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25 May 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 works

Location: Maughanaclea, County Cork

A Chara, To Whom It May Concern

I am writing as a named individual to formally object to the above planning application by Maughanaclea Ltd., which seeks permission for a wind farm of 14 turbines, a 110kV substation, and 20.5 kilometres of underground cabling at Maughanaclea, County Cork. I want to say something clearly at the outset. I support Ireland's transition to renewable energy. I accept that wind infrastructure will be part of how we meet our climate commitments. This objection is not about wind energy. It is about *this development, in this place*, and it is grounded in specific, documented concerns about the quality of the planning application, the inadequacy of the environmental assessment, the irreplaceable archaeological heritage that stands to be affected, and the complete absence of any real, enforceable benefit for the community that will live with the consequences.

I live in Coomleagh West, within two kilometres of the nearest proposed turbine. I grew up here, left for ten years, and came home. That decision was not accidental. This valley — the quality of its landscape, the stillness of it, the sense that something ancient and unhurried is present here — was what I came back to. I write this submission as someone with a direct, personal stake in what happens to this place.

1. THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT IS SELF-CONTRADICTIONARY

The Environmental Impact Assessment Report (EIAR) lodged with this application on 26 March 2026 contains internal contradictions serious enough that, I would respectfully argue, the board cannot rely upon it as an adequate basis for any decision.

On Cultural Heritage

Chapter 14, Section 14.7 of the lodged EIAR contains the following conclusion, which I quote verbatim:

"Residual effects will remain with regards to the setting of archaeological, architectural and cultural heritage sites, due to the fact that the effects on the setting of the sites cannot be mitigated. These effects will not be significant or permanent, and will be removed following the decommissioning of the turbines."

The developer gives a reason for this conclusion: the turbines will be decommissioned, so the effects are not permanent, and therefore not significant. I accept that the reasoning is stated. What I challenge is whether it is adequate.

The first is the question of scale. This application is for a ten-year planning permission. The sites affected by these unmitigable setting effects include the Kealkill Stone Circle complex and Breeny More — both subject to Preservation Orders under the National Monuments Acts, both Bronze Age monuments between three and four thousand years old. The developer's logic classifies a decade of industrial-scale visual intrusion on monuments of that antiquity as temporary and therefore not significant. I would ask the board to look carefully at whether that reasoning holds up when considered against the nature of what is being affected. The second problem is internal to the EIAR's own methodology. Table 14-2 of the EIAR defines receptor sensitivity for heritage sites subject to Preservation Orders as *"Very High."* Table 14-3 defines a magnitude of impact of *"High"* as including an impact which *"alters an important aspect of the archaeological and cultural heritage environment, including the setting of upstanding monuments."* Table 14-4 — the Impact Assessment Matrix — shows

that a High magnitude impact on a Very High sensitivity receptor produces a *"Very Significant"* effect. Even a Medium magnitude impact on a Very High receptor produces a *"Significant"* effect.

The EIAR's own Significance of Effect section concludes that operational phase visual impacts on heritage are *"Not Significant,"* and the Impact Assessment Classification Summary table on page 14-70 formally records visual impacts as *"Long-Term, Imperceptible to Moderate, Negative"* with a residual significance of *"Not Significant."* But the developer has not demonstrated how impacts on sites carrying the highest possible sensitivity rating — Very High — can be assessed at a magnitude low enough to fall below significant. The reasoning is not provided. The matrix exists, and the conclusion is stated, but the workings that connect one to the other are missing.

I also draw the board's attention to a further inconsistency within the same chapter. Section 14.4.5 states: *"No direct effects on archaeological, architectural and cultural heritage resource are noted during the operational phase."* Yet the Mitigation and Monitoring section of 14.4.4 concedes in the same breath that setting effects will remain and cannot be mitigated during that same operational phase. The document records both no operational effects and unmitigable operational effects as conclusions. They cannot both be true.

