

24 May 2026

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An Coimisiún Pleanála
64 Marlborough Street
Dublin 1, D01 V902

Re: ACP-324165-26

Maughanaclea Wind Farm / Enerco's Application
to Construct 14 Industrial Wind Turbines on Maughanaclea
a 110kV substation and 110kV underground cabling connection & associated works

A chara,

I make this submission as a resident of the Mealagh Valley, a community organiser, an artist, an environmentalist, and someone who strongly supports the transition away from fossil fuels.

Our home is covered in solar panels and for much of the year we generate more electricity than we consume, exporting surplus renewable energy back to the grid. Installing solar has been one of the best investments our family has ever made. We are not unusual in this regard. This is a progressive part of the country and many of our neighbours in the Mealagh Valley & Cousane have also embraced solar energy and other practical measures to reduce emissions.

I am optimistic about the future of renewable energy. Advances in energy storage technologies, including long-duration storage solutions like sand batteries, are increasingly demonstrating that renewable generation can be deployed in ways that are both environmentally responsible and socially sustainable.

My objection is in no way to renewable energy or wind turbines. Rather, it is my view that this proposal would result in unacceptable impacts on biodiversity, landscape, archaeology, dark skies, residential amenity, tourism, water resources and community wellbeing, and that many of those impacts have not been adequately assessed within the Environmental Impact Assessment Report.

After reviewing the planning documentation in detail, attending consultation events, examining planning policy, speaking with environmental specialists, and gathering evidence from local residents, I have reached a simple conclusion:

this proposal is in the wrong place, at the wrong time, in the wrong scale.

The Mealagh Valley, Cousane, and surrounding uplands are environmentally sensitive, archaeologically significant, exceptionally dark, rich in biodiversity, and increasingly important for tourism and recreation. Yet throughout the application there is a recurring pattern of impacts being minimised, cumulative effects being underestimated, sensitive environmental information remaining unavailable, and outdated assessment approaches being relied upon to justify a development of unprecedented scale.

The recurring theme throughout this application is not the absence of impacts, but the repeated underestimation of them.

WHITE TAILED SEA EAGLES

One of my most significant concerns relates to the adequacy of the ecological assessment and, in particular, the treatment of White-tailed Sea Eagles and other protected species within the wider Maughanaclea landscape.

The applicant's own ornithological surveys recorded White-tailed Eagle as a target species within the study area.¹ White-tailed Eagles are listed on Annex I of the Birds Directive and are among the most strictly protected bird species in Europe. Their protection is not merely a matter of avoiding direct mortality; it requires careful

¹ Appendix 7-4 Bird Monitoring Programme, Target Species List; Appendix 7-2 Ornithology Survey Results

consideration of habitat use, disturbance, flight behaviour and cumulative effects².

In addition to the developer's own bird survey, neighbours living immediately adjacent to the proposed development have observed and photographed White-tailed Sea Eagles. These dated & geotagged observations³ demonstrate that the eagles are regularly using the wider landscape surrounding the proposed development.

However, what concerns me most is not simply the presence of white tailed sea eagles, but the absence of publicly available information regarding their movements.

I have sought access to White-tailed Sea Eagle monitoring information through formal FOI requests to the National Parks and Wildlife Service. Those requests have not produced the information sought within the statutory timeframe. I fully appreciate that sensitive species data may require careful handling.

However, where potentially relevant information exists regarding a protected Annex I species, I do not believe the absence of public access should prevent the Commission from obtaining and considering that information before making a determination.

The potential risk to White-tailed Sea Eagles should not be dismissed as hypothetical. In October 2025, Donegal Daily reported that NPWS confirmed three White-tailed Eagles were fatally injured by wind turbines in South Donegal between October 2024 and May 2025. Two tagged male eagles were killed by the same turbine at Anarget Windfarm,



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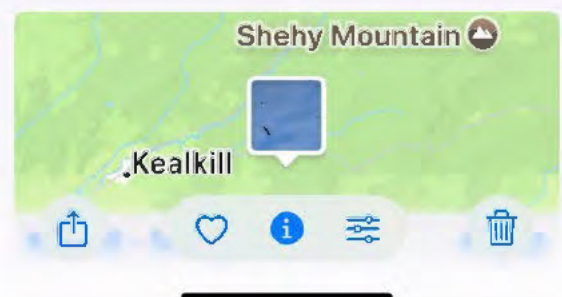
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² EU Directive 2009/147/EC on the Conservation of Wild Birds, Article 4(1)

