
ACP-324165-26 – Maughanaclea Wind Farm

From Peterjohn.oconnor <peterjohn.oconnor@protonmail.com>

Date Mon 9/14/2026 11:03 PM

To SIDS <sids@pleanala.ie>

 1 attachment (199 KB)

Maughanaclea_Environmental_Observation.pdf;

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Dear Sir/Madam,

I was invited by An Coimisiún Pleanála, by letter dated 14 August 2026, to make a further submission in relation to Section 4.3.2 Nature Conservation of the Applicant's Response to Observations.

I understand that this Commission-invited follow-up submission does not attract a further fee, having already paid the €50 observation fee in relation to my original submission.

The Commission's letter directed me to the case webpage for the submission process. However, the online facility appeared to require the submission to be made as a new/fresh submission and did not provide an option to identify it as a Commission-invited follow-up submission without a further fee.

I have therefore attached my follow-up submission to this email for consideration in relation to the Commission's invitation.

I confirm that the attached submission is confined to the matters arising from Section 4.3.2 Nature Conservation of the Applicant's Response to Observations, as requested in the Commission's letter.

I would be grateful if you could confirm receipt and that the attached submission will be accepted for consideration in response to the Commission's invitation. I would also be grateful if you could disregard my earlier email which did not specify correct dates.

Kind regards,

Peter O'Connor

Sent with [Proton Mail](#) secure email.

AN COIMISIÚN PLEANÁLA

Maughanaclea Renewable Energy Development

Case Reference: 324165

RESPONSE TO SECTION 4.3.2 — NATURE CONSERVATION

Observer: Peter O'Connor

Date: 14.09.2026

Introduction

I welcome the opportunity to comment on Section 4.3.2, Nature Conservation, of the Applicant's Response to Observations.

I am making this submission as a local resident who cares deeply about the natural environment of this area. I recognise the need for renewable energy and have no interest in overstating ecological concerns simply to oppose development. My concern is that a development of this scale should be decided on the strongest available evidence, particularly where protected habitats, watercourses and species are involved. The independent review has raised a number of specific questions which I believe should be resolved before this application is determined.

I have reviewed the Applicant's response alongside the independent ecological review prepared by Ecofact Environmental Consultants Ltd., which examined the Applicant's Natura Impact Statement, Biodiversity, Ornithology, Botanical, Bat and Aquatic Baseline reports and the NIS Schedule of Mitigation Measures.

The independent review is particularly useful because it does not simply criticise the application for a lack of survey work. It finds that the survey programme is substantial and, in several respects, comprehensive. Its principal concern is the interpretation of the evidence and the degree of certainty attached to the Applicant's conclusions. That distinction is important.

The Applicant states that its surveys provide the information necessary for a "complete, comprehensive and robust assessment".

The independent review reaches a more cautious conclusion: the information collected demonstrates a sensitive ecological environment, while some of the resulting significance conclusions are more certain than the evidence supports.

I therefore ask the Commission to consider the following matters before determining the application.

1. Bandon River SAC and Freshwater Pearl Mussel

A significant outstanding issue is that the independent review identifies Bandon River SAC as the principal Appropriate Assessment concern. The aquatic surveys identified:

- salmonid habitat;
- eel habitat;
- lamprey habitat;
- high-quality fisheries habitat;
- sediment-sensitive headwater systems; and
- Freshwater Pearl Mussel eDNA.

Freshwater Pearl Mussel was detected at GC5, GC6 and GC11, with 12 out of 12 positive replicates at GC5. A potential ecological pathway to Bandon River SAC is therefore clearly identified.

The Applicant relies substantially on construction mitigation, including pollution prevention, silt control, HDD and environmental monitoring. The independent review accepts that these measures may reduce risk, but identifies the absence of a sufficiently detailed quantitative assessment of sediment mobilisation and HDD-related risk. The aquatic baseline also records difficult survey conditions at some locations, including high flows, torrential conditions and limitations on electrofishing and kick-sampling. The independent reviewer considers that these limitations introduce uncertainty which is not always reflected in the confidence of the subsequent conclusions.

I ask the Commission to require clarification of:

1. the predicted sediment mobilisation associated with the grid connection works;
2. the specific risks associated with HDD crossings;
3. the potential consequences of HDD drilling-fluid breakout;
4. monitoring locations and trigger levels;
5. emergency response procedures; and
6. how the positive Freshwater Pearl Mussel eDNA findings have been incorporated into the risk assessment.

The absence of open-cut works within the watercourse does not, by itself, remove the pathway. The independent review specifically identifies road corridors, watercourse crossings, HDD locations and drainage pathways as potential routes for sediment or pollution to reach sensitive aquatic receptors.

2. Hen Harrier and Mullaghanish to Musheramore Mountains SPA

This is, in my view, the most important outstanding ornithological issue. The Applicant's surveys demonstrate repeated Hen Harrier use of the site.

The independent assessment records:

- repeated site use;
- post-breeding activity;
- winter activity;
- up to three individuals;
- hunting behaviour; and
- records within 500m of proposed turbines.

