

Timothy O'Sullivan  
Goulanes  
Bantry  
Co. Cork  
P75 XN61

May 2026

An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

Re: Objection to Maughanaclea Wind Farm — ACP-324165-26 / 324165

To the Commissioners,

My name is Timothy O'Sullivan and I have lived in West Cork all my life. I write to object, in the strongest terms I know how, to the proposed Maughanaclea Wind Farm. My home in Goulanes sits approximately 2 km from the nearest of the proposed turbines in the southern cluster of this development. I have been here long enough to remember when the planning system in this country meant something, and long enough to know what is being lost when it stops.

I want to begin by being plain about one thing. I am not against renewable energy in principle. I support climate action. What I object to is the idea that climate action requires us to sacrifice the last of West Cork's unspoiled landscape, its peat hills, its birds and its dark sky, when there are far better-sited alternatives that this country has refused to prioritise. That is not climate action. That is convenience dressed up as climate action, and the people who pay the price are the people who live here.

### ***Where I am writing from***

I live below the proposed southern turbine cluster, on the south-facing side of the ridge that the developer calls Maughanaclea Hills and that the rest of us know simply as our skyline. The 14 turbines proposed for this development are 169 metres tall to the tip of the blade. To anyone reading this in Dublin who has not been to West Cork, that is more than twice the height of Liberty Hall on Eden Quay. It is a structure that does not belong on a ridgeline in a valley like ours, and the developer's own Environmental Impact Assessment Report admits that the turbines will be sited "across a southwest-northeast trending topographic ridgeline" and on the ridgeline of the Maughanaclea Hills itself. The Cork County Development Plan, at GI 14-9(d), tells planners to "protect skylines and ridgelines from development." On page one of the application, that policy is broken.

### ***The planning rules I lived under***

In 2007 my wife and I applied for planning permission to build the house I live in today. We were told, in writing, that we could not even put dormer windows on the front of our own house because we lived in an area of scenic beauty. Friends of ours, a little further down the road, were refused permission outright before we built, on the same grounds. We understood. We accepted it. The character of the place was the reason we wanted to be here in the first place, and if the rules had to be strict to keep that character, then so be it.

Now I am being asked to accept that the same Cork County Council that refused my dormer windows is in a position to allow 14 industrial turbines, each one nearly 170 metres tall, on the very ridges that defined that scenic beauty. Borrow pits will be excavated in the same hills. Massive amounts of concrete will be poured into ground that has been peat bog for thousands of years. Access roads will be cut into slopes that I have walked all my life. I do not know how to describe what that feels like, except to say that it makes a fool of every household in this valley who was ever told to redesign their porch because it would be visible from the road.

If An Coimisiún Pleanála grants this permission, it will be telling every small householder in West Cork that the rules are one thing for them and a different thing entirely for an industrial developer.

### ***Why we are taking more than our share***

West Cork is already among the most heavily developed parts of Ireland for onshore wind. Within ten kilometres of my home there are existing or permitted wind farms at Gortloughra, Shehy More, Dereenacreenig West, Curraglass, Milane Hill, Carrigarierk, Carrigarierk Extension and Grousemount. The LVIA in the developer's own EIAR identifies 29 wind farm developments within 25 km of this site. Meanwhile entire counties in the east of this country contribute zero gigawatt hours to the national grid from wind. Cork and Kerry between them produce more wind electricity than the remaining twenty-four counties combined. There is no honest argument for piling another 14 turbines on top of that imbalance, in this particular ten-mile square, and calling it a national strategy.

And these are not the only developments coming. Local residents have been tracking the parallel applications at Curraglass, Gortloughra, Goulacullin, Dereenacrinnig West and Cummeen — a total of around 30 proposed or contested turbines within a ten-mile radius of where I sit writing this. The developer's cumulative assessment treats each of these as a separate matter. The valley does not have that luxury. We get the sum total of all of them, every day, for the next 35 years.

### ***The wildlife***

I have been hugely concerned about the wildlife around here for years. We have already watched the corncrake disappear from this country in my lifetime, lost to agricultural intensification. The birds of prey are next if we are not careful. We have hen harriers in these hills — the developer's own ornithology chapter records nineteen observations of hen harrier during their vantage point surveys, ten of those observations inside 500 metres of the proposed turbines, and a male

performing a territorial skydance display on the wind farm site itself in January 2024. The hen harrier is an Annex I species under the EU Birds Directive and it is in serious decline in this country. EU case law (Commission v Ireland, C-418/04) confirms that Annex I protections apply outside designated Special Protection Areas, not just inside them. The developer's own data is telling them that this site is being actively used for breeding behaviour by an Annex I species, and yet the report concludes the effect is not significant.