³ Please see objections from Sean Worboys and Annabel Seymour for more dated & geotagged photos of the white tailed sea eagles on Maughanaclea

Meenacloghspar, Inver, and a third female eagle was killed by a turbine at Cornacahan near Killybegs in November 2024. Post-mortem examinations under the NPWS RAPTOR protocol reportedly found broken bones consistent with turbine strikes and no signs of poisoning or gunshot.⁴

While each site must be assessed on its own merits, these incidents demonstrate that collision risk to White-tailed Sea Eagles is a real and documented concern in Ireland. This concern becomes particularly important given the scale of the proposed development. At 169 metres in height, the turbines would represent some of the largest structures within the surrounding landscape. White-tailed Eagles are highly mobile birds capable of travelling large distances across interconnected upland, coastal and riverine habitats. Their use of the landscape cannot be understood solely by reference to individual turbine locations or administrative boundaries.

The Department of Housing, Local Government, & Heritage's own nature-conservation response raised serious concerns regarding White-tailed Sea Eagles. It states that the proposed wind farm is within the range of the recently reintroduced White-tailed Sea Eagle, an Annex I species under the EU Birds Directive, and notes that the species is "particularly susceptible to collision with wind turbine blades." The Department also warned that collision and mortality risk "must be fully assessed" and that the assessment "cannot have lacunae" but must contain "complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt."⁵

Given that White-tailed Sea Eagles have been recorded in the Maughanaclea ornithological material and local residents hold geo-tagged photographs of eagles in the area, I respectfully request that the Commission obtain and review any relevant NPWS tracking or GPS monitoring data before reaching a decision.

⁴ Donegal Daily, "Three white tailed eagles killed by wind turbines in South Donegal", 2 October 2025 <https://www.donegaldaily.com/lead-stories/three-white-tailed-eagles-killed-by-wind-turbines-in-south-donegal-1-609472>

⁵ Department of Housing, Local Government and Heritage / Development Applications Unit, Nature Conservation observations, Ref: G Pre Planning-CK-Maughanaclea, 7 April 2025.

ECOLOGICAL CONCERNS

I have visited the Coillte nature reserve on Maughanaclea a number of times over the years. Anyone who spends time there quickly realises that this is not an empty hillside. It is a living landscape supporting a remarkable diversity of wildlife and habitats. The nature reserve is maintained by local conservationist, Sioned Jones, who borrowed one of our trail cameras to monitor wildlife within the reserve.



The trail cam recorded Pine Marten, Red Squirrel, Irish Hare, European Jay and numerous other species using the nature reserve.⁶

During my own visits I have heard frogs calling within the reserve and in this photo taken by Sioned you can even see frog spawn along the reserve boundary. These observations reinforce what locals already know: Maughanaclea functions as an active ecological corridor supporting a wide range of species across interconnected habitats.

It is therefore difficult to reconcile the ecological importance attributed to this landscape through the



⁶ Please see Sioned Jones' submission for all trail cam photos & nature reserve documentation

establishment of the Coillte nature reserve with proposals for major infrastructure works immediately adjacent to it.

Wildlife does not recognise reserve boundaries. The ecological value of a reserve depends not only on the land enclosed within a fence line but also on the quality, integrity and hydrological functioning of the surrounding landscape.



Of particular concern is an apparent discrepancy between the reserve as it exists on the ground and the reserve as depicted within the planning documentation.⁷

In these photos you can clearly see the reserve's boundary, defined by deer fencing extending all the way to the road. However, the reserve (in yellow) appears to be mapped as substantially smaller within parts of the application documentation. This is not merely a cartographic detail. The applicant proposes infrastructure works, including cabling, in an area that appears to coincide with land enclosed by the reserve fencing. If the reserve boundary



⁷ Substation Biodiversity Map <https://maughanacleaninfo.com/wp-content/uploads/2025/08/Substation-Biodiversity-Enhancement-Area.pdf>

has not been accurately represented, then the ecological assessment based upon that mapping may also be incomplete.

