

Tushaline Sahseetharan

From: christine o leary <christineaoleary@gmail.com>
Sent: Thursday, August 27, 2026 3:26 PM
To: SIDS
Subject: ACP-324165-26 maughanaclea wind farm
Attachments: response to maughanaclea mko.pdf

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To Whom It May Concern,

Please find attached my submission in response to the invitation issued to me to comment on the applicant's Response to Observations – Section 4.3.2 Nature Conservation, relating to Case Number ACP-324165-26 (Maughanaclea Wind Farm).

I was invited to submit further observations specifically on matters concerning Nature Conservation, and the attached document sets out my concerns regarding potential impacts on protected species, habitats, upland ecology, and cumulative environmental effects.

Yours sincerely, Christine O'Leary

Lackareagh,

Kealkil,

Bantry

Co Cork

26th of August 2026

Phone number 0863758275

An Coimisiun Pleanála

64 Marlborough Street,

Dublin 1

D01

V902

Re: Submission on the proposed Maughanaclea Wind Farm development
Planning Reference: ACP-324165-26

I am making this submission to An Coimisiún Pleanála in response to the invitation dated 14 August 2026. Having reviewed MKO's response to observations, particularly Section 4.3.2 on nature conservation, I remain concerned about the potential effects of the proposed development on the local natural environment.

In my view, the applicant's response does not fully address the possible impacts on habitats, protected species, birds, water-dependent ecosystems, or the ecological connections between these natural areas. I ask An Coimisiún Pleanála to take the concerns outlined below into account when considering the applicant's response and making its decision on the application.

In Response to 4.3.2.1 White tailed Eagle

Casualty risk and local sightings

I don't agree with MKO's view that white-tailed eagles aren't at risk from the proposed Maughanaclea Wind Farm. People living very close to the site have seen these birds with their own eyes. One resident, Sean Worboys, even photographed a pair of white-tailed eagles flying over the exact area where turbines are planned. He has seen them more than once, even if he didn't always manage to get photos and he provided evidence in his submission.

The white-tailed eagle was reintroduced to Killarney National Park in 2007, and people in the wider Kealkill area were already spotting them in the early years. At the time, nobody realised wind farms would become such a big issue locally, so those sightings weren't formally recorded. In 2012, a pair from the Killarney project settled in Glengarriff and eventually raised a chick in

2016 — the first born in Cork in over 100 years. That alone shows how slow and fragile the process of establishing new breeding pairs can be.

Once young eagles leave the nest, they can travel far and eventually set up new territories. These territories can last for decades, passed down through generations of birds. That's why it's important to understand how they use the wider landscape, not just whether a nest is right beside a turbine.

I believe the Maughanaclea and Shehy Mountain area is genuinely suitable for white-tailed eagles. It has the kind of features they look for quiet uplands, mature trees, cliffs, lakes, rivers, bogs, wetlands, and plenty of food sources like fish, waterfowl and deer. MKO describe the area as forestry, but the map they provided shows a much more open mountainous landscape. A lot of the forestry is due to be felled anyway, and many turbines are placed along the forest edges rather than deep inside it.

Each turbine would be 169 metres tall with a huge rotor span, and across 14 turbines that's almost 200,000 square metres of moving airspace. It's hard to see how a large bird like a white-tailed eagle could safely navigate that, especially if you consider the cumulative impact of existing and proposed turbines. The EIAR shows that within 25 km there could eventually be around 300 turbines. The whole landscape is slowly turning into one giant wind farm.

And we already know what can happen. A female eagle from Grousemount was killed by a turbine in 2025, only about 5 km from the Maughanaclea site. There have been several other eagle deaths in the Kilgarvan area over the years, and more recently in Donegal. These aren't theoretical risks they're real incidents.

Older generations never got to see these birds in the wild, but they heard stories about them. My own family passed down stories from the Glengarriff and Adrigole area about how people once destroyed eagle nests by putting them on fire on cliffs and ledges to stop them breeding. It's heartbreaking to think that after all the effort to bring them back, wind farms could become another major threat.

The assessment also doesn't properly look at how the Kealkill and Mealagh valleys might act as flight corridors or provide uplift for soaring birds. The landscape, the south-westerly winds, the slopes and ridges, and the connection to Bantry Bay, the Shehy Mountains and Gougane Barra all suggest that large birds could easily use these areas for travelling and soaring. I regularly see gulls flying along the Maughanaclea hillside morning and evening, which shows that birds are using these valleys as travel routes. It's reasonable to ask whether larger birds might do the same.

