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Date: 13/5/26

**SID Planniing**  
**An Coimisiún Pleanála,**  
**64 Marlborough St,**  
**Dublin 1**  
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**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: Ardrah, Maughanaclea, Ballynamought, Gortloughra, Cousane, Coomclogh, Derragh, Glanycarney, Keenrath, Derrynacaheragh, Shiplough, Coolsnaghtig and other townlands Co. Cork**

Dear Sir / Madam,

I am writing to object to the above named wind farm proposed for Maughanaclea and surrounding area.

Firstly I would like to address the fact that while the developer has had a number of years to gather their information , we , the public only have 8 weeks to sift through it all and make our observations. This is very unreasonable and very much in favour of the developers as it gives us little time to thoroughly sift through the hundreds of pages of information to make our objections.

On finding out about this project a number of concerned members of the community got together to support each other and see what we could do to protect our peaceful, historic and scenic landscape which is also home to a diverse range of wildlife. It quickly came to our attention that many people in the area knew nothing about the proposed development, why? Because they never received a letter through the door. In addressing only those within a 2k radius of the proposed site , Enerco have excluded a large number of the local community including the village of Kealkill itself and many residents along the R584 who will have a full view of the proposed turbines and also be impacted by them if they were to go ahead.

At 169 meters in height these turbines will intrude the view for many people living along this road along with the construction noises which we will echo in the valley. Acoustics travel quite far here, Enerco have not done any acoustic assessments of the impact of construction noise in the area. Are we expected to endure 18-24 months of heavy construction noise while at home? We will also be subjected to those intrusive red lights at night time where we currently have the beauty and stillness of being in a very dark sky area.

Granted Enerco had a public information day but many people were not aware of this. I, and many of those concerned only attended as we had the letters through our door. People are very busy, putting an advert in the newspaper or on the radio does not guarantee that people will be made aware of the proposed development. In my opinion the fact that Enerco excluded directly informing so many areas of the local community that will be impacted by this is an attempt of minimising community concerns and not giving everyone a voice.

There are many air bnb's, holistic services and wellness retreat places in the proposed area such as Hagel Farm, Wild Hideaways, the Waterfall Alpaca Farm along with my own wellness business that I run from my home, that will be greatly impacted by the construction process alone. I am not satisfied that Enerco has conducted proper sound modelling on the noise of construction in the area. For example when we get the occasional rock breaker in the area it can be heard from over 2.5 kilometres away if not further. The sound echoes and reverberates, traveling through our house so we can hear it inside. This proposed development will involve significant on going rock breaking, digging along with other construction noise for up to two years with a phased plan of 10 years! I am concerned how that will affect my business as I take clients at my home for holistic healing treatments. I get regular clients from Cork City and surrounding areas, two years of construction work on roads/ traffic delays will also put these clients off. Being subject to construction noise echoing all around the area for up to two years will not only affect my business but also my own mental health and peace of mind. As a highly sensitive person (hsp) I also process sensory and emotional information very deeply. I have quite heightened senses and also suffer from migraines which are triggered by stress, flashing lights, bright lights, visual disturbances and other things that can overload my senses. I am also concerned about the flashing red lights and continual rotation of the blades which we will see from T13,14 and possibly T11 and 12 along with the infrasound caused by the turbine operation. All of the rooms we use for sleep and relaxation are situated facing the valley. Its not ok that we are subjected to flashing red lights and continual visual disturbances when in our home. To be told to close the blinds (which we don't have) or curtains which is suggested in chapter 5 of volume 1 of Enercos EIAR document is a very dismissive statement and frankly unprofessional statement. We have an incredible view from our window, we shouldn't have to shut it out.

## **Noise and Health concerns**

There are many noise concerns that I am concerned about that Enerco have not fully addressed in their proposal. The first being Infrasound, while this sound is negligible to the human ear it is of a certain frequency that is known to negatively impact human health. While infrasound can be created by natural events wind, earthquakes etc, Wind turbine generated infrasound is rhythmic and repetitive making it continuous, distinct and very different from any naturally occurring infrasound in the landscape. Continuous exposure to infrasound has been found to have detrimental effects on human health.

