



Outlook

Re: ACP-324165-26

From Lorna Mauney-Brodek <lorna555@gmail.com>

Date Mon 9/14/2026 3:14 PM

To SIDS <sids@pleanala.ie>

 1 attachment (107 KB)

Response to Applicant's Response to Observations Lorna Mauney-Brodek ACP-324165-26.pdf;

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Dear Honor Caird Marren / An Coimisiún Pleanála,

Please find attached my submission as a PDF in response to the Commission's letter of 14 August 2026 regarding case reference ACP-324165-26.

As requested, my observations are strictly confined to Section 4.3.2 (Nature Conservation) of the developer's Response to Observations.

Could you please confirm receipt of this email and the attached document?

Thank you,

Lorna Mauney-Brodek

Lorna555@gmail.com

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Inchiroe, Kealkill, Co. Cork, P75 Y765

Submission to An Coimisiún Pleanála

Case Reference: ACP-324165-26

Subject: Response to Applicant's Response to Observations (Section 4.3.2: Nature Conservation)

Observer: Lorna Mauney-Brodek, Inchiroe, Kealkill, Co. Cork, P75 Y765

I am writing in response to the Commission's letter of 14 August 2026. I live and work in the townland of Inchiroe as a professional herbalist and eco-tourism guide, with my family's home located just 2km from the proposed northern cluster of turbines.

As requested, my observations focus entirely on Section 4.3.2 (Nature Conservation) of the applicant's Response to Observations (RtO). Having reviewed the applicant's response alongside the formal submissions from the Development Applications Unit (DAU), Cork County Council, and the Irish Peatland Conservation Council (IPCC), it is clear that the developer has not resolved the serious ecological risks raised by the community and experts.

Rather than providing clear field evidence, the developer's response relies on shifting data baselines, survey gaps, and an attempt to justify digging up protected peatlands by offering unproven management promises elsewhere. Specifically, my objection focuses on four key failures:

1. A contradictory and shifting cumulative baseline;
2. Critical data gaps, including the total absence of nocturnal flight surveys and omitted raptor collision models;
3. A complete disregard for the functional ecology and landscape-scale displacement of protected upland bird species; and
4. An attempt to justify the mechanical excavation and destruction of active Annex I peatlands through unproven habitat management promises.

1. Inconsistent Cumulative Baseline

Throughout their environmental assessments, the developer includes the neighboring Dreenacreenig West wind farm when assessing the combined impacts on local birds like the Kestrel, Snipe, Buzzard, and Sparrowhawk. However, they explicitly left Dreenacreenig West out of their cumulative assessments for noise and visual impacts.

By keeping this neighboring project in the bird assessment, they inflate the amount of development in the area so their own project's impact on our local bird population seems smaller. More importantly, by admitting in their own bird chapter that Dreenacreenig West is close enough to affect the exact same bird populations, they are actually demonstrating one of the most serious ecological issues with this proposed project: that it will result in the Meallagh Valley being squeezed from both sides by turbine development, which I will address further in Point 3.

2. Inconsistent and Desk-bound Assumptions

The developer's response fails to fix the significant gaps highlighted by the DAU and the County Ecology Officer, specifically regarding nocturnal flight data and missing Hen Harrier collision assessments.

- **No Night-Time Surveys:** The developer gathered absolutely zero nocturnal flight activity data across the entire site, relying entirely on daytime surveys. This is an issue as the Department of Defence mandates that all 14 turbines be fitted with 24/7 red aviation lights. Without any night-time data, the developer cannot possibly know how this permanent, high-intensity lighting will attract or disorient migrating or night-foraging birds in the misty conditions we frequently get in these upland areas.
- **Missing Hen Harrier Risk Assessment:** The developer failed to include a collision model for the Hen Harrier, asserting "no effect" simply because they didn't see them flying at turbine height during the day. However, the Cork County Council Ecologist explicitly pointed out that turbine collisions are a documented risk for this species, noting two mature adult fatalities in County Cork in the past five years.
- **Copy-Paste Errors:** The fact that much of this assessment was done from a desk rather than the field is obvious on page 43 of their response. Under the heading for the "Sparrowhawk," the text erroneously opens with: "*Snipe is a habitat generalist...*". Leaving sloppy, copy-pasted templates in a formal submission does not inspire confidence that a rigorous, site-specific ecological appraisal was actually done.