The same goes for peregrine falcon, which the developer recorded 28 times during vantage point surveys, half of those within 500 metres of the proposed turbines. And the white-tailed sea eagle, which the National Parks and Wildlife Service specifically warned the developer about — NPWS said clearly that placing turbines on ridges above valleys where eagles use rising air currents to gain altitude was an additional risk for this re-introduced species. The developer's answer was that because no eagles happened to fly past at collision height during their survey hours, no collision risk assessment for the eagle was carried out. That is not science. That is a get-out clause. A long-lived raptor whose range is expanding into West Cork does not respect the survey hours of a consulting ecologist.

And we have other animals too — pine marten, red squirrel, Irish hare — all protected. We have bats. We have lizards. We have ferrets living up in the hills. Where do any of these creatures go when massive plant moves in for 18 to 24 months, dynamiting borrow pits, breaking rock, felling forest? They get pushed down onto the agricultural land below, or they are simply lost. The accuracy of the developer's ecological assessment is something I do not believe has been independently tested. The NPWS Article 17 mapping shows Wet Heath, Dry Heath, Blanket Bog (active) and Alpine/subalpine heath at this site — all priority habitat under the EU Habitats Directive. The fact that some of it has been smothered by conifer plantation in the meantime does not, to my mind, give anyone the right to build over it now.

### ***Dark skies, lighting and tourism***

Like everyone in this valley, my work and what I do day to day are tied to tourism in West Cork — directly or indirectly, the local economy here runs on it. And tourism in this part of the country runs on something this developer has not assessed at all: the night sky. The Maughanaclea ridge sits in one of the darkest parts of mainland Ireland — conditions comparable to Kerry Dark Sky Reserve and Mayo Dark Sky Park. The Programme for Government 2025 has committed the State to expanding our Dark Sky reserves. A Dark Sky Community application is being prepared for this very valley. Visitors travel from across Europe and beyond to come and see what we can still see here when the lights go out.

The proposed wind farm would mount red, medium-intensity aviation warning lights on the top of every one of the 14 turbines. Twenty-eight red lights, on a near-pristine ridge, blinking every night for 35 years, visible from the entire Meallagh Valley and well beyond. The developer does not assess this against any night-time baseline. They simply state that the lighting will “not be overbearing or dominant.” That is not an assessment. That is wishful thinking written down. Recent academic work has shown that aviation lights of the kind proposed are

visible to the naked eye, brighter than Venus, at distances of up to four kilometres. From my home, every clear night for the rest of my working life, that is what I would be looking at instead of the stars.

The Fáilte Ireland West Cork Coast Destination and Experience Development Plan — the official strategy for tourism in this area — puts dark skies, tranquillity and unspoiled landscape at the centre of what visitors come here for. The developer's Tourism Impact Assessment did not consult a single tourism operator in the valley before reaching its conclusions, although Fáilte Ireland's 2023 EIAR guidelines specifically require it. This proposal is a direct contradiction of West Cork's tourism strategy, and yet the developer's Planning Report claims the project has no significant impact.

### **Noise**

Sound carries strangely in the Mealagh Valley. It echoes off the ridge on the far side and comes back at us from directions you would not expect. The developer's noise assessment, in my view, has not properly accounted for the hilly, bowl-shaped terrain we live in. There is peer-reviewed work (Van Renterghem, 2017, *Philosophical Transactions of the Royal Society A*) showing that turbines on a ridge above a valley produce very different sound propagation patterns from turbines on flat ground, and the developer's model does not, to my reading, take that properly into account.

Beyond that, only six noise monitoring locations were used to set the background noise baseline for a study area containing 79 sensitive receptors. The locations were selected by the developer using a method that essentially guarantees they will be the quietest spots in the model after the turbines are built — which is the opposite of how a proper baseline should be set. The actual quietest existing locations, the eco-retreats and the B&Bs and the rural homes that depend on real silence, were not measured. Night-time noise, low-frequency noise and amplitude modulation are concerns at every Irish wind farm of this scale; they are concerns here. And during the 18 to 24 month construction period, the developer's own noise chapter confirms there will be blasting and rock breaking in the borrow pits, with two rock breakers running simultaneously during daytime periods. The noise from that will echo across the valley for almost two years.

### ***Shadow flicker, water and the ground itself***

My home is within range of potential shadow flicker from the turbines, and the spaces I use daily would be affected. The developer's own modelling identifies dozens of dwellings within shadow flicker range, with individual properties predicted to experience as much as 103 hours of shadow flicker per year before mitigation — multiples of the 30-hour annual statutory limit. The developer says this will be mitigated by software that switches the turbines off when the sun is in the wrong position. I have to take their word that that software will work reliably for 35 years, that there will be no failures, no software bugs, no disputes about what counts as a hit. I do not have that level of trust. Nor do any of my neighbours.

