



Outlook

case/324165 response

From Aileen Lynch <aileen_lynch@hotmail.com>

Date Mon 9/14/2026 12:50 PM

To SIDS <sids@pleanala.ie>

Cc maria lynch <lynchmaria1@gmail.com>

 1 attachment (31 KB)

Maria Lynch_Observations.Submission to ACP 324165-26_14Sept2026.docx;

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Dear Sir / Madam,

Please find attached an observations/submission related to 324165-26.

Regards

Maria Lynch

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To Whom It May Concern

Observations/Submission to ACP in relation to the applicant's response to previously made observations to ACP 324165-26.

White-Tailed Eagle

I question the accuracy and adequacy of the recording and survey information provided in relation to the White-Tailed Eagle, particularly given the proximity of the proposed **T7 turbine** to my home.

I live very close to the proposed **T7** location and, in March of last year, I personally observed a White-Tailed Eagle flying over my house in the direction of Cousane Gap. White-Tailed Eagles are capable of travelling considerable distances and gaining altitude by using favourable air currents and wind corridors. This means that the absence of frequent recorded sightings in a particular area should not, in itself, be taken as evidence that the species does not use or regularly pass through the area.

White-Tailed Eagles forage over both water and land. However, Enerco does not appear to have adequately addressed the presence of the two lakes located within the proposed wind farm area. White-Tailed Eagles are known to forage for fish, waterfowl, hares and other prey. In this context, the following water bodies are particularly relevant:

- **Loch Naibiree** is very close to the proposed **T13** turbine and lies within the EIAR site boundary. It is also relatively close to **T14** and **T12**.
- **Gortloughra Lake** is very close to the proposed **T2** turbine and is also well within the EIAR site boundary.

Given their proximity to the proposed turbines, these lakes are potentially important foraging areas for White-Tailed Eagles and may also be used by the species for other activities. Their presence should therefore be properly considered and assessed when determining the potential impact of the proposed development.

White-Tailed Eagles are also recognised as being at significant risk of collision with wind turbines. In light of my own direct observation of a White-Tailed Eagle very near my home, together with the location of the lakes in relation to several proposed turbines, I believe that the potential impact of the development on this species requires a much more thorough and robust assessment.

In particular, the assessment should adequately consider the potential use of the lakes and surrounding lands by White-Tailed Eagles, their flight paths through the area, and the potential collision risk associated with the proposed turbine locations.

Annex I and Article 17 Habitats Directive

Ardrah Bog, together with the surrounding wet heath and dry heath areas, comprises Annex I habitats.

Enerco suggests that these habitats are degraded. However, an independent ecologist's report indicates that any degradation is minor, and that these Annex I habitats remain living ecosystems, supporting the biodiversity and ecology typical of these habitats.

The **EU Habitats Directive** and the associated **Article 17** reporting requirements provide important **protection for Annex I habitats**. They require the conservation status of protected habitats to be monitored and aim to prevent further deterioration of their ecological condition.

The proposed development of **T13** and **T14** could have serious detrimental effects on the ecological quality of Ardrah Bog, Loch Naibiree and the surrounding area. The construction of these turbines, together with their associated access roads and other infrastructure, will cause significant degradation and disturbance to these sensitive habitats. The construction process will also cause pollution through the release of silt, sediment, hydrocarbons and other construction-related pollutants.

Gortloughra Lake, located directly below the proposed **T2** turbine, may also be at risk of pollution, sedimentation and ecological degradation from the construction and operation of the turbine and its associated infrastructure. While mitigation measures may reduce these risks, they cannot necessarily guarantee that all silt, sediment, spilled hydrocarbons or other pollutants will be fully contained, particularly during major construction works and periods of heavy rainfall.

The potential consequences for Ardrah Bog, Loch Naibiree, Gortloughra Lake and the surrounding sensitive habitats and water supply therefore require proper and comprehensive assessment. The assessment should consider not only the existing condition of these habitats but also the likelihood of the proposed development to cause further deterioration and ecological loss.

Hen Harrier

Hen Harriers are rare ground-nesting birds of prey that breed in open upland heather moorland and, in some circumstances, young forestry. The terrain around **T2, T4 and T5** provides suitable breeding and foraging habitat for this species, which has been repeatedly observed in this area and around Loch Naibiree. The heather, gorse, bracken and bilberry in this area, including the type of habitat present around the **T13** site, provide the kind of terrain preferred by Hen Harriers.

The proposed development therefore presents a significant potential risk of displacement from existing breeding, foraging and other important habitat.

The Hen Harrier is an **EU-protected species of conservation concern**, and the fact that these birds fly and forage within the proposed wind farm area should be fully taken into account when assessing the development.

Peregrine Falcon

Peregrine Falcons have been observed at Ballinamought and Coomclough, as well as in the less-improved farmland and heather moorland around **T4 and T5 and adjacent to T2**. These areas provide suitable habitat for foraging and other activities, and the potential effects of the proposed turbines on these birds should be properly assessed.

Other Red-Listed Bird Species

Enerco states that much of the proposed wind farm area consists of commercial forestry. However, this is not correct. **T4 and T5** are located on unimproved or less-improved farmland and open ground. **T12, T13 and T14** are also located outside commercial forestry. Forestry edges, particularly where they adjoin open ground, can provide important habitat and foraging areas for a range of bird species. These habitats may also create areas of increased collision risk in the vicinity of turbines, including **T7**, which is located just inside the forestry, as well as **T2 and T11**. Furthermore, prey species on which Red-Listed birds depend on, may be displaced from the area through avoidance of the turbines and associated infrastructure. Any such displacement could have wider consequences for the local bird population and the ecological balance of the area.

Anthropogenic Activity

Enerco claims that the servicing and maintenance of the wind farm would not significantly increase existing background levels of human activity.

I strongly disagree with this assessment. I live very close to the forestry road, the proposed **T7** turbine and the proposed substation, which would be located very close to the boundary of my land.

All maintenance and service vehicles associated with **T7 to T14 inclusive, as well as the substation**, would be travelling along the forestry road immediately above my house.

I am extremely concerned about the additional noise, traffic and disturbance that this would create.

I am particularly concerned about the potential effects of increased traffic and activity associated with the proposed substation on the nature reserve located directly along the boundary of my land, and on the wildlife and habitats within it.

The cumulative effect of construction, servicing, maintenance traffic, turbine operation and the associated infrastructure should therefore be properly considered together, rather than assessing each element in isolation.

Regards,

Maria Lynch

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