This concern is heightened by the reserve's location directly downslope from the proposed substation and associated construction works. The Department of Housing, Local Government and Heritage specifically highlighted concerns regarding peat disturbance, sediment mobilisation, drainage impacts, hydrological change and effects on wetlands and watercourses.⁸

Given the reserve's position within the receiving landscape, I am not satisfied that the potential ecological consequences have been fully assessed.

HYDROLOGY, WATER QUALITY, & PEAT STABILITY

One of my principal concerns is the potential impact of this development on water quality, hydrology and peatland stability within the wider Maughanaclea catchment. Unlike many development sites, Maughanaclea is not an isolated parcel of land. It is part of a complex upland hydrological system characterised by peat soils, numerous streams, wetlands, flushes and watercourses which ultimately connect to downstream habitats, private water supplies, and the Mealagh, Ouvane, and Bandon rivers.

The Department of Housing, Local Government and Heritage specifically highlighted concerns regarding peatland disturbance, drainage impacts, sediment mobilisation, hydrological change and impacts on wetlands and watercourses. The Department noted that wind farm development has the potential to alter patterns of surface water flow, expose peat, increase erosion risk, affect groundwater pathways and impact habitats some distance from the development itself.⁹

These concerns are particularly relevant in an area such as Maughanaclea where extensive peatland occurs across the site and where large-scale excavation, road construction, drainage works, turbine foundations and substation infrastructure are proposed.

⁸ Appendix 2-2 Scoping Responses, Department of Housing, Local Government and Heritage / Development Applications Unit Nature Conservation observations, Ref: G Pre Planning-CK-Maughanaclea, 7 April 2025.

The Department further noted that the site is hydrologically connected to the River Bandon SAC and highlighted the sensitivity of downstream aquatic habitats, including Freshwater Pearl Mussel interests within the catchment. The Department repeatedly emphasised the need for a complete assessment of sedimentation risks, cumulative effects and water-quality impacts.¹⁰

These concerns are not merely theoretical. Local residents are well aware that this is a wet, exposed upland environment subject to intense rainfall events. Water moves rapidly through the landscape during periods of heavy rain and the effects of disturbance can extend far beyond the footprint of individual construction works.

In September 2023, Uisce Éireann confirmed that the Kealkill water treatment plant had shut down because of poor raw water quality and elevated turbidity following heavy rainfall, stating:

*"The plant had originally shutdown due to poor raw water quality and turbidity as a result of heavy rainfall at the weekend. This also caused treated water storage in the reservoir to fall below safe levels."*¹¹

This demonstrates that the local catchment is already vulnerable to water-quality deterioration during periods of intense rainfall.

I am particularly concerned by the reliance placed upon standard mitigation measures throughout the hydrological assessment. While measures such as settlement ponds, drainage controls and sediment management are routinely proposed, I am not satisfied that the application demonstrates how these measures will perform under the specific conditions that exist on Maughanaclea, including steep terrain, extensive peat soils, high rainfall and increasingly frequent extreme weather events.

Climate change is expected to increase the frequency and intensity of heavy rainfall

¹⁰ (Appendix 2-2 Scoping Responses, Department of Housing, Local Government and Heritage / Development Applications Unit Nature Conservation observations, Ref: G Pre Planning-CK-Maughanaclea, 7 April 2025.)

¹¹ Uisce Éireann, "Uisce Éireann working to restore normal water supply to customers served by the Kealkill Water Treatment Plant", September 2023.

events. In my view, greater weight should therefore be given to worst-case scenarios rather than average conditions when assessing potential impacts on water quality and hydrology.

PRIVATE WELLS & GROUNDWATER

I also have concerns regarding the potential impact of the development on private groundwater supplies.

The Department of Heritage's observations note the importance of understanding groundwater pathways and the potential for hydrological changes associated with excavation, drainage and peat disturbance.

In a landscape characterised by complex geology and shallow groundwater systems, it is difficult to predict impacts with certainty without comprehensive baseline information.

Like many rural households, we depend on local groundwater resources. Any reduction in water quality or changes in groundwater movement could have serious consequences for affected households.

