Michaella Carling
Coomleagh East
Bantry
Co. Cork
P75RX44

083 028 8936
michaellacarling@outlook.com

Date: 22/05/2026

SID Planning
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Planning Application Reference Number: ACP-324165-26
Applicant: Maughanaclea Ltd / Enerco
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, County Cork

To Whom It May Concern,

I would like to lodge my objection to the currently proposed wind turbine development at the above location based on the following concerns.

Firstly, I would like to say that I am a hard working member of the community who pays their taxes and who leads a relatively simple life (not unlike many of my neighbours). Consequently it is an enormous challenge to wade through the huge amounts of technical information for a planning application such as this. I therefore find myself wondering where are the public supports and protections in a process which appears to largely alienate ordinary people from being able to involve themselves in decisions which have the potential to significantly impact their lives?

Moving on to the content of my submission.

1 - visual impact.

The Mealagh valley sits within character area 15a: ridged and peaked uplands and is designated as a landscape of high sensitivity in the Cork County Council Development Plan. The valley is an area of great natural beauty and unspoiled uplands. It is a popular area for both walkers and for visitors from all parts of the world. It is also a place for which the local community share much appreciation.

When looking at the photo montages included in the proposed application, I was taken aback to observe the sheer scale of the proposed turbines on the landscape and as a backdrop to the houses in

the valley. It was such a jarring contrast to the landscape as a whole, but more than this, the visual dominance of these huge turbines over peoples homes and over our community was unfathomable.

From my garden Maughanclea hill rises up above us some 232 meters. Under the current proposals Turbine 08 will sit almost directly above us and will rise some 169 meters above the ridge line. This will not only be markedly out of character with the rest of its surroundings in the Mealagh Valley, but will also serve as a dominating, imposing and oppressive presence towering above our home, and above the homes of our neighbours at approximately 426 meters above sea level.

The proposal is that this then be repeated along the ridge line where eight mammoth turbines jut high above the landscape creating a jarring image of industrialisation over nature. However, this could become more than just an image, this could be the reality for residents, for wildlife, for the town of Bantry, and for visitors to our community. This would have such dominance on the landscape as to be seen for miles around, and would remain for years and years to come.

Being on the wild Atlantic Way Bantry and its surrounds are a major attraction for tourism, and as stated earlier the Mealagh Valley is a popular area for walking. The roads between Castle Donovan, the Mealagh Valley, and Kealkill are popular walking routes, and significant work has taken place in particular to promote St Finbarr's Pilgrim Path on the local, national, and international stage. People walk these routes to enjoy the peacefulness and natural beauty that nature affords, and as such the visual impact and noise of the proposed development will undoubtedly detract from the enjoyment of the area.

By the developers own admissions there will be significant visual effects at multiple viewpoints within 1km of the turbines, and a substantial magnitude of change admitted in relation to viewpoint 16 where turbines would comprise of 44 percent of all landscape views.

In addition to the visual impact by day, there is also the impact by night. With 14 turbines, comes 14 high intensity aviation lights which will cause significant light pollution along the ridge line affecting residents on both sides of the Maughanaclea hill, as well as other residential populations.

As I highlight below the Mealagh Valley has near pristine night sky conditions. The addition of multiple and constantly illuminated aviation lights will permanently remove these conditions with significant impact on night sky visibility. Furthermore our home (and likely others) have velux windows in the roof, given the location of the turbines above our property these lights will be a highly visible presence particularly through the winter months thus impacting the residential amenity of our home. As highlighted by Dark Skies Ireland "u*nless the lights are very directional, light falling on the ground (horizontal illuminance) has been shown to raise light levels above the natural background in dark locations such as the Mealagh Valley to kilometre distance".*

2 - Dark Skies – As a community, residents in the Mealagh Valley are in the process of gaining dark skies accreditation in recognition of the unique night sky environment the valley affords. In doing so grant funding has been secured and links have been forged with Dark Skies Ireland and Cork Astronomy.

The Mealagh Valley community is actively pursuing Dark Sky Community accreditation from DarkSky International which would be the first in Ireland. A formal committee has been established and the application is at an advanced stage. Amber Harrison, Dark Sky Places Programme Manager at DarkSky International, has been in direct correspondence with The Mealagh Valley Dark Skies Committee since October 2025, and Georgia MacMillan of Mayo Dark Sky Park (Ireland's first dark sky designation) has offered practical guidance on the accreditation process. Cork County Council's Roads Management division held an active meeting with The Mealagh Valley Dark Skies

Committee on the lighting policy, with follow-up correspondence dated 8 May 2026 just 17 days before the deadline for observations on this planning application. Deputy Christopher O'Sullivan TD, Minister of State for Nature, Heritage and Biodiversity, engaged personally with the project and subsequently provided a formal written Letter of Support (see below) in which he states " I am delighted to have the opportunity to express my support for the initiative being undertaken by Wild Hideaways and the local community to develop an accredited Dark Sky Park within the Mealagh Valley, County Cork.

The goal of a Dark Sky Park is to raise awareness of the need to reduce light pollution and promote responsible lighting solutions, in order to protect the natural night sky for the benefit of both people and wildlife.

I am also conscious that it brings the potential for the development of rural tourism products outside the typical summer season. Dark Sky tourism is a growing sector internationally, attracting visitors who are seeking experiences rooted in nature, heritage and wellbeing, and promoting sustainable rural development and tourism diversification"(Christopher O' Sullivan 2026).

