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P75 V215

To An Coimisiún Pleanála,
In relation to case number
324165. Submitted 2026.
Maughanaclea Wind Farm.

I enclose my printed observations
with respect to the applicant's
(Enerco) response to our previous
submissions regarding this wind
farm proposal.

Thank you for studying our
submissions -

Sioned Jones

AN COIMISIÚN PLEANÁLA	
LDG-	_____
ACP-	_____
09 SEP 2026	
Fee: €	Type: _____
Time: 9:15	By: POST

AN COMISIUN PLEANĂLA	
LDC-	_____
ACP-	_____
09 SEP 2026	
Fee: €	Type: _____
Time: _____	By: _____

From: Treewoman Jones <treewomanjones@gmail.com>
Sent: Tuesday 8 September 2026 15:35
To: print@myfast.ie
Subject: Observations / Submission to A

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

White tailed sea eagle

The applicant acknowledges that White Tailed Sea Eagle are present in the area but they underestimate it's frequency of visitations and they underplay the value of this site to the species. They claim that the site area is unsuitable habitat for this species.

I have seen the species twice near my house, within the last year. I live in close proximity to the proposed T7 and T8. On one occasion it flew across the valley being mobbed by corvids. On the other occasion it flew high above my house towards Cousane and disappeared into low cloud.

These sea eagles forage over land and over water. The applicant acknowledges that the species forages over water without mentioning the presence of 2 lakes within the proposed site area and a third lake a short distance outside of it.

The species forages around lakes for fish and waterfowl.

I visited all 3 of these lakes.

Why does the applicant omit to mention Lough Naibiree, which is located right in the middle between 3 proposed turbines T12, T13, and T14 ?

Near L. Naibiree is Lough Carrignaneane just outside their EIAR report area. From this lake would be a dominating view of T11, T12, T13 and T14 just to the East.

At L. Carrignaneane, I saw 2 Mallard ducks (M + F) which flew off to the East. Later I walked back to L. Naibiree and one of the same ducks was on this lake... It flew off again, and I realised how closely connected these 2 lakes are.

White Tailed Sea Eagles eat Mallard ducks if they can catch them. Undoubtedly the eagle would check out these lakes periodically for forage.

Similarly for Gortlughra lake - a larger lake with similar vegetation located just a short distance below T2. The chances are high that both Mallard ducks and sea eagles would also visit this lake.

I would estimate White Tailed Sea Eagles to be at high risk of collision from this wind farm proposal. And also it's important to take into account the cumulative risk of collision from other existing and proposed wind farms in the locality.

Annex 1 and Article 17 Habitats directive.

The applicant repeatedly describes these Annex 1 habitats as "degraded" thus attempting to downplay their ecological significance.

In my observations many of these were not degraded. Ardrah bog, located around L. Naibiree and T14 retains all it's characteristic vegetation types and hydrological function.

Minor "degradation" does not necessarily remove ecological value.

The construction of T14 and it's access roads would cause unacceptable degradation to Ardrah bog and the beautiful Lough Naibiree.

T 13 would involve the destruction of Annex 1 dry siliceous heath dominated by rocky outcrops and dwarf shrubs such as heathers, bilberry and dwarf western gorse..This habitat in my observation is in excellent condition not at all degraded.

This area including this lake would also be at high risk of unacceptable pollution from spillage of hydrocarbons, silt etc during operation of heavy machinery, drilling etc .This applies also to Gortlughra lake located directly below T2. Their proposed mitigation measures are unlikely to catch

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or prevent all of it.

Hen Harrier

A rare ground nesting bird of prey at high risk of extinction due to declining numbers and habitat loss. This species is protected under the NPWS guidelines, EU birds directive and Irish Wildlife Act. They nest in upland areas of heather moorlands and young forestry. Their habitats are under threat from wind energy developments as well as commercial forestry and intensification of farming. Hen Harrier are regularly sighted within the site area. Turbine 13 and the rocky dry / wet heath areas around Lough Naibiree and L. Carrignaneane would be ideal Hen Harrier breeding and foraging grounds.

Their preferred prey, meadow pipits and skylark are breeding within the wind farm site area. These prey species were recorded by me around L. Naibiree and at the nature reserve area near T7 and near the proposed substation.

Another area of high value to Hen Harriers is the wet / dry heath mosaic area above Gortlughra lake, near T2. These birds have been seen foraging here on a number of occasions.

Other red listed birds.

The proposed wind farm site forms part of an upland ecological landscape used by multiple protected bird species.

All these species are under pressure from habitat degradation and fragmentation, reduction in availability of prey species, and collision or displacement by industrial scale developments such as this.