The developer has not taken any water samples from private wells. I am not satisfied that sufficient certainty has been provided regarding the potential impacts on private wells, groundwater pathways or downstream water resources. At a minimum, comprehensive baseline testing, ongoing monitoring and clearly defined remediation measures should be required before any development proceeds.

HEALTH, WELLBEING, & RESIDENTIAL AMENITY

I appreciate that considerable debate exists regarding the direct health impacts of wind turbines. I do not seek to make claims beyond the available evidence. However, I believe it is entirely reasonable for the Commission to consider the effects that major changes to a person's living environment may have on wellbeing, quality of life and residential amenity.

My concern is not based upon any single factor in isolation. Rather, it relates to the combined effect of visual intrusion, turbine movement, aviation lighting, noise, construction activity and the loss of the quiet rural environment that currently

characterises the Mealagh Valley.

A substantial body of research has identified associations between proximity to wind turbines, sleep disturbance, annoyance and reductions in reported quality of life among some residents. While opinions differ regarding the mechanisms involved, there is broad agreement that sleep quality and environmental stress are important components of human wellbeing.¹²

For many people, rural tranquillity is not a luxury. It is one of the primary reasons for choosing to live in the countryside. The ability to sit outside without industrial noise, enjoy dark skies, listen to wildlife and experience a sense of calm has genuine value. These qualities contribute to mental wellbeing, particularly in an increasingly noisy and connected world.

NOISE, RESIDENTIAL AMENITY, & THE PRECAUTIONARY PRINCIPAL

The Mealagh Valley is valued for its peace and tranquillity. The ability to enjoy natural soundscapes, dark skies and a largely undeveloped environment is one of the reasons many people choose to live here and one of the qualities that attracts visitors to the area.

For this reason, I have significant concerns regarding the adequacy of the noise assessment presented in support of this application.

My primary concern relates to the baseline noise measurements upon which the assessment is based. The only noise monitoring location situated within the Mealagh Valley itself was NML4. The description provided within the application refers to a rural environment characterised by birdsong, wind in vegetation and infrequent traffic. However, this description does not reflect the full reality of conditions surrounding the monitoring location.

As illustrated on the next page, NML4 was located in proximity to one of the busiest farming areas in the upper Mealagh Valley, including active agricultural operations, livestock movement and nearby land-management activities. During the monitoring

¹² For example: Onakpoya et al., "The effect of wind turbine noise on sleep and quality of life", Environmental International, 2015.

period, local residents also observed chainsaw activity, rock-breaking and other intermittent noise sources within the wider area. These factors have the potential to elevate background noise levels above those typically experienced by many residents elsewhere in the valley.

I do not suggest that such activities should have been excluded from monitoring. However, I believe they should have been transparently described and considered when presenting baseline conditions to the Commission. Instead the NML4 was described as a "quiet garden location" with "infrequent traffic & birdsong".¹³

Decision-makers are entitled to a complete and accurate understanding of the circumstances under which background noise measurements were obtained. The photos, maps, and descriptions of monitor locations do not paint an accurate picture.

This issue is important because background noise measurements directly influence the operational noise limits subsequently considered acceptable. If baseline conditions are elevated above the area's typical rural sound environment, then the resulting assessment may underestimate the real-world effect of turbine noise on nearby residents.

I am also concerned that the assessment provides limited discussion of how the particular topography of the Mealagh Valley may influence sound propagation. The proposed turbines are located within a landscape of steep slopes, enclosed valleys, ridgelines and varied elevations rather than flat, open terrain.

Research reviewing wind turbine noise propagation in complex terrain has highlighted that hills, valleys, meteorological conditions and topographical features can significantly influence how turbine noise travels and is experienced by receptors located some distance from the source.¹⁴

¹³ EAIR Ch 12 Noise & Vibration 12.4.2.1.4 NML4

¹⁴ Van Renterghem, Propagation of Noise from Wind Turbines in Complex Terrain: A Review, Renewable and Sustainable Energy Reviews, 2014 https://docs.wind-watch.org/Van-Renterghem_wind-turbine-noise-hills-valleys.pdf

In such circumstances, reliance upon a single monitoring location raises legitimate questions regarding whether the existing acoustic environment has been adequately characterised across the wider valley. Residents on opposite sides of the valley, at different elevations, or in different topographical settings may experience sound very differently.

