

SUBMISSION OF OBJECTION

Proposed wind farm at Maughanaclea, near Kealkill, Co. Cork — ACP-324165-26

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Distance to nearest proposed turbine: approximately 2 km

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Date: May 2026

To: An Coimisiún Pleanála

Re: Objection to the proposed Maughanaclea Wind Farm (ACP-324165-26)

I am writing as a member of a household at Moonlands, Laharanshermeen, approximately 2 km from the proposed turbines. I am 27, a mechanical engineer by training. I grew up in this valley. I have been working abroad for the past five years and I am planning to bring my family home to live here. The home address above is my permanent home and the address I am returning to. I have set out my objection below in numbered points. I have kept it short because I prefer to be plain. Every point is mine.

SCALE AND VISUAL IMPACT

1. The proposed turbines have a tip height of **169 metres**. For local context that is roughly two and a half times the height of County Hall in Cork stacked on top of itself, sited on an exposed ridgeline above a quiet valley. Fourteen of them. This is industrial infrastructure, not landscape integration.
2. From my home at Moonlands the ridgeline north of the Mealagh Valley is the dominant feature of the horizon. The proposed turbines would be in continuous view from the house, the yard, and the road. They would be the first and last thing seen each day.
3. The Cork County Development Plan 2022–2028 designates this landscape as a High Value Landscape and a Highly Sensitive Landscape. The developer's own LVIA records Significant visual effects at multiple viewpoints, including Substantial magnitude of change at VP16. A proposal cannot reconcile a Significant residual visual effect with a planning designation built around preserving the very character it would destroy.

CUMULATIVE IMPACT

4. There are already operating, permitted or proposed wind farms within commuting distance of my home, including the Coomatallin, Knockduff and Derryvoughta clusters. Adding fourteen more turbines on the Maughanaclea ridge places this rural area at the centre of an industrial wind cluster of a size that no urban planning authority in the country would permit on its own boundaries. The cumulative ecological, visual and acoustic impact of these clusters in combination has not been properly assessed.
5. Rural West Cork is absorbing a disproportionate share of national wind development. This is a planning decision about the distribution of harm, not just the merits of a single application.

RESIDENTIAL AMENITY

6. The townland I am returning to is genuinely quiet. The background sound is wind, sheep, the river, and not much else. The introduction of a fourteen-turbine industrial plant on the nearest ridgeline removes that, permanently. My family will inherit the consequences of a planning decision taken in our absence.
7. The construction phase is described in the EIAR as lasting 18 to 24 months. The application proposes blasting and simultaneous twin rock-breaker operation at four borrow pits on peat-dominated terrain. This is heavy industry on a country road. The disruption to daily life over two years — traffic, dust, vibration, the noise of haulage and breaking — is not adequately captured in the application.
8. I expect this development will reduce the value of my home if it is built. That is not speculation. Gillespie and McHale at the University of Galway (*see source E*) performed a hedonic price analysis on the housing market in seven west-of-Ireland counties and recorded a robust, statistically significant reduction in property value of 14.7% for dwellings within 1 km of a turbine, with the effect increasing with turbine height and number, and decaying only slowly over a ten-year window. My home is approximately 2 km from the nearest proposed turbine of a 14-turbine, 169 m array — outside the inner band of the study but plainly inside the range across which the authors record persisting, if smaller, effects. The Commission is not bound to weigh that point, but it is a real consequence for every household within sight of the turbines and the literature is now clear that it occurs.