The ground these turbines are being built on worries me as much as anything else. This is peat country. The peat is shallower than at Shass Mountain in Leitrim where peat collapsed in 2020, or Meenbog in Donegal where it also collapsed in

2020, or Derrybrien in Galway where the slide in 2003 became an international scandal — but it is still peat, and peat depths on parts of this site go up to 4.5 metres. The Geological Survey of Ireland’s own landslide susceptibility mapping rates parts of this site as “moderately high to high.” A recorded peat slide event happened at Goulacullin just 3.6 km east of the southern turbine cluster in 2001. The developer’s answer is that their own factor-of-safety calculations override the GSI’s mapping. Maybe they do, on paper. The valley below the slope is not on paper. Extreme rainfall events are not on paper. I worry about the runoff from steep peat slopes after construction, about erosion, about what happens to the watercourses that feed the Mealagh and the Owvane below — both of which are sensitive Freshwater Pearl Mussel catchments under S.I. 296/2009.

### ***Cost, benefit, and the bit nobody wants to talk about***

Back in 2002, when wind turbines were a new idea in this country, the payback period on a turbine was about 12 years. Since then the price of steel has gone up, copper wire has gone up, diesel has gone up, raw materials are up by close to 100 percent across the board, and the cost of excavation and concrete has soared with them. I am not the person to do that arithmetic for the Coimisiún — but somebody should, before this country commits to another generation of onshore wind built on the assumption that the numbers still work the way they did twenty years ago.

And what about 25 years from now, when these turbines reach end of life and have to be dismantled? Does anybody really know what the environmental cost of that will be? We already know from other countries that turbine blades cannot be recycled in any practical way. We know that the maintenance costs over a 35 year lifespan have been badly under-estimated in plenty of other projects. We know that decommissioning bonds in this country have historically been inadequate. I have a real fear that this will play out as it has played out so many times before in Ireland: nobody will shout stop, the development will proceed, problems will emerge, and a decade or two from now the government of the day will say “we’ve learned our lesson” — and the lesson will have been paid for by the people in this valley.

This development is not community-owned. The profits will leave the area. The community has not given meaningful consent to it. The Community Benefit Fund that has been proposed is something I do not want a part of — it is not compensation for what we lose.

### ***Construction, traffic and consultation***

The construction phase is projected at 18 to 24 months. Heavy haulage will use roads that were never designed for it. The landslide risk on steep peaty slopes during construction is real, regardless of what the factor-of-safety report says. None of this was made plain to me or to my neighbours during the developer’s consultation period. Information that was given to me was, at best, incomplete, and I was certainly not given a clear picture of the size of the turbines, the scale of the road works or what construction would mean for the valley day to day. The developer’s public information event was held at Westlodge Hotel in Bantry, well outside the affected area. The community consultation report was restricted to households within 2 km, even though the shadow flicker study area extends to

1.33 km and the LVIA assesses receptors out to 15 km. The consultation area was a fraction of the impact area.

### ***Heritage***

I will not pretend to be an expert on the archaeology of these hills. But I know the Mealagh Valley is one of the richer landscapes in West Cork for prehistoric monuments, and I know the developer's own EIAR confirms 11 recorded archaeological sites within the wind farm site, 210 further sites within 5 km, and 6 National Monuments within 10 km. I know also that the Cultural Heritage chapter of that EIAR contains the verbatim admission that "it is not possible to mitigate indirect effects on the archaeological, architectural and cultural heritage resource, due to the nature and scale of the proposed turbines within the landscape." That is the developer themselves, in their own report, saying that the visual intrusion on these monuments cannot be mitigated. That sentence alone should give An Coimisiún Pleanála pause.

### ***In closing***

I find myself, at this stage of my life, in genuine fear of being surrounded by wind turbines. I already know people in nearby townlands who live with the existing wind farms and who have had their lives changed in ways they did not bargain for. I do not want to be next.

The planning laws in Ireland for wind energy have not been seriously updated since 2006. The setback distance is the same as it was when turbines were half the height. The night-time noise guidance is still in draft. The shadow flicker enforcement framework is whatever the operator chooses to honour. These rules need to be updated before any further industrial-scale wind farm is consented in a populated rural valley like ours. To grant permission now, under the existing framework, is to grant permission under rules that everyone in the system knows are out of date.

West Cork is one of the most beautiful corners of this country. It is also, in 2026, one of the most heavily developed corners for onshore wind in Europe. We have done our share. I respectfully ask the Coimisiún to refuse this application.

Yours faithfully,

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Timothy O'Sullivan

Goulanes, Bantry, Co. Cork, P75 XN61

Approximate distance to nearest proposed turbine: 2 km (southern cluster)