
ACP-324165-26 – Further Submission in Response to Letter dated 14 August 2026

From Kait H <kaithusmann@gmail.com>

Date Mon 9/14/2026 4:31 PM

To SIDS <sids@pleanala.ie>

 1 attachment (47 KB)

wind turbine letter response to ACP.pdf;

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A Chara,

Please find attached my further submission in relation to Maughanaclea Renewable Energy Development, case reference ACP-324165-26, in response to the Commission's letter of 14 August 2026 concerning Section 4.3.2 (Nature Conservation) of the Applicant's Response to Observations.

I would be grateful if you could acknowledge receipt of this submission.

Le meas,

Kait Husmann

Subject: ACP-324165-26 – Further Submission in Response to Letter dated 14 August 2026

Re: Maughanaclea Renewable Energy Development – ACP-324165-26
Response to Section 4.3.2 – Nature Conservation

A Chara,

I am writing in response to the Commission's letter dated 14 August 2026 inviting a further submission concerning Section 4.3.2 (Nature Conservation) of the applicant's Response to Observations.

I wish to confine this response to matters arising from that section.

White-tailed Eagle

I remain particularly concerned by the applicant's response regarding White-tailed Eagle. The Development Applications Unit itself raised concern that White-tailed Eagles have been recorded near the proposed wind farm and noted casualties along the Cork/Kerry border. The applicant responds principally by stating that only two observations of White-tailed Eagle were made during its three years of surveys, neither within 500 metres of a proposed turbine, and that because there were no flights through the proposed wind farm site it was not possible to calculate a formal collision-risk estimate. The applicant then concludes that no significant effects are predicted. (*Applicant's Response to Observations, Section 4.3.2.1, pp. 34–35.*)

I do not believe that the absence of recorded flights through the turbine envelope during finite survey periods provides sufficient reassurance for a species capable of ranging across a very large landscape. The developer has not provided GPS data from NPWS that could confirm their assertion.

This is particularly concerning because the applicant's own subsequent cumulative assessment acknowledges that wind energy and its associated infrastructure is ranked as a high-importance pressure/threat for White-tailed Eagle, and that upland open habitats are of value to the species. That assessment expressly identifies numerous wind farms occupying these upland habitats, including Dreenacreenig West, Gortloughra and other developments throughout the surrounding uplands. (*Applicant's Response to Observations, Section 4.3.2.3, White-tailed Eagle, pp. 39–40.*)

This is not a hypothetical concern. The DAU submission records the death of an adult female White-tailed Eagle following collision with a turbine at Grousemount in 2025, approximately 5 km north of Maughanaclea, as well as earlier turbine fatalities elsewhere in Cork and Kerry. The DAU further records that turbine strikes account for 19% of White-tailed Eagle casualties where the cause of death has been established. (Development Applications Unit submission SID-CK-2026-011, 25 May 2026.)

In that context, I respectfully submit that "we did not observe an eagle flying through the proposed turbine area during our survey watches" is not equivalent to demonstrating that eagles will not use that airspace during the operational lifetime of the development.

The turbines would potentially remain in this landscape for decades. White-tailed Eagles are once again establishing themselves in Ireland. Their future use of this landscape

cannot reasonably be assumed to remain identical to the limited activity captured during the survey period.

Cumulative Effects and Displacement

I am also concerned that the applicant's response continues to place considerable emphasis on predicted collision mortality while the cumulative ecological issue is broader than birds physically striking turbine blades.

Wind farms can also cause displacement and barrier effects, whereby birds alter or cease using otherwise suitable habitat. Indeed, the applicant expressly recognises direct habitat loss, disturbance/displacement, barrier effects and collision as the three principal potential impacts of wind farms on birds. (Applicant's Response to Observations, Section 4.3.2.2, pp. 36–37.)

This is particularly important in the Meallagh Valley because Maughanaclea is not an isolated development.

The applicant's own cumulative assessment now identifies Dreenacreenig West, Gortloughra and numerous other wind developments as occupying the same wider upland habitat used by species including Hen Harrier, Peregrine, Chough, White-tailed Eagle, Red Grouse and Snipe.

Maughanaclea would occupy one side of the Meallagh Valley while Dreenacreenig West is proposed on the opposing uplands. Birds do not experience those developments as separate planning applications. They experience the ridgelines, valley floor and airspace between them as one ecological landscape.

This matters particularly for Hen Harrier. The DAU submission cites Irish research showing substantial reductions in Hen Harrier activity close to turbines and identifies effects on other upland species including Snipe. The study cited was undertaken across twelve Irish upland wind farm sites, making it particularly relevant to this landscape. (Development Applications Unit submission SID-CK-2026-011, 25 May 2026; Fernández-Bellón et al., 2019, *Conservation Biology* 33(2), 413–422.)

I therefore do not believe it is sufficient simply to calculate predicted mortality separately for individual species and conclude repeatedly that the resulting effect is "low". The Commission should consider whether the progressive occupation of neighbouring upland ridges by wind-energy infrastructure could cumulatively reduce the amount of undisturbed habitat and movement space available to these species.

Aviation Lighting and Nocturnal Bird Activity

Finally, I remain concerned about an ecological impact that appears not to have been adequately addressed in Section 4.3.2: permanent aviation lighting.

The Department of Defence has requested that all turbines be illuminated with Type C medium-intensity fixed red obstacle lighting of at least 2,000 candela, visible in all directions and operational 24 hours a day, seven days a week. The applicant has expressly confirmed that it is agreeable to those conditions. (Applicant's Response to Observations, Section 4.2, p. 34.)

Yet the ornithological assessment contains no corresponding nocturnal flight-activity dataset.

This seems to me a significant evidential gap. The proposed development introduces permanent elevated artificial lighting into an exceptionally dark upland environment, but bird activity appears to have been assessed through daytime survey methodologies.

As someone who lives in the Mealagh Valley and spends considerable time outdoors here after dark, including through my work in night-sky photography and our community's ongoing Dark Sky initiative, I am particularly conscious that the ecological landscape does not cease functioning when daylight surveys end. Birds move through this landscape at dusk, during darkness and before dawn, including during migration.

The issue becomes still more important cumulatively. Dreenacreenig West's EIAR also provides for 2,000-candela fixed red aviation lighting on its three turbines. The ecological consequences of illuminated turbine arrays on opposing uplands of the same valley do not appear to have been assessed using nocturnal bird-activity data.

I respectfully submit that absence of data should not be treated as evidence of absence of an effect.

Conclusion

Having considered Section 4.3.2, I do not believe the applicant's response resolves the nature-conservation concerns raised. In particular, I remain concerned that:

- The White-tailed Eagle assessment draws a strong conclusion from a very small number of detections despite documented turbine mortality nearby and the applicant's own acknowledgement that wind-energy infrastructure is a high-importance pressure on the species;
- Cumulative assessment does not, in my view, adequately address the potential landscape-scale displacement and barrier effects created by multiple wind developments across neighbouring uplands; and
- The ecological effects of permanent 2,000-candela aviation lighting have not been supported by nocturnal bird-activity data.

Given the number of existing, permitted and proposed wind developments within this upland landscape, I respectfully ask the Commission to apply a precautionary approach and satisfy itself that these cumulative effects have been adequately assessed before determining the application.

Thank you for considering this further submission.

Le meas,

Kait Husmann
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Mealagh Valley
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