HEALTH AND NEURODIVERSITY

9. I have autism, ADHD and an auditory processing disorder. I find it difficult to switch off at night as it is. Sleep is harder for me than for most people, and the conditions I have are well documented in the peer-reviewed literature as conferring particular vulnerability to environmental noise. The Schmidt and Klokke systematic review in *PLOS ONE* (*see source A*) concluded that wind turbine noise is associated with annoyance, sleep disturbance and decreased quality of life, and that the evidence is strong enough to apply the precautionary principle in policy. The World Health Organization's 2018 Environmental Noise Guidelines for the European Region (*see source B*) reach the same conclusion and recommend that average wind turbine noise exposure should not exceed 45 dB *Lden* — a level the Maughanaclea EIAR's own predictions exceed at multiple receptors.
10. The EIAR Health Impact Assessment does not address neurodevelopmental conditions specifically. People on the autistic spectrum are documented in the literature as having heightened sensitivity to sound (Howell and colleagues report sound sensitivity in over 40% of children with autism) and a tendency to fixate on rotational movement (Becchio and colleagues). Shadow flicker and persistent low-frequency noise are accordingly a more serious matter for autistic adults than the EIAR's averaged human-receptor model assumes.
11. The Commission has previously recognised this issue in the context of educational facilities for children with additional needs near wind farms (ABP precedents PA00-41 and ABP-PA0038). The principle applies equally to a household occupied by a neurodiverse adult.

12. I do not raise my own condition lightly. I raise it because the Commission has a duty under the Aarhus Convention and EU environmental impact assessment law to consider differential effects on vulnerable receptors, and because my household is one of those receptors.

NOISE

13. I am raising noise as a ground of objection in this submission.
14. The acoustic modelling in Chapter 12 of the EIAR uses ISO 9613-2, which is documented in the modelling literature as *underestimating* sound propagation across complex hilly terrain in stable, downwind night-time conditions. The Mealagh Valley is precisely that geometry: turbines on a ridge to the north, dwellings in a valley basin to the south. Van Renterghem (see *source C*) modelled exactly this case and showed that valley-floor receivers experience markedly higher long-distance propagation than flat-terrain models predict.
15. The EIAR placed six noise monitoring locations to establish baseline. None of them are anywhere near the quietest receptor in the Mealagh Valley — Wild Hideaways Eco Retreat — even though the developer’s own glossary defines a Noise Sensitive Location to include any area of high amenity whose proper enjoyment requires absence of noise at nuisance levels. NML4, the single location placed inside the Mealagh Valley, is described as a “quiet garden location” with audible road traffic. It does not represent the quietest baseline in the valley. A baseline measured at the wrong place produces a turbine noise prediction that flatters the developer.
16. Borrow pit rock breaking is admitted in the EIAR at 48 dB LAeq at the closest receptor 300 m away (Chapter 12 § 12.6.2.3), with blasting at 59 dB LAeq. That is two years of intermittent industrial noise echoing across a steep-sided valley which acts as a natural amphitheatre.
17. Night-time noise, low-frequency noise and amplitude modulation are not adequately addressed in the application. The Institute of Acoustics Amplitude Modulation Working Group method (see *source D*) sets out a measurable penalty scheme for the rhythmic “thumping” character of turbine noise that conventional A-weighted limits do not capture. The EIAR does not apply it. The Ballyduff judgment confirms in any event that compliance with planning permission noise limits does not preclude a later finding of private nuisance. Granting permission on the basis of the current acoustic case exposes the development to that risk.

SHADOW FLICKER

18. I do not trust the modelled exceedance figures in the EIAR. Shadow flicker prediction at H031 (98 hours/year) and at multiple other dwellings already exceeds the 30-hour-per-year industry guideline before any allowance is made for cloud cover assumptions, screen-modelling defaults, or the cumulative effect of a 14-turbine array. The mitigation offered — software shutdown on detection — transfers the burden of complaint to residents and assumes the system is correctly configured and consistently operated over the project lifetime. That is not mitigation; it is a service-level commitment.

PLANNING PROCESS AND DEVELOPER CONDUCT

19. The developer's community engagement was confined to households within 2 km. Information presented at consultation events was incomplete in respect of final turbine size, road works and construction phasing. Drawings circulated to the community did not match what subsequently appeared in the application. I do not accept the characterisation in the Community Engagement Report (Appendix 2-1) that this consultation was extensive or that it shaped the final proposal. It did neither.
20. Several internal inconsistencies in the application have been identified by the community. The two most striking, in my view as an engineer reading the technical chapters, are: (a) the climate balance in Chapter 17 claiming a long-term moderate positive effect while Chapter 11 admits that carbon losses from vegetation removal have not been quantified and that no restoration will occur on decommissioning; and (b) Chapter 6 § 6.6 claiming that good-quality intact Annex I habitats have been completely avoided, while Table 6-24 in the same chapter records a permanent significant residual effect on Annex I Upland Blanket Bog. A planning application is not a marketing document. These contradictions are not minor.

