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P75 V968

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

20 May 2026

Re: Submission of objection to the proposed Maughanaclea Wind Farm (ACP-324165-26 / 324165) — Enerco Energy Ltd

Dear Sir or Madam,

I am writing to object to the proposed Maughanaclea Wind Farm. I live at Droumsullivan, in the Mealagh Valley, and my home sits within roughly three kilometres of the nearest proposed turbine, on the valley floor directly south of the ridge where the turbines would stand. I run Valley View House, a small self-catering letting at the same address, which is also where my family lives. I am fifty-four years old. I have lived in this valley my whole life. My trade is construction, and I know what a quarry-grade rock breaker sounds like on a hillside, and what it sounds like a mile away.

The valley and the ridge. The turbines proposed for Maughanaclea would stand 169 metres to blade tip. To put that in plain terms, that is the height of about fifty terraced houses stacked one on top of the other. They would not sit on flat ground. They would sit on the ridgeline directly above us, in full view from my house, from my yard, and from the lane I have walked since I was a child. The Mealagh Valley is a scenic rural landscape and it is described as such in the Cork County Development Plan. Putting a row of structures of that height on the ridge above us does not respect that landscape designation. It overturns it. The development plan exists to keep places like this place like this. Granting permission for these turbines would make the development plan meaningless in the very place it is meant to protect.

Quiet, and what we stand to lose. The reason people come to stay at Valley View House, and the reason I am still here at fifty-four, is the quiet. The valley is quiet in a way that surprises visitors. You can hear a stream at night. You can hear nothing at all, if you stand still long enough. That is the asset. That is what guests pay to experience and what my family lives in. Once a turbine of any size starts turning above this valley, that asset is gone. It does not come back when the wind drops, because by then people have stopped coming, and my children no longer think of the place as somewhere to stay.

Noise across a valley is not noise across a field. The developer's noise assessment treats this site as if the turbines were on open ground. They are not. They are on a ridge with a valley below them, and the receptor properties are on the valley floor. Peer-reviewed research on exactly this geometry (Van Renterghem, 2017; see source A) shows that sound from a ridge-mounted turbine propagates very

differently across a valley than it does across flat ground. There is some shielding near the source, but further across the valley the modelling predicts conditions close to free-field propagation, particularly where the ground is rocky rather than soft. Much of the ground between the proposed ridgeline and my house is exposed rock and thin pasture over rock. That is the worst case in the modelling. The assessment lodged by the developer does not address this. It uses generic noise propagation assumptions and applies them to a site that the published literature singles out as unusually difficult to model. I do not accept the noise figures presented and I do not accept that the noise impact on my home has been honestly characterised.

Night-time, low frequency, and rock breaking. The complaint that arises in nearly every operational wind farm of comparable scale is low-frequency noise and amplitude modulation at night, when background levels fall and the turbine sound carries furthest. That is precisely the time of day when the valley is quietest and most of my neighbours are asleep. Separately, the construction phase, eighteen to twenty-four months by the developer's own estimate, will involve rock breaking on the ridge. Rock breaking carries. In a valley with hard ground it carries a long way. I work in construction. I have heard it. The notion that a valley like this can absorb two years of breaking without serious disturbance to the people living below it is simply not credible.

Shadow flicker. My house is south-facing. The proposed turbines sit north of me. That is the geometry that produces shadow flicker through south-facing windows in the morning and evening, depending on the time of year. The kitchen and the sitting room both face that direction. I do not trust the modelled exceedance figures in the EIAR. Even on the developer's own modelling, the flicker is reported as occurring within the "acceptable" limit. That limit is a planning convention, not a measure of whether a person can comfortably read in their own sitting room. I do not want to find out, after the fact, what thirty hours a year of strobing across my back wall feels like.

Peat, water, and what is underneath us. The development site is peat-dominated ground on a steep slope. The Derryclogher (Knockboy) Bog SAC lies to the north, and the wider area carries blanket bog habitat that is a priority habitat under Annex I of the Habitats Directive. Heavy construction on peat-dominated slopes has a long, well-documented history of going wrong in Ireland, the Derrybrien peat slide being the case still cited in Court of Justice judgements (C-261/18; see source B). My household water comes from a shallow gravity-fed well. There has been no baseline testing of private wells in this area, and the EIAR contains no commitment to baseline testing of mine. If my water goes cloudy, or stops flowing, or arrives with peat in it during a wet winter after blasting and excavation on the ridge above me, I will have no measured baseline to compare it against and no clear party against whom to make a claim. That is not acceptable. Any permission, if granted, would need to be conditioned on baseline well testing of every household on private supply within a defined radius, and on rolling water-quality monitoring throughout construction and for at least five years afterwards.