I am also concerned that locations where tranquillity is itself a valued amenity do not appear to have been represented within the monitoring programme. The Wind Energy Guidelines recognise the importance of protecting areas used for relaxation and activities for which a quiet environment is highly desirable. Yet noise monitoring was not undertaken at tourism accommodation, wellness retreats, scenic viewpoints, walking routes, archaeological sites, or other locations whose value depends upon peace and quiet. Businesses such as Wild Hideaways have built their entire visitor experience around the exceptional tranquillity of this landscape, yet locations of this nature appear absent from the baseline assessment.

The issue is therefore not simply whether a predicted decibel threshold may or may not be exceeded. The issue is whether the baseline assessment provides a sufficiently representative picture of the sound environment experienced by residents, visitors and businesses throughout the Meallagh Valley.

I am further concerned that compliance with numerical planning limits should not automatically be regarded as evidence that residential amenity will be adequately protected. Irish courts have recognised that significant interference with the enjoyment of a home may occur even where developments operate within regulatory frameworks and predicted limits. The experience of residents in wind farm nuisance cases demonstrates the importance of robust assessment before development occurs, rather than relying upon future complaints or litigation after impacts have already arisen.

Taken together, the reliance upon a single monitoring location within the Meallagh Valley, the placement of that monitor within an active agricultural setting, the limited consideration of complex topography, and the absence of monitoring at locations where tranquillity is itself a valued amenity leave me unconvinced that the existing acoustic environment has been fully characterised.

Given these uncertainties, I do not believe the application has removed all reasonable scientific doubt regarding the potential long-term effects of turbine noise on residential amenity and quality of life. I therefore respectfully request that the Commission apply the precautionary principle when assessing this aspect of the proposed development.

ARCHAEOLOGY, HERITAGE AND CULTURAL LANDSCAPE

My concerns regarding this development extend beyond ecology and landscape into the cultural heritage of Maughanaclea and the wider Mealagh Valley.

The applicant's own Cultural Heritage assessment acknowledges that this is an area of exceptional archaeological significance. According to the EIAR, there are 11 recorded archaeological sites within the development area itself and a further 210 recorded archaeological sites within 5 kilometres of the proposed turbines. Six National Monuments are located within 10 kilometres of the site.¹⁵

This concentration of archaeology is not surprising. The mountains and valleys of this part of West Cork have been occupied, travelled through and shaped by successive generations for thousands of years. The landscape we see today is not simply a natural landscape; it is also a cultural one.

The significance of this heritage is reflected in the Kealkill Stone Circle complex, which is protected by a Preservation Order and recognised as one of the most important prehistoric monuments in the region. I note that the applicant's own assessment acknowledges that residual impacts on the setting of archaeological, architectural and cultural heritage sites will remain because such effects cannot be mitigated.¹⁶

The historic Butter Road, associated with the transport of goods to the Cork Butter Exchange, also crosses the development area. These routes derive much of their significance from their relationship with the surrounding landscape and the generations

¹⁵ EIAR Chapter 14 Cultural Heritage

¹⁶ EIAR Chapter 14 Cultural Heritage; Preservation Order PO 69/1938.

VOICES OF THE VALLEY
PREMIERED TO A PACKED
HOUSE AT THE
SCREENING ON AUGUST



of people who travelled through these hills long before modern roads existed.¹⁷

The archaeological importance of the area has long been recognised by researchers and local historians.

David Myler's *Archaeological Survey of the Mealagh*

Valley documented approximately ninety archaeological

and historical sites throughout the valley, including many that had not previously been formally recorded. Archaeologist Tony Miller has described these hills as containing one of the richest concentrations of prehistoric monuments in Ireland.

The cultural significance of Maughanaclea is also reflected in the Dúchas Schools' Collection, which records Butter Roads, burial grounds, ringforts, standing stones and numerous locations associated with local folklore, memory and community life.¹⁸ These records remind us that Maughanaclea is not merely a collection of archaeological sites on a map, but a landscape woven into the history and identity of the people who have lived here.