Dark Skies Ireland note that the Mealagh Valley has a near pristine night environment. This offers a valuable opportunity to build on existing tourism and provide a significant boost to the local economy. However it is the concern that the aviation lights used on wind turbines are not compatible with the dark skies initiative due to their visual impact. According to Dark Skies Ireland "*Research shows that even a single aviation warning light can impact on the visual amenity of the surrounding area, particularly given their siting on wind turbines over 100 metres tall. Calculations show that medium intensity lighting can be appear brighter than Venus – the brightest planet – out to distances of 4 km or so and, against a dark sky, such lights can be seen up to distances of tens of kilometres. The visual effect is, of course, multiplied by the combined effect of all the lights of the entire farm, including those sited on high ground 400 metres high. Unless the lights are very directional, light falling on the ground (horizontal illuminance) has been shown to raise light levels above the natural background in dark locations such as the Mealagh Valley to kilometre distances, with the potential to affect ground-dwelling species. While the impact as seen from ground level is one aspect, these lights are obviously intended to be visible from the air where they can also impact migratory birds who depend on their vision in the red part of the spectrum for navigation and can cause more harm in overcast or foggy conditions.*

Dark Sky Ireland notes that preservation of biodiversity as required by recent EU actions. Although the night-time environment has been given insufficient attention to date, this is changing as it is becoming more recognised as being important for the well-being of all species – terrestrial, airborne and aquatic. This has also been recognised in the current Programme for Government's plans to "Promote and encourage an expansion of Dark Sky Ireland national parks and reserves" under the "Protecting Heritage and Nature" section of the document".

Research by Failte Ireland in 2019 found that Dark sky areas generate significant economic benefits and are proven to boost off season occupancy which is a key challenge for rural tourism. In doing so research noted that the Galloway Dark Sky Park in Scotland generates almost 9000 bed nights and direct expenditure of £363,443 annually (Failte Ireland commissioned research 2019).

The programme for government 2025 commits to " promote and encourage an expansion of Dark Sky Ireland national parks and reserves". If successful the current community Dark Sky application would be the first of its kind in Ireland. However, not only does the current development application conflict with stated government commitments, the 28 mandatory red aviation warning lights of the proposed turbines would permanently preclude the community from becoming a Dark Sky area/reserve,and therefore loose access to this valuable route for economic growth.

When considering this in relation to the proposed economic benefits set out in the application, I note that whilst there might be an initial short term boost to the economy of some predicted 100 jobs (although not necessarily local employment as I suspect Enerco have their go to contractors), once complete this falls dramatically to only 3 – 4 jobs (again not necessarily newly generated or local). It is therefore apparent that any economic benefits will be incredibly short lived when considering the potential for long term increased tourism revenue that can be generated from being a Dark Skies community.

It therefore cannot be overstated enough that should this proposed development go ahead, the environmental and economic impacts on this community will be detrimental and far reaching.

3- Tourism

On reading the EIAR it was disappointing to see the developers lack of understanding of tourism in our rural community. The EIAR appears to largely utilise data trends for other areas and gives no consideration of the potential for tourism growth.

Failte Ireland's West Cork Coast and Experience plan aims to increase tourism in rural areas by developing ecotourism, birdwatching, and activities such as forest bathing. As is noted in the Ornithology chapter the developer confirms hen harrier and Peregrine falcon are present and hunting within the farm site. Furthermore there have been at least two confirmed sightings of the White Tailed Eagle on the site over locations for turbines T7 and T14. (I believe photographic evidence of this will be included in the submission of another local resident). When taking into account the unspoiled landscape, variety of walking routes, and the potential for becoming a Dark Skies community, it is clear that there is much scope for tourism/eco tourism development in this area, and that we are very much a fit for what Failte Ireland is seeking to develop. Our natural environment sits at the heart of this.

The EIAR 6.17 states "*Outside of registered tourist accommodation, there are an additional eleven Airbnb premises within the Study Area. This is a form of accommodation that is speculative in nature and is currently undergoing significant change with the introduction of the Short-Term Letting and Tourism Bill 2025 . It is not possible to determine how many of the twelve premises in the area will remain in business following the full implementation of this Bill".*

What the EIAR fails to acknowledge is that the government has amended the short term letting bill to exclude towns and communities with populations of less than 20,000.
As one of the accommodations catering for tourism I can confirm that in our first summer last year we were booked out with guests from all over Europe, many of whom chose our accommodation because of its location. We have also had many enquiries this year (both for summer and winter), again from people seeking the restorative benefits of time spent in nature. We could if we so wish operate our accommodation all year round, but choose for now to restrict this to the summer months due to other obligations.

As a provider who specifically caters to those guests who want to get away from busy lives to enjoy the peacefulness which nature and the Mealagh Valley affords. I am hugely concerned about the impact of a wind turbine sitting on the hill above us as the associated noise and light pollution will undoubtedly impact visitors experience.

The Mealagh valley and Bantry area has a population of well under 20,000. Consequently there is no reason to expect tourism in the area will do anything other than expand under the current circumstances. Especially when considering current community plans for Dark Skies accreditation.

It is of note that most visitors are attracted by being able to enjoy the unspoiled landscape of the Mealagh Valley, and the opportunity to get away from the business of daily life. From experience this is becoming even more valued as people seek to step outside of lives dominated by noise and technology.