The scientific paper titled **Infrasound and Human Health: Mechanisms, Effects, and Applications** by The Journal of Applied Sciences found here

<https://www.mdpi.com/2076-3417/16/3/1553> highlights the many health implications caused by continuous exposure to infrasound such as oxidative stress, death of health cells in the body, cardiovascular problems , nervous system disruption , sleep disturbances, fatigue and more all of which will negatively impact out mental and physical health and wellbeing.

*"Salt and Kaltenbach demonstrated this underestimation in wind turbine sounds. At 10 Hz, A-weighting recorded no measurable sound, while C- and G-weighted measures, as well as unweighted measures, indicated pressures of 40–60 dB. In the 1 Hz range, C- and G-weighted measures remained similar, whereas the unweighted measure reached ~90 dB. These levels can stimulate inner hair cells on the basilar membrane and in various body cavities, demonstrating that sub-10 Hz turbine sounds are potent biological stimuli. The C-weighted scale, which reflects ear sensitivity at higher sound levels, provides a uniform gain from ~50 Hz to ~10 kHz and may capture effects on other organ systems. In contrast, the G-weighted scale, which is less aligned with perceived loudness, better represents pressure fluctuations that interact with the human body's intrinsic properties [2]."*

If this is how infrasound can effect humans, it is a reasonable argument to say that it will also have an effect on wildlife in the area. This does not contribute to protecting species in the area. There was no specific assessment of infrasound in Enerco's proposal meaning they dismissed this altogether stating it will fall below perceptibility levels so there is no need to do one. In chapter 12, noise and vibration , the assessment provides a detailed "Sound Power Level Spectra" for the proposed turbines, the data starts at the **63 Hz** octave band. Infrasound is defined as sound at frequencies **below 20 Hz**, and the developer provides no measurements or predictions for this specific range, so there is a real lack of data here. Enerco have validated this by comparing it to environmental infrasound however you cannot make comparisons between environmental infrasound and wind turbine infrasound. As I pointed out above, infrasound caused by nature is not consistent, rhythmic or distinct, whereas turbine infrasound is making it distinctly different and constant which is a health concern. With no numerical predictions or tests done on infrasound for the proposed turbines in this site specific area we are none the wiser here. Its relevant information that we should be provided with. Enerco have assumed and

presumed that there will be no ill effects, assumptions are not good enough research and do not protect people or wildlife in the area.

This does not give any peace of mind in safeguarding our health due to the long term exposure we would experience. There is also no indication of what the infrasound levels will be .

It seems other issues to do with sound and vibration of the turbines have been conveniently glossed over. The landscape for the proposed development is a peaked and ridged upland area , there was no site specific terrain impact study done for Amplitude Modulation, there is no assessment done to show how the topography of the land will influence the amplitude modulation of the turbines. They did not use specific modelling for the terrain. The developer cannot state that something is 'generally not expected' " at least on relatively level sites" when they have not actually done the studies on the specific landscape involved, it is a unique terrain which is very exposed and again, very hilly and peaked so they have not taken into account the topography of the land for all turbines and how this can differ and effect people/ wildlife in different areas where the turbines are proposed to go.

The developer claims there is "nothing at the planning stage" that can be used to predict the likelihood of "Other" or "Excessive" AM based on a site's general characteristics or terrain. How is this acceptable? It is vitally important that all assessments are accurate and specific to the location to prevent distress and or harm to people, species, habitats and the environment of the area before anything is put in place.

There was no criteria proposed for assessing low-frequency noise as part of the EIAR with no investigation into low- frequency noise conducted for the planning stage, instead the developer states this should be done after the proposed project is operational should an issue arise. Again this is not reassuring and there is too much assumption from the developer that everything will be within acceptable limits without any real site specific studies or evidence provided. All problems that could arise from such a large industrial project should be eliminated completely before any construction phase.