There's also strong historical evidence of eagles in this wider landscape places such as Shehy More, Nowen hill and Gougane Barra, Eagle Point at Ballylickey. In 1953, a pair was still nesting in Gougane Barra and was mentioned in historical notes such as *The Observers Book Of BIRDS EGGS compiled* by G. Evans. Nature can return if it's given the chance. For example, the pass of Keimaneigh (Ceim an Fhia), meaning the step or "Leap of the deer" is now full of deer, even though they weren't there 50 years ago.

The photos taken at Lackavane in Conigar Bog show exactly the kind of open uplands, slopes, ridges and connected valleys that soaring birds use. From there you can see all the way to Bantry Bay, across to Maughanaclea hillside and the Mealagh Valley and down into Gougane Barra. It's a continuous mountainous landscape, not a series of isolated pockets.

For all these reasons, a much more thorough assessment is needed. If MKO are saying the valleys aren't suitable for large raptors, they need to explain how they reached that conclusion. Surveys should have been carried out in the right weather conditions, with proper vantage-point observations, and should have looked at ridge lift, thermals, flight paths and how the landscape connects to Bantry Bay and the surrounding mountains.

Most importantly, just because eagles weren't seen during a limited survey doesn't mean they don't use the area. Their movements depend heavily on weather, wind and season. A proper assessment should reflect that.



https://maughanaclea.info.com/wp-content/uploads/2025/11/7_Maughanaclea-Dwellings-A1-Ortho.pdf

The map above, taken from the Enerco information website and prepared by MKO, shows the proposed Maughanaclea Wind Farm layout, with the turbine locations marked. It also gives an indication of the surrounding landscape, which I would describe as open mountainous terrain with some forestry plantations.

MKO appears to describe the area as forestry, but the map suggests that this is not the full picture. I can identify seven turbines within the forestry section referred to, but that forestry is also proposed to be felled. On closer inspection, most of these turbines appear to be positioned close to the forestry edge rather than in the centre of the plantation.

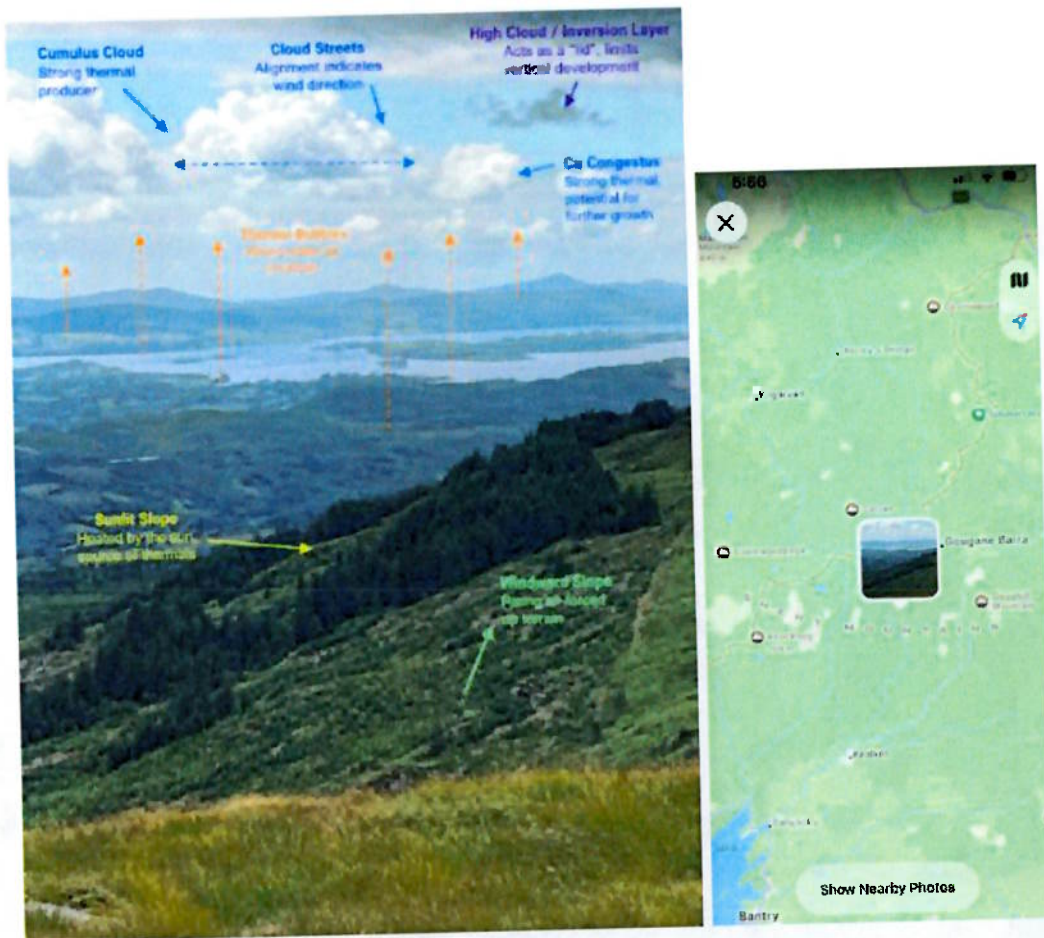
[illegible]

