



Outlook

ACP-324165-26

From Cathy Martucci <cathymartucci@icloud.com>

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To SIDS <sids@pleanala.ie>

 1 attachment (27 KB)

Maughanaclea second submission letter.pdf;

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Please find attached my submission in respect of Maughanaclea Ltd's response to observations, as outlined in Honour Caird Marren's letter of 14 August

Kind Regards
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An Coimisiún Pleanála

10 September 2026

Dear Sir

Re: ACP - 324165-26 Applicant: Maughanaclea Wind Farm

I refer to Honor Caird Marren's letter of 14th August inviting me to respond to Maughanaclea Ltd's response to observations, in particular Section 4.3.2

I have read with interest the response of the applicant to the issues raised by the DAU submission, and despite some facts and figures that have been quoted I do not feel that the applicant has given an adequate or satisfactory response to the points raised by the DAU.

In particular, they seem to have simply added up information about collision risks at each of the wind farms within the locality, to arrive in each case at a sum which they say is negligible. Is this a scientific way to do it? Not being a scientist, I am not sure but I don't think it fully addresses the cumulative risks.

The applicant does include the proposed Dreenacreenig Wind Farm in their cumulative impact remarks. However there is no specific reference to the geography of the Mealagh Valley, and what having a wind farm on both the Northern ridge of the valley (Maughanaclea) and the southern ridge (Dreenacreenig) will mean in terms of displacement of the birds native to the valley - both the rare species and those more common.

"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" It is this paragraph in particular, from the DAU submission, that I feel has not been fully or satisfactorily dealt with.

The applicant also points out the amount of forestry in the area (mainly single species non-native) and says this is not regarded as high value landscape. Whilst this is true, I don't think that gives the applicant carte blanche to say the impact their development will have on the landscape is negligible. We should be putting ecological improvements at the top of requirements.

It is also worrying to see how many times impact on the rare red listed species is said to be low. These listed species are so rare, that any impact is surely unacceptable.

The DAU ask for further information about orographic lift: "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." This has not been dealt with by the applicant.

In addition, there is an error in the section on Sparrowhawks, where the applicant refers in the second paragraph to Snipe. So, does the information given relate to Sparrowhawks or Snipe?

Finally no surveys have been done on night or dawn /dusk flying birds, and the impact of the aviation lights that are required. I have seen both barn owls and Long Eared Owls in the valley, and also Snipe.

I feel strongly that here in Ireland we are facing real ecological problems, especially the loss of habitats and the loss of species, and there seems to be direct conflict between allowing this proposed development to go ahead, and maintaining at best, but preferably improving the ecological situation

Yours Faithfully
Cathy Martucci