
FW: Subject: ACP-324165-26 - Response to Section 4.3.2 - Christian Ahles

From SIDS <sids@pleanala.ie>

Date Thu 9/10/2026 2:25 PM

To Honor Caird Marren <honor.cairdmarren@pleanala.ie>

 1 attachment (12 KB)

Christian_Ahles_Section_4.3.2_Response.pdf;

From: cahles@me.com <cahles@me.com>

Sent: Thursday 10 September 2026 2:10 pm

To: SIDS <sids@pleanala.ie>

Subject: Subject: ACP-324165-26 - Response to Section 4.3.2 - Christian Ahles

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Dear Secretary,

I refer to the Commission's invitation of 14 August 2026 in case ACP-324165-26. My response, confined to Section 4.3.2 (Nature Conservation) of the applicant's Response to Observations, is attached as a PDF.

An acknowledgement of receipt would be appreciated.

Yours faithfully,

Christian Ahles

Faraway Place, Ards More, Bantry, Co. Cork, P75 Y895

RESPONSE TO SECTION 4.3.2 (NATURE CONSERVATION) OF THE
APPLICANT'S RESPONSE TO OBSERVATIONS
Maughanaclea Renewable Energy Development — ACP-324165-26

Christian Ahles

Faraway Place, Ards More, Bantry, Co. Cork, P75 Y895

To Whom It May Concern,

1. I make this submission in response to the letter from An Coimisiún Pleanála dated 14 August 2026, inviting observations on the applicant's Response to Observations received by the Commission on 14 July 2026. In accordance with that invitation, I confine myself to Section 4.3.2 (Nature Conservation). My original objection of May 2026 stands in full and nothing here should be read as narrowing it — including the noise grounds raised there.
2. In my original objection I described the two decades my family has spent maintaining our land for biodiversity, and I submitted photographic evidence of pine marten, Irish hare and red squirrel in the enclosed nature reserve on Maughanaclea. I asked the Commission to apply the precautionary principle. Section 4.3.2 has not changed my position; it has, if anything, given me a new and specific reason for concern, which is the inconsistency within the applicant's own paperwork.
3. In its Section 4.3.2 cumulative assessments, the applicant includes the consented Dreenacreenig West wind farm. It is named individually in the kestrel assessment and the upland-habitats list at page 40, in the upland habitats list for red grouse at page 41, for snipe at page 42, and individually again for buzzard (page 42) and sparrowhawk (page 43). At page 42 the applicant itself writes that "Dreenacreenig West and Gortloughra are located within, or partially within, upland habitats (bog/wet grassland)."
4. Yet the same Dreenacreenig West development is absent from the cumulative assessments in the EIAR's landscape chapter, its noise chapter, and its project description. The applicant cannot have it both ways. Either Dreenacreenig West is a relevant cumulative development — as its own Response to Observations now accepts, six times over, in the bird assessments — or it is not. A development real enough to count for snipe and buzzard is real enough to count for landscape and noise. This contradiction is supplied entirely by the applicant's own documents, and it means the environmental assessment before the Commission is not internally consistent.
5. The Development Applications Unit of the Department of Housing, Local Government and Heritage made this general point in its submission on this case (ref. SID-CK-2026-011, 25 May 2026): a conclusion of no individual significance for each species, leading to 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." That is precisely the pattern in Section 4.3.2. The animals in my photographs do not experience

Maughanaclea, Dreenacreenig West and Gortloughra as separate files. They experience one upland, being developed from several directions at once.

6. The DAU's submission also records what displacement actually looks like in the field: a predicted 53% reduction in hen harrier flight activity within 500 metres of turbines, and a 50% reduction in snipe breeding density within 500 metres. Section 4.3.2 nowhere confronts these figures with the combined footprint of the developments its own bird tables now list.

7. I draw a simple conclusion from all of this, and I ask the Commission to draw it too. An applicant whose cumulative assessment includes a neighbouring wind farm in one chapter and excludes it in three others has shown that its assessment cannot be relied upon — and an assessment that cannot be relied upon cannot support a grant of permission. I am not asking for the assessment to be redone. As I said in May, where uncertainty remains, the precautionary principle must be applied in favour of the habitat and the species, not the developer; and my position, and my family's, is that this development is wrong for this upland regardless of how many further chapters are written. I respectfully ask the Commission to refuse permission.

8. I request written acknowledgement of receipt of this submission.

Yours sincerely,

Christian Ahles

Faraway Place, Ards More, Bantry, Co. Cork, P75 Y895