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Laharanshermeen
Bantry, Co. Cork
P75 P599

13 May 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re: Submission of objection — Maughanaclea Wind Farm

Planning reference: ACP-324165-26 / 324165

Dear Sir or Madam,

I am writing to object, in the strongest possible terms, to the proposed Maughanaclea Wind Farm in the Mealagh Valley, west of Bantry. I am twenty-five years old. I have lived here all my life. The €50 fee enclosed with this submission is the first step of what I expect to be a long and unrelenting opposition to this development on the part of my generation in this valley.

Let me state the central point plainly. This is not a debate about renewable energy. It is a debate about whether a multinational developer, on a fixed-tip-height 169-metre industrial scale, is entitled to install rotating steel structures and borrow-pit excavations on a fragile peatland ridge two kilometres from my home, in one of the last genuinely unspoiled valleys in West Cork, in exchange for a community fund that the community itself did not ask for and does not want. The answer, from me, is no.

The place itself. The Mealagh Valley is not a generic upland. It is a specific, named, mapped, protected landscape. The Cork County Development Plan affords it scenic and landscape designations precisely because of the qualities that make it worth living in: the unbroken ridgelines, the dark sky, the silence, the cluster of Bronze Age monuments, the rivers and the bog. The development proposes to put eight turbines, each with a tip height of 169 metres — roughly the height of two Capital Dock towers stacked end to end — on the ridge above my home. The ridge is the skyline I have seen every day of my life. Once it is industrialised, no condition of permission can restore it.

Cumulative effect. There are already operational, permitted and proposed wind farms across this part of West Cork. The cumulative landscape and ecological burden has not been honestly assessed in the EIAR. Saying that each development is acceptable in isolation, and ignoring the aggregate, is precisely the intellectual sleight of hand that has turned other rural areas into industrial energy hinterlands while urban planners have congratulated themselves on hitting

decarbonisation targets. The Meallagh Valley is being asked to absorb a disproportionate share of national wind development, and there is no mechanism in the current planning code that protects communities like mine from that imbalance.

Dark skies and the nocturnal landscape. My parents run Wild Hideaways, a small off-grid eco-tourism business in this valley. Its entire commercial proposition rests on three things: silence, darkness, and the night sky. Guests come from all over Europe and further afield to lie outside their cabin at night and see stars they cannot see at home. The Bará & Lima (2024) study, published in the *Journal of Quantitative Spectroscopy and Radiative Transfer* (see source A), models the visual impact of wind farm aviation lights on the nocturnal landscape and shows that medium-intensity turbine obstruction lights remain brighter than Venus up to four kilometres from the turbine, and brighter than the brightest star in the night sky out to ten kilometres. Wild Hideaways is well within both of those ranges, as are most homes in the valley. The EIAR's lighting assessment treats this as a daytime visual issue with a footnote on lighting. The peer-reviewed science treats it as a separate, severe, and twenty-four-hour visual impact. The Commission should treat it the same way.

The Fáilte Ireland feasibility study on dark sky tourism along the Wild Atlantic Way (CHL Consulting, 2019 — see source B) identifies West Cork as one of the few remaining stretches of Class 1 and Class 2 dark skies in Europe, and identifies dark-sky tourism as an emerging niche capable of supporting rural off-season business. That is not speculation; that is a national tourism agency's strategic position. The proposed Maughanaclea development is in direct contradiction with it. The Programme for Government 2025 commits to expanding Dark Sky reserves, not industrialising the few we still have.

Noise. I want to raise noise as a substantive ground of objection. The acoustic modelling submitted with the EIAR is, in my view, structurally inadequate for this site. Van Renterghem (2017), published in the *Philosophical Transactions of the Royal Society A* (see source C), demonstrates that sound propagation from a ridge wind turbine across a valley produces a complex sound-pressure-level distribution that is poorly captured by the flat-terrain ISO 9613-2 method that wind farm acoustic consultants typically rely on. The Meallagh Valley is the textbook case of the geometry that defeats those models — a steep concave bowl with rising ground on the far side, low background noise, and atmospheric conditions favouring downward refraction at night. The background-noise monitoring locations chosen by the applicant were not, to my knowledge, anywhere near the quietest receptors in the valley, which include the guest cabins at Wild Hideaways and several other small B&Bs and retreats. Night-time low-frequency noise, amplitude modulation, and the eighteen to twenty-four-month rock-breaking phase during construction are all material concerns. I raise them here as substantive grounds of objection, not as a footnote.