This heritage continues to be actively valued and interpreted today. The Mealagh Valley Hidden Heritage Trail is a new project funded by The Heritage Council, to help residents and visitors explore many of the archaeological, historical and cultural features of the Mealagh Valley.

The existence of these projects reflects a wider reality: the heritage of Maughanaclea & the Mealagh Valley is not limited to a handful of recorded monuments. It is embedded throughout the landscape itself, in its ancient routes, archaeological sites, place names, folklore and community memory.

My own connection to our local heritage extends beyond archaeology alone. In 2024 I produced *Voices of the Valley*, an oral history documentary supported by funding from the Heritage Council.

¹⁷ EIAR Chapter 14 Cultural Heritage; Dúchas Schools Collection, Maughanaclea entries "Butter Road" Titles 44 & 46.

¹⁸ Dúchas Schools Collection, Maughanaclea records: Butter Roads, Baile na Bocht burial place, Rathanna agus Liosanna, standing stones and related entries.

I continue to have the privilege of recording the memories, stories and experiences of local people whose lives have been shaped by this landscape. The project reinforced something I had long understood: heritage is not only found in monuments and artefacts. It also lives in the memories of communities, in place names, in old roads, in local traditions, in oral histories, and in the relationship between people and the landscape around them.



It is notable that public bodies such as the Heritage Council continue to invest resources in documenting, preserving and celebrating the heritage of this area. The Mealagh Valley Hidden Heritage Trail, local archaeological surveys, the Dúchas archive and Heritage Council-supported films such as *Voices of the Valley* all reflect the same reality: **this is a landscape whose cultural significance is considered worthy of preservation, interpretation and public investment.**

For this reason, I am concerned that the assessment treats heritage largely as a series of individual monuments rather than as an interconnected cultural landscape. Archaeological sites do not exist in isolation. Their significance is often inseparable from their setting, their relationship to surrounding landforms and their place within a broader historic landscape.

I am also concerned by an apparent inconsistency within the Cultural Heritage chapter itself. While the assessment concludes that there will be no significant operational effects on archaeological, architectural or cultural heritage resources, it also acknowledges that residual effects on the setting of heritage sites will remain because such effects cannot be mitigated. In my view, these two conclusions sit uneasily together and warrant careful scrutiny by the Commission.



OUR WORK WAS RECOGNISED DURING NATIONAL HERITAGE WEEK 2025 WHEN WE WON THE MOST INCLUSIVE AWARD



Taken together, the concentration of recorded archaeology, the likelihood of unrecorded heritage within the landscape, the acknowledged impacts on the setting of cultural monuments, and the living heritage reflected through community projects, oral histories and local traditions lead me to conclude that the cultural heritage impacts of this proposal have not been adequately addressed.

DARK SKIES

One of the qualities that makes the Mealahg Valley special is something that is becoming increasingly rare throughout Ireland: genuine darkness.

For many people, darkness is simply the absence of light. For those of us who live here, it is something far more valuable. It allows us to experience the night sky as previous generations experienced it – filled with stars rather than artificial lighting. It supports wildlife, contributes to tranquillity, attracts visitors and provides opportunities for recreation, photography and education that are becoming increasingly difficult to find in modern Ireland.

As a photographer and filmmaker, I have spent countless hours beneath the night skies of West Cork capturing the Milky Way, meteor showers, aurora displays and the slow movement of



the stars across the landscape. Through that work I have come to appreciate how unusual the darkness of the Mealahg Valley truly is.

The darkness here is not merely the absence of development. It is a natural resource in its own right.

This is not simply a personal opinion. In written correspondence to a neighbour dated 25 June 2025, Brian Espey, Chairperson of Dark Sky Ireland, described the Mealagh Valley as possessing 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 significance of this resource is reflected in the community-led effort currently underway to secure Dark Sky Community accreditation for the Mealagh Valley. If successful, it would become the first Dark Sky Community in Ireland. A formal committee has been established, DarkSky International has been engaged throughout the process, Mayo Dark Sky Park has provided guidance, Cork County Council has participated in discussions regarding lighting policy, and Minister of State Christopher O'Sullivan TD has provided written support for the initiative.