To my knowledge Enerco has not made contact with any of the households providing for tourism in the Mealagh valley, including the largest provider and eco-resort Wild Hideaways. I therefore fail to see how they can reach determinations on local tourism without the input of those who know it best. I would further argue that the planning proposal does not offer an accurate account of tourism in the area or appropriately acknowledge the far reaching impacts on tourism of this proposed development.

4- Impact on local area - The Mealagh Valley, Bantry, Kealkill, Drimoleague & Dunmanway areas are experiencing a saturation of windfarm developments over what could be considered a relatively small geographical area.

According to Enerco's planning application there are 19 existing windfarms, 7 proposed windfarms, and a further 4 permitted windfarms within 25km of the proposed development totalling 300 turbines with the greatest cumulative landscape effects occurring in LCT 15a

From the viewpoint of Nowen Hill (a popular walking route) 4 windfarms are visible on a cloudy day and more when the weather is clear.

Should the currently proposed developments at Dereenacrinnig and Maughanaclea go ahead residents at the the east end of the Mealagh valley will find themselves sandwiched between two industrial sites and our home will sit with one development approx 2kms to the front and another 1.4 km to the rear.

In 2012/13 when planning was granted for the Shehy More windfarm the inspectors report raised the issue of concentration of windfarms in the area stating

"the main concern I would have is the cumulative impact of so many exisiting windfarms in this one area.
While in many respects the area is ideal for wind farms, like any landscape it has its limits before the number of turbines fundamentally alters the landscape qualities in an unacceptably negative way. To a large extent this is a subjective judgement as there are no clear guidance nationally as to when it can be concluded enough is enough. Clearly the apellants feel they have been asked to accept too many turbines in one area and I have a lot of sympathy for their concerns.....I would conclude that for this appeal, the landscape has not yet reached it's limits for capacity of windfarm developments, although it is quite close to a reasonable limit for what it can take before any further developments result in a strongly negative impact".

PL.88.240070-Philip Davis report dated 4th May 2012 13/0051.

Since this time multiple other planning applications have been submitted for the area 3 of which are surrounding or in close proximity to the Mealagh Valley, and currently 4 windfarm proposals are at either the planning or preplanning stage those being Curraglass, Gortloughra, Maughanaclea & Dereenacrinnig. Although with it's being situated across two sites, it could be argued that the current proposal for Maughanaclea amounts to two separate windfarms.

Taking into consideration the observations in Philip Davis report I would argue that this area is at

saturation point and risks being overwhelmed by industrial development on an unprecedented scale. Consequently the potential for irreversible negative impact and widespread habitat degradation is now upon us.

As a small geographical area the capacity for windfarms has been exceeded in this part of rural West Cork and I believe its residents are bearing a disproportionate burden for windfarm development when compared with other parts of the country. For this reason I feel it important that the planning authority look at this development in the context of other windfarm applications and consider the cumulative impact on this part of County Cork in terms of both residents and environment.

5 – Noise

Having read the EIAR I am concerned that firstly, only one noise monitoring location was used on the Mealagh Valley side of the proposed development. This was situated at a location on (or in close proximity to) two large working farms, and I would suggest is not acoustically comparable to residential properties in the area.

Secondly the methodology used combines long periods of night time data into a single averaged relationship intended to represent typical conditions. Consequently this approach serves to suppress the conditions under which impacts of noise such as amplitude modulation would be most severe.

Further to this the use of decibels levels alone as a measure of noise has been determined to be an insufficient measure when assessing the characteristics of wind turbine noise.

In the judgement of Webster & Anor Vs Meenacloughspar Ltd. 2024 the court noted that current planning guidelines are insufficient for determining the impacts of turbine noise, and the Court relied on the Windfarm Noise Statutory Nuisance Complaint Methodology 2011 which identifies both quantitive and qualitative criteria to be weighed and assessed in adjudication on wind turbine noise nuisance. In doing so the court found that wind turbine noise caused a nuisance during both night hours and quiet waking hours.

Significantly, “the judgement confirms that the quality and character of the noise matter just as much as the volume. Factors such as the rhythmic “thumping” sound some turbines produce, noise unpredictability, and the times at which noise occurs – particularly at night – are all relevant. It means that a wind farm could be within its permitted noise limits and still be found to be causing a nuisance”(https://www.pinsentmasons.com/out-law/news/irish-wind-turbine-noise-concerns-planning-permission 2026)

The EIAR acknowledges that amplitude modulation cannot be predicted at the planning stage which creates the perfect conditions for uncertainty and risk.

When considering my own position I am extremely concerned that this planning application fails to appropriately take into account the unique topography of the Mealagh Valley as a complex terrain. In this environment sound not only carries but also echoes and bounces off the sides of the valley. Even low level noise becomes amplified and can be heard at some distance particularly in the night time hours where the valley is at its quietest. This has not been adequately addressed within the application for development, and I would argue that the developer has failed to include sound predictions with measured data from similarly complex terrain. As such the data methods and use of decibels to determine noise impacts on residential amenity are not sufficient to establish real noise levels as they relate to the Mealagh Valley side of the proposed development.

As a woman of a certain age, I am at a stage in life where I can suffer with disrupted sleep. I work a pressured job in frontline children's services and as such sleep is hugely important to me. Because of this, having a quiet space where I can have the windows open for fresh air is essential as it maximises my ability for restful sleep to support wellbeing. Being well rested also supports my ability to function and maintain my employment. However the introduction of turbine noise which has a different character to existing background noise, is mechanical in nature, and is likely to be constant, creates high probability for ongoing night time disturbance.