I respectfully ask the board to require the applicant to demonstrate, with reference to the EIAR's own impact assessment matrix, how impacts on Very High sensitivity heritage receptors have been assessed as not significant in the operational phase.

On Noise — Three Inadequacies in the Assessment

The noise assessment contains three distinct problems, each of which independently raises questions about its adequacy. Taken together they are serious.

The first is an omission that contradicts the developer's own definitions.

The EIAR's Glossary at Appendix 12-1 defines a Noise Sensitive Location as including *"any other facility or other area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels."* Wild Hideaways Eco Retreat, a luxury wellness and spa business in the Mealagh Valley whose entire commercial proposition depends on quiet, undisturbed natural surroundings, does not appear anywhere in the noise assessment. It is absent from the NSL list of H001 to H279 in Appendix 12-3, which I have checked directly. It is not addressed in Chapter 12. By the developer's own definition, it is precisely the kind of location that requires assessment. Its absence is not a minor administrative gap — it means

the noise impact on one of the most obviously affected commercial premises in the valley was never calculated.

The second concerns the only noise monitor in the Mealagh Valley.

Chapter 12, Section 12.4.2 records that six noise monitoring locations were used across the entire study area, designated NML1 to NML6. Only one of these — NML4 — was located in the Mealagh Valley. The EIAR's description of NML4 in Section 12.4.2.1.4 records that the monitor was installed in "*the garden to the front of the property*" with "*birdsong and infrequent road traffic*" noted. What is not mentioned is the active dairy farm and regular cattle movement on the road that the community says is present approximately 100 metres from the monitor. The EIAR does acknowledge, in a general paragraph covering all six monitoring locations, that "*agricultural and farming typical noises*" formed part of the noise environment across site visits — but does not identify this as a site-specific contextual factor for NML4 in particular. This matters because periodic noise from farm activity would elevate the recorded background level at NML4 above the quieter conditions that prevail across much of the valley. A higher baseline means higher permissible turbine noise limits. The board should require the applicant to demonstrate that the baseline figure recorded at NML4 is representative of the quieter parts of the valley, and not inflated by local agricultural activity that was not adequately described or accounted for.

The third is the complete absence of terrain analysis.

Appendix 12-3 confirms that noise predictions were conducted using ISO 9613-2 standard methodology. The Mealagh Valley is a glacially carved landscape characterised by bowl-shaped enclosed terrain in which sound can travel further, reflect off valley sides, and concentrate at distances standard modelling does not predict. Research published in the *Proceedings of Meetings on Acoustics* has established that this exact scenario — wind turbines on a ridge, receivers in an adjacent valley — produces pronounced asymmetry in noise exposure that standard flat-terrain models do not capture. The paper's own author concludes that the method he proposes "*could help in optimal placement of wind turbines at ridges when the adjacent valley is inhabited.*" [5a] The turbines here sit on a ridge. The valley below is inhabited. The EIAR does not mention terrain, valley, or hill anywhere in its Noise and Vibration chapter. That is not an adequate basis for predicting noise impacts in this landscape.

2. THE ARCHAEOLOGICAL AND HERITAGE IMPACT HAS NOT BEEN ADEQUATELY ADDRESSED

The Maughanaclea and Mealagh Valley area is one of the most archaeologically significant upland landscapes in Ireland. There are 11 recorded archaeological sites within the wind farm boundary itself, 210 recorded sites within 5 kilometres, and six National Monuments within 10 kilometres of the proposed turbines. [1]

The Kealkill Stone Circle complex — a Bronze Age five-stone circle, standing stone pair and radial cairn sitting on the slopes of Maughanaclea Hill overlooking Bantry Bay — is a National Monument subject to Preservation Order No. 69/1938 under the National Monuments Acts (NMS records CO106-00601, CO106-00602, CO106-006003). [2] Preservation Orders represent the highest level of legal protection available to an archaeological site in Ireland. The nearby Breeny More stone circle and boulder burials carry a separate Preservation Order, No. 84/1940.

