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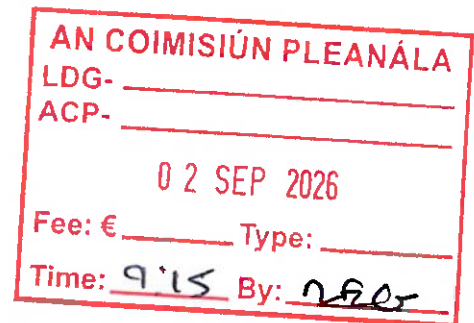
An Coimisiun Pleanála
64 Marlborough Street
Dublin 1
DO1 V902

Date 1st September 2026

Case Number ACP— PAX04 -324165-26

An Coimisiun Pleanála

RE -10 year planning permission for Maughanaclea Wind Farm consisting of 14 no wind turbines 110kv substation and 110kv underground cabling connection and associated works located in Ardrah, Maughanaclea, Ballynamought, Gortloughra, Cousane, Coomclogh, Derragh, Glanycarney, Keenrath, Derrynacaheragh, Shiplough, Coolsnaghtig and other townlands Co Cork .



Dear Sir/Madam

We would like to make further comments and observations on the following planning application. **we strongly object** to this planning application for the above, case number 324165. Section 4.3.2 Nature Conservation.

Annex 1 and Article 17 Habitats Directive. The state has responsibilities under Article 17 of the EU Habitats Directive to report details and losses of degradation to Article 17 mapped habitats.

HABITATS

Wet Heath loss 1.6ha loss of Annex 1 wet Heath.

Blanket Bog 0.21 ha loss of Annex 1 blanket bog.

Plus 0.2ha of unmapped blanket bog, near proposed T10, T09, T08, T07 and T1.

The loss of 1.6ha of Wet Heath is to be offset, and a Biodiversity Management Enhancement Plan (BMEP).

Spoil management consists of conifer plantation, documents state there will be no further losses of Annex 1 habitat loss.

The developer states T7 & T8 is in a conifer plantation and does not contain Annex 1 Habitat. T7 & T8 are in an upland habitat area, the understory of the conifer plantations are full of Mosses Lichens, Fungi, Seeds and Invertebrates. These areas have not been surveyed. We walk in the local conifer plantations, they contain many pools of water, and provide shade and a refuge for our Birds and other wildlife, including the Kerry Slug. we dispute that there void of any life. Building roads full

of aggregate /concrete for turbine foundations these are permanent, these areas will never be able to be restored to any high value. These turbines will cause disruption and the possibility of collision, this site still functions as an ecological corridor regardless of tree planting. Wind turbines do not just destroy physical ground they cause visual & acoustic displacement of birds over vast distances. Blasting will also disrupt the local hydrology, altering critical wetland areas.

The developer admits to permanent destruction of 1.8 ha of Annex 1 Habitat, (Wet Heath and Blanket Bog,). Appendix 6-4 of the EIAR, no amount of mitigation or future management can ever justify healthy protected habitat, as reported there will be a residual loss of 0.2ha of unmapped blanket bog habitat which has not been mapped or reported under Article 17.

Oak Trees and Scotts Pine are proposed to be planted, (BMEP)these take 50 years plus to grow.

Reptile & Amphibians plate 6.44

Frog Spawn recorded in drainage ditches and along access roads, and Smooth Newts were recorded.

We witnessed what happened to Frog Spawn on the 3T extension up the Carrigdangan wind farm, heavy plant continuing to use a forestry track, where frogs were laying their Spawn and Tadpoles emerged, reported to the developer and kindly asked if it could be removed to a safer habitat, **This was not carried out**, this raises serious questions as to whether a qualified Ecologist was on site

Developers see nothing but another wind resource a piece of land to develop, green energy should not come first. The developer is relying upon a future Biodiversity Management Enhancement Plan. These lands are shared by the developer, private owners and Coillte/forestry operations, planners must not approve a plan where multiple parties can shift the blame when it suits them. The surveyors -McCarthy Kelville O Sullivan have no power to enforce compliance once construction begins. The planning Authority must not accept promises.