In the applicants Appendix 5-1 it is acknowledged that there is consistent evidence linking turbine noise with annoyance and associated sleep disturbance. Furthermore recent court cases (Gibbet Hill Windfarm 2025 & Ballyduff windfarm 2024), serve to demonstrate a clear and significant link between wind turbines and noise nuisance.

When considering the above alongside the recent EEA report on the impacts of noise pollution on health and wellbeing, it is my concern that this proposed development has the potential for significant impact on residential amenity, as it relates to character, privacy, and the ability to enjoy my home for the purpose of relaxation. Further to this, I am concerned that the additional noise created by the introduction of such a large scale industrial development (running for 24 hrs a day) into a natural environment which is as quiet as the Mealagh Valley (particularly overnight) has significant potential to contravene my Article 1 & 8 rights as set out by the ECHR

It is therefore my view that the EIAR does not meaningfully engage with uncertainty around noise and amplitude modulation, and that there is insufficient evidence that data measuring techniques used are suited to the topography of the surrounding landscape or appropriately address the character of the noise as highlighted in the Webster & Anor Vs Meenacloughspar Ltd. 2024 judgement.

6 – Wildlife

The upland areas which surround the valley are home to a wide variety of birdlife with multiple species highlighted in the EIAR. Of particular note are the Hen Harrier, White Tailed Eagle, Peregrine Falcon, Buzzard, Kestrel and also the Chough. Of these, four species fall under article 4 (1) of the EU birds directive. Legislation states "*The species mentioned in Annex I shall be the subject of special conservation measures concerning their habitat in order to ensure their survival and reproduction in their area of distribution." (EU Directive 2009/147/EC (Birds Directive), Article 4(1))*

Whilst the EIAR states there were no recordings of the White Tailed Eagle within the proposed development site it does highlight sightings in the wider area. However, I am aware that that there have been at least two recent sightings of said Eagle in the areas for proposed turbines T7 & T14 of which photographic evidence exists and sightings have been registered with biodiversity Ireland.

The White Tailed Eagle is protected under Irish Wildlife Acts and the EU Birds Directive, as such it is of great concern that within the EIAR a collision impact assessment in respect of this species was not deemed necessary. Whilst the EIAR states no White Tailed Eagle were observed at the proposed development site, there were recorded sightings, and the report highlights that the White Tailed Eagle is likely to become more widespread so as to be frequently observed in the vicinity of the development. In doing so the EIAR states " *On a precautionary basis, the population in the area is likely to become one of* ***County Importance*** *over the lifetime of the proposed project"(EIAR 7.5.1.7 2026)*

"White-tailed eagles face high collision risks from wind turbines, primarily due to their large size, soaring flight behaviour, and reduced avoidance capabilities, particularly in high-density wind

farms within preferred habitats. Collisions are often fatal and can significantly affect local populations and breeding success, especially when turbines are located in prime foraging areas. (Pacific Northwest National laboratory Norway 2024) Consequently "*the importance of understanding the complex relationship between wind power and avian wildlife is rapidly growing"* (Pacific Northwest National laboratory Norway 2024).

Between 2005 & 2010 there were 39 recorded Sea Eagle deaths recorded at one wind farm in Norway. Figures for Ireland show that between 2007 & 2019 there were six recorded White Tailed Eagle deaths as a consequence of wind turbine collision, and a further 3 deaths were recorded over a 7 month period to May 2025 at a single wind farm location in Donegal (NPWS).

Research indicates that Raptors are at greater risk of fatality from wind turbines due to their reliance on updrafts for lift, and also because Raptors are more likely to hunt on ridges and mountaintops. Consequently the risks from windfarms in locations such as the one proposed is significant. It is therefore my concern that the EIAR does not accurately reflect the White Tailed Eagles presence in the area and as such the development fails to meet the requirements of the EU Birds Directive. Given their conservation status and significance to the local community this is a highly concerning omission by the developers.

Considering wildlife habitats and protection more roundly, it is of note that the recent report by the Independent Advisory Committee on Nature Restoration highlights that Ireland is in the bottom 10 percent in the world for intact biodiversity. A truly shocking statistic.

Climate measures and climate protection is about much more than energy. The importance of habitat restoration is increasingly coming to the fore and the Governments Nature Restoration plan has been developed in response to recent EU legislation.

Whilst it will be claimed that the land will eventually recover and wildlife will return. That vast swathes of the land will have been cleared and filled with concrete, makes full recovery highly unlikely. It should also be noted that concrete does not absorb carbon (in fact concrete has a large carbon footprint), and that the green credentials of wind energy are becoming increasingly questionable given issues around the ability to recycle turbines once they reach the end of their life, and also the lack of forward planning which often sees turbines become obsolete after 20/25 years and the concrete pads which anchor them being unsuitable for mounting newer models.

Evidence is also emerging to suggest many animals do not return to development sites due to ongoing noise and vibration from the turbines. In much the same way noise and vibration are known to impact humans, animals are also susceptible and will become distressed or disorientated by noise (both construction and operational) which can obscure the sounds they rely on to navigate and communicate. This leads them to seek out other habitats and has real potential to contribute to loss of both habitat and wildlife diversity in the area.

