From:	Housing Manager DAU
To:	SIDS; LAPS
Subject:	Our Ref: SID-CK-2026-011 Your Ref: ACP-324165-26. Proposed Strategic Infrastructure Development (SID): 10-year planning permission for Maughanaclea Wind Farm
Date:	Monday 25 May 2026 16:48:17
Attachments:	20260525 SID-CK-2026-011 (003).pdf

A chara,

Please find attached Nature Conservation and Heritage related observations/recommendations for the above mentioned SID planning application.

Kindly forward a copy of your decision to manager.dau@npws.gov.ie as soon as it issues.

In addition, please acknowledge receipt of the attached letter (as required under Article 29(2) of the Planning & Development Regulations 2001).

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: manager.dau@npws.gov.ie

Kind regards,

Cormac O'Flaherty
Higher Executive Officer

Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Your Ref: ACP-324165-26
Our Ref: SID-CK-2026-011
(Please quote in all related correspondence)

25 May 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email to: laps@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Strategic Infrastructure Development (SID): 10-year planning permission for Maughanaclea Wind Farm consisting of 14 no. wind turbines, a 110kV substation and 110kV underground cabling connection and associated works located in Ardrah, Maughanaclea, Ballynamought, Gortloughra, Cousane, Coomclogh, Derragh, Glanycarney, Keenrath, Derrynacaheragh, Shiplough, Coolsnaghtig and other townlands Co Cork

A chara,

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

Archaeology

It is noted that the Environmental Impact Assessment Report (EIAR) submitted as part of the planning application includes a desk-based Archaeological Impact Assessment, which was carried out in relation to the proposed development by IAC Ltd (EIAR Chapter 14; dated 26 March 2026).

The proposed development is located in proximity to a number of Recorded Monuments that are subject to statutory protection under Section 12 of the National Monuments Act 1930–2014. The EIAR also acknowledges that there is a potential that previously unknown sub-surface archaeological features or deposits may be present within the proposed development

site (PDS), which may be negatively impacted by the proposed development. The Department notes that no advance archaeological investigations have been carried out within the PDS to inform the EIAR, other than a walkover survey. The Department advises that advance archaeological test excavation should be carried out in advance of any development to determine if previously unknown sub-surface archaeological features or deposits are present. If such material is present, then additional mitigation measures to ensure the preservation in situ or preservation by record (i.e. full archaeological excavation) of such discoveries will be necessary. The Department advises that this can be addressed by the inclusion of an appropriate condition, if the development is permitted.

The Department, therefore, advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C3, C5 and C6 as set out in OPR Practice Note PN03: Planning Conditions (October 2022), with appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

Archaeological Requirements:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 14 of the EIAR shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.

2. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed ground disturbance and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the National Monuments Service of the Department, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.

a. The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in-situ, preservation by record (archaeological excavation) and/or monitoring may be required.

b. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service of the Department, shall be complied with by the developer.

c. No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.

3. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 14 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.

4. The planning authority and the National Monuments Service of the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.

Nature Conservation

The following observations are made in the context of this Department's role in relation to nature conservation, including as a prescribed authority under planning legislation. The observations are not exhaustive and are offered to assist the Commission in meeting the nature conservation obligations that arise in respect of this proposed development.

White Tailed Sea Eagle (WTSE). It is noted that WTSE were recorded near the site. This area along the Cork-Kerry border has been regularly used by white-tailed eagles over the years, with a number of casualties. The most recent being an adult female at the nearby Grousemount wind farm last year approximately 5 kilometres to the north. Cumulatively, turbine strikes now account for 19% of casualties where the cause of death has been established (White-tailed Eagle Phase II release: report 2025). Also, between 2007 and 2014 three fatalities were recorded at Sillahertane and Lettercannon-Coomagearlahy area wind farms.

This species is particularly susceptible to collision with wind turbine blades. In Norway, 39 white-tailed eagle deaths were recorded from such collisions at one large wind farm (Smøla) between 2005 and 2010. Eagles, when soaring, may even be slightly attracted to fly within the rotor-swept zone of turbines, “possibly induced by the extra wind energy created by the turbulence”.