Image taken from the EIAR section *Maughanaclea Tourism Impact Assessment V4*.

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This photo shows a sweeping view out on to Bantry Bay photo was taken in the townland of Lackavane, Conigar Bog NHA also a part of the Beara Breifne Way and you can see the diverse habitat suitable for eagles.



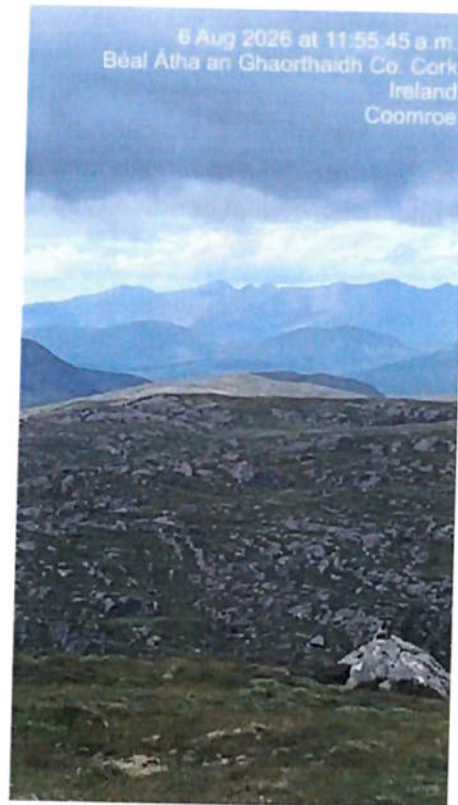
Example of how thermals are created using same photograph as above.



Photo taken from Lackavane Kealkill from Conigar Bog NHA the same location overlooking the townland of Cappaboy Beg where the proposed Curraglass wind farm will be located. A place where the eagle is sometimes observed.



When you reach the top of Lackavane you are greeted with another spectacular view down into Gougane Barra Lake and hillside where once the eagle soared in abundance.



Another view of the Shehy mountain range suitable for an eagle to soar with the Paps peaks in the distance.

In Response to 4.3.2.2 Annex 1 and Article 17 Habitats

Impacts on Article 17 Habitats

I would not agree that the vicinity of T7 and T8 are not within article 17 reasons are as follows.

1. Pine marten sightings and habitat protection

Pine martens have been sighted very close to the vicinity of T7 and T8. Photographic evidence of these sightings was submitted by Sioned Jones and Sean Worboys. The pine marten is a protected wild animal under the Wildlife Act and is also listed under the EU Habitats Directive. For this reason, any disturbance, damage or removal of suitable pine marten habitat should be carefully assessed, as it may constitute an offence.

2. the forestry present is planted on wet heath and has areas of alpine/subalpine heath nearby.

Botanical survey findings for T7 and T8

I have included below extracts from MKO's EIAR, specifically the Botanical Survey Report in Appendix 6.1.

The botanical survey extracts for Turbines T7 and T8 show that the proposed infrastructure is not simply located on ordinary dry forestry ground. The report records peat soils beneath the plantation and identifies bryophyte and sphagnum-dominated ground layers in the vicinity of the turbine locations, including areas associated with the proposed hardstands and access infrastructure. In ecological terms, the presence of sphagnum, wet ground conditions and underlying peat indicates that the area retains peatland characteristics despite being under conifer plantation. This is relevant because peatland habitats can remain ecologically important even where they have been modified by forestry, and any assessment should therefore consider the underlying habitat conditions as well as the plantation cover visible above ground.

See assessments and charts below copied from MKO EIAR submission

Turbine T07 and Associated Infrastructure

"Turbine T07 and associated infrastructure (hard stand and access roads) as well as associated peat and spoil management area, are located in the east of a mature Conifer Plantation (WD4), in the south of the Proposed Wind Farm site. This plantation is located on sloping ground underlain by peat soils. The plantation is dominated by dense, dead Sitka Spruce. The ground layer in the vicinity of T07 was dominated by carpets of Bryophytes, and sphagnum and was wet underfoot. The access road to T07 is located on drier, sloping ground, dominated by needles."