TOURISM

21. My parents run Wild Hideaways, the only registered tourist accommodation premises identified within 5 km of the site in the developer's own Tourism Impact Assessment (Chapter 5 § 5.3.2.3). The business depends on a single commercial proposition: silence, darkness, and the unspoiled character of the Mealagh Valley. None of those things survives the proposed development.
22. The TIA acknowledges the existence of the business and then concludes that the area is "not of high tourism significance." That conclusion is contradicted within the same chapter, which lists Gougán Barra (~63,000 visitors annually), the Wild Atlantic Way scenic corridor, the Sheep's Head Way, St Finbarr's Pilgrimage Path, and the registered Wild Hideaways retreat. Fáilte Ireland's own 2024 Wild Atlantic Way 10-Year Economic Impact Report (*see source 1*) values that corridor at over €3 billion per year in tourism revenue to communities along the western seaboard, supporting 121,000 jobs. The developer's characterisation of the receiving environment is not consistent with the State's own data. The developer also did not consult my family, or any other tourism operator, despite citing Fáilte Ireland's 2023 EIAR Guidelines which require engagement with tourism stakeholders.
23. I am writing this submission not only on my own account but because I expect, in the ordinary course of things, to take over Wild Hideaways from my parents one day. That is what the family business is for. The application asks me to inherit a tourism enterprise whose product has been destroyed by the planning system before I have even moved home.
24. I have children of my own. When I bring them back here to live, I would like them to experience this valley the way I did growing up — quiet, dark at night, with the ridgeline above the house unbroken. Instead I would have to explain to them why the adults who were here before them allowed a fourteen-turbine industrial array on that ridge, and why the place they were brought home to was already gone.

DARK SKIES AND AVIATION LIGHTING

25. The proposed turbines carry mandatory aviation warning lighting. The receiving environment is described by Dark Sky Ireland as near-pristine, and the Wild Hideaways business explicitly markets itself on it. The economic value of unspoiled dark skies to a rural tourism economy is no longer a matter of opinion. The independent economic assessment of Galloway Forest Dark Sky Park (see *source F*) found a return of £1.93 per £1 of public investment, an additional £500,000 per year of visitor spend within ten years of designation, and 77% of local businesses reporting increased overnight stays attributable directly to the dark sky designation. Fáilte Ireland's own 2019 feasibility study (see *source G*) concludes that protecting and enhancing the quality of dark skies is essential to maximising tourism potential along the Wild Atlantic Way. The application proposes to do the opposite, in the exact corridor that strategy is built around.
26. This contradicts Fáilte Ireland's Dark Sky tourism strategy for the Wild Atlantic Way, the Programme for Government 2025 commitment to expand Dark Sky reserves, and the obvious commercial proposition of every astro-tourism business along this coast.

CLIMATE AND ENERGY POLICY

27. I support climate action. I am a mechanical engineer. I understand the urgency. I do not accept that this site is the right place. Professor Hannah Daly's December 2024 work on Ireland's carbon budgets (see *source H*) shows that Irish electricity demand growth is driven primarily by data centre expansion, and that the wind build-out is in significant part feeding corporate Power Purchase Agreements rather than electrifying Irish homes. The framing of this application as climate-emergency-justified obscures who actually benefits from the energy.
28. Better sited alternatives exist. Offshore wind, brownfield onshore sites, large-scale rooftop solar on industrial and commercial buildings, and proper grid investment together would deliver renewable energy without sacrificing irreplaceable habitat, heritage and rural amenity in West Cork.

COMMUNITY OWNERSHIP AND BENEFIT

29. This project is not community-owned. The profits leave the area. The Community Benefit Fund proposed is not adequate compensation for what is being taken. The community has not given meaningful consent.

CONCLUSION

I am a man of few words. I have done my best to set out, in plain numbered points, the reasons I object to this application. Every point is mine. I object on landscape, cumulative, residential amenity, health, noise, shadow flicker, planning conduct, tourism, dark skies, climate and community grounds, and I ask the Commission to refuse permission.

Thank you for reading this.

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SOURCES CITED

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