It is of concern in terms of the wind farm location overall that it may give further rise to the risk of collision risk for the species. Collision and mortality risk must be fully assessed for the project and it should be borne in mind that assessment cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt. Dahl et al (2013) conclude, regarding management implications, that their results suggest that it will be difficult to employ mitigation measures to decrease the white-tailed eagle collision hazard. They, therefore, emphasize the importance of conducting thorough pre-construction studies to identify wind-power plant locations with low densities of species vulnerable to collision.

In terms of increasing the risk of collision, the siting of turbines on locations on ridges above valleys where eagles are likely to use rising air currents to obtain ‘orographic lift’ to gain altitude would be an additional concern, but it is not clear if their micro siting is in an area of higher ‘orographic lift’. It should be assessed as part of the overall assessment whether models, such as that in Hanssen et al. (2020), are applicable at this wind farm in detecting microsite susceptibility to generating ‘orographic lift’, which may attract eagles into the rotor-swept zones of these turbines. Also new turbines could add to the cumulative risk of collision and narrow a potential corridor of flight activity (directional flight, social behaviour, and soaring). These factors should also be considered during the collision and mortality risk assessment for the project.

Both proposed turbines and numerous supporting infrastructures occur within annexed habitats under the EU Habitats Directive. For Annex I habitat under the EU Habitats Directive European the State has reporting obligations under Article 17 of the Directive to the European Commission on details of losses and degradation. The EPA’s European Communities (Environmental Liability) Regulations 2008 Schedule 1 Criteria in Assessing Damage to Protected Species and Natural Habitats may also be relevant with regard to annexed species and habitats identified as a concern within these observations. Damage to natural habitats and protected species means any damage that has significant adverse effects on reaching or maintaining the favourable conservation status of those habitats or species. The species and habitats covered are those listed in the Birds Directive (79/409/EEC) and the Habitats Directive (92/43/EEC) and the Environmental Liability Regulations apply protection against

damage to all species of birds, plant and animals listed in the relevant legislation wherever they occur in Ireland regardless of whether they are within or outside a designated land area.

As well as the direct loss of blanket bog and heath there is also likely to be an impact on other areas of annexed habitat through road and drainage works. It is stated that given distance there will be no effect on other annexed habitat but no information is provided. Regarding compensation it is proposed to remove very recently planted conifers from other annexed habitat.

Regarding cumulative impact and in combination effects it is mentioned that as all other wind farms in the area have mitigation in place there will be no effects. However, this misses the point of cumulative impact and in combination effects. It should be noted that it is noted that many of the document's state that species can use habitat elsewhere but this does not seem to take into account the other 28 wind farms within 25 kilometres s/8 within 10 kilometres. A conclusion of no individual significance so no cumulative is a concern. Displacement effects are often not calculated for or mitigated for. Also, for example, WTSE impacts in other EIA's have been ruled out regarding significant effects even where subsequent collision mortality has then occurred.

The Commission should note the fact that the project is located within peatland habitats and soil. Potential negative effects on peatland habitats could arise through direct excavation of peatland habitat, drainage effects on adjacent/nearby peatland habitat, habitat fragmentation, exposure of underlying peat, increased risk of erosion, opening up of areas of the habitats to new or increased exploitation or disturbance through the provision of new and upgraded roads, peat slippage, landscaping, side casting, drain installation, excavate storage, sediment disposal etc.

From the documents provided it appears that approximately 16 bird species that are either Annex I Birds Directive species or red listed Birds of Conservation Concern in Ireland (BoCCI) were recorded during the fieldwork. As the majority of these species are known to be impacted by habitat loss and/or displacement or direct collision etc., this is a concern. This has previously been pointed out but the response was that these species are more common than thought (which would be incorrect). Just some examples are provided below.

Chough were confirmed breeding within the Proposed Wind Farm site in 2022 and 2023. The territory within the Proposed Wind Farm site (CF-3) was approximately 1 kilometre from the nearest proposed turbine. There were a further two territories outside the Proposed Wind Farm site (CF-1, approximately 1.2 kilometres from the boundary and CF-2, approximately 2.4 kilometres). These territories are likely to be connected to SPA populations but it is just

stated that collision related mortality is not likely to significantly impact this species, based on available data. However, disturbance, displacement, fragmentation etc. may also be issues and the comment on available data should be considered in the context of any scientific doubt.