Birds. I see hen harriers over the bog at the back of the house several times a year. I have seen a sea eagle once, three years ago, and a peregrine more recently. These are not abstractions and they do not stop at the boundary of a Special Protection Area. The Court of Justice has already confirmed (Commission v Ireland, C-418/04) that the protections owed to Annex I species apply outside designated SPAs as well as within them. Research carried out in Ireland by Fernández-Bellón and others (2019; see source C) found that total bird densities at operational Irish wind farms were lower

than at control sites, and that the differences were greatest close to the turbines. The EIAR's bird survey effort, in my view, does not reflect the level of raptor activity that local people actually observe on this ridge, and I would urge the Commission to treat the developer's baseline survey with caution.

Dark skies and the letting business. The night sky over the Mealagh Valley is one of the darker skies in southern Ireland. It is one of the reasons guests come to Valley View House, and it is the reason at least one neighbouring business markets itself specifically on dark-sky tourism. Aviation lights on a row of 169-metre turbines on the ridge above us would put red flashing lights into every south-facing window in this part of the valley, all night, every night, for the operational life of the development. The Programme for Government 2025 commits to expanding Dark Sky reserves in Ireland, not extinguishing the ones we have left informally. The Galloway dark-sky study (see source D) shows what a protected sky is worth in cash terms to a rural tourism economy, and the Fáilte Ireland West Cork Coast Destination and Experience Development Plan treats tranquillity and landscape as primary assets of this region. Putting aviation lighting on the ridge above me is not consistent with either.

Health, sleep, and access to hospital. There is someone in my household with a condition that is exacerbated by poor sleep, and I will leave it at that in writing. Sleep disturbance from wind turbine noise is documented in the peer-reviewed literature (Onakpoya et al., 2015; see source E). The construction-phase closures of the R586 are a more practical worry. The R586 is the road we take to Cork city for hospital appointments. Anybody in this valley needing emergency or scheduled hospital care during the construction period needs that road open. I am also concerned, as a small-scale livestock keeper, about the effect of construction noise and operational noise on farm animals. I have not seen this addressed seriously in the EIAR.

Renewables in the right places, not the wrong ones. I am not opposed to renewable energy. I work in construction and I have wired enough houses with solar panels by now to have an opinion. Renewable energy belongs on offshore platforms, on brownfield sites, and on the roof of every warehouse and shopping centre in the country before it belongs on a peat-dominated upland ridge above a settled valley with active farms, holiday lettings, archaeological monuments and a fragile water table. The argument that we must accept this development to meet climate targets is one I do not accept, because no credible climate target requires us to destroy intact rural landscapes when better-sited alternatives are available and unbuilt. Better-sited renewable capacity should come first.

The developer's engagement. The information that has been given to us locally has changed more than once. Turbine numbers, turbine heights, and access route details have all been adjusted between presentations, and the version that ended up in the EIAR is not the version that was first described to us. I am not satisfied that the consultation process meets the standard expected of a development of this scale. I have also not been given a clear picture of construction traffic on the R586 or on the local roads off it, and there is no transport management plan I have seen that makes serious provision for emergency vehicle access during haulage and road works.

A note on the four-times-tip-height setback. SPPR 2 of the 2019 Wind Energy Development Guidelines requires a setback for visual amenity purposes of four times the tip height of the turbine between each turbine and the nearest curtilage of any residential property, with a mandatory minimum of 500 metres. Four times 169 metres is 676 metres. The Commission will wish to satisfy

itself that this requirement is met not just for the nearest dwellings on the developer's map, but for every property boundary in the vicinity, including outbuildings, lettings, and farm dwellings that may not be obvious from a desk-based map.

In summary. The proposed development is in the wrong place. The ridge-and-valley geometry will carry noise into the homes below it in a way the developer's noise assessment does not properly capture. The aviation lighting will end the dark sky we trade on. The peat, the water table, the birds, and the archaeology of the Meallagh Valley are not assets that can be reinstated once damaged. I respectfully request that An Coimisiún Pleanála refuse permission.

Yours faithfully,

Patrick Kearney
Droumsullivan, Bantry, Co. Cork, P75 V968

Sources cited

- A. Van Renterghem, T. (2017). *Sound propagation from a ridge wind turbine across a valley*. Philosophical Transactions of the Royal Society A, 375: 20160105.
- B. Court of Justice of the European Union, Case C-261/18, *Commission v Ireland* (Derrybrien), judgment of 12 November 2019.
- C. Fernández-Bellón, D., Wilson, M.W., Irwin, S., and O'Halloran, J. (2019). *Effects of development of wind energy and associated changes in land use on bird densities in upland areas*. Conservation Biology, 33(2): 413–422.
- D. Galloway Dark Sky Park Economic Impact Assessment, summarised in the All-Party Parliamentary Group for Dark Skies submission to the UK Parliament, 22 September 2023.
- E. Onakpoya, I.J., O'Sullivan, J., Thompson, M.J., and Heneghan, C.J. (2015). *The effect of wind turbine noise on sleep and quality of life: a systematic review and meta-analysis of observational studies*. Environment International, 82: 1–9.