

Tushaline Sahseetharan

From: John O'Sullivan <johnnystones1974@gmail.com>
Sent: Wednesday, August 26, 2026 9:40 AM
To: SIDS
Subject: Subject: ACP-324165-26 — Response to Section 4.3.2 — John O'Sullivan
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Dear Secretary,

I refer to the Commission's letter of 14 August 2026 in case ACP-324165-26 and attach my response, which is confined to Section 4.3.2 (Nature Conservation) of the applicant's Response to Observations. My objection of May 2026 remains before the Commission in its entirety. Please acknowledge receipt in writing.

Yours sincerely,

John O'Sullivan

Moonlands, Laharanshermeen, Bantry, Co. Cork, P75 P599

John O'Sullivan
Moonlands, Laharanshermeen, Bantry, Co. Cork, P75 P599

The Secretary
An Coimisiún Pleanála
64 Marlborough Street, Dublin 1

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

To whom it may concern,

1. I refer to the Commission's letter of 14 August 2026 inviting observations on the applicant's Response to Observations, received by the Commission on 14 July 2026, confined to Section 4.3.2 (Nature Conservation). This response respects that scope. My objection of May 2026 remains before the Commission in its entirety — including its grounds on noise, cumulative impact and residential amenity — and nothing here waives any part of it.

2. I was born in this valley in 1974 and I live approximately 1.1 km from proposed Turbine 14. In my May objection, the single most important point I put to the Commission was cumulative impact — and specifically that Cork County Council's grant of conditional permission for the Dereenacrinnig West scheme on the far side of the Mealagh Valley was a material change in circumstances that the applicant's assessment did not reflect. I have read Section 4.3.2 with that point in mind, and what I found is something I did not expect: the applicant now agrees with me, but only in one chapter.

3. In its Section 4.3.2 bird assessments, the applicant includes that neighbouring development (which it spells "Dreenacreenig West") in its cumulative analysis. It is named individually in the kestrel assessment at page 40 and again for buzzard at page 42 and sparrowhawk at page 43, and it appears in the upland-habitats lists for red grouse (p. 41) and snipe (p. 42). At page 42 the applicant writes that "Dreenacreenig West and Gortloughra are located within, or partially within, upland habitats (bog/wet grassland)."

4. So the applicant accepts, at least six times in its bird tables, that the scheme on the southern ridge is a relevant cumulative development. Yet the same scheme is excluded from the cumulative assessments in the EIAR's landscape chapter, its noise chapter, and its project description — the very chapters in which I asked for it to be assessed. The contradiction is now internal to the applicant's own documents. If Dereenacrinnig West is real for the snipe, it is real for the people and the landscape of this valley, and an assessment that includes it selectively, chapter by chapter, is not a lawful basis for consent. The State's own environmental assessment case law, as the Development Applications Unit notes in its submission on this file (SID-CK-2026-011, 25 May 2026), requires findings "capable of removing all reasonable scientific doubt." A cumulative envelope that changes from chapter to chapter cannot meet that standard.

5. There is a second dimension to this that Section 4.3.2 never confronts. My home sits in the valley between the two ridges. From Moonlands I would look north to fourteen turbines on the Maughanaclea ridge and south to three more at Dereenacrinnig West. What is true for me is true for the birds that live and move below both ridgelines. The DAU's submission sets out the displacement evidence for the upland species of this ground: significant hen harrier avoidance within 250 metres of turbines, a predicted 53% reduction in harrier flight activity within 500 metres, and a 50% reduction in snipe breeding density within 500 metres. Open-country birds using the valley floor and both ridges would face displacement pressure from two developments simultaneously — a barrier effect across the full cross-section of the valley. No

chapter of the EIAR, and nothing in Section 4.3.2, has ever assessed the two ridges together. The DAU's broader warning applies exactly: a conclusion of no individual significance rolled into a conclusion of no cumulative significance "misses the point of cumulative impact," and displacement effects are "often not calculated for or mitigated for."

6. I do not ask the Commission to have this assessment repaired, and I would not be answered by a repaired one. The contradiction I have set out is not a drafting slip to be tidied; it is the application showing its own hand — a neighbouring wind farm acknowledged where acknowledgment costs nothing and suppressed where it would count. An applicant that assesses a valley that way has told the Commission everything it needs to know about the weight its conclusions deserve. I was born between these two ridges. There is no version of seventeen turbines standing over this valley, on any conditions, with any further studies, that the people who live in it are prepared to accept, and I am one of them. I respectfully submit that the application must be refused, and I ask the Commission to refuse it.

7. Please acknowledge receipt of this response in writing.

Yours sincerely,

John O'Sullivan

Moonlands, Laharanshermeen, Bantry, Co. Cork, P75 P599