It also identifies a remaining question concerning whether some of these birds may be associated with the Mullaghanish to Musheramore Mountains SPA.

The Applicant's assessment places considerable weight on breeding-season foraging ranges and the availability of habitat elsewhere.

The independent review considers this insufficiently cautious, particularly because the observed use includes post-breeding and winter activity.

This raises a straightforward question: has the Applicant demonstrated that the site is not functionally important habitat for Hen Harrier associated with the SPA? The existence of other suitable habitat elsewhere does not necessarily answer that question. The independent review considers that the Applicant has not given sufficient weight to this issue.

I ask the Commission to require:

- a clearer assessment of post-breeding and winter Hen Harrier use;
- consideration of functional habitat rather than habitat availability alone;
- assessment of potential displacement and barrier effects;
- consideration of the possible relationship with the Mullaghanish to Musheramore Mountains SPA population; and
- a clearer cumulative assessment of Hen Harrier habitat loss and displacement.

3. Cumulative effects on upland birds

The Applicant states that bird impacts have been assessed cumulatively. The issue is therefore no longer whether a cumulative assessment exists, but whether it adequately addresses cumulative ecological change across the wider landscape.

The independent review identifies limited quantitative or landscape-scale analysis of:

- cumulative habitat fragmentation;
- cumulative displacement;
- cumulative collision mortality;
- barrier effects; and
- progressive reduction in habitat connectivity.

It considers this particularly important given the increasing density of wind energy development across upland areas of southwest Ireland.

The species most relevant to this issue include:

- Hen Harrier;
- Chough; and
- Red Grouse.

The concern is not necessarily that any one project produces a large effect; it is the progressive alteration of the same upland landscape by multiple developments. That distinction should be addressed explicitly in the Commission's assessment.

4. Chough

The Applicant acknowledges the presence of Chough and addresses collision risk and cumulative effects.

The independent review accepts the survey work but considers that the assessment gives insufficient attention to the wider functional landscape.

This is relevant because Chough were recorded breeding in and around the site, while the surrounding upland landscape is also subject to other wind energy proposals.

The question is therefore not simply whether Maughanaclea causes a significant effect in isolation, it is whether the cumulative loss, fragmentation and alteration of suitable Chough habitat across the wider landscape is being adequately understood.

The independent review identifies this as a weakness in the cumulative assessment.

I ask that this be addressed before determination.

5. Annex I habitats — "degraded" does not remove the ecological issue

The Applicant acknowledges direct loss of:

- 1.6 ha of Annex I wet heath; and
- 0.2 ha of Annex I blanket bog.

It describes the wet heath as degraded and proposes to address the loss through the Biodiversity Management and Enhancement Plan.

The independent assessment accepts that the Applicant has identified and surveyed the habitats. It nevertheless notes that the habitats retain ecological character and that infrastructure remains within degraded wet heath, fragmented dry heath and upland blanket bog. The fact that a habitat is degraded is relevant to its condition. It does not mean that it has no ecological function.

This is particularly important on a peat-dominated site where habitat condition, drainage, watercourses and hydrology are closely connected.

The independent review also identifies conifer plantation areas containing peat, Sphagnum and peatland-associated vegetation, and considers that their hydrological sensitivity should not be obscured by their classification as plantation.

6. Habitat restoration is not the same as avoidance

The Applicant proposes restoration measures, including felling approximately 5.4 ha of young conifer plantation in areas where wet heath previously occurred. I do not dispute that restoration may provide a long-term ecological benefit.

However, the independent assessment identifies inherent uncertainty in restoration, including:

- hydrology;
- grazing control;
- soil conditions;
- seed sources;
- timescale; and
- long-term management.

It therefore cautions against treating restoration as an immediate or guaranteed replacement for habitat loss.

I ask the Commission to distinguish clearly between:

- habitat avoided;
- habitat lost;
- habitat mitigated;
- habitat restored; and
- habitat enhanced.

Those are not interchangeable outcomes.

7. Hydrological sensitivity of peatland habitats

The botanical assessment identifies watercourses, drainage features and unmapped headwater channels across the site. The independent review notes that the T04 and T12–T13 access roads cross unmapped upland/eroding watercourses. It considers that these features increase the potential for sediment mobilisation and downstream aquatic impacts. This links the habitat issue directly to the Bandon River SAC concern.

The ecological risks cannot always be separated neatly into:

1. "habitat impact" and
2. "water impact".

On an upland peatland site, the two are connected.

8. Mitigation measures and enforceability

There is a further issue which I ask the Commission to examine closely.

The independent review examined the NIS Schedule of Mitigation Measures and found that it contains only three measures, all relating to water-quality protection associated with the grid connection and HDD crossings.

This is notable because the wider ecological assessment relies on a considerably broader range of measures, including:

- habitat management;
- ecological monitoring;
- ornithological measures;

- restoration;
- bat mitigation; and
- other biodiversity measures.

The independent review considers that these are not comprehensively captured in the mitigation schedule. This creates a practical question: which mitigation measures are actually being relied upon to support the conclusions of no significant residual effect, and how will those measures be enforced and monitored?