Golden plover were observed in the breeding and winter seasons. Studies have highlighted turbine avoidance by wintering golden plover over distances of 50–850 metres with an average of 175 metres (but with turbine height positively correlated with displacement distance). Therefore, there is potential for a large habitat loss to the species through displacement. For the Annex I bird species under the EU Birds Directive Article 4(4) of that Directive requires Member States to strive to avoid deterioration of habitats outside Special Protection Areas (SPAs).

Kestrel breed at the site. The species has previously been recorded in similar upland heath and bog habitat within wind farm project sites as a collision victim (more than one bird even on random checks post construction at a single project site). This may be due in part to hunting common lizards basking on turbine hard standing areas. Kestrels are a species known to continue foraging activity close to turbines and to be susceptible to collision.
Red Grouse were recorded during the breeding season. The species is known to have collision mortality at wind farm projects. There has been a serious decline in range (50%) in the past 40 years nationally and again the presence of other wind farms nearby (and other habitat quality pressures) is relevant in terms of the aforementioned in combination effects and cumulative impacts and amount of suitable habitat in the wider area.

Common Snipe is a Red-listed listed species with regard to breeding and wintering populations and was recorded during breeding. The development could potentially result in the loss of breeding and foraging habitat through displacement effects. Pearce Higgins et al. (2009) found a 50% reduction in breeding density of common snipe within 500 metres of turbines. In addition, the same issues also occur in terms of in combination effects and cumulative impacts as outlined for Hen Harriers, golden plover etc. in that for example data is not provided in terms of habitat displacement and loss etc. regarding how the overall density of wind farm projects in the area is affecting the amount of similar habitat.

Concerning the breeding woodcock, it should be noted that studies regarding wind farm effects have reported a decrease in abundance, which may have been due to the barrier effect of the turbines and acoustic effects interfering with display flights and mating, with potential displacement effect in the 250–500 metres distance band (roding activity).

With regards to wintering Merlin, as well as potential disturbance effects, indirect effects could also occur for this species whereby prey species are affected for example reduced density of prey species near wind energy developments (see below on meadow pipit for example, this is also relevant regarding Hen Harrier etc.). Wind turbines can result in reduced habitat quality and extent (*e.g.* WINDHARRIER findings in relation to small bird abundances), thereby limiting foraging and nesting resources. The results of the WINDHARRIER study indicate that small bird densities were lower at wind farm sites than at control sites and lower closer to wind turbines than further away at wind farm sites. These species are also Merlin prey species. Curlew was recorded at the site in 2025 and the site contains potential breeding habitat for the species.

The breeding and other observations of Curlew the species is a major conservation concern/issue nationally. In Ireland is critically endangered, facing near extinction as a breeding species due to a catastrophic population collapse (over 97% in 40 years). It is also listed as Red List (BoCCI) and Near Threatened globally (IUCN). Therefore, urgent action such as restoration of bog areas would be an important measure to try to prevent local extinction. Wind farms can significantly affect curlews, primarily through habitat loss and disturbance during construction, leading to major population drops (e.g., 40% in a UK study) that often don't recover, as they abandon breeding sites, creating higher energetic costs for migration and reduced breeding success, making cumulative impacts crucial for this already threatened species. Low activity does not correspond to low proportional impact on a species from losses in the case of rare species.

Meadow Pipit, is a BoCCI Red Listed (Breeding Populations) species of conservation concern in Ireland due to its declining numbers and Skylark, Amber listed, breed on the site. These are important prey species for some of the other recorded species such as Hen Harrier and Merlin. Negative impacts from wind farms have been recorded.