The developer's own EIAR, as I have quoted above, admits that visual impacts on the settings of these sites cannot be mitigated. And yet the conclusion drawn is that there are no significant effects. I would ask the board to treat this admission with the seriousness it deserves rather than allow it to pass as a footnote.

West Cork archaeologist Tony Miller has described the Shehy Mountains, Mealagh and Maughanaclea area as containing an important cluster of Bronze Age stone circles, with Kealkill being one of the finest in the region. [3] The Dúchas Schools' Collection documents the Maughanaclea townland as containing Butter Roads, ancient burial grounds at Baile na Bocht, ringforts, standing stones and sites of deep community memory. This is not an empty upland. It is a landscape in which human presence stretches back thousands of years, and which carries that history in visible, protected, irreplaceable form. [4]

When I bring visitors to this part of West Cork, the Kealkill Stone Circle is where I take them first. It sits in the landscape in a way that stops you. You stand there and feel the weight of time — not metaphorically, but actually. These are not ruins. They are intact, in the place where people put them four thousand years ago, oriented to a landscape that still looks much as it did then. The developer tells the board these impacts are temporary. I would ask the board to consider what temporary means when measured against what is already there.

3. THIS DEVELOPMENT IS BEING ASSESSED UNDER GUIDELINES THAT EVERYONE AGREES ARE OUTDATED

Ireland's Wind Energy Development Guidelines were written in 2006. The turbines being proposed here are 169 metres from the ground to blade tip. The 2006 guidelines were not designed with turbines of this scale in mind.

What is telling is that the developer appears to know this. Their own project information boards state that the 2019 Draft Guidelines are due to be adopted and that the wind farm has been designed to achieve the revised requirements as currently drafted. In other words, they have built this proposal to meet a higher standard, while seeking permission under a lower one.

It is not in the public interest for a development of this permanence and scale to be decided under a regulatory framework that the applicant itself has quietly acknowledged is no longer fit for purpose. The board should apply the 2019 Draft Guidelines to the assessment of this application, or defer determination until updated guidelines are formally in place.

4. THE PUBLIC BENEFIT CASE HAS NOT BEEN MADE

The applicant claims this development will contribute to cheaper electricity for consumers. I am not disputing that wind energy can, in general, reduce wholesale electricity prices. What I am disputing is whether that claim has any practical meaning for the people who will actually live with this development.

The grid cannot absorb what is already being generated

According to EirGrid's own Annual Renewable Energy Constraint and Curtailment Report 2024, fourteen per cent of all available wind energy across the island of Ireland was wasted in 2024 — turned off because the grid could not absorb it. [5] For the Republic of Ireland in 2025, the figure was eleven point three per cent, with six point six per cent caused specifically by transmission constraints in areas like West Cork, where generation capacity already outstrips the grid's ability to carry power east to where it is needed. [6] In 2025 alone, over two million megawatt-hours of wind power were lost — enough to power more than half a million homes. [7]

EirGrid's own Transmission Development Plan for 2021 to 2030 identifies existing constraints on exporting power from the Cork area as a problem requiring urgent attention. [8] Adding further generation capacity to a network already operating at constraint thresholds does not reduce bills. It increases the volume of energy that must be curtailed — and curtailed energy costs consumers money. The applicant's 20.5-kilometre underground cable solves their commercial access problem. It does nothing to fix the underlying bottleneck.

Who actually benefits — and where does the energy go

There is no binding commitment in this application to reduce electricity costs for anyone in this area. I would ask the board to require the applicant to confirm whether the energy generated has already been pre-committed via Corporate Power Purchase Agreement to a commercial buyer — potentially including a data centre operator — and whether that is consistent with the public interest test that a Strategic Infrastructure Development of this kind is required to meet.