7- Flooding & landslide

Geological Survey Ireland identify the ridged peaks of Maughananaclea as an area of high susceptibility to landslide (id 7085791) with adjoining land being of moderately high susceptibility to landslide.

In addition to risk of landslide, the local area has seen more frequent incidents of flooding in recent years due to heavier bouts of rainfall, and Bantry town itself has suffered regular incidents of significant flooding in recent years. Climate change modelling shows that rainfall levels in terms of

heaviness and volume have increased significantly and will continue to do so.

The Environmental Protection Agency states"*predictions indicate a substantial increase in the frequency of heavy precipitations in winter and autumn (approx 20%)".* https://www.epa.ie/environment-and-you/climate-change/what-impact-will-climate-change-have-for-ireland/ .

Research also highlights that *"the intensity of heavy rainfall events has increased, with heavy storm downpours between Oct 2023 and March 2024 made 20% more intense due to human-induced climate change*". And that "s*ubstantial increases in heavy precipitation events are projected for winter and autumn, increasing the risk of river and coastal flooding" (EPA website).*

When considering methods for flood risk management, floodinfo.ie highlights aspects such as land use management and natural flood risk management measures as part of a wider response. According to Flood Info "*flood flows depend on how much rain falls in the catchment and the pattern of rainfall, and also on how much and how rapidly the rain runs off the land into the river. The volume and rate of runoff can be reduced by changing land use practices and by implementing measures to increase the retention of rainfall, by slowing the flow of water down catchments and rivers, by protection and/or rewetting of peatlands and bogs and by planting hedgerows across hillsides".*

It is widely accepted that a contributory factor to incidents of flooding is loss of natural habitats which serve to slow and/or absorb rainfall, and it is the concern that this development will involve the loss of a significant area of upland ground cover which acts to slow water run off, as well as serving to maintain ground stability. Replacing this with vast concrete bases will not ameliorate the issue and will only serve to reduce the area available to soak and slow water. The inevitable impact of this will be faster flowing and larger volumes of water running down from upland areas creating significant potential for increased local flooding, as well as the potential to impact Bantry town itself given the proposed developments proximity to Bantry and that all major waterways run towards the town .

Rainfall over the last two winters has been noticeably heavier and has caused considerable damage to roads and pathways in the area. Given the changing climate, it is therefore the concern that removing such a large area of ground cover in an area already susceptible to flooding and landslide will destabilise a large area of higher ground leaving the community further vulnerable to climate influenced events.

Climate action needs to be about more than energy production, and in considering this application I would like to draw attention to the European Union's Nature Restoration Law, in which biodiversity must be restored. The European Union Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 sets clear targets for the year 2030. In response the Irish Government has rolled out a Nature Restoration plan which highlights a commitment to tackling nature loss through a programme of habitat restoration amongst other things. I would also like to share the words of Christopher O' Sullivan TD and Minister of state with special responsibility for nature, heritage, and biodiversity. On his Facebook page Mr O' Sullivan writes "*nature holds some of the answers for flood prevention. Towns like Bantry, Enniscorthy and Midleton need flood defence schemes and they need them as soon as possible. I've seen the benefits and confidence that a working flood defence brings to an area. In Skibbereen, Clonakilty and Bandon, Cork County Coucnil and the OPW have shown what's possible. But we need to have a serious conversation about what's happening upstream. We can invest billions in flood defences but if we don't address the scale at which upland areas are being drained then towns and villages will continue to become overwhelmed by floods.*
It's simple science. Healthy habitats are deigned to absorb water like a sponge and slowly release it

into the water body. This prevents areas down stream from being overwhelmed by floods" (Christopher O' Sullivan 28.02.2026.

In his statement Christopher O Sullivan highlights Bantry as a town which is in need of a flood defence scheme. The uplands of Maughanaclea currently serve as part of the natural defences surrounding the town and I would argue that the loss of upland coverage which will occur as a consequence of this proposed development directly contravenes the aims of the Nature Restoration plan as it relates to restoring habitats and preserving natural flood defences. This has implications for longer term climate planning and should be equally weighted when considering the meeting of climate targets.

8 - Private wells/ Water supplies

Like many rural homes we rely on a private well as our only source of fresh water.
The EIAR states that there are no private wells mapped within 5km of the proposed development. Consequently the EIAR fails to appropriately address any potential impact on local water sources.

As a community many of us do not have an alternative option to a private well. I therefore have concerns regarding the potential impact of this development on private groundwater supplies.

The EIAR acknowledges that the database of private wells is incomplete, yet no field survey or direct identification of wells appears to have been carried out, despite recommendations from the HSE.

In 2024 three environmental experts wrote to then Taoiseach Simon Harris (see below) expressing concerns under the heading *Windfarm applications in Ireland: Effect of the Inadequacy of Environmental Impact Assessments.*

On drinking water they write "here, we state categorically that there are significant problems with the EIA process for wind power. The EIAs for wind power submitted to either County Councils or An Board Pleanála as Strategic Infrastructure Development (SID) are rarely correctly informed, are most often incorrectly concluded and they are, more often than not, indefensible in the context of the legislation enacted in Ireland to protect water as a resource (The Water Framework Directive 2 and associated Irish Statutory Regulations), water as a Source of Public Water Supply (The Drinking Water Regulations, 2023) and our valued birds, species and habitats (The Birds and Habitats Regulations and associated Directive). It is of great concern to us to read in windfarm EIARs, statements such as "No Impact" or "Mitigatable Impact" regarding drinking water, peatlands, birds, bats *etc.,* without sufficient robust data to support these statements. The repeated evidence of poor investigation practices and inadequate survey methods leads to a situation that does not align with either Ireland's Statutory Instrument or the EU Directive for Environmental Impact Assessment. The Statutory Instrument detailing the protection of drinking water and health of citizens is clear and detailed in its legal requirements. In most EIARs for wind power, there is a complete lack of acknowledgement of the Drinking Water Regulation's required Risk Assessment" (P.Johnston, M.Gormally, & P Bartley 2024).