Table 3-11 Botanical Survey Results for Turbine T07 and hardstand

Turbine T07		
Management Regime: Conifer Plantation		
Relieve Area: 10x10m		
Date of Survey: 18/07/2024		
Species		% Cover
Vascular Plants	Scientific Name	Plot (ITM 510312, 555772)
Canopy Layer		
Sitka Spruce	<i>Picea sitchensis</i>	90
Field Layer		
Bilberry	<i>Vaccinium myrtillus</i>	1
Ground Layer		
<i>Sphagnum cuspidatum</i>		5
<i>Sphagnum fallax</i>		4
<i>Pleurozium schreberi</i>		40
<i>Thuidium tamariscinum</i>		30
Pine needles		20
Fossitt (2000) Habitat Classification	Conifer Plantation (WD4)	

Turbine T08 and Associated Infrastructure

“Turbine T08 and associated infrastructure (hard stand and access roads), as well as associated peat and spoil management area, are located in the south of a large, mature Conifer Plantation (WD4), in the south of the Proposed Wind Farm site. This plantation is located on sloping ground underlain by peat soils. The plantation was dominated by dense, dead Sitka Spruce. The ground layer in the vicinity of T08 was dominated by bryophytes and sphagnum and needles and was dry underfoot. The access road to T08 was located on drier, sloping ground, dominated by needles.”

Table 3-12 Botanical Survey Results for Turbine T08 and hardstand

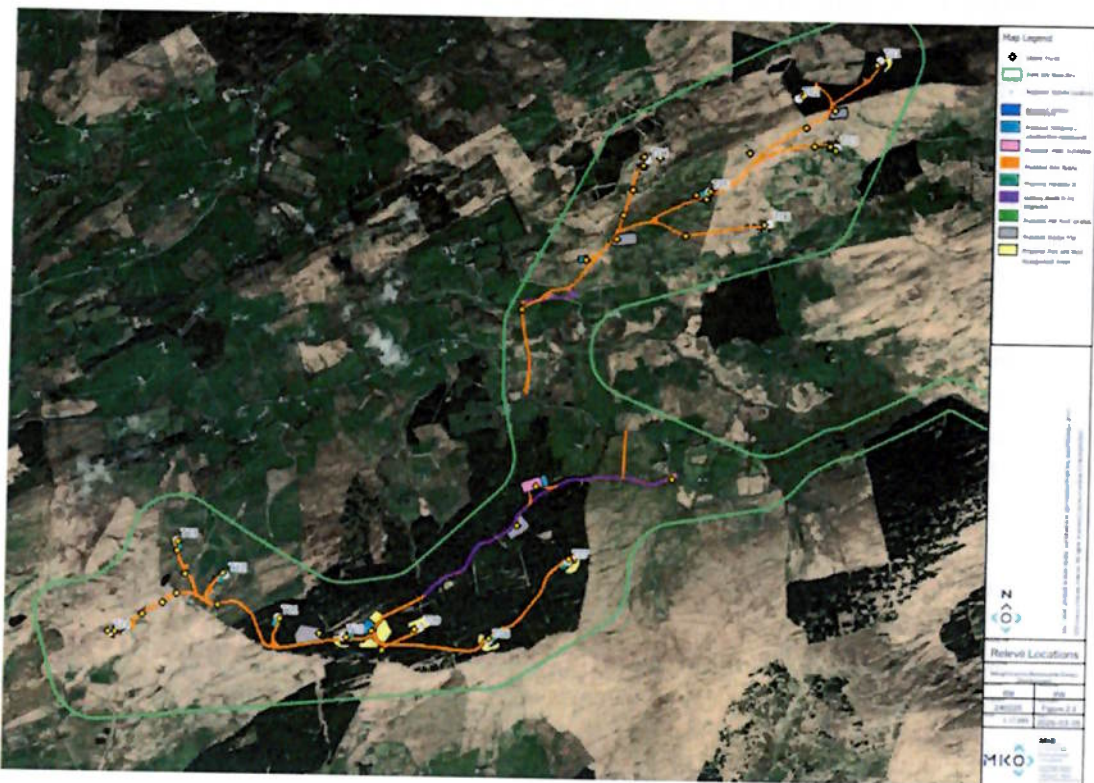
Turbine T08		
Management Regime: Conifer Plantation		
Releve Area: 10x10m		
Date of Survey: 18/07/2024		
Species		% Cover
Vascular Plants	Scientific Name	Plot 1 (ITM 509848, 555251)
Canopy Layer		
Sitka Spruce	<i>Picea sitchensis</i>	90
Ground Layer		
<i>Sphagnum fallax</i>		5
<i>Pleurozium schreberi</i>		70
<i>Thuidium tamariscinum</i>		20
<i>Polytrichum commune</i>		10
Pine needles		5
Fossitt (2000) Habitat Classification		Conifer Plantation (WD4)

