the following grounds.

#### 1. Visual Impact and Landscape Character

The proposed development would impose large industrial turbines of 169m on a landscape of significant scenic and rural character. At a distance of just under 1 kilometer from the nearest turbine, the structures would be a dominant and unavoidable feature from my property, seriously and permanently altering the visual amenity of the area. Parts of the Mealeagh Valley have been designated a high value landscape and any large industrial development of this sort would contradict the Cork County Development Plan.

The turbines would be visible from the principal rooms and outdoor spaces of my home and would fundamentally change the open and natural horizon that currently exists. In my opinion the Environmental Impact Assessment Report (EIAR) fails to adequately

address cumulative visual impacts when combined with any other existing or consented wind energy infrastructure in the wider area.

I respectfully ask the Board to have particular regard to the Guidelines for Planning Authorities on Wind Energy Development (2006) and any updated national policy, particularly in respect of setback distances and visual sensitivity.

## 2. Noise and Shadow Flicker

I am deeply concerned about the potential for noise disturbance, including both audible low-frequency noise and infrasound, generated by turbines located just under 1 kilometer from my home. Research and experience from comparable developments in Ireland indicate that residents at these distances can experience significant sleep disturbance and general amenity loss. In *Webster and Anor v Meenacloghspar (Wind) Ltd* (March 2026) the windfarm was found liable in nuisance for the noise of its turbines not just in terms of decibel volume, but in relation to specific noise characteristics.

Shadow flicker is a further concern. Given the orientation of my property relative to the proposed turbine locations, I submit that the applicant has not demonstrated to an adequate standard that shadow flicker will be maintained within the World Health Organisation's recommended limit of 30 hours per year, or 30 minutes per day. I request that the Board commission an independent noise and shadow flicker assessment rather than relying solely on the applicant's own commissioned reports.

## 3. Hydrology and Private Water Supply

My property relies on a private well for domestic water supply. The construction and operation of wind turbines in close proximity presents a material risk to the integrity of local groundwater systems. Specifically, I am concerned that:

Foundation excavation and piling works could fracture or alter subsurface rock, disrupting groundwater flow paths serving my well.

Access road construction and surface drainage alteration could introduce contamination or silt into local watercourses and the aquifer.

There is insufficient baseline hydrogeological data in the submitted EIAR to properly assess these risks.

I submit that the Board should require a comprehensive independent hydrogeological assessment, including baseline groundwater monitoring over a meaningful period, before any decision is made. Adequate legally binding mitigation and compensation mechanisms must be in place to protect private water supplies before construction commences.

## 4. Impact on Property Values and Tourism/Business

I operate an Airbnb business from my property. The rural scenic character of this area is the principal attraction for my guests. Guests specifically seek out this location for its unspoiled landscape, peace, and tranquillity — all of which would be severely diminished by the construction of an industrial wind farm within close proximity. The area is within landscape character area 15a (ridged and peaked uplands) - designated high landscape value and high landscape sensitivity in the Cork County Development Plan. The site also falls within the Wild Atlantic Way which is Irelands premier tourist trail. The CCDP designates this area as 'open to consideration' for wind energy and not 'acceptable in principle'. The burden of proof therefore rests with the developer to prove that tourism will not be affected yet the developer has not consulted with us on this matter despite knowledge that we run a tourism business – the tourism impact assessment was prepared without consulting any tourism business in the area. The 12 Airbnb's should have been contacted – we could have confirmed that any new legislation would not have affected us as our property is our main and only home, and that we have up to 1,000 people staying each year which is no insignificant number. This contradicts the developers statement that the immediate area is not highly significant in tourism terms and that tourists are only interested in staying right on the coast. In 6.21 of the Tourism Impact Assessment they state that there is an absence of any visitor attraction in the immediate area, indicating that it is not of high tourism significance. This contrasts greatly in our experience of why our guests choose to stay with us. We are central to multiple historically important archeological sites, castle ruins, nature walks, dark skies and as a central base to explore the West Cork peninsulas. They are also assuming that the smaller Airbnb's will not be operating in the future even though there has been no finalisation of the Short Term Lettings Bill. During the construction phase the walking and cycling routes, in particular the Sheeps Head Way, would be seriously impacted. The DEDP action D.6 on sustainability explicitly calls for protection of communities from developments that undermine local sense of place, environment and cultural heritage. The developers admit that there will be significant visual effects from the turbines at multiple viewpoints within 1 kilometer of the turbines particularly at VP16 where they comprise 44% of all landscape views.