That question is made more pressing by the ownership structure. Maughanaclea Ltd. is a subsidiary of Enerco Energy Ltd., which is majority owned by Craydel Unlimited Company (company number 171933). [11] An unlimited company in Ireland has no legal obligation to publish accounts or disclose financial arrangements. The ultimate financial beneficiaries of this development are not visible to this process. I ask the board to satisfy itself as to who owns this development, and where the energy it generates is intended to go, before any permission is considered.

5. THE LANDSCAPE IMPACT AND THE CUMULATIVE PICTURE

Cork County Council refused planning permission for the nearby Gortloughra Wind Farm in May 2025. The two reasons given were: first, that the development would be sited in an elevated, exposed and open unspoilt landscape; and second, that it would require the removal of wet heath, blanket bog and wet heath mosaic, all habitats of special conservation significance. [9] The Gortloughra turbines were proposed at 175 metres tip height — six metres taller than those proposed here, in the same broader landscape.

The Mealagh Valley falls within Landscape Character Area 15a, designated High Landscape Value and High Landscape Sensitivity in the Cork County Development Plan. The Development Plan classifies this area as Open to Consideration for wind energy, not Acceptable in Principle. That matters, because it places the entire burden of proof on the developer to demonstrate that adverse impacts on the landscape can be avoided. That case has not been made.

An Coimisiún Pleanála has itself refused wind farm permission in this part of West Cork on landscape grounds — in the Ballydehob case, the board found the proposed development would be a highly visually obtrusive development at an inappropriate location that would unacceptably interfere with the character of the designated high value landscape. [10]

On a clear night in Coomleagh West, I can walk outside and see the full arc of the Milky Way. There is no light pollution here. The valley is genuinely dark, and genuinely quiet — quiet in a way that is rare in Ireland now. The sound you hear at night is a fox occasionally, or wind in the trees. That quality of darkness and silence is not incidental to this place. It is what this landscape is. Fourteen industrial wind turbines, 169 metres tall, with aviation warning lights required by law, would end that. Not temporarily. For the duration of my lifetime and beyond.

On cumulative impact: the EIAR's own Section 14.6.2 identifies both the proposed Gortloughra wind farm, approximately two kilometres to the northeast, and the proposed Derreenacrinnig West wind farm, approximately 3.6 kilometres to the south, as projects within the cumulative assessment area — and then concludes that no additional effects are predicted beyond those of this development alone. The methodology does this by treating each proposed development's effects as already captured in the baseline for the next. The practical result is that no cluster of wind farm proposals in the same landscape can ever produce a finding worse than the worst individual development. That is not a genuine cumulative assessment. The board should require a unified visual assessment of Maughanaclea, Gortloughra and Derreenacrinnig West as a combined scenario.

6. THE COMMUNITY BENEFIT FUND IS NOT ENFORCEABLE

The applicant refers to a community benefit fund, but cannot agree with itself on the amount. The project information boards state approximately €410,000 per year. The FAQ document states €435,000 per annum — but only for the first 15 years of operation. After that, the fund reverts to an unspecified rate. Neither figure is binding, and the applicant cannot commit to a consistent number across its own documents.

Both figures depend entirely on the project being developed under the Renewable Energy Support Scheme, which is not guaranteed. The governance structure for the fund does not exist. The applicant's own FAQ states that the first task, if the project proceeds, will be to form a working group that will then design the governance and structure of a community entity to administer the fund. There is no community equity stake or co-ownership model proposed.

Nothing in this proposal is offered as a binding planning condition. A fund with no governance structure, no consistent value, time-limited in its most generous form to 15 years, and conditional on a support scheme that may not apply is not a public benefit. It is an

aspiration. For a Strategic Infrastructure Development of this scale and permanence, the board should require real, enforceable, measurable community benefit as a condition of any permission — not a promise to form a working group after the fact.