<https://www.pleanala.ie/publicaccess/Case%20Documentation/324165/Applicant%20Documents/Application%20Documents/EIAR/Volume%203%20-%20EIAR%20Appendices/Appendix%206-1%20Botanical%20Survey%20Report%20-%20F%20-%20202026.03.23%20-240225.pdf?r=212077019208>

3. Proximity to alpine/subalpine heath and potential indirect habitat effects

Turbines T7 and T8 appear to be located close to areas mapped as alpine/subalpine heath in the EIAR turbine-location mapping. This is significant because heath and bogland habitats are hydrologically connected to the surrounding peat system and can be affected by works outside their immediate mapped boundary.

I am concerned that the proposed removal of forestry, peat and ground vegetation in this area could alter local drainage patterns, disturb peat structure and create edge effects on nearby heath and bogland habitats. These changes may have long-term ecological consequences, particularly where habitats depend on stable water levels, intact peat soils and undisturbed ground conditions. In my view, the assessment should not focus only on the direct turbine footprint but should also consider indirect and cumulative effects on the adjacent heath, bogland and the wildlife that depends on these habitats.



<https://www.pleanata.ie/publicaccess/Case%20Documentation/324165/Applicant%20Documents/Application%20Documents/EIAR/Volume%203%20-%20EIAR%20Appendices/Appendix%206-1%20Botanical%20Survey%20Report%20-%20F%20-%20202026.03.23%20-240225.pdf?r=212077019208355988>

Summary

The area around Turbines T7 and T8 should be assessed carefully because it appears to contain ecological features relevant to Article 17 habitats and protected species. Pine martens have been recorded close to the proposed turbine locations, and the botanical survey findings indicate that peat soils, sphagnum and bryophyte-rich ground layers remain present beneath the conifer plantation. These features suggest that the land may retain peatland characteristics despite forestry cover. Given the proximity of mapped alpine/subalpine heath, any assessment should consider not only the direct turbine footprint but also potential indirect effects on drainage, peat structure, adjacent heath and bogland habitats, and the wildlife that depends on them.

Response to impacts on other Annex I habitats

Forestry cover does not remove the underlying habitat concern

MKO states that Turbines T10, T09, T07 and T01 are located within areas that are currently under conifer plantation forestry. While this may be correct in terms of the surface vegetation, it does not fully address the ecological condition of the ground beneath the plantation. The botanical assessment records several sphagnum species such *Sphagnum tenellum*, *Sphagnum cuspidatum*, *Sphagnum subnitens*, growing under the canopy. Sphagnum is strongly associated with wet peatland conditions and is an important indicator that the substrate remains peat-

based, even where the habitat has been modified or degraded by forestry.

Potential loss of peatland function

In my view, this means the area should not be treated simply as commercial forestry with limited ecological value. If peat is excavated, drained or permanently covered to construct turbine hardstanding's, access tracks or associated infrastructure, there is a real risk of losing remaining peatland function. That loss should be considered habitat loss, not just the removal of plantation forestry.

Limits of biodiversity enhancement measures

Although a biodiversity management or enhancement plan may provide some compensatory measures, it cannot simply replace intact peat. Blanket bog and related peatland habitats take thousands of years to form. They store carbon, regulate water, support specialised plants and wildlife, and provide important ecosystem services. Once peat is removed, compacted or hydrologically altered, those functions may be lost for the long term.

For these reasons, I believe the proposed works could cause long-term damage to Annex I blanket bog and associated peatland habitats, even where those habitats are currently affected by conifer plantation.

Annex 1 Bird Species and Red Listed Birds Species

Conservation significance of recorded bird species

The presence of 17 Annex I and red-listed bird species recorded either within, or very close to, the proposed Maughanaclea site suggests that the area has substantial conservation importance. It also indicates that the surrounding upland and wetland habitats may provide valuable conditions for resident, upland and migratory bird species.

