



Outlook

FW: ACP-324165-26 — Response to Section 4.3.2 — Annika Ahles

From SIDS <sids@pleanala.ie>

Date Thu 9/10/2026 2:24 PM

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

 1 attachment (14 KB)

Annika_Ahles_Section_4.3.2_Response.pdf;

From: Annika Ahles <the.annika.ahles@gmail.com>

Sent: Thursday 10 September 2026 1:53 pm

To: SIDS <sids@pleanala.ie>

Subject: ACP-324165-26 — Response to Section 4.3.2 — Annika Ahles

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A chara,

Please find attached my response to Section 4.3.2 (Nature Conservation) of the applicant's Response to Observations in ACP-324165-26, submitted further to the Commission's letter of 14 August 2026.

Could you please acknowledge receipt.

Le meas,

Annika Ahles

Faraway Place, Ards More, Bantry, Cork, P75 Y895

Annika Ahles
Faraway Place
Ards More
Bantry, Cork
P75 Y895

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1, D01 V902

Re: ACP-324165-26 — Maughanaclea Renewable Energy Development
Response to Section 4.3.2 (Nature Conservation) of the applicant's Response to
Observations

A chara,

I am responding to the Commission's letter of 14 August 2026 inviting observations on the applicant's Response to Observations, received by the Commission on 14 July 2026. As requested, this response deals only with Section 4.3.2 (Nature Conservation). My original objection, and every ground in it including noise, remains before the Commission unchanged.

- THE QUESTION I ASKED IN MAY -

In my original objection I made one very specific request: that the Commission obtain GPS tracking data and flight records for the white-tailed sea eagle from the NPWS, so that the presence of protected birds at this site could be assessed independently of the developer's own survey hours. I made that request because I have grown up here and I know the white-tailed sea eagle is in this valley's skies, whatever the consultants' vantage-point logs say.

Section 4.3.2 answers with this sentence, at page 35: "Because of the absence of flights within the Proposed Wind Farm site, it was not possible to calculate a formal estimate of predicted collisions." In other words: the surveys saw no eagle cross the boundary, so no collision assessment was done. That is precisely the reasoning my original objection asked the Commission not to accept — and no independent data has been sought to test it.

- WHAT THE STATE'S OWN EVIDENCE NOW SHOWS -

Since my objection was written, the Development Applications Unit of the Department of Housing, Local Government and Heritage has made its submission on this case (ref. SID-CK-2026-011, 25 May 2026). It records that the Cork-Kerry border area is regularly used by white-tailed eagles, with a number of casualties; that an adult female was killed at Grousemount wind farm in 2025, roughly 5 km north of this site; and that turbine strikes account for 19% of white-tailed eagle casualties where the cause of death has been established. The applicant's own Response acknowledges, at page 34, "several casualties along the Kerry/Cork border."

The DAU also gives a warning that I would ask the Commission to weigh very carefully: in other Irish EIARs, impacts on this species have been "ruled out regarding significant effects even where subsequent collision mortality has then occurred." The Department's submission on the reactivated Graffy appeal (PL05E.322673), as reported in October 2025, describes three white-tailed eagles killed at two south Donegal wind farms between October 2024 and May 2025, with post-mortems under the NPWS RAPTOR protocol confirming turbine-strike injuries — at turbines considerably smaller than the 169-metre machines proposed here. Paper assessments said the risk was negligible. The birds died anyway.

- THE INCONSISTENCY IN THE APPLICANT'S OWN TABLES -

I would also draw the Commission's attention to a matter of simple consistency. In Section 4.3.2 the applicant includes the consented Dreenacreenig West development in its cumulative bird assessments — it is named at pages 40 to 43 for kestrel, red grouse, snipe, buzzard and sparrowhawk. The same development is excluded from the EIAR's landscape, noise and project-description cumulative assessments. If Dreenacreenig West exists for the purposes of counting snipe, it exists for every other purpose too. An assessment that switches a neighbouring wind farm on and off depending on the chapter cannot be relied upon.

- WHAT I ASK -

In May I asked for independent data because I did not trust the developer's survey logs. Section 4.3.2 has confirmed that mistrust: no independent data was sought, the mortality record was stepped around, and the cumulative tables contradict the rest of the application. I want to be clear that I am not asking the Commission to send the applicant away to do better homework. What these failures demonstrate is that the risk to the white-tailed sea eagle in this border country cannot be excluded — the carcasses at Grousemount and in Donegal say so more plainly than any model — and a development whose risk to a bird like this cannot be excluded should not be built here at all. I grew up under these skies and my position is not conditional: I ask An Coimisiún Pleanála to refuse permission for this development.

Please acknowledge receipt of this response.

Yours sincerely,

Annika Ahles

Faraway Place, Ards More, Bantry, Cork, P75 Y895