Annex 1 Bird Species & Red Listed Bird Species

The DAU have highlighted their concerns Chough, Golden Plover, Kestral, Common Snipe, Breeding Woodcock, Wintering Merlin, Curlew, Hen Harrier, Ring Ouzel, Whooper Swan, Goshawk, Golden Eye, Grey Wagtail, Redwing, Swift, Peregrine Falcon and Stock Dove.

Documents state Studies were conducted between April 2022 & March 2025 under Nature Scotts Guidelines 2 years & 11 months daylight hours dawn to dusk.

No night time studies for our owls, under E U and national environmental Law, a lack of regard for protected species means the project should not be approved until night surveys are completed.

Barn Owl Red Listed facing severe pressure from habitat loss.

Short- Eared Owl Amber Listed, winter visitor, bogs, marshes, moorlands.

Long -eared Owl Green listed rely on dense forestry and woodland edges, not on the red list but are fully protected. Barn Owl was observed twice 660m from the site, Long Eared Owl was also spotted 1km from the site.

Turbines can destroy local hunting fields Just because Owls fly below the collision zone does not mean you can skip the surveys, they are all part of an eco-system and would rely on this site to hunt for food and possible breeding.

OSPREY reintroduction program, the Osprey is an Annex 1 species under the E U Birds Directive making regional tracking vital.

The future ecological value of this site. NPWS initiated the multi year release of Osprey chicks in the South West of Ireland these birds are actively establishing themselves in Ireland. Upland ridges are transit corridors for dispersing and migrating raptors that navigate between inland lakes and coastlines, The EIAR fails to account for emerging ecological concerns. Ireland is spending significant

resources to bring back the Osprey. 50 Osprey chicks came over to Ireland in 2023 from Norway and another 19 chicks were released in August 2025.

In Co Fermanagh a wild pair of Ospreys successfully bred and the first chicks were born in Ireland. (a confidential nest site), a pair of Ospreys successfully bred in Co Leitrim during the summer of 2024, these were also a wild pair.

Migrating Ospreys from Scotland and Wales are still spotted along the Irish coastline sightings at Ballycotton and at Courtmacsherry during spring and late summer migrations.

Onshore wind farms located along migrating coastal paths and transit corridors present a verified collision risk to high flying raptors. This wind farm proposed at Maughanaclea, and other wind farms proposed Curraglass, Gortloughra and also other existing wind farms already in this area Shehy More, Carrigdangan act as a barrier for migrating birds. When multiple wind energy developments are built close together, they create a barrier a wall of rotating wind turbine blades, there is a huge risk of collision, it also uses a birds energy.

Collision risk modelling a developers Environmental Impact Assessment must account for changes in Irish Raptor populations. Ospreys fly long distances to hunt. Just because Ospreys are not recorded flying through this site does not mean the birds are not using the area, or they will **not** use it in the future.

In August 2020 a young Osprey chick named Hesgyn (tagged with a blue ring number 7A) had hatched at the Dyfi Osprey Project in Mid Wales he made his way over to Ireland, solo migration, he flew through Co Cork airspace and over to Co Waterford, he then made his way back across the Irish sea to Wales where his satellite tag went stationary, he collided with a wind turbine blade at a wind farm in North Wales Clocaenog Forest Wind Farm and died.

Small upland birds are skipped altogether of these surveys, some are highly threatened and are legally protected.

Meadow Pipit Red Listed, nesting on the site.

Skylark Red Listed both unfortunately a food source for the Hen Harrier.

Nightjar nocturnal one male was recorded in Timoleague at Inchy Bridge Co Cork, 2012.fly dusk and dawn, spruce plantations, gorse, bracken, bogs. Not observed breeding in West Cork now observed as a passive migrant.

White-tailed Sea Eagles

Thanks to ongoing conservation works by the NPWS and others the White -Tailed Sea Eagles are doing well here in Ireland, the warm weather this summer has encouraged the birds to take advantage of the thermals, and that people are seeing the birds more often.

The presence of the white Tailed Sea Eagle here in West Cork has become an added eco- tourism draw, when coaches take tourists on shore excursions from Bantry Bay to Glengarriff," they say keep your eyes on the Skies".

Tourism Ireland – the state agency responsible for marketing Ireland to overseas visitors – actively uses the White- tailed Sea Eagle as a flagship attraction for West Cork and the wild Atlantic way. Because eco-tourism and wildlife watching are massive drivers for European and American travelers.