In addition to drinking water supply, we have a freshwater stream which boundaries the west of our property with water flowing down from Maughanaclea hill. This stream has two status according to the environmental protection agency those being high status water body and high status objective.

As a high status water body our stream is considered to be pristine, and as a high status objective water way there is a legal obligation to maintain the status of this water course.

I therefore have significant concern regarding the potential for contaminated water run off and subsequent contamination of our stream during the construction phase when significant ground disruption will occur. The water course originates in an area which will be at the heart of the

development and is therefore highly vulnerable to construction of the scale proposed. There appears to be no specific detail/plan as to how these risks will be managed under real conditions such as during periods of high rainfall which are increasing in frequency and bring large volumes of water through our stream from the hills above. I would also be concerned regarding the potential disconnect between developer and those responsible for construction in terms of how risk management plans are communicated, monitored, and are managed/mitigated.

From reading, this assessment largely appears to rely on assumptions regarding groundwater flow and distance rather than site-specific evidence. In particular no baseline testing of private wells has been undertaken. This means there is no reliable way to detect or prove any impact on water quality or supply. Given the complex, hilly terrain and underlying geology of the area, I am not satisfied that the risk to private wells or water courses has been adequately assessed or addressed. At the very least I would request that a full survey of private wells (at a minimum all properties within 2km of the proposed site), baseline water testing, and a robust monitoring and remediation plan be required prior to any development being considered for possible planning approval.

Conclusion

In conclusion, I have significant concerns regarding the proposed development at Maughanaclea, and am of the view it poses considerable risks in relation to its impact on the environment and hydrology, its impact on the community and tourism initiatives, and its impact on wildlife habitat and diversity. Not to mention the potential personal impacts in terms of impact on residential amenity and personal wellbeing.

Whilst I recognise the need for a green energy plan which enables us to reduce our reliance on fossil fuels, I also believe this needs to be undertaken in a way that is well considered and which ensures communities are not disproportionately impacted. As well as ensuring necessary environmental protections.

Finally, I note that a number of local house sales have stalled since Enerco's plans became public. Whilst there are currently very few studies on the topic, anecdotal evidence suggests many residents living in close proximity to windfarm developments have found themselves unable to move as there is little appetite to purchase properties in these locations. Particularly properties within 2km of a development.

We are getting older and are only too aware that there will likely come a time where rural living is no longer practical. As a Social Worker and someone who has worked in the field of adult social care, I understand very well the challenges of maintaining independence into old age, as well as the importance of being able to access necessary supports and services. However, I now find myself fearful for what the future holds, as should this development go ahead, there is a very real prospect of becoming those people who are trapped in a home they cannot sell, and subsequently being denied access to the supports and services which contribute to quality of life. My question then is where does the responsibility lie? Are Enerco going to pay the cost of our house to allow us to move and live with dignity as is our right? These are significant and relevant community issues which deserve appropriate consideration.

Yours Sincerely

Michaella Carling

Christopher O'Sullivan TD

Minister for Nature, Heritage and Biodiversity. TD for Cork South-West.

Dear Amy,

I am delighted to have the opportunity to express my support for the initiative being undertaken by Wild Hideaways and the local community to develop an accredited Dark Sky Park within the Mealagh Valley, County Cork.

The goal of a Dark Sky Park is to raise awareness of the need to reduce light pollution and promote responsible lighting solutions, in order to protect the natural night sky for the benefit of both people and wildlife.

I am also conscious that it brings the potential for the development of rural tourism products outside the typical summer season. Dark Sky tourism is a growing sector internationally, attracting visitors who are seeking experiences rooted in nature, heritage and wellbeing, and promoting sustainable rural development and tourism diversification.

Wild Hideaways have demonstrated an innovative and forward-thinking approach with this proposal, and I understand they have engaged widely with the local community. I believe that Dark Sky Park accreditation would be a very positive addition to the region and I wish them the best of luck with this work.

Kind Regards,

Christopher O'Sullivan T.D.

Clonakilty Office:
40 Ashe St,
Clonakilty,
Co. Cork, P85V308
Tel: (023) 8811 011

Bandon Office:
Market Buildings,
New Road Bandon,
Co. Cork, P72K738
Tel: (023) 8811 011

Dail Éireann:
Leinster House,
Kildare Street,
Dublin 2.
Tel: 01 618 3000

Email: christopher.osullivan@oireachtas.ie

Fianna Fáil
THE REPUBLICAN PARTY

To: An Taoiseach Mr. Simon Harris.
Date: 12th October 2024.
From: Professor Paul Johnston, Trinity College Dublin; Professor Mike Gormally, University of Galway; Dr Pamela Bartley, Hydro-G.
Purpose of Note: Windfarm applications in Ireland: Effect of the Inadequacy of Environmental Impact Assessments - concerns of experts.

