
Fw: ACP-324165-26

From SIDS <sids@pleanala.ie>

Date Fri 9/11/2026 8:55 AM

To Honor Caird Marren <honor.cairdmarren@pleanala.ie>

 1 attachment (86 KB)

Andy response to invitation for comment.pdf;

From: Andy Carling <andycarling1964@gmail.com>

Sent: Thursday, September 10, 2026 5:57 PM

To: SIDS <sids@pleanala.ie>

Subject: ACP-324165-26

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Dear Sir/Madam

Please find below my response to the letter of 14/08/26 from An Coimisiún Pleanála inviting further comment on Section 4.3.2 (Nature Conservation) of the applicant's Response to Observations

Kind regards,

Andrew Carling

Andrew Carling
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Date: 10/09/2026

SID Planning
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Planning Application Reference Number: ACP-324165-26

Applicant: Maughanaclea Ltd / Enerco

Description of Development: 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

Location: Maughanaclea, County Cork

To whom it may concern,

Please find below my response to the letter of 14/08/26 from An Coimisiún Pleanála inviting further comment on Section 4.3.2 (Nature Conservation) of the applicant's Response to Observations

I do not have access to the resources or man-hours available to Enerco or their consultants MKO so my response will not be as thorough as I would prefer.

I note that Section 4.3.2 (Nature Conservation) of the applicant's Response to Observations is specifically in response to the submission made by the Development Applications Unit (DAU) on the original application.

In that submission the DAU notes with regard to the White Tailed Sea Eagle that:

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.

They then go on to say:

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 rotorswept zones of these turbines.

However, in the applicants Response to Observations there is no mention of any assessment of 'orographic lift' just a statement that:

"...there is no evidence ... that the area in which the Proposed Wind Farm site is located provides attractive thermals or corridors for travelling and hunting."

This does not strike me as an assessment that *'cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt.'*

The applicants original application and Response to Observations contain many assessments that have lacunae and do not contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt and I request that no decision is made until such time as they do.

Yours sincerely,

Andrew Carling