Migratory and Wintering Birds: Cumulative Impacts

- I am concerned about the impact on migratory and wintering birds such as Whooper Swan, Goldeneye, Redwing, Snipe, Ring Ouzel and Woodcock.
- These birds may use the wider area for feeding, resting, roosting, shelter and movement.
- This should be checked through proper surveys before impacts are assessed.
- With up to 300 turbines within 25 km, bird movement across the area needs careful assessment. Maughanaclea should be assessed cumulatively, not in isolation.
- Birds such as Redwing, Woodcock, Snipe, Whooper Swan, and Swift may move between lakes, wetlands, uplands and feeding areas, bringing them through or near several wind farms.

Whooper Swan – winter presence in West Cork

Whooper Swan is a species of particular concern in relation to the proposed development. Whooper Swans are regular winter visitors to West Cork and are

known to occur at a number of locations in the wider area, including Gougane Barra, Reendonegan Lake near Bantry, Lough Allua between Ballingeary and Inchigeelagh, and Lough Nambrackderg at the foothills of Shehy More.

Sitings mentioned in the EIAR demonstrate that the wider landscape provides suitable conditions for wintering Whooper Swans. The potential for birds to move between these sites and other suitable feeding and roosting locations should therefore be properly investigated.

Whooper Swans are large-bodied birds and their flight behaviour, particularly during movements between wetland sites, should be considered when assessing potential collision and displacement effects. Weather conditions, darkness, fog and other periods of reduced visibility may also influence the ability of birds to detect and avoid obstacles.

Whooper Swans may return to established wintering areas and follow repeated seasonal movement patterns is also relevant. It is therefore important that the assessment establishes whether regular flight routes or movement corridors occur within or near the proposed turbine array.



Image of Whooper swan taken from a public Facebook Beautiful Cork Images in Gougane Barra November 2022



Whooper swan

Table 7-4: Whooper swan sightings records

Ref.	Location	Date	Time	Species	Number	Notes and activity	Observer
WS001	Hen Harrier Roost Survey, 200m east of V10	17/02/2023	16:42	Whooper Swan	10	upland blanket bog, small flock, flying south	JM
WS002	Hen Harrier Roost Survey, HHVPS	18/11/2024	12:09	Whooper Swan	10	upland blanket bog, travelling, probably going to a roost point out of view but in distance	LB

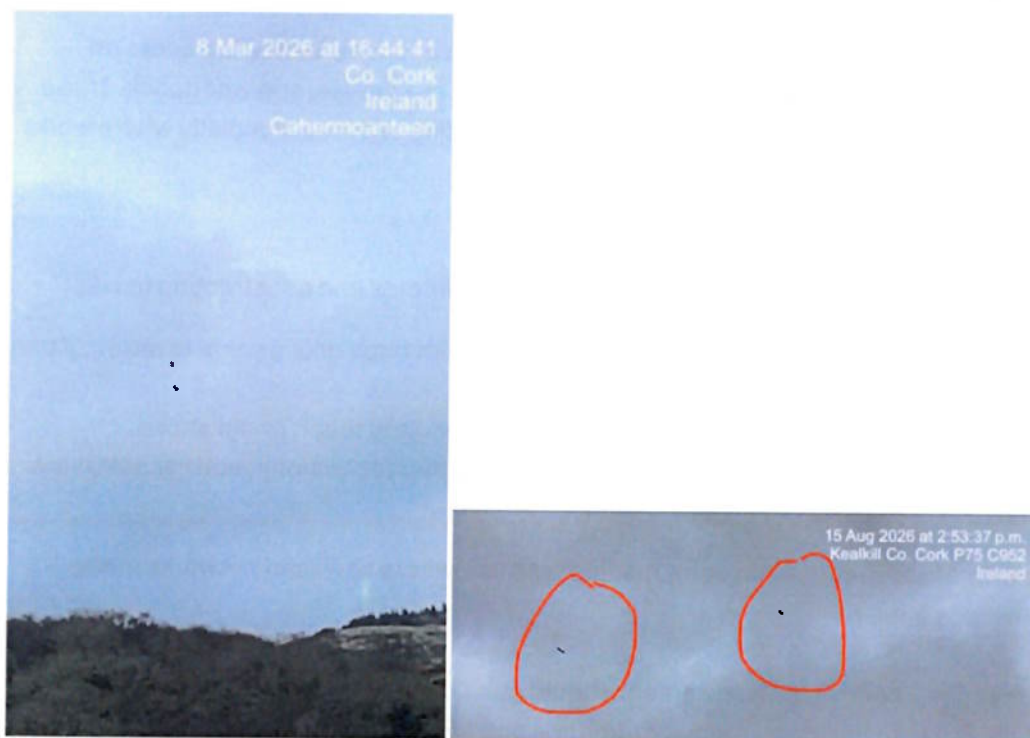
Appendix 7-4 Survey Data – F – 2026.03.26 – 240225.p218/222 showing location of Whooper swan recorded by MKO 11.03.26.

