
ACP-324165-26 — Response to Section 4.3.2 — Elva O'Sullivan

From Elva Barron <elvabarron1@gmail.com>

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To SIDS <sids@pleanala.ie>

 1 attachment (12 KB)

Elva OSullivan Response to Letter.pdf;

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A Chara,

Further to the Commission's letter of 14 August 2026 in case ACP-324165-26, I attach my response to Section 4.3.2 (Nature Conservation) of the applicant's Response to Observations. It follows the joint observation made by my husband Alan and me in May 2026, which stands in full.

Please acknowledge receipt.

Is mise, le meas,

Elva O'Sullivan

Glencreagh,

Bantry,

Co. Cork,

P75 YA72

Elva O'Sullivan
Glencreagh, Bantry, Co. Cork, P75 YA72

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

Re: Proposed Maughanaclea Renewable Energy Development — ACP-324165-26
Response to Section 4.3.2 (Nature Conservation) of the applicant's Response to Observations

A Chara,

I write further to the Commission's letter of 14 August 2026, which invited observations on the applicant's Response to Observations, received by the Commission on 14 July 2026, confined to Section 4.3.2 (Nature Conservation). In May my husband Alan and I made a joint observation from our household at Glencreagh, on the southern side of the Mealagh Valley, about 3 km from the nearest proposed turbine. That observation stands in full — every ground of it, our noise concerns included — and I write now in my own name, within the scope the Commission has set.

Two passages of our May observation bear directly on nature conservation, and I have read Section 4.3.2 to see whether either has been answered. Neither has.

The first concerns the night. I wrote in May that from our garden we can see the Milky Way without the aid of any equipment, and that this is not something many people in Ireland can say from their own back door. I cited the published work of Bará and Lima on what turbine aviation lighting does to a nocturnal landscape. The applicant's Response now confirms, at Section 4.2 (page 34), that it is agreeable to the Department of Defence condition requiring fixed red obstacle lighting of a minimum 2,000 candela on all fourteen turbines, visible in all directions of azimuth and operational 24 hours a day, 7 days a week — and the consented Dreenacreenig West scheme carries the same lighting on its three turbines (its EIAR, Section 13.8.5). What the applicant has never done, in the EIAR or in Section 4.3.2, is consider what that permanent illumination means for the creatures of the night it will shine on. Every bird survey behind its Nature Conservation response was conducted in daylight; there is no nocturnal flight data for this site at all. NatureScot's information note, "The Effect of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures," identifies phototaxis — the attraction of birds to artificial light — as the principal concern with lighting of precisely this specification. The applicant does not reference it. A sky that is to be marked red from both ridgelines of this valley, every night, for the life of the development, has been assessed for aircraft and never once for birds.

The second concerns what I called, in May, the blank canvas. We wrote then that West Cork is not a blank canvas, and that the developer's cumulative assessment treats each scheme as if it sits in isolation. Section 4.3.2 has now confirmed that criticism in a way I did not expect: the applicant includes the Dreenacreenig West development in its cumulative bird assessments —

naming it at pages 40 to 43 for kestrel, red grouse, snipe, buzzard and sparrowhawk — while the very same development remains excluded from the cumulative assessments in the EIA's landscape chapter, its noise chapter and its project description. A neighbouring wind farm cannot be part of the picture when birds are counted and outside it for everything else. The Development Applications Unit of the Department of Housing, Local Government and Heritage, in its submission on this case (SID-CK-2026-011, 25 May 2026), put its finger on the underlying method: a conclusion of no individual significance rolled forward into a conclusion of no cumulative significance "misses the point of cumulative impact and in combination effects," and displacement effects are "often not calculated for or mitigated for." The wildlife of this valley will live between two lit and turning ridgelines at once. No chapter of this application has ever assessed that reality, and Section 4.3.2 does not begin to.

I said in our May observation that the felling of trees and the disturbance of sensitive ecosystems on this site were foreseeable harms to which the developer's response was thin. Having read its Nature Conservation response, I would now go further: the response is not thin, it is hollow — confident conclusions resting on an unexamined night and an inconsistent count of what surrounds the site.

I want to be clear, finally, about what I am asking, because it is what Alan and I asked in May and it has not changed. We are not asking for a smaller scheme, a relocated scheme, or a delayed scheme — and I am not asking now for a better-surveyed one. No further report would reconcile this development with this valley, and our household would not accept it on the strength of one. The failures in Section 4.3.2 simply confirm what we already knew: that the applicant does not know this place, by day or by night, and that its assurances about the nature of the Mealagh Valley cannot carry the weight a permission would place on them. I respectfully ask An Coimisiún Pleanála to refuse this application.

I would be grateful if receipt of this response could be acknowledged.

Is mise, le meas,

Elva O'Sullivan

Glencreagh, Bantry, Co. Cork, P75 YA72