The Commission should be able to identify clearly which mitigation measures are relied upon for each conclusion. I ask that the Applicant provide a single consolidated schedule identifying:

- the mitigation measure;
- its location;
- when it applies;
- who is responsible;
- how compliance is monitored;
- the trigger for corrective action; and
- how the Commission will be informed of non-compliance

9. Bat activity and adaptive mitigation

The surveys are substantial - however, the independent review records more than 73,000 bat passes, including substantial activity by Leisler's Bat and Common Pipistrelle, with elevated activity around T02, T03 and T14.

The concern is the reliance on future adaptive mitigation where the operational parameters are not yet fully defined. In particular:

- what activity threshold triggers curtailment?
- at what wind speeds?
- during what periods?
- for how long?
- who makes the decision?
- how is compliance demonstrated?

If future adaptive management is material to the conclusion that residual effects are insignificant, those mechanisms need to be sufficiently defined now.

10. The overall pattern requires a precautionary approach

The independent assessment raises a recurring concern across several parts of the ecological assessment.

The surveys demonstrate:

- sensitive aquatic systems;
- Freshwater Pearl Mussel eDNA;
- sediment-sensitive headwaters;
- Annex I peatland;
- repeated Hen Harrier use;
- breeding Chough;
- Red Grouse;
- substantial bat activity; and
- an increasingly developed upland landscape.

The subsequent significance conclusions frequently rely on:

- mitigation;
- alternative habitat;
- degraded habitat condition;
- low predicted collision rates;

- future restoration; or
- future adaptive management.

The independent review considers that the evidence supports a more precautionary interpretation in several areas.

I respectfully ask the Commission to consider the evidence as a connected ecological system rather than solely as a series of individual receptor assessments.

11. Specific clarification required — Hen Harrier cumulative mortality

There is also a specific numerical issue in the Applicant's response which I ask the Commission to have clarified.

The Applicant gives a cumulative predicted Hen Harrier collision figure of approximately 0.012 birds per annum and subsequently refers to an estimated wintering county population of three birds and an increase in annual mortality of 2.11%. The relationship between those figures is not apparent from the response.

I am not suggesting that this is necessarily an error. However, the calculation should be explained.

The Applicant should state:

- the population figure used;
- the mortality denominator;
- the source of that figure;
- the calculation producing 2.11%; and
- whether the percentage represents additional total mortality or another metric.

This is particularly important where the calculation is subsequently used to support a conclusion of low cumulative significance.

Requested action

In light of the above, I respectfully request that the Commission does not determine the application on the present ecological information without first resolving the outstanding matters identified above.

In particular, I request:

Bandon River SAC / Freshwater Pearl Mussel

Clarification and, where necessary, further assessment of:

- sediment mobilisation;
- pollution pathways;
- HDD risks;
- Freshwater Pearl Mussel eDNA findings; and
- cumulative catchment effects.

Hen Harrier / Mullaghanish to Musheramore Mountains SPA

Further assessment of:

- post-breeding and winter use;
- functional habitat;
- potential SPA linkage;
- displacement;
- barrier effects; and
- cumulative landscape effects.

Cumulative ornithology

A more meaningful landscape-scale assessment of:

- fragmentation;

- displacement;
- connectivity;
- cumulative collision mortality; and
- progressive loss of functional upland habitat.

Annex I habitats

Clear identification of:

- habitat permanently lost;
- habitat indirectly affected;
- restoration proposed;
- restoration timescale; and
- the evidence supporting the predicted restoration outcome.

Mitigation

A consolidated and enforceable ecological mitigation and monitoring schedule covering all measures relied upon in reaching the conclusions in Section 4.3.2.

Conclusion

The Applicant has provided a substantial body of ecological information which I acknowledge.

The concern arising from the independent review is more specific: the ecological evidence does not always support the level of certainty expressed in the Applicant's conclusions.

The site and its surroundings support sensitive aquatic systems, protected and priority bird species, Annex I habitats and peatland-dependent ecological functions. The proposed grid connection also creates a direct hydrological pathway towards the Bandon River SAC, with Freshwater Pearl Mussel eDNA already detected in the relevant catchment.

The Applicant's response has not removed the uncertainty surrounding the functional use of the site by Hen Harrier, the cumulative alteration of the wider upland landscape, the treatment of degraded Annex I habitat, or the reliance on future restoration and adaptive mitigation.

The independent ecological review concludes that the principal weakness is not the absence of ecological data, but the interpretation of that data and the degree of certainty attached to the conclusions.

I therefore respectfully ask the Commission to require the Applicant to address the matters above before determination.

If those matters cannot be satisfactorily resolved, I ask that the Commission refuse permission on ecological and Appropriate Assessment grounds.

The Observer's earlier submission should also be read alongside this response, particularly the concerns regarding the Kealkill drinking water catchment, peat and hydrology, and the cumulative effect of Maughanaclea alongside other wind energy developments in the Bantry-Kealkill-Drimoleague area.

I hope the Commission will give these matters careful consideration before making a decision that may have lasting consequences for the area's natural environment.

Sincerely,

Peter O'Connor
Deelish,
Drimoleague,
Co Cork
P47 FT28