Dear Simon

We, the undersigned, have all acted as advisors to competent authorities and understand the intricacies of the Statutory Instruments enacted in Ireland and their parent Directives issued from Europe. We are writing this note to share with you our strong concerns relating to the implementation of Ireland's EIA Regulations and its parent Directive in relation to windfarm proposals and planning applications in Ireland.

As experts in our fields, we would ask you to consider that Ireland's Wind Energy Strategy, as it currently operates, is not sustainable and is not aligned with, among other legal instruments, the European Union's Nature Restoration Law, in which biodiversity must be restored. The European Union Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 clearly sets out targets for the year 2030, i.e. less than 7 years' time. Much other existing environmental legislation is in conflict with our national requirements for siting increasing numbers of windfarms.

We ask that you give serious consideration to this letter. With the recent changes in EU legislation we, as a nation, now have the required supports to get this right. We also have the scientific evidence to ensure that we do not repeat the mistakes of our forebears when much of our nature was destroyed by intensive agriculture, commercial forestry and peat extraction practices. While our forebears could argue that they did not realise the full extent of the environmental degradation caused by their actions, our generation does not have that excuse and the next generation will judge us on that basis.

We are writing this note as Nationally Recognised Subject Matter Experts with experience, as follows, with biographic notes below:

Paul Johnston's 50 years of academic and state advisory positions in Hydrogeology & Peatlands.

Mike Gormally's 30 years of academic and research experience in Applied Ecology, Biodiversity and Wetlands.

Pamela Bartley's 30 years of Site Investigation, Construction, Research, Planning, the Law and Impact Assessment.

In our expert subject matters, we have reviewed many Environmental Impact Assessment Reports (EIARs) relating to windfarms in Ireland in the last number of years and are familiar with the details of wind turbine construction.

Here, we state categorically that there are significant problems with the EIA process for wind power. The EIAs for wind power submitted to either County Councils or An Board Pleanála as Strategic Infrastructure Development (SID) are rarely correctly informed, are most often incorrectly concluded and they are, more often than not, indefensible in the context of the legislation enacted in Ireland to protect water as a resource (The Water Framework Directive and associated Irish Statutory Regulations), water as a Source of Public Water Supply (The Drinking Water Regulations, 2023) and our valued birds, species and habitats (The Birds and Habitats Regulations and associated Directive). It is of great concern to us to read in windfarm EIARs, statements such as "No Impact" or "Mitigatable Impact" regarding drinking water, peatlands, birds, bats *etc.,* without sufficient robust data to support these statements. The repeated evidence of poor investigation practices and inadequate survey methods leads to a situation that does not align with either Ireland's Statutory Instrument or the EU Directive for Environmental Impact Assessment. This is borne out by An Bord Pleanála's continued

planning decision refusals on points of environmental law, and explains the frequent referrals for judicial review.
Many of the EIAR chapters we have reviewed do not adhere to EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports (2022). On a regular basis, we observe EIAR contents that provide significant potential risks to landscape, water, environment, birds, bats etc for reasons including, but not limited to, the following:
Inappropriate site and landscape selection.

Inadequate baseline data.

Outdated bird survey methodologies.

Impact predictions being presented without satisfactory supporting evidence.

Mitigation measures lacking sufficient detail and understanding, with the result that thesuccess of proposed mitigation measures cannot be guaranteed, as demonstrated bythe Meenbog Windfarm bog slide in Co. Donegal.

Poor consultation with community groups; and a general lack of clarity, to say the least.

"*Maintaining objectivity*" is one of the fundamental principles of best practice in Environmental Impact Assessment (EPA, 2020) yet the tone of the majority of the windfarm EIARs we have reviewed to date has been to present the proposed wind farm in the best possible light so that the development has the best chance of succeeding in the planning process. The negative impacts of built, or partially built, Irish windfarms that have made the national/international news is testament to the outcome of such practices: some Public Water Supply Sources have been severely damaged with THM issues due to landslides, and salmonid rivers have been inundated with peat slides. In addition, there are unassessed potential persistent chemical risks posed to waters used to supply the public. A quick snapshot is provided here to give you some brief examples of **poor practice** we have documented in windfarm EIARs in recent years.

1. Targeting peatlands and bog wetlands as potential windfarm sites:

Beyond all scientific doubt, building turbines in peat will negatively affect biodiversity andincrease carbon loss from this habitat through the required drainage, foundations andinfrastructure. Damage arising from construction releases more carbon from the peatland.The long-term sustainable approach is the restoration of bog wetlands. A strategy ofrestoration, rather than any construction whatsoever, will provide a reduction in carbonemissions from the peatland in perpetuity. The societal benefits will be better water quality,reduction in flood events, a reversal of biodiversity loss and more opportunities for peopleto connect with nature resulting in better physical/mental health outcomes, as recognizedin the Climate Action Plan, a derivative of the Paris Agreement. Moreover, since 1987,Ireland has been a signatory of the international Ramsar convention which provides for theprotection and promotion of wetlands including peatlands. The case that windfarms in3 peatlands are incompatible with these requirements is rarely even considered appropriately in EIARs.

2. Bird survey methodologies currently employed by consultancies in Ireland for wind farm EIARs:

Bird mortality due to collision with wind turbine blades is universally accepted. The daytime observational methods used in Irish EIARs are outdated and do not record bird movements during night-time hours. Thermal imaging and passive audio recording are now best practice technologies widely available for more than 10 years, yet, to date, we have not observed these methods in any of the windfarm EIARs we have reviewed. In addition, passerines (perching birds) are not generally considered in Irish EIARs despite recent scientific literature indicating that mortality rates are significantly underestimated due to the small size of these birds.