Also the noise level monitors used in the assessment were only in site for 6 weeks out of a 52 week year, (from March 28, 2025, to May 8, 2025) to capture a representative sample of wind speeds and weather conditions in the area. This does not account for the different weather we get during the winter months. We frequently get weather warnings of an Orange level and have had 2 Red warnings in the last two years, a six week slot in spring time does not give an accurate measurement of noise levels for the year. We live here all year around so we need to know how this will affect us.

There are more and more accounts in the news of how wind farms have caused a negative impact to people living in close proximity to them for example the Gibbett Hill case in Co.Wexford where the court found that the disturbances caused by the operation of the turbines caused serious health issues to the family involved. There is no room for

assumptions for such a large scale proposal that will forever change the landscape and effect the people who live here. The current wind development guidelines have also not been updated to account for the larger scale of developments and the protection of people and wildlife

### **Lack of Community Ownership / dividing of the community**

Wind farms also cause divides in local communities. The so called community funds that are offered may benefit some but often not those who are the most impacted by these large scale industrial structures. Yes is all good for a local team to get a new playing pitch but at the cost of the health and wellbeing of those who have to live with them in close proximity, it also devalues homes of those in close proximity. This shows lack of care for communities, using money as a tool to bribe and divide is, in my opinion a filthy tactic.

There is no community ownership of these turbines either, which is stated as a priority in the cork county development plan. Our electricity bills have not become cheaper with the introduction of wind energy and with the increase in data centres and their demand for energy there is no real benefits for the Irish homeowner here. We get our local and beautiful scenery demolished and torn apart, 169meter turbines jutting out of the landscape, two years of road works, commuter delays , construction noise , for who's benefit?

### **Visual Impact**

As you may be aware, there are already a large number of wind turbines located in West Cork which have a huge negative impact on the unique and beautiful landscape here.

The size of the proposed turbines for Maughanaclea are an overwhelming 169 meters in height, which is colossal in scale, far exceeding the height of other turbines in the area, in fact far exceeding the height of any building in the whole of Ireland. These exceedingly large structures will severely impact the tranquil and beautiful scenery of this area. The R585 is a scenic route, the Cousan Gap being a gateway to wild west Cork. If these turbines were to go ahead tourists visiting the area will simply be greeted by several monstrosities interrupting the landscape. There are several viewpoints which will be severely impacted by this, its noted that there will be significant visual impact at viewpoints 6, 11, 12 and 16 where the turbines will impact 44% of all views here. Also the montages provided by Enerco are cleverly shown to downplay such impact, form limited viewpoints and also from perspectives showing turbines in line with each other seemingly minimising their impact.

## **Environmental Impact and landscape sensitivity**

This area is also designated as (15a) a high value landscape which is deemed sensitive and vulnerable. This is stated in the Cork County development plan. High value landscapes are described in the CC development plan as "vulnerable landscapes with the ability to accommodate limited development pressure. However in Enerco's assessment it was downgraded to Medium value due to being of local importance only. It does not acknowledge the sensitivity of the landscape. We are locals and this is important to our area as well as tourism in the area. There are many scenic routes that bring people from all over the world to visit these areas of West Cork. While it also states there has been human modification to the land this is not on a large scale industrial level as proposed by Enerco.

While the proposed area is listed as open to consideration for wind farm development, Cork County Development Plan (CCDP) states specific criteria must be met

The first being that such a project must avoid adverse impacts on the "**visual quality of the landscape**" and minimize the degree to which impacts are visible over wider areas.

- "**Catchment Protection:** For upland sites located in sensitive catchments (such as those containing peat), the policy requires developers to demonstrate that the project is designed to "**prevent any risk of peat slippage or erosion**" and maintain natural hydrological processes.' CCDP

This proposed development is far from limited. The construction, digging, rock breaking , pouring several hundred tonnes of concrete into the landscape (not environmentally friendly!) the run off from the building site areas , this is destruction of a landscape.