7. WHAT I AM ASKING THE BOARD TO DO

I am asking An Coimisiún Pleanála to:

- Require the applicant to submit a revised EIAR that resolves the internal contradictions identified in this submission, in particular on cultural heritage and noise.
- Require a revised noise assessment that correctly identifies Wild Hideaways Eco Retreat and similarly situated amenity businesses as Noise Sensitive Locations consistent with the applicant's own definition; that provides a transparent account of the contextual noise sources in the vicinity of NML4; and that addresses the propagation of turbine noise in the complex glacially carved terrain of the Mealagh Valley.
- Assess this application against the 2019 Draft Wind Energy Development Guidelines, or defer determination until updated guidelines are formally in place.
- Require the applicant to disclose the full ownership structure and the intended commercial destination of the energy generated, including any existing Corporate Power Purchase Agreement.
- Require a genuine cumulative visual impact assessment covering the combined effect of this development alongside the Gortloughra and Derreenacrinnig West proposals.
- Refuse planning permission on the grounds set out in this submission, having particular regard to the unmitigable impacts on protected archaeological heritage confirmed in the applicant's own EIAR, the inadequacy of the noise assessment, the failure to demonstrate public benefit, and the clear regional precedent established by the Gortloughra refusal.

I reserve the right to supplement this submission with further observations if additional information becomes available.

Yours faithfully,

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke extending to the right.

25th May 2026

SOURCES AND REFERENCES

- [1] Community Objection Writing Resources, Maughanaclea, Stop the Spin Campaign. Available at: stopthespin.ie. Citing: 11 recorded archaeological sites within site boundary; 210 within 5km; 6 National Monuments within 10km.
- [2] National Monuments Service, Archaeological Survey Database. Kealkill complex, Entity ID CO13799. SMR records: CO106-006003 (radial-stone cairn); CO106-00601 (five-stone circle); CO106-00602 (standing stone pair). Official NMS record states: *"This monument is subject to a preservation order made under the National Monuments Acts 1930 to 2014 (PO no. 69/1938)."* Searchable at: heritagemaps.ie, search SMR No. CO106-006003.
- [3] Tony Miller, West Cork archaeologist, cited in Stop the Spin community resources (2025-2026).
- [4] Dúchas Schools' Collection, Maughanaclea townland records. Available at: duchas.ie/en/cbes/4811628/4803841
- [5] EirGrid, *Annual Renewable Energy Constraint and Curtailment Report 2024*, April 2025. PDF: [EirGrid Curtailment Report 2024](#). Dispatch-down rate 14.0% in 2024, up from 10.7% in 2023.
- [5a] Van Renterghem, T. (2017). 'Sound propagation from a wind turbine in a hilly environment.' *Proceedings of Meetings on Acoustics*, Vol. 28, 045002. Presented at the 22nd International Congress on Acoustics, Buenos Aires, September 2016. Published by the Acoustical Society of America. DOI: 10.1121/2.0000317. Conclusion states: *"The proposed method could help in optimal placement of wind turbines at ridges when the adjacent valley is inhabited."*
- [6] Green Collective, 'A Year in Review: The Irish Grid in 2025', January 2026. greencollective.io. Citing EirGrid data: ROI wind dispatch-down 11.3% in 2025.
- [7] SSE Renewables, February 2026. sSERenewables.com. Citing EirGrid data: over 2 million MWh lost to dispatch-down in 2025.
- [8] EirGrid, *Transmission Development Plan 2021-2030 Consultation Report*. PDF: [EirGrid TDP 2021-2030](#)
- [9] Cork County Council refusal, Gortloughra Wind Farm (Statkraft), May 2025. Reported in: Farmers' Journal, 26 May 2025. farmersjournal.ie
- [10] An Bord Pleanála refusal, Ballydehob wind farm, West Cork. Reported in: Southern Star. southernstar.ie
- [11] Enerco Energy Ltd. ownership. IE Global Database: ie.globaldatabase.com/company/enerco-energy-limited. Unlimited company status: invisenergy.com/terms-of-use