Birds of Prey

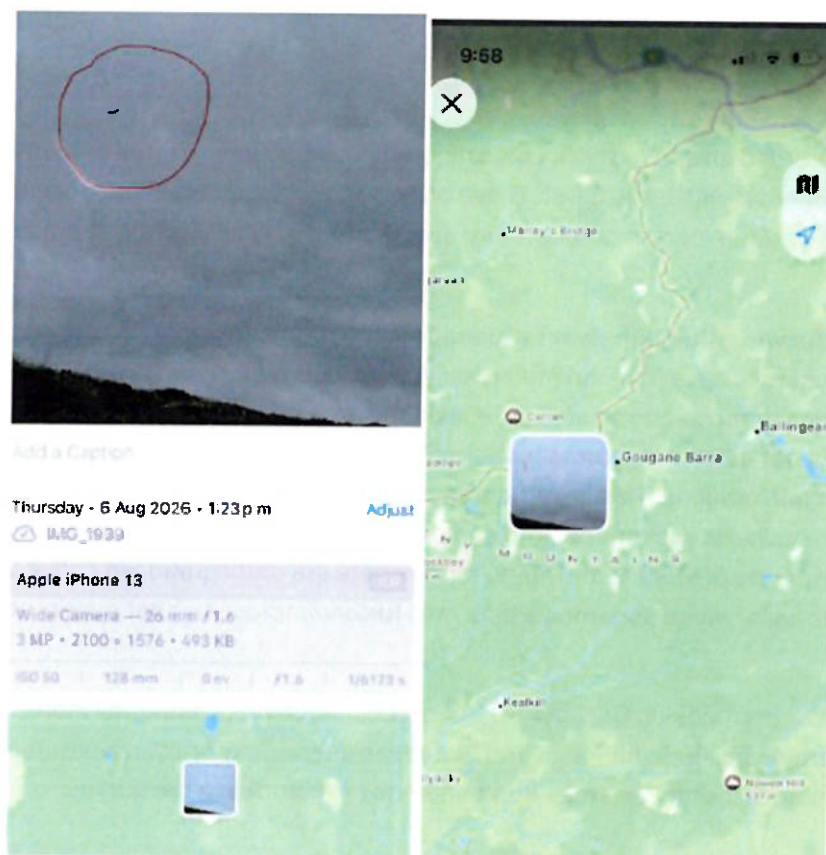
Birds of prey: collision risk and wider landscape use

Birds of prey recorded within or close to the proposed site include buzzard, sparrowhawk, kestrel, hen harrier, merlin, peregrine falcon, goshawk, barn owl and long-eared owl. I am concerned that these species may be vulnerable to turbine collision risk, particularly while hunting. Raptors often focus their attention on the ground when searching for prey, which may reduce their ability to detect moving turbine blades in time to avoid collision. Many of these birds hunt over upland habitats and rely on prey such as meadow pipit and other small birds.

I am also concerned that the cumulative assessment may not have fully considered birds of prey using the wider Kealkill Valley and surrounding uplands, rather than only those recorded within the immediate site boundary. From my own observations, birds of prey such as buzzards, Kestrel and sparrowhawk move through the wider area from place to place which I have observed from my home. I have also observed a hen harrier at Conigar Bog, which is located close to the proposed Curraglass wind farm site.



Buzzards in flight taken on the March 2026 and August 2026 observed in the townland of Cahermoanteen and Lackareagh



Hen Harrier observed in Congiar bog townland Lackavane August 2026 close to Curraglass wind farm site.

Ground nesting birds

I have concerns about the potential impact of construction and long-term site access on ground-nesting birds such as curlew, snipe, meadow pipit, red grouse, and woodcock. These species may be vulnerable to disturbance during the breeding season, especially where works take place near nesting or foraging areas.

My concerns include:

- disturbance from rock blasting, machinery, vehicle movements and construction noise;
- possible displacement from breeding or feeding areas, with birds taking years to return, if they return.
- increased access through areas that were previously difficult to reach could cause disturbance from walkers, hunters with dogs off leads or other recreational activity using new access roads.
- possible future land reclamation or intensified land use where new road networks make access to hillside easier.