In terms of displacement alone, displacement effects from upland wind farms in Hen Harriers Pearce-Higgins *et al.* (2009b) provide evidence of significant Hen Harrier avoidance of apparently suitable habitat within 250 metres of turbines, with a predicted 53% reduction of Hen Harrier flight activity within 500 metres of turbines, assuming that modelled habitat usage is proportional to breeding density (see Pearce et al 2009). A large area of the proposed development site is comprised of potentially suitable Hen Harrier foraging habitat (including heath and bog habitat, which is of particularly high value for the species) and the displacement effects of the wind farm could potentially result in the loss of a large foraging resource for the known Hen Harrier population. Wind farms can result in connectivity, fragmentation, barrier effects and foraging efficiency issues. Foraging behaviour of breeding pairs may be influenced at distances conceivably up to 11.4 kilometres from extant turbines.

In combination effects and cumulative impacts assessments from the other wind farms in the population area would also have to be taken into account. In addition, the documents submitted do not seem to fully reference indirect effects whereby prey species are affected (e.g. reduced density of prey species near wind energy developments) and how this aspect also affects overall quality of open habitats. No reference appears to be made to the Hen Harrier Threat Response Plan. No assessment seems to have been carried out regarding the impact on wintering harriers. The site contains many of the prey species of harrier and wind farms are known to lower densities of some species. This includes important prey species for harriers outside the breeding season such as snipe. There may be increased anthropomorphic activity and disturbance to species (see other species as well as harriers) at the site through the wind farm development (directly and indirectly). There are many factors which may contribute to collision risk for individual species (which are well described in the literature and include individual species traits, flight speed, flight type, nocturnal activity, wing span, body size), but the possibility of alternative flight behaviours by hen harriers, which may increase collision risk i.e. sky dancing flights in spring, commuting flights, effects of poor weather etc. and Irish records of harrier collision should be noted.

The April record for Ring Ouzel Wind farms pose potential risks to Ring Ouzel through potential displacement and habitat loss (for example avoiding foraging areas near wind turbines, causing loss of habitat), disturbance during construction and operation, habitat fragmentation etc.

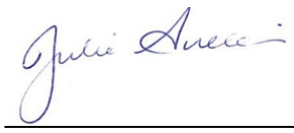
Though recorded outside the wind farm site during the survey work the Commission should note that wind farms may have direct negative effects on Whooper Swans through collision mortality, decreased landscape function (barrier effects) and displacement from feeding areas. Accurate assessment of potential cumulative impacts from multiple wind farms along a flyway is a major challenge as it requires detailed information on the birds' migration routes.

Numerous other species potentially impacted also occur on site. Examples include Goshawk (potential collision risk), Goldeneye (potential disturbance, a red listed species for the time of year it was recorded), Grey wagtail (a red listed species for the time of year it was recorded with potential water quality and disturbance issues), Redwing (a red listed species for the time of year it was recorded with known collision mortality recorded nationally), Peregrine falcon (known collision mortality etc.), Swift (a red listed species for the time of year it was recorded with known collision risks), collision), Stock Dove (a red listed species for the time of year it was recorded in) etc.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: manager.dau@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Yours faithfully,



Julie Sullivan
Assistant Principal
Development Applications Unit
Administration

References:

Dahl, E.L., Bevanger, K., Nygòrd, T., Røskaft, E. and Stokke, E.C. (2011) Reduced breeding success in white-tailed eagles at Smøla windfarm, western Norway, is caused by mortality and displacement. *Biological Conservation* **145**: 79-85.

Hanssen, F., May, R. and Nygård, T. (2020) High-resolution modelling of uplift landscapes can inform micrositing of wind turbines for soaring raptors. *Environmental Management* **66**: 319-332.

Dahl, E.L., May, R., Hoel, P.L., Bevanger, K., Pedersen, H.C., Røskaft, E. and Stokke, B.G. (2013) White-tailed eagles (*Haliaeetus albicilla*) at the Smøla wind-power plant, Central Norway, lack behavioural flight responses to wind turbines. *Wildlife Society Bulletin* **37**: 66-74.

Mee, A. (2014) Irish white-tailed sea eagle reintroduction programme report 2014. Golden Eagle Trust / Department of Arts, Heritage & the Gaeltacht / Norwegian Institute for Nature Research. http://www.norway.ie/PageFiles/747152/Irish%20WTSE%20report_2014.pdf ; see also 'Rare sea eagle killed by wind turbine', Irish Times, 4 April 2011.