Health and sleep. The Onakpoya et al. (2015) systematic review in *Environment International* (see source D) found a consistent association between residential proximity to wind turbines and sleep disturbance, annoyance, and reduced quality of life. The authors concluded that the evidence base, while imperfect, was strong enough to warrant precaution in siting decisions. The EIAR's treatment of health is largely a recital of A-weighted decibel limits. That is not what a

sleep-disturbance or chronic-annoyance impact assessment looks like in the peer-reviewed literature.

Birds and bog. The Fernández-Bellón et al. (2019) study in Conservation Biology (see source E) found that total bird densities, and densities of forest and open-habitat species, were significantly reduced at Irish upland wind farms compared with control sites, and that displacement effects extended at a landscape scale. White-tailed sea eagle, hen harrier and peregrine falcon are recorded in this wider area; all three are Annex I species under the Birds Directive, and the European Court of Justice has confirmed in Commission v Ireland (C-418/04) that the protection of Annex I species is not confined to designated Special Protection Areas. The bird survey effort in the EIAR — measured against the Bird Survey Guidance for Onshore Wind Farms (Percival/SNH derivatives) — is, on the developer's own figures, thin. The peatland and blanket bog substrate of the ridge is a separate and equally serious problem. Excavation, drainage, and the cumulative loading of access tracks and turbine bases on deep peat carries a documented risk of peat slide. The community in this valley does not need a reminder of Derrybrien to know what that looks like.

Archaeology and pilgrimage. The developer's own Cultural Heritage assessment concedes eleven recorded archaeological sites within the wind farm site, two hundred and ten further sites within five kilometres, and six National Monuments within ten kilometres, including the Kealkill Stone Circle, which sits under Preservation Order PO 69/1938. The assessment also concedes that certain visual impacts on the setting of these monuments cannot be mitigated. The Meallagh Valley Loop and St Finbarr's Pilgrimage Path traverse this landscape; the prehistoric monument cluster is part of what makes the valley nationally significant. "Cannot be mitigated" is the developer's own phrase. It should be the end of the conversation.

Process and consent. The developer's community engagement has been, from my own direct experience, performative. Information given at one meeting has been contradicted at the next. Turbine dimensions, road-haulage routes and the scale of borrow-pit excavation have been moving targets. The proposed Community Benefit Fund is not community ownership; it is a transactional payment, structured by a multinational developer, to a community that has not consented to the project the fund is meant to soften. I am twenty-five. I will live with the consequences of this decision for the next sixty years. I have not consented. Most of my neighbours have not consented. The absence of meaningful consent is itself a material planning consideration where the Aarhus Convention, the EIA Directive and the public participation principles of the Planning and Development Act 2000 (as amended) are engaged.

Climate is not the question here. I support climate action. My generation will spend our adult lives dealing with the failures of the generations above us on that front, and I take the urgency seriously. That is precisely why the argument that any wind farm anywhere is justified by climate is wrong. Renewable energy must be sited where it does the least harm. Offshore wind, brownfield repowering, rooftop and commercial-roof solar, and grid-scale battery storage are all legitimate alternatives that do not require destroying a designated scenic landscape, a peatland, a tourism economy and a community to deliver. The argument that we must accept this specific development to meet climate targets is not an engineering claim; it is a political convenience for

the developer.

I ask An Coimisiún Pleanála to refuse permission for ACP-324165-26 in its entirety. The project is in the wrong place. It contradicts the Cork County Development Plan, the Fáilte Ireland West Cork Coast Destination and Experience Development Plan, the Programme for Government 2025 commitments on dark skies, and the protections owed to Annex I species under EU law. Its visual, acoustic and ecological impacts cannot be mitigated to an acceptable level. And it has no social licence in the community it claims to benefit.

I respectfully ask that this submission be read on its merits, and that the silence and the night sky of the Meallagh Valley — neither of which can be replaced, and neither of which belongs to the applicant — be weighed in the balance.

Yours sincerely,

Lauren Carter-O'Sullivan

Sources cited

- A. Bará, S. & Lima, R. C. (2024). *Quantifying the visual impact of wind farm lights on the nocturnal landscape*. Journal of Quantitative Spectroscopy and Radiative Transfer, 329, 109203.
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- C. Van Renterghem, T. (2017). *Sound propagation from a ridge wind turbine across a valley*. Philosophical Transactions of the Royal Society A, 375, 20160105.
- D. Onakpoya, I. J., O'Sullivan, J., Thompson, M. J. & Heneghan, C. J. (2015). *The effect of wind turbine noise on sleep and quality of life: A systematic review and meta-analysis of observational studies*. Environment International, 82, 1–9.
- E. Fernández-Bellon, D., Wilson, M. W., Irwin, S. & O'Halloran, J. (2019). *Effects of development of wind energy and associated changes in land use on bird densities in upland areas*. Conservation Biology, 33(2), 413–422.