Against this backdrop, I find it difficult to reconcile the proposed introduction of twenty-eight aviation warning lights distributed across the Maughanaclea ridgeline with the ongoing effort to protect and promote the area's dark skies.

The impact of these lights should not be underestimated. Recent research found that wind turbine aviation lights can appear brighter than Venus, the brightest planet visible in the night sky, at distances of up to approximately 4 kilometres, and brighter than Sirius, the brightest star visible from Earth, at distances of up to approximately 10 kilometres. The authors concluded that the night-time visual range of wind farms may be considerably greater than their daytime visibility and should be properly considered within environmental impact assessments.¹⁹

This issue extends beyond visual amenity. Artificial light at night is increasingly recognised as an environmental concern in its own right, with consequences for nocturnal wildlife, including bats, birds and insects. The Department of Housing, Local Government and Heritage specifically noted in its scoping response that lighting with

¹⁹ Barra & Lima, "Quantifying the visual impact of wind farm lights on the nocturnal landscape", *Journal of Quantitative Spectroscopy and Radiative Transfer*, 2024.

turbines and masts can increase collision risk for birds and should be assessed accordingly.²⁰

There are also significant tourism implications. Businesses within the Mealagh Valley increasingly rely upon the area's reputation for tranquillity, nature and dark skies. Wild Hideaways, Ireland's first Dark Sky tourism venue, has built an entire visitor experience around these qualities. Through my work as a photographer and filmmaker with Wild Hideaways, I have seen how visitors travel specifically to experience the stars, the silence and the sense of escape that this landscape provides.

They are not coming here to look at industrial infrastructure. They come because places like the Mealagh Valley still offer something increasingly rare: a landscape where darkness falls naturally, where the Milky Way is visible overhead, and where the modern world briefly feels far away.

The loss of dark skies cannot easily be mitigated. Once aviation lighting is installed across a ridgeline, the darkness that made the landscape special is fundamentally altered for everyone who lives beneath it. The stars remain, but our experience of them changes.

Unlike many environmental impacts, darkness is not something that can simply be recreated elsewhere. It exists only where it has been protected.



²⁰ Appendix 2-2 Scoping Responses, Department of Housing, Local Government and Heritage, Nature Conservation observations, Ref: G Pre Planning-CK-Maughanaclea, 7 April 2025.

At a time when local communities, national organisations and public bodies are working together to preserve Ireland's remaining dark skies, I believe the introduction of permanent aviation lighting into one of the darkest landscapes in the country represents a significant and irreversible loss.

For these reasons, I believe the dark-sky impacts of this proposal have been substantially underestimated. I further believe that the introduction of twenty-eight aviation warning lights across the Maughanaclea ridgeline is fundamentally incompatible with the community's efforts to secure Dark Sky Community status and with wider national ambitions to promote and expand Ireland's internationally recognised dark sky destinations.

SUSTAINABILITY WITHOUT COMMUNITY ISN'T SUSTAINABLE

Throughout this submission I have outlined concerns relating to ecology, heritage, landscape, dark skies, water resources and residential amenity. Taken together, these issues raise a broader question about what sustainability should mean in practice. Sustainability is often discussed in environmental and economic terms, but genuine sustainability must also include communities. A development cannot be considered fully sustainable if the benefits and burdens are distributed unevenly, or if local people feel excluded from decisions that will fundamentally alter the places where they live.

One aspect of this proposal that concerns me is the absence of any meaningful community ownership or participation in the project itself. The Cork County Development Plan explicitly recognises the importance of community ownership of renewable energy projects, stating that "the Council recognises the importance of community ownership of wind energy projects".²¹

In contrast, ownership and control of the proposed development remain entirely external to the local community. While a limited number of landowners may benefit directly, many of the impacts identified throughout this submission – including impacts on landscape, dark skies, heritage, water resources, tranquillity and residential amenity –

²¹ Cork County Development Plan 2022-2028, Objective CCDP 13.7.4, p.300

will be experienced by the wider community. This imbalance risks undermining public confidence in the transition to renewable energy.

I support renewable energy and I support climate action. I also believe communities should be active participants in that transition rather than passive recipients of decisions made elsewhere. Experience across Europe demonstrates that acceptance of renewable energy projects is often strongest where local communities are given a meaningful stake in ownership, governance or long-term benefit.