The landscape here also consists of blanket peatland with several watercourses running through it. We get high volumes of rain through out the year in this area during which these watercourses are transformed from streams and rivers to raging flood waters. A lot of surface water is also prevalent during heavy rainfall leading to run off into local rivers. Which will also include concrete run off and industrial substances used in construction. Enerco's plans do not acknowledge this or the damage that may occur to the landscape such as landslide, damage to watercourse and local drinking water supplies or peat slides. In Appendix 8.1- their Geotechnical Stability report there is contradicting information provided with a discrepancy of the peat depth at areas where T 13 and T14 are located where peat depth is recorded at 4.5 meters in depth yet the drawing number P24-118-0600-0001 features a legend where the deepest category provided is  $\geq 3.5 \leq 4$ .

Their non technical summary states that the site is low risk for peat slides yet the in the Site-Specific Assessment they detail a risk register for the section from **T13 to T14** explicitly states "**Control Required: Yes**". It also notes a pre-control risk factor for "**Evidence of previous failures/slips**".

Providing general information is not accurate information and I feel Enerco have pushed to promote that their plans overall are generally safe, manageable and minimal impact to the environment and surrounding lands which cannot be accurately verified by selective information only.

The carbon footprint alone for the concrete needed, along with the manufacturing and transportation of the turbines is a huge carbon footprint in itself. *"Notably, the manufacturing of wind turbines is the primary contributor to the carbon and energy footprints, highlighting a critical area for targeted environmental mitigation strategies."*

<https://www.sciencedaily.com/releases/2024/05/240516122608.htm>

There is no current plan for the recycling of the turbine blades when the turbines are decommissioned either. It is not environmentally responsible to simply dump the blades in landfill. It simply adds to the problem of negative impacts on our environment which in turn affect species and climate change.

Concrete is not environmentally friendly and has a huge carbon footprint. It is also non-porous so it will also contribute to drainage problems in the landscape, which can have a knock-on effect on the diversity and ecological aspects of the land.

### **Impact on local rivers and Drinking water supply.**

The hydrology report in Enerco's documents notes a high risk to public drinking water supplies, acknowledging that the proposed wind farm represents a significant rise to local water supplies especially in the Kealkill area. 'The wind farm area covers a **"significant portion"** of the drinking water abstraction catchment for Kealkill. The Kealkill abstraction point is located only 1.3km from the site boundary and 2km from the nearest infrastructure' The report classifies the public drinking water sources as 'very sensitive' which is the highest possible rating for environmental receptors

The report also notes contamination risks due to **suspended solids (silt), hydrocarbons (fuel/oil), and alkaline cement-based products** and the Potential for Increased Siltation in "High Status" Waters

The wind farm site is located at the headwaters of several rivers that currently enjoy **"High" status** (Q4-5) under EPA biological monitoring, including the **Owngar, Owvane, and Mealagh Rivers.** **Natural High Runoff:** The site is characterized by exceptionally high surface water runoff rates (**87%**), meaning that the vast majority of rainfall travels over the peat surface directly into streams rather than being absorbed into the ground.

**Construction Disturbance:** The project requires massive earthworks, including the construction of **14 turbine foundations, 5 new watercourse crossings,** and the felling of **44 hectares of forestry.** These activities provide a direct source of sediment that can be entrained in runoff.

Enerco's proposal of "Siltbuster" systems to eliminate this problem are ineffective as the report admits that fine particles like **clays and peat** have very slow settling velocities and do not settle out efficiently without chemical dosing. Overdosing with these chemicals presents its own perceived risk of "chemical carryover" into post-treatment water.