Cumulative ecological pressures already affecting upland environments are substantially increased by projects such as this with severe detrimental effects on survivability for these species. Bear in mind also the cumulative effects of multiple existing and proposed other wind farms.

Increased Anthropological Activity / Substation / Nature Reserve.

The applicant states that management and servicing of wind farm will not add significantly to background levels of disturbance currently occurring in the area.

I would absolutely dispute this particularly in relation to the Nature Reserve / existing broadleaf area which would be subjected to disturbance from all traffic relating to all of the 8 turbines T7 to T14 inclusive, as well as disturbance from visits to the proposed Substation adjacent.

The Nature Reserve is located very near the entrance to the forestry exactly adjacent to the current forest road proposed for "upgrading".

The applicant still hasn't said what they plan to do with the Nature Reserve deer fence which runs directly adjacent to the forestry road. How can they upgrade this road without damaging the deer fence? They deny they would demolish the fence yet looking at the plans for their road upgrade this seems impossible.

Their proposed substation is not only adjacent but seems partially superimposed upon the Nature Reserve, whose size they have grossly underestimated due to incompetence using out of date maps. They've used old satellite maps from 2017 to indicate the dimensions of the nature reserve - the reserve underwent significant expansion between 2017 and 2020 when its dimensions became fixed by Coillte erecting the deer fence.

Their substation has marked car parking spaces for 16 vehicles. Staff Welfare facilities. Mess room. Hydrocarbon interceptor. As well as all the electrical equipment.

Why would they need all these extra facilities if there was not going to be significant and repeated human activity and potential pollution at this site?

What is the required set back between a nature reserve and such a facility? They've left room for none.

They again use the word degraded to describe the area around the substation. They call it degraded commercial forestry.

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To call this nature reserve "degraded" is a misnomer indeed.

Couldn't be further from the truth.

This nature reserve is one of the most biodiverse hotspots within the whole site area.

It is of high value to nature.

Yes it was initially planted with Spruce in 1996 approx. But much of the spruce was subsequently removed early enough that most of the background vegetation has survived, such as heather, bilberry, etc. A good variety of native trees have been planted and are thriving in there. But it's not all trees - there are open areas too which enhances its value ecologically.

Trees are self seeding in there, such as oak, planted by Jay birds. This site is nature in action. It is evolving by itself

The old forestry mounds and cut off spruce stumps provide great habitat for overwintering insects. On warm spring and summer days the place comes alive with energetic creatures. At night a different set emerge.

The plentiful insects provide food for birds and bats. Raptors visit occasionally looking for forage. Meadow pipit, willow warblers, wrens, dunnoek and others are breeding in there and skylark are breeding on the adjacent rough moorland.

The reserve contains a frog breeding pool and large numbers of frogs make the place home. Frogs are prey species for many predators. The site is an important contributor to the wider food chain.

Red squirrels have been recorded in there twice by me. 2 different squirrels. The footage of one was not clear enough to use as evidence but I could certainly see it. Pine marten are frequent visitors and leave evidence such as scats and kill remains of hare and birds. Jay birds have been seen caching acorns. The squirrels are collecting hazel nuts from the young hazels planted in there.

The applicant plans to divert away the nature reserve's water supply in order to drain the ground for their substation. This would be devastating for the nature reserve. It's water supply comes not only through forestry trenches but also from an old drain bounded by bilberry covered ditches that enters via the site of their proposed substation.

The nature reserve includes a little valley through which the old drain carries water in the same way a natural water course would flow.

This old drain contains mud and vegetation and provides perfect hibernation sites for amphibians.

The applicant acknowledges the presence of amphibians, squirrels and pine marten at this location but they suggest that these creatures can just relocate to somewhere else.

But there isn't anywhere else like this. This site is unique. It should be treated with the utmost respect and left alone. It's an important contributor to the wider ecological landscape. These creatures need some space away from such industrial scale developments.

These substations emit significant noise. Not only from the generation of AC current through coils but also from auxillary equipment such as cooling fans, pumps and compressors used to prevent overheating. Any wildlife not driven away by the loss of the reserve's water supply will surely be displaced by such noises, powerful electric fields and extra human and vehicle activity occurring at this substation and forest road on top of the whooshing thumping and grinding noises from the turbines themselves.

The displacement of prey species from this site would be a big loss to the wider environment, including to our vulnerable red listed birds.

Please, ACP do visit this site and check out the details re size, inner complexity etc. The chain on the gate is to prevent the gate being blown open by the wind. There is a link which can be undone and alternatively there is a ladder and platform around the North side to enable easy access for humans over the deer fence.

Please compare the actual size of the enclosed area with the applicant's maps and compare with their proposed substation and cables layout.

Thank you for your attention to all these matters.

Yours sincerely

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