My confidence in the community engagement process has also been affected by my own experience. Notification relating to this project was not delivered through my letterbox but was instead left in a woodpile beside the rear of my home, where it was almost accidentally burned before being discovered. While this may seem a minor matter in isolation, it did not inspire confidence in the care with which public consultation was undertaken.

More fundamentally, I note an apparent inconsistency within the applicant's own Community Engagement Report. The report concludes that "active engagement and consultation with the local community has taken place from an early stage" and that the process provided "a detailed, and enhanced understanding of the key issues and concerns of the local community".²² However, the same report states that consultation was limited to householders within approximately 2km of the site.²³

This raises legitimate questions regarding how representative the consultation process was of the wider community affected by the proposal. Tourism businesses, recreational users, heritage groups, environmental organisations and many residents living beyond the immediate notification radius may experience significant impacts from a development of this scale despite not forming part of the consultation process described by the applicant.

The level of concern within the community is also reflected in independent local engagement. In May 2025, volunteers conducted a door-to-door survey throughout the

²² Community Engagement Report, Section 4, p.9

²³ Community Engagement Report, Section 2.1, p.3

area, distributing 277 questionnaires and receiving 118 completed responses – a response rate of 42.6%. Of those who responded, 95.8% stated that they did not support the proposed development. The survey found that visual impact on the landscape, harm to protected species, loss of dark skies, construction disruption, archaeological impacts and lack of community benefit ranked among the highest concerns expressed by residents. It also found that almost one-third of respondents were previously unaware of the proposal, including thirteen respondents living within two kilometres of the site.

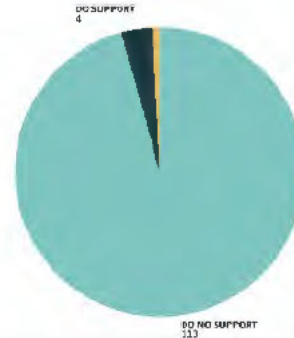
MAUGHANACLEA WIND TURBINE DEVELOPMENT COMMUNITY SURVEY RESULTS

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

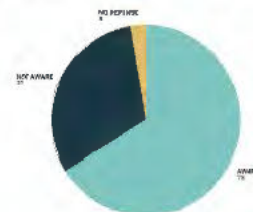
DO YOU SUPPORT THE PROPOSED WIND TURBINE DEVELOPMENT?



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.

In addition, a public petition relating to the proposed Maughanaclea Wind Farm has attracted more than 1,000 verified signatures.²⁴

While planning decisions must ultimately be based on evidence rather than popularity, these figures demonstrate that concern regarding the project is both substantial and widespread.

They also suggest that concerns about landscape, biodiversity, heritage, dark skies and quality of life are not confined

²⁴ <https://www.change.org/p/stop-the-spin-on-maughanaclea>

to a small number of objectors but are shared by many people within the wider community.

This raises questions regarding how representative the consultation process was of the broader community affected by the proposal. Tourism businesses, recreational users, heritage groups, environmental organisations and many residents living beyond the immediate notification radius may experience impacts from a development of this scale despite not forming part of the consultation process described by the applicant.

The transition to renewable energy is one of the defining challenges of our time. However, climate action and community wellbeing should not be treated as competing objectives. The most successful projects strengthen both. In my view, sustainability without community is not sustainable.

A genuinely sustainable energy transition should enhance local resilience, strengthen community participation and protect the environmental and cultural assets that make places like West Cork special.

For these reasons, I do not believe the social and community dimensions of this proposal have been given sufficient weight within the assessment process.

THE LEGACY WE LEAVE

I appreciate that An Coimisiún Pleanála must assess this application against planning policy, environmental law and the evidence presented. I do not envy the responsibility of balancing Ireland's renewable energy ambitions with the protection of the landscapes, ecosystems, and communities that make this country unique.

Future generations will inherit the consequences of the decisions made today. They will judge not only whether we produced renewable energy, but whether we protected the landscapes, ecosystems and cultural heritage entrusted to our care while doing so.

For all of the reasons set out above, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed Maughanaclea Wind Farm development.

Le meas,

Kait Husmann