At the Smola wind farm in Norway, long- term monitoring of the White-tailed Sea Eagles highlight significant collision risks.

The Smola wind farm has 68 Turbines with a nominal capacity of 2-3.3mw each, hub height of 70m & rotor blade of 38-41m.a two- phase construction, over approx, 18.1 kilometers.

The wind turbines proposed at the Maughanaclea wind farm are 175m, so one single turbine covers more than three times the spinning airspace of the older Smola turbines.

At present 2026 approx. 46 wind turbines are proposed in this area alone, a sweep a continuous line over the west Cork hills is a dangerous barrier. The entire geographic footprint of all these wind farms will. easily span 18 kilometers

Some findings a lesser number of fatalities at the Smola wind farm at four of the turbines when one blade on each of the four turbines was painted black, reducing fatalities. Approx. a total 6 White-tailed Sea Eagle deaths due to collisions with wind turbine blades per year at Smola.

Some of the fatalities were in spring and autumn, the spring fatalities were probably due to the ground warming up, of the juveniles that were killed with colliding with a wind turbine this was put down due to their lack of experience and agility. Some observers noted birds circulated the turbines, probably due to extra wind energy created by the turbines.

The White-tailed Sea Eagle looks down for food instead of looking ahead that increases their collision risk with wind turbines. The birds need lift to maintain height with minimum energy cost. The best time of day to see White-tailed Sea Eagles.

Thermal timeline 10am- 12noon as the ground heats up that is when thermals start triggering. Mid afternoon 12- 4.00pm, this is peak time for raptors thermal intensity and altitude peak are at there strongest, after 4pm ground temperatures cool down, soaring birds must descend or switch to wind-driven slope soaring.

The cumulative impact of existing & future wind energy projects is a concern, especially for our Raptors.

White-tailed Sea Eagle 2 observations greater than 500m from a turbine, so it was not possible to calculate a formal estimate of predicted collision. and the White-tailed Sea Eagles are not utilizing the site. Eagles rely heavily on thermals for soaring. The wind turbine blades spin using horizontal wind, and vertical thermals are pockets of warm rising air, caused by the sun heating the ground, especially rock faces.

An eagle travelling at standard cruising speeds can cross 500meters in less than 45 seconds, please provide the specific meteorological data, thermal modelling or LIDAR used to scientifically verify the absence of vertical lift across all seasons.

Chough observed on many occasions, breeding within the site.

The Choughs rely on short cropped damp grass /earth areas where they are able to probe for invertebrates, developers must prove their drainage layout does not negatively impact the hydrology of nearby foraging and breeding sites. If these areas dry out it means the Choughs will have to travel further to find food, which burns energy, drying these upland areas, kills off ants, beetle larvae , leather-jackets, these form a large part of the Choughs diet, they drink from water that trickles down rock faces, the dew on grass and water troughs Draining water away from the Upland wind farm sites strips away vital fresh water.

NPWS conservation staff discovered Choughs are now nesting in-land they have been observed nesting in barns farm buildings and cattle sheds instead of cliff edges.

Hen Harrier observed over- head 2024. I have witnessed the male Hen Harrier and the female flying between Shehy More wind farm and Carrigarielck wind farm, female flew over to the improved Grassland area, now to have 3 more turbines, one of the new turbines is being built on the grassland area.

Peregrine Falcon confirmed breeding. observed 500m near a turbine. There were no surveys done for the 2nd site you used for the Carrigarielck /Shehy More wind farms (Murray Bros Ltd Ardcahan) the area you used has a **Peregrine Falcons** nest in. And they have nested in there for a number of years now.

Curlew breeding.

Grey Wagtail confirmed 500m from site.

Kestrel calling and hunting 650m from site.

Red Wing foraging and perching 950m

Buzzard displaying on site.

(P4)

Sparrow Hawk near the boundary and around forestry.

Woodcock flushed 600m and observed in conifers and bog area.

Swift 500m

Stock Dove flying near site.

Common Snipe flushed 500m, Jack Snipe and Common Snipe still allowed to be hunted.

Ring Ouzel observed passing 1km from site.

Red Grouse confirmed breeding potential, observed just outside site.

Merlin observed in winter.

Hen Harrier observed many times and **Ringtail** observed on the site.

Goshawk observed outside the site.

Golden Plover flock about 17 were observed 500m from site.