This is a health and safety risk to all who's homes are supplied by the local drinking water water as well as the many hundreds of homes that are supplied by their own wells on the land. These will no doubt also be affected

In terms of environmental impact on the local river habitats, The project is located within sensitive catchments for the **Freshwater Pearl Mussel**. The site drains into the Bandon/ Caha Catchment, which is designated as a sensitive area for this species. Pearl mussels are extremely vulnerable to the **suspended solids** and **siltation** that the report identifies as a "significant" potential impact of the construction phase. The fresh water Pearl mussels is also a protected species

So there is a documented risk not only to the public drinking water supply for hundreds of people in the area but also irreversible damage of high status bodies of water and protected habitats use to unavoidable siltation and chemical runoff.

This does not protect the people, the landscape or the environment.

### **Actual Impact on Climate Change**

I would like to make it clear that I am very passionate about taking care of the Earth. I am all for sustainability and ways to lesson our impact on the planet. I am objecting to these wind farm proposals because the reality is that they are not a sustainable way to reduce our carbon footprint. They are know to generate thousands of tonnes of carbon in their production, transportation and construction which they do say can be offset over a number of years however taken into consideration the destruction of peatland here in this specific case, this project will off load more carbon than other proposed projects. Given the short life span of the turbines and the huge carbon imprint this project will do little to sustain reduce Irelands carbon footprint.

The turbines themselves will not always be in operation. I understand that they cannot be in use during storms, note, here the west coast including county Cork is susceptible to the majority of storms and high winds off the Atlantic, often with status orange or red warnings. The turbines also get shut down frequently when they produce too much as the grid cannot handle the amount of electricity generated. During this time the developers still get paid to switch them off. Why do they get paid for doing nothing? Also who pays for this? Our electricity is not getting any cheaper, in fact the cost of electricity in Ireland is the most expensive in Europe. Recent studies by Hannah Daly from UCC also show that the majority of electricity produced in Ireland is now going to power data centres , not Irish homes. These data centres are also largely owned by multinational corporations such as Amazon, google and Microsoft. Ireland is paying the price to feed these companies  
Daly's study shows that since 2017, all the energy from new wind developments has gone to power data centres.

While data centres currently account for roughly 3% of Europe's total energy consumption, Data centres in Ireland account for 21% of total energy consumption with a prediction to rise to 33% by 2030, this is compared to the 3% of energy consumption by data centres in Europe.

Ireland is expected to reduce its carbon emissions by 42% by 2030, wind turbines are not going to fix this especially with the energy going to data centres which use more power. The government needs to change its policy here and actually do something about the larger industrial scaled projects such as data centres as the problem here is energy demand from large corporations and data centres, not from Irish home owners.

The excess of data centres are a drain on the environment, there are huge impacts to waterways and water resources due to these data centres. This is a huge issue which a blind eye seems to be turned to. Will this be looked into? If Ireland wants to reduce its carbon footprint, a great start would be to reduce the amount of data centres in the country and to stop pushing everything to rely on electricity or an internet connection. There are other ways they just need to be considered.

What I would like to see going forward is more community consultation, not on the construction of wind turbines but on how communities can work together to thrive in a sustainable way. Communities know their landscape, they know each other and we often don't have a say and if they do its not always made very accessible or clear for deadlines etc.

Looking at other countries Sweden has the lowest carbon emissions in Europe. While this is due to renewables it is not down to energy produced by wind turbines

"Hydropower and bioenergy are Sweden's largest renewable sources. Hydropower is mostly used for power generation and bioenergy for heating. Forest covers 63 per cent of the country and is the main source of bioenergy." Could these be potential and less impactful renewable resources for Ireland going forward? I do believe the research needs to be done, its time for more positive change that supports our communities and our environments health and wellbeing. In order to thrive on this planet we really must take care of it, it is not only our home but the home of many species of flora and fauna too. We must create balance for us all to live on this earth. Humans simply take too much from it as a cost that will be irreparable if we continue to live this way.

Thank you for taking the time to read my observations.

Kind regards

Natasha Edmondson

A handwritten signature in blue ink, appearing to read 'Natasha Edmondson', written over a horizontal line.