I submit that the development would:

Reduce the marketability and nightly rates achievable for my accommodation.

Result in a significant loss of bookings from guests who prioritise natural scenery.

Negatively impact the short and long-term capital value of my property.

I respectfully submit that this constitutes a real and measurable economic harm that has not been adequately addressed in the applicant's socioeconomic assessment.

5. Questionable Carbon Benefit When Curtailment, Construction and Decommissioning Are Properly Accounted For

I submit that the applicant's environmental case for the development overstates its net carbon benefit and fails to present a complete lifecycle analysis. The Board should scrutinise the following three interconnected issues.

#### 5a. Construction and Decommissioning Carbon Costs

Wind turbines are not carbon-neutral assets. Their manufacture, transportation to site, civil construction works (including foundations, access roads, and cabling), and eventual decommissioning all generate significant greenhouse gas emissions. Published research indicates that construction, installation, and decommissioning collectively account for the vast majority of a wind turbine's total lifecycle emissions. Critically, academic literature has identified that onshore wind farms constructed on peatland — such as is common in Cork and the wider Munster uplands — face a materially extended carbon payback period, potentially running to several years, where no adequate mitigation measures are implemented. This is because the disturbance of peat releases stored carbon that can negate a significant portion of the climate benefit.

I submit that the applicant has not provided a sufficiently rigorous lifecycle carbon assessment that accounts for local peat and soil conditions at the Maughanaclea site. The Board should require an independent lifecycle carbon assessment before any decision is made. The developers have also failed to supply any information on the particular type of wind turbine being used therefore we do not know what materials will be used in the blades in order to assess the amount of potential ecological damage caused by leading edge erosion to the soil and water course.

#### 5b. Curtailment and Dispatch-Down: The Development May Not Deliver Its Stated Energy Output

Ireland's electricity grid faces a well-documented and growing curtailment problem. EirGrid data shows that in 2025, the total wind dispatch-down rate in the Republic reached 11.3%, meaning that over one tenth of available wind generation was wasted. Constraints — which arise from local transmission network limitations of the kind that affect rural Cork — accounted for 6.6% of that total. In 2024, it was reported that 2.1 TWh of renewable electricity was curtailed in the Republic of Ireland alone, enough to meet all domestic electricity demand in County Dublin.

The consequence for this application is significant. If the Maughanaclea wind farm is constructed but the local transmission infrastructure is not upgraded in parallel, a material proportion of its potential output will be dispatched-down, and it will never deliver the carbon savings projected in the EIAR. The applicant must demonstrate, with evidence from EirGrid's network capacity assessments, that adequate grid infrastructure either exists or is firmly committed to serve this development. Assertions in the EIAR based on theoretical maximum output are not a sufficient basis for granting permission.

### 5c. Curtailment Compensation Costs Borne by Consumers

Under Ireland's Renewable Energy Support Scheme (RESS), wind farm operators awarded contracts under RESS 3 and subsequent rounds are entitled to compensation at the agreed "strike price" for electricity they are unable to supply due to curtailment or oversupply. This means that in circumstances where the local grid cannot accept the farm's output, the developer will receive payment for electricity never generated — a cost ultimately borne by Irish electricity consumers through levies on their bills.

Constraint payments to generators in Ireland have amounted to hundreds of millions of euros in recent years. I submit that it is contrary to the public interest to grant planning permission for a development that, due to foreseeable grid limitations in this area, may generate substantial consumer-funded curtailment payments while delivering a fraction of its projected carbon benefit. The Board should require the applicant to provide a detailed assessment of projected curtailment levels at this specific location, supported by EirGrid network data, and to quantify the likely cost to consumers of constraint payments over the lifetime of the development.

### 6. Conclusion

For all of the foregoing reasons, I respectfully request that An Bord Pleanála refuse planning permission for Application ACP-324165-26. Alternatively, if the Board is minded to grant permission, I request that robust and independently enforced conditions be attached addressing all of the issues raised above — in particular the protection of private water supplies, noise limits, shadow flicker, an independent peatland carbon lifecycle assessment, and a verified assessment of projected curtailment rates and their cost to consumers. I also respectfully request that I be notified of any oral hearing convened in relation to this application and that I be afforded the opportunity to appear and make submissions.

Yours faithfully,

David Shires



Att: €50 cash fee