Little Egret observed flying.

Raven is on the green list.

My observation on the proposed Curraglass wind farm site. we have observed changes in the bird species on the site. In 2025 as I was walking up the forestry track and onto the proposed wind turbine site which I have walked many times, I was accompanied by not two Ravens but eventually seven Ravens all circling overhead, they all came from different directions, they interacted for about 5 minutes, then flew off in different directions.

While wind farm bird surveys are helpful, walking the sites for a few hours can never capture the true reality of the landscape, completely missing those rare moments like the seven Ravens, I witnessed.

Birds & Bats provide many vital services in the environment. They control insects and rodents, pollinate, spread seeds, the planet would be in trouble without them. Birds need a healthy habitat where they can find food and water, shelter, and nesting spaces.

No significant residual effects or habitat loss, displacement or collision risk were reported for any other wind farm. The lack of reporting does not mean a lack of impact.

Developing this wind turbine site will kill this environment instead of allowing it to grow.

Bad site management, Basic Housekeeping Watching a multi-million euro project treat a sensitive landscape, carelessly, while pretending everything is going to be managed perfectly on paper. If a developer cannot manage something simple as staking a mobile toilet down or emptying its tank of toilet chemical and next to a new constructed ditch full of frogspawn it completely undermines their claim that they are capable of managing high-risk elements.

PHOTOS included. taken at Carrigdangan 3T extension.

- (1) Carrigdangan wind farm, this is the old Borrow Pit where stone/rock had been excavated out when the first 5 T turbines were being constructed, (approx. 6 years ago)later Coillte excavated more rock from this area, for new tracks to enable removal of more trees to be harvested on the site.

Observed two excavated areas, peat burial pits. Peat was excavated out around T3, after a few months these two places were observed filled in with peat taken from the area around T3, to create the new track/road, we observed that no greenery has ever grown back here.

- (2) Carrigdangan the other burial pit excavated area has new green growth, it also shows the lack of any growth over the second burial pit area.
- (3) Carrigdangan 3 T extension a mix of excavated peat /Spoil, in our opinion we observed there is no separation of logs, brash, peat rock, soil or greenery, this photo shows peat dried out.
- (4) Carrigdangan 3T extension, exposed a bank of peat draining off and running into a newly formed ditch, this shows the bank face is actively losing water and degrading, excavated out to construct a new track, peat run off. This proves there is high environmental toll on these upland sites.

(PS)

CONCLUSION

Habitat Fragmentation splitting eco-systems into isolated smaller pockets, especially around turbine foundations and access roads. removing forestry increases light penetration, exposing the remaining interior. construction tracks bring in invasive species, (witnessed at Carrigdangan wind farm).

EXCAVATING on the Maughanaclea site will release more carbon than this wind farm will save.

BARRIERS TO MOVEMENT A threat to our wild life and birds leaving them less freedom to move about.

HYDROLOGICAL FRAGMENTATION

Hydrological disruption altering how the natural water flows on the site and damaging peatland.

WATER QUALITY soil and silt run-off, to local streams and our rivers, (as witnessed at Carrigdangan & Shehy More wind farm construction on both sites & on the cable route to the Dunmanway substation). Silt and mud entering the Bandon River SAC. (We live next to it, we know.)

SOCIAL ECONOMIC & HUMAN IMPACTS visual amenity losses will be devastating to this area, this landscape is highly valued and will be permanently spoiled, and so will our valued dark skies.

NOISE & SHADOW FLICKER wind turbines emit a complex mix of sounds, Amplitude Modulation & Low-Frequency Noise, strobing shadows will not only affect humans and can disrupt bird and animal species, effecting their hunting for food. especially Owls and Bats.

CABLE ROUTE & FINAL CEMP

Article 27 of the European Communities (Waste Directive) Regulations. Excavated materials from all roads along the cable route and jointing bays must be specified and classified in planning documents, to distinguish between non -hazardous and hazardous materials Article 27 by – Product notification to the EPA and taken to an appropriate licensed facility. to prevent unauthorized placement. Any tarmac/asphalt plant must be explicitly named in the planning documents, official EPA documents Article 27 Notification..

Strict Prohibition of any material disposal onto third- party lands ("back door") all site arisings must be strictly tracked and accounted for and disposed off at authorized, licensed waste facilities.

