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To: The Secretary
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AN COIMISIÚN PLEANÁLA	
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ACP-	_____
07 SEP 2026	
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Time: 9:15	By: RW PO87

Thursday, 03rd September, 2026

Re: ACP-324165-25 Maughanaclea Renewable Energy Development Response concerning Section 4.3.2 Nature Conservation

A chara,

I refer to the Commission's letter dated 14th August 2026 inviting me to comment specifically on Section 4.3.2 Nature Conservation, of the applicant's response to observations.

I have carefully considered the applicant's response and remain seriously concerned that it does not resolve the nature conservation issues raised. In several important areas, the response confirms the existence of ecological impacts or uncertainty, but then seeks to reduce their significance through assumptions, numerical classification or proposed mitigation.

In my view, that is not sufficient for a development of this scale in an environmentally sensitive upland area such as the Maughanaclea Hills, close to Bantry, West Cork.

1. The applicant's response does not remove the uncertainty.

A recurring problem throughout the response is the difference between showing that an impact will not occur and simply stating that the available assessment predicts that the impact will be low or not significant and it is clear that each of these are substantially different. Where important ecological questions remain uncertain, particularly in relation to protected birds, habitat loss and cumulative effects, I ask the Commission to apply particular precaution before accepting the applicant's conclusions. This is especially important as the development would not be a temporary presence in this landscape as it would

introduce 14 large wind turbines each 169 metres in height, associated roads, hardstanding, drainage, cabling, a substation and continuous operational activity. The ecological assessment must consider the development in its entirety.

2. White-tailed Eagle - lack of data

The Development Applications Unit raised the presence of White-tailed Eagle in the wider area and referred to casualties along the Cork/Kerry border. The applicant acknowledges that White-tailed Eagles have suffered collision mortality and that the species may be particularly susceptible to collision. However, because its surveys did not produce enough flight activity with the proposed wind farm site, a formal collision estimate could not be calculated. I find that deeply concerning as an inability to calculate a collision figure is certainly not evidence that the collision risk is zero. It means that the available data did not allow the risk to be quantified and I ask that the Commission should not allow uncertainty in the data to become acceptable in the conclusion.

This is particularly relevant for a large, wide-ranging bird such as the White-tailed Eagle. The fact that an eagle was not recorded crossing a particular turbine location during a particular survey period cannot in any way guarantee that it will not do so during the lifetime of the wind farm.

I therefore ask the Commission to treat the absence of a collision calculation as an area of uncertainty requiring extreme caution, rather than as evidence of no significant risk.

3. The habitat loss is permanent

The applicant's response confirms direct loss of approximately 1.6 hectares of precious wet heath and approximately 0.2 hectares of precious blanket bog. These figures are genuine and demonstrate that actual areas of habitat would be lost to this development. The applicant seeks to reduce the significance of these losses by promising mitigation and its Biodiversity Management and Enhancement Plan. It also distinguishes the blanket bog on the basis that it is unmapped and has not been reported under Article 17. I strongly submit to the Commission that being unmapped does not make a habitat ecologically unimportant.

Nor should suggested proposed enhancement elsewhere by the developer disguise the basic fact that existing habitat at this wind farm site would first be removed and altered. This precious habitat exists now and we must be the gatekeepers and address what would be lost, disturbed and whether proposed measures and mitigation could genuinely compensate for that loss. I urge the Commission to examine the actual loss before believing promises of later enhancement.

4. Chough - use of the area

The applicant confirms that Chough were recorded using fields within or close to the proposed wind farm development area, including important foraging activity. This is critical evidence as the issue is not simply whether a nest is located inside the wind farm boundary. Birds do not navigate or recognise planning boundaries as their survival depends on the wider landscape that they use for feeding, movement, shelter and breeding.

The Commission must therefore consider whether the construction and operation of this development would alter this area for Chough, rather than looking only at designated boundaries or nest locations.

5. Hen Harrier - figures require independent checking

I am particularly concerned by the figures presented for Hen Harrier. The applicant gives a combined collision figure of 0.012 birds per year. However, the percentage calculation which follows appears inconsistent with that figure and requires independent validation.

Where numerical calculations are then used to classify an ecological effect as "Low", the calculation itself must be correct. I respectfully ask the Commission not to accept the applicant's resulting conclusion unless the underlying figures, population used for comparison and resulting percentage have been independently checked. It is critical to address that a conclusion is only as reliable as the figures on which it is based.

6. Cumulative effect

I am very concerned by the way cumulative impacts are reduced to individual calculations. A bird does not experience one wind farm as a percentage, another a separate percentage and another development as a separate assessment. The bird experiences a landscape in its entirety. I ask the Commission to seriously consider the relevant questions of what happens when habitat loss, turbine collision risk, disturbance, displacement, roads, forestry activity and other developments occur across the same wider ecological area over many years.

Several individually "Low" effects' do not automatically mean that the combined effect is actually low. This is particularly important for species which range across large areas and may encounter more than one wind farm development.

I ask the Commission to examine the cumulative ecological pressure on the wider landscape rather than accepting a series of individual "Low" conclusions.

7. Disturbance

The applicant places considerable emphasis on construction impacts and mitigation. However, the ecological change does not end when construction is over. The completed development would remain an operational industrial-scale wind farm development of 14 turbines each 169 metres in height plus all the associated infrastructure. There would be continuous disturbance with access, maintenance, vehicles, personnel and activity during the operational life of the wind farm.

For sensitive bird species, the Commission should consider not only direct collision with these 169 metre turbines, but whether repeated disturbance or avoidance could reduce the area of the important habitat available to them.

8. Mitigation

I am very concerned by the extent to which the applicant relies on management plans, monitoring and mitigation to support conclusions of low or insignificant effects. Monitoring after construction cannot undo damaging impacts. Also proposed habitat enhancement cannot replace established habitat that has already been removed or broken up.

I ask the Commission to question and scrutinise the following:

- Actual loss of precious wet heath and blanket bog
- Use of area by protected bird species
- Recognised collision vulnerability of White-tailed Eagle
- Insufficient data to calculate White-tailed Eagle collision estimate
- Predicted collision mortality for other species
- The need for mitigation, habitat management and monitoring
- Cumulative interaction with other projects

The above cannot be disregarded simply because the applicant ultimately assigns an impact a 'low' or 'not significant' classification. It is obvious here that ecological effects and worrying uncertainties exist.

Conclusion:

My concerns are deeply worrying regarding the siting of this major industrial wind farm development where significant ecological damage and uncertainties remain. Section 4.3.2 has not in my view, answered these concerns. Instead, it confirms important habitat losses, acknowledges risks to protected species, identifies areas where reliable collision modelling was not made possible and this applicant relies heavily on mitigation and numerical classifications to reach conclusion of limited significance.

I believe that nature cannot be protect by assuming that every uncertainty will produce the presumed and mitigated outcome. I would stress that where protected species, Annex 1 habitats and cumulative ecological pressures are involved,, the consequences of getting the assessment wrong would cause irrevocable damage.

I therefore respectfully ask An Coimisiún Pleanála to scrutinise the applicant's Section 4.3.2 response with particular caution, to independently verify the calculations and assumptions upon which its conclusions depend and to give serious and substantial consideration to the concerns raised by the Development Applications Unit and in my original submission.

For the reasons I have set out above, it is clearly evident that the applicant has not demonstrated that the Nature Conservation concerns have been satisfactorily resolved. I therefore request that permission for the proposed wind farm on the Maughanaclea Hills close to Bantry, West Cork be refused.

Yours faithfully,


Noëlle Aller Ontalba