



ACP-324165-26

From Michaella Carling <michaellacarling@outlook.com>

Date Sat 9/5/2026 10:34 AM

To SIDS <sids@pleanala.ie>

 1 attachment (96 KB)

submission Enerco response.pdf;

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To whom it may concern,

Please see attached in response to letter of 14.08.2026

Kind Regards

Michaella

Sent from [Outlook](#)

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Date: 05/09/2026

SID Planning
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
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Planning Application Reference Number: ACP-324165-26

Applicant: Maughanaclea Ltd / Enerco

Description of Development: 10 year planning permission for Maughanaclea Wind Farm consisting of 14 no. wind turbines, a 110kV substation and 110kV underground cabling connection and associated works

Location: Maughanaclea, County Cork

To Whom it may concern,

Please see my below response to the letter received from An Coimisiun Pleanala on 14.08.2026 regarding the above proposed planning application.

In the Ornithology section of the EIAR it is stated "Although white-tailed eagle were not recorded within 500m of the Proposed Wind Farm site, given their conservation status as a recently re-introduced species, they are discussed here. The white-tailed eagle range in Ireland is expanding, and it is therefore reasonable to assume that this species will become more widespread and frequently observed in the vicinity of the Proposed Wind Farm site. On a precautionary basis, the population in the area is likely to become one of County Importance over the lifetime of the Proposed Project".

Under consultations the response recorded by the Dept of Housing, Local Government and Heritage states "The Proposed Wind Farm is within the range of the recently re-introduced white-tailed sea eagle, a species listed in Annex I of the EU Birds Directive (Council Directive 2009/147/EC). Collision and mortality risk must be fully assessed for the project and it should be borne in mind that assessment cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt. 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 potential concern. It is not clear if turbine siting will be proposed 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. Existing and proposed adjacent windfarms could add to the cumulative risk of collision and narrow a potential corridor of flight activity (directional flight, social behaviour, and soaring). This factor should also be considered during the collision and mortality risk assessment for the project"

When considering sightings of the White Tailed Sea Eagle as recorded in the EIAR it is of note that there have been at least two further reported sightings (by members of the public) actually over the proposed site which have been recorded with biodiversity Ireland.

Given their known proximity to the proposed site and their expected expansion in the area, alongside the recorded Sea Eagle fatalities at windfarms in Ireland see below:

- One adult female white-tailed eagle was killed at the Grousemount wind farm in 2025, approximately 5 kilometres north of the proposed Maughanaclea site.
- Three white-tailed eagles were confirmed killed by turbines at two separate wind farms in south Donegal between October 2024 and May 2025 (two males at the same turbine at Meenacloghspar near Inver and one female at Cornacahan near Killybegs). Post-mortem examinations under the NPWS RAPTOR protocol
- confirmed turbine-strike injuries.
- Three fatalities were recorded between 2007 and 2014 at the Sillahertane and Lettercannon-Coomagearlahy wind farms in Kerry/Cork.

It is of significant concern that Enerco continue with their assertion of no significant impact without providing the "*precise and definitive findings and conclusions required to remove all reasonable scientific doubt*". By their own account "*white-tailed eagle range in Ireland is expanding, and it is therefore reasonable to assume that this species will become more widespread and frequently observed in the vicinity of the Proposed Wind Farm site*". And yet they still have not provided a *robust collision impact assessment*.

According to DAU records turbine strikes now account for 19% of white-tailed eagle casualties where the cause of death has been established (White-tailed Eagle Phase II release report, 2025).

In addition, whilst other windfarms in the area are mentioned, the response fails to meaningfully engage with the subject of cumulative risk and the potential impact on flight corridors. All of which are highly relevant given the likelihood of species expansion in the area over the coming years.

Sadly this response does little to reassure and I would suggest has more omission than meaningful content in terms of addressing the key risk factors as it relates to the White Tailed Sea Eagle.

Yours Sincerely

Michaella Carling.