This developer promises a minimal footprint on paper, but when construction starts the footprint on this site will grow, and damage will be done.

Yours faithfully

Kate S Baker
Tim R Baker

K.S. Baker



(P6)

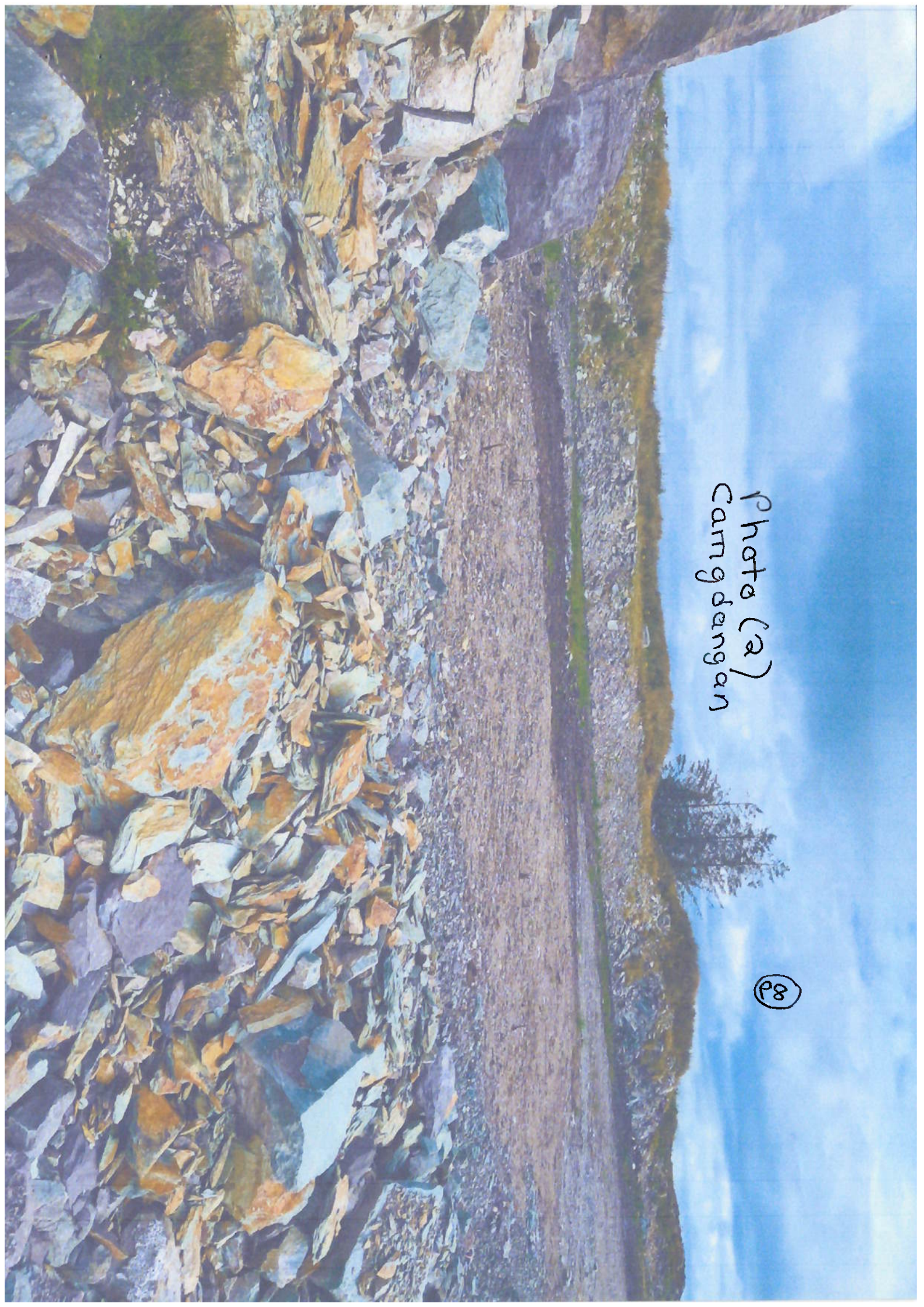


Photo (1)
Carrigdangan
Borrow Pit

P-7

Photo (a)
Cangdangan

(p8)



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Photo(3)

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Cangdangan
Photo (4)

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