3. Failure to acknowledge the requirements of the Drinking Water Regulations (2023) in wind farm EIARs:

The Statutory Instrument detailing the protection of drinking water and health of citizens is clear and detailed in its legal requirements. In most EIARs for wind power, there is a complete lack of acknowledgement of the Drinking Water Regulation's required Risk Assessment.

4. Failure to correctly acknowledge the now short time frame for Ireland's compliance with the Objectives of the Water Framework Directive:

Ireland is fast approaching the 2027 deadline for WFD compliance, for which we have had 24 years to work towards. Time is now running out. Whilst previously County Councils and The Board *may* have had some justification in permitting development consent in catchments not currently meeting WFD Obligations, that time has now passed, and the nation now has 2 years to bring all rivers to '*at least*' Good Status. The impact of windfarms is frequently incompatible with meeting this objective.

We bring to your attention to Ireland's 4th National Biodiversity Action Plan (2023-2030) which, using a "*whole government, whole society*" approach, "*aims to deliver the transformative changes required to the ways in which we value and protect nature*". The aim is to "*ensure that every citizen, community, business, local authority, semi-state and state agency has an awareness of biodiversity and its importance, and of the implications of its loss, while also understanding how they can act to address the biodiversity emergency as part of a renewed national effort to "act for nature*"." In addition, The Wildlife (Amendment) Act 2023 introduced a new public sector duty on biodiversity. The legislation provides that every public body, as listed in the Act, is obliged to have regard to the objectives and targets in the National Biodiversity Action Plan. See https://www.npws.ie/legislation for further details.

We recognize the pressing need for the development of renewable energies which is resulting in considerable pressure on EIA consultancies to "deliver" for both the Government in its 'Climate Objectives' and for the developer, who is their client. Nevertheless, we have observed a significant absence of objectivity in parts of the required EIARs. There is real conflict between the requirements of historical as well as current environmental legislation and the equal need for development of windfarms as sources of renewable energy. A resolution for this conflict may lie in an integrated national landuse policy but meanwhile, there is an urgent need to have a genuine conversation about the above issues and we would be happy to be part of that conversation. 4 The existing and growing resistance to terrestrial windfarms due to their environmental impact is frequently justified and exacerbated by inadequate EIARs which result in extra delays and costs as well as in poor planning decisions. This conflict between the requirements of environmental legislation and the need for increased wind power is unsustainable.

When it comes to protecting our environment and its increasingly important ecosystem services on which the human race depends, an excerpt from the famous song "Big Yellow Taxi" by Joni Mitchell comes to mind.

"Don't it always seem to go
That you don't know what you got 'til it's gone?"

We thank you for your time and look forward to discussing the issues with you.

Professor Paul Johnston Professor Mike Gormally FRES Dr. Pamela Bartley
Dept Civil & Environmental Eng. Director of Applied Ecology Unit Hydro-G
Trinity College Dublin University of Galway Galway
pjhnston@tcd.ie mike.gormally@universityofgalway.ie pamela@hydro-g.com

BIOGRAPHICAL NOTES

PAUL JOHNSTON

Paul is a Professor at Trinity College Dublin's Department of Civil, Structural & Environmental

Engineering, specialising in peatland hydrology, hydrogeology and ecohydrology. He has acted as a specialist advisor to An Bord Pleanála, NPWS, multiple Government Departments, Teagasc, the EPA, the National Roads Authority (now TII). Paul has advised NPWS on ecohydrology and he is the mentor for NPWS's first ever employed ecohydrologist: Professor Shane Regan, who himself is a lecturer now in UCD.

MIKE GORMALLY
Mike is the Director of the Applied Ecology Unit (AEU) at the University of Galway, which has a strong track record in applied ecological research. His unit has undertaken applied ecological research on internationally famous ecosystems such as disappearing lakes (turloughs), peatlands, unregulated flood meadows and coastal grasslands (machairs) as well as terrestrial invertebrates as bioindicators of habitat quality. Mike, an active member of the County Galway Heritage Forum and Irish Ramsar Wetland Committee, also lectures in Environmental Impact Assessment (EIA) to both BSc and MSc students. 5

PAMELA BARTLEY
Pamela is a civil engineering hydrogeologist and water supply engineer. She has had her own limited company for over 20 years. She is the only water supply engineering hydrogeologist in Ireland to be certified, accredited and experienced to act as a Construction Regulation compliant Project Supervisor Design Phase (PSDP) and Project Supervisor Construction Phase (PSCS). Her expertise includes the assessment of and interaction between the law, water and bedrock to enable functioning of Regionally Important quarries in Ireland, which are required to support the housing policies of Government. She therefore understands how construction can be completed within the legislative framework. She has adjudicated cases and Oral Hearings for An Bord Pleanála. Pamela is hydrogeological lead consultant, for all counties of the western coast and northern boundary, in the delivery of Uisce Eireann's Supply Demand Balance Programme that grew from the National Water Framework Plan. Pamela has written advice papers on Irish Statutory Instruments enacted for the Water Framework Directive (WFD) and presented to the National Planning conference and Environmental Health Officers of the HSE. Her PhD, completed 20 years ago, is still a hot topic: Nitrates, Groundwater & Dairy Agriculture.