For these reasons, I believe the assessment should consider not only the direct effects of construction, but also the longer-term disturbance and habitat-pressure effects created by new access routes through the upland landscape.

Birds associated with watercourses

Local observations and survey concern

Grey wagtail was recorded on site by MKO. I also regularly observe grey wagtail near my home by the Owvane River, together with Little Egret. These observations are relevant because they show that local rivers and wetland margins support bird species that may not be fully represented in the survey record.

Need to consider the wider Kealkill river landscape

The survey area appears to have focused mainly on the wind farm site itself. In my view, it should also have considered the north side of Kealkill the area between the proposed Curraglass and Maughanaclea wind farm locations. This wider area includes townlands with rivers, streams, wetland margins. This is particularly relevant because several farms close to the proposed wind farm have not experienced the same level of intensive agriculture or land reclamation as other parts of Kealkill and some landowners are participation in native woodland establishment and conservation schemes which may further improve habitat quality across this wider landscape.

Townlands such as Cahermuckee, Gortluchra, Coomclogh, Inchiroe, Cappaboy More, Cappaboy Beg, Curraglass, Kilnagnappoge and Maulavanig retain a more semi-natural character in many places, but these areas don't seem to be included in the survey.

Kingfisher observation

For example, in July 2026 I observed a kingfisher on the Owvane River, although I was unable to obtain a photograph. This observation raises a reasonable question about whether the original survey work was sufficiently robust and whether additional Annex I or red-listed species may be present within the wider area.

Common Kingfisher

Lackanagh, Kesh, Co. Wick
July 17, 2026



Recorded kingfisher in the Owvane in July and observed a day earlier.

The image below, taken from the EIAR, shows the locations used for the bird surveys. It indicates that survey coverage on the north side of the proposed site very limited and the cumulative effect of Curraglass wind farm site isn't taken into account.



Appendix 7-1 Survey Effort - F - 2026.03.26 - 240225.pdf taken from EIAR.

Conclusion

I want to thank An Coimisiún Pleanála for giving me the opportunity to make this observation. I appreciate being able to share my concerns as someone who lives in the area and sees the landscape and wildlife every day.

After reading the applicant's responses, I still feel that the real environmental risks have not been fully addressed, especially the impacts on protected birds, peatland habitats, and the wider upland ecosystem. The presence of species like the white-tailed eagle, pine marten, wintering Whooper Swans, birds of prey, ground-nesting birds and river-dependent species show that this is a sensitive and key area. The land around several turbine locations is not just

commercial forestry; it still contains peat, sphagnum, wet ground and semi-natural habitat that could be permanently damaged.

With so many existing and proposed turbines in the wider region, the cumulative impact is becoming extremely hard to ignore. Once this upland landscape is changed, it cannot be undone, and wildlife will have to navigate an increasingly industrialised environment.

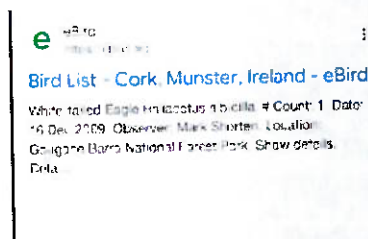
This is a special and sensitive landscape. The wildlife that depends on it should be fully protected through a careful, robust assessment before any decision is made.

Thank you again for allowing me to submit my observation. Can you please acknowledge my submission for records.

Yours sincerely

Christine O' Leary

Appendix Evidence of Historical suitability



Above is a screen shot record of a eagle siting in 2009

Below you will find Eagles are also mentioned in a poem about Gougane Barra composed by Jeremiah Callanan approximately 1826.

Gougane Barra By Jeremiah Joseph Callanan

Posted on January 30, 2013 by Author Admin | Dublin Irish Wiki

Gougane Barra

'There is a green island in lone Gougane Barra,
Where Allua of songs rushes forth as an arrow,
In deep-valley'd Desmond – a thousand wild fountains
Come down to that lake from their homes in the mountains.
There grows the wild ash, and a time stricken willow
Looks chidingly down on the mirth of the billow;
As, like some gay child, that sad monitor scorning,
It lightly laughs back to the laugh of the morning.

And its zone of dark hills – oh! to see them all bright'ning,
When the tempest flings out its red banner of lightning;
And the waters rush down, 'mid the thunder's deep rattle,
Like clans from their hills at the voice of the battle.
And brightly the fire-crested billows are gleaming,
And wildly from Mullagh the eagles are screaming.
Oh! where is the dwelling in valley, or highland,
So sweet for a bard as this lone little island.'