
Response to RtO of ACP-324165-26

From bm.collins@btinternet.com <bm.collins@btinternet.com>

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To SIDS <sids@pleanala.ie>

 1 attachment (167 KB)

Submission response to RtO Sept 2026 BC.pdf;

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Please find attached my response to the RtO relating to ACP-324165-26. I would be grateful if you acknowledge receipt.

Many thanks for your help in this matter.

Brid Collins

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

11th September 2026

A Chara,

Re: Developer: Maughanaclea Ltd / Enerco: SID Application Submitted to An Coimisiún Pleanála

Ref No: ACP-324165-26 **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 work.

Location: Maughanaclea, in townlands of Ardrah, Maughanaclea, Ballynamought, Gortloughra, Cousane,

I am responding to the letter received of August 14th 2026 from Honor Caird Marren. My response is confined to Section 4.3.2 (Nature Conservation) of the RtO.

Ornithology: Raptors

In view of the sightings of the white-tailed sea eagle being recorded near the proposed wind farm site, I am concerned that the applicant has dismissed potential collisions based on 2 recorded sightings in three years. WTE adults will range 30-70 kms, while in the non-breeding season can roam 100km plus, and youngsters will travel considerably farther. Large raptors are likely to use rising air currents 'orographic lift', so the positioning of turbines on high ridges makes them highly vulnerable. All raptors and small migrating birds are at danger of collision with wide sweeping wind rotor blades, particularly in poor weather when visibility is low, as it often is in these hills.

The DAU has stated in its observation document ref. SID-CK-2026-011, that turbine strikes account for 19% of casualties (WTE Phase 2 release report 2025) and that an adult female was killed at the Grousemount wind farm just 5km away, while other fatalities have been recorded in the last 20 years at wind farms in the Cork/Kerry border. It is notable that the strike impacts on this bird are often downplayed as not significant in other EIARs according to the DAU. Further killings of white-tailed eagles in Donegal have occurred and confirmed under the NPWS RAPTOR protocols. These species are often long-lived and slow to reproduce, so impacts on adult mortality can have a profound effect on local populations and take time to recover.

I would add that in Cousane this summer, when the weather has afforded days of clear skies, several raptors have been observed by ourselves and our neighbours. Buzzards have been particularly active, in pairs or a group of three, flying at height over and close to the turbine sites 1-6. Kestrels, Sparrowhawks have also been sighted in the area and in the evenings we have seen and heard owls close to our home.

Displacement:

I also have concerns about the applicant's opinion on **cumulative impact and displacement**. The applicant suggests that bird species can move to habitats elsewhere in the area, while not acknowledging that there are 28 other wind farms within a 25km radius, all claiming that similar mitigation is in place, so there will be no effects. As the DAU stated, this misses the point of cumulative effects.

There is no guarantee that bird populations will recover once they lose their preferred habitat through excavation, drainage and habitat fragmentation in this area of peatland. On UK moorland, studies have found lower bird densities near to wind farm sites, particularly lower densities of breeding birds. For some species such as curlew and snipe, the construction phase of wind farms seems to have the most impact, with bird densities dropping during the building phase and not recovering afterwards.

It is well known that several species have significantly lower breeding density within 500m of a wind turbine. One study published in 2009 looked at twelve moorland bird species and found that seven were affected by the presence of turbines. Across these species, the density of breeding birds was between 15 and 53% lower within 500m of the turbines, compared to further away. The effect was most marked for buzzard, hen harrier, golden plover, snipe, curlew and wheatear. (Pearce-Higgins, J. W., Stephen, L., Langston, R. H. W., Bainbridge, I. P. & Bullman, R. 2009).

I draw attention to the fact that the applicant has provided **no data for the effects of displacement**. I must add that in the RtO about the Sparrowhawk, p43, there is an error describing Snipe instead as a habitat generalist- a mistake in cut and copy, it seems - and mirrors the same paragraph information as given for buzzards and kestrels.

Aviation obstacle lighting: It should be noted that the applicant's bird assessment makes use of daytime surveys only. No nocturnal or low visibility surveying was evidenced, no evidence of data for migratory birds at night, or the effects of fixed red aviation lighting on bird behaviour. NatureScot has identified this lighting as a concern for the attraction and disorientation of migrating birds. I could find no acknowledgement of the tourist business property in the Mealagh which has gained Dark Skies accreditation either.

There is nothing in MKO's response to objections that gives me any greater confidence in their plans for this landscape, and its effects on habitats and wildlife, and I am concerned about identified gaps in their assessment. As the DAU pointed out in regard to the white-tailed eagle, assessment 'must contain complete, precise, and definitive findings capable of removing all scientific doubt'.

I ask you again to seriously consider the rejection of this application.

Mise le Meas

Brid Collins (Mrs)