3. Ignoring the Squeeze Effect

The developer repeatedly tries to brush off the fact that birds will be disturbed by claiming there is plenty of similar habitat in the wider area. This is a generic assumption that ignores the reality of how this specific valley functions. The IPCC has formally noted in their observation that 82% of Ireland's peatlands are degraded, and that this specific site is one of the last functioning open peatland/heath habitats in the region, providing a vital refuge for vulnerable wildlife.

- **The Valley Squeeze:** Maughanaclea is proposed for the northern ridge of the Meallagh valley, and Dreenacreenig West is proposed for the southern ridge. If both are built, birds that use this valley for hunting and roosting—like the Hen Harrier, Red Grouse, and Snipe—won't just be displaced; they will be squeezed out from both sides simultaneously, effectively severing the ecosystem.
- **Destroying the Food Supply:** The developer claims that small songbirds won't be significantly impacted, meaning the birds of prey that eat them will be fine. However, the WINDHARRIER study (conducted by Fernández-Bellon et al. in 2019) across 12 Irish upland wind farms proved that small bird densities drop significantly the closer they are to turbines. Small birds like the Meadow Pipit are the primary food source for the Hen Harrier and Merlin. The developer cannot claim this project will have "no adverse effect" on hunting raptors while simultaneously driving away their food supply.

4. Irreversible Destruction of Protected Peatlands

In their response, the developer admits to the direct loss of 1.6ha of Annex I wet heath and 0.2ha of Annex I blanket bog to accommodate Turbines 4 and 14. They attempt to justify this permanent destruction by claiming the blanket bog is "unmapped," labeling the wet heath as

"degraded," and promising that the loss "will be offset through the implementation of the Biodiversity Management and Enhancement Plan".

- **Experts Reject the "Degraded" Excuse:** The Cork County Council Ecology Officer firmly rejected the idea that you can dig up blanket bog just by calling it degraded or unmapped. The ecologist unequivocally stated that "the removal of blanket bog habitat, at any scale, is unacceptable... and should not be permitted to occur," and recommended that Turbines 4 and 14 be entirely removed from the plan.
- **Their Own Data Contradicts Them:** The developer's attempt to downgrade the habitat is contradicted by their own botanical data. The plot surveys taken along the proposed access road for Turbine 14 clearly document active, peat-forming Sphagnum mosses covering up to 20% of the ground. This proves the bog is still very much alive and actively forming peat.
- **Mass Excavation Cannot Be "Offset":** You cannot offset the permanent, physical destruction of an active ecosystem by promising to manage another parcel of land nearby. The developer is planning to excavate over 170,000 cubic meters of living peat and pile it into storage berms. You cannot extract that volume of living bog without permanently drying out the surrounding land, oxidizing the stored carbon, and irreversibly destroying the habitat.

The planning authority has a clear legal obligation to protect these vital habitats and precious inhabitants. Because the applicant has relied on a shifting baseline, left critical night-time collision risks completely unassessed, ignored how raptors and their prey will be squeezed out of this valley, and proposed the mass excavation of living peatlands, they have not provided the clear proof needed to guarantee this ecosystem will be safe.

I respectfully request that An Coimisiún Pleanála listen to the recommendations of the Cork County Council Executive Ecologist and the Irish Peatland Conservation Council, apply the precautionary principle, and refuse permission for this proposed development.

Lorna Mauney-Brodek
Inchiroe, Kealkill, Co. Cork, P75 Y765
14 September 2026