

Tushaline Sahseetharan

From: Amy O'Sullivan <info@wildhideaways.ie>
Sent: Thursday, August 27, 2026 12:32 PM
To: SIDS
Subject: ACP-324165-26 — Response to Applicant's Response to Observations (Section 4.3.2) — Wild Hideaways Eco Spa Retreat
Attachments: WildHideaways_Maughanaclea_Response_432_v3.pdf
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Dear Honor Caid Marren

Re: ACP-324165-26 — Maughanaclea Renewable Energy Development, Co. Cork

Further to the invitation issued by letter of 14 August 2026 from Honor Caird Marren, Executive Officer, we attach our response to Section 4.3.2 (Nature Conservation) of the applicant's Response to Observations, received by An Coimisiún Pleanála on 14 July 2026.

Our submission is confined to the scope identified in the Commission's letter and raises four observations, with a full list of references and sources.

Observers:

Wild Hideaways Eco Spa Retreat
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info@wildhideaways.ie

Attachment: WildHideaways_Maughanaclea_Response_432_v3.pdf (13 pages)

We would be grateful if you would acknowledge receipt of this submission.

Is muid, le meas,

Amy & John O'Sullivan
Wild Hideaways Eco Spa Retreat--



Amy O'Sullivan
Founder and Managing Director
wildhideaways.ie



ECO SPA RETREAT · MEALAGH VALLEY · WEST CORK

Response to the Applicant's Response to Observations

Maughanaclea Renewable Energy Development

Ardrah, Maughanaclea, Ballynamought, Gortloughra, Cousane and other townlands, Co. Cork

ACP CASE REF. ACP-324165-26

OBSERVER	Amy & John O'Sullivan, Wild Hideaways Eco Spa Retreat, Mealagh Valley, Co. Cork
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INVITED BY	Letter from Honor Caird Marren, Executive Officer, An Coimisiún Pleanála, dated 14 August 2026
SCOPE	Section 4.3.2 (Nature Conservation) of the Applicant's Response to Observations, received by An Coimisiún Pleanála on 14 July 2026
DEADLINE	14 September 2026
DATE OF SUBMISSION	Thursday 27th August 2026

Preliminary Observations

We are grateful to An Coimisiún Pleanála for the opportunity to respond to the applicant's Response to Observations ("the RtO"). We note that the Commission has limited the scope of this round of observations to Section 4.3.2 (Nature Conservation) of the RtO, and we have confined this submission accordingly.

Amy and John O'Sullivan are the founders and operators of Wild Hideaways Eco Spa Retreat in the Meallagh Valley, the holder of Europe's only DarkSky International Approved Lodging designation (Certificate DS-LOD-15, issued 5 March 2026). Our original observation on this application addressed the failure of the EIAR to assess the night-time and dark-sky effects of the proposed development, the inadequacy of the cumulative assessment, and the non-identification of Wild Hideaways as a receptor. Those grounds are not the subject of this response. We make this further submission because the applicant's RtO, in addressing Nature Conservation, raises issues that are directly relevant to the ecological and cumulative integrity of the receiving environment — and in particular to the upland habitats and bird communities of the Meallagh Valley and its environs, which our guests visit and on which our dark-sky and nature-based tourism depends.

We make **four observations** on Section 4.3.2.

OBSERVATION 1

The Cumulative Baseline is Internally Inconsistent

1.1 Dreenacreenig West is included in the ecological cumulative assessment but excluded from all other cumulative assessments

Section 4.3.2 of the RtO presents cumulative assessments for multiple species. In doing so, the applicant's ecologists repeatedly include **Dreenacreenig West**¹ in the cumulative baseline. Dreenacreenig West appears in the list of developments "located within, or partially within, upland habitats (bog/wet grassland)" in the cumulative assessments for **white-tailed eagle** (p. 40), **red grouse** (p. 41) and **snipe** (p. 42), and is named individually in the cumulative assessments for **kestrel** (p. 40), **buzzard** (p. 42) and **sparrowhawk** (p. 43). For example, in the cumulative assessment for buzzard the RtO states:

APPLICANT'S RTO, SECTION 4.3.2, P. 42 (BUZZARD — VERBATIM)

"Dreenacreenig West and Gortloughra are located within, or partially within, upland habitats (bog/wet grassland)."

The identical sentence appears in the kestrel assessment (p. 40) and again in the sparrowhawk assessment (p. 43). The applicant's ecological consultants therefore treat Dreenacreenig West as a development whose landscape context and habitat associations properly inform the cumulative assessment — and rely upon it across at least six species accounts.

INTERNAL INCONSISTENCY

This is irreconcilable with the cumulative treatment in the Maughanaclea EIAR's landscape and visual (LVIA), noise, and project-description chapters, in which Dreenacreenig West is conspicuously absent. Wild Hideaways' original observation of May 2026 documented that omission: Dreenacreenig West was excluded from the cumulative baseline in those chapters despite being one of the closest neighbouring developments to the proposed site — and it has since been granted conditional permission by Cork County Council. The applicant cannot simultaneously include Dreenacreenig West in the ecological cumulative assessment and exclude it from the landscape, visual, noise and lighting cumulative assessments. The selective use of the baseline demonstrates that the project team is fully aware of the development's existence and proximity, yet has excluded it precisely from those assessments in which its inclusion would be most damaging to the application.

We further note that the species accounts in Section 4.3.2 show signs of unreviewed duplication. The cumulative assessment under the heading *Sparrowhawk* (p. 43) opens: "Snipe is a habitat generalist that may use commercial forestry, agricultural and upland environments" — a sentence evidently carried over from another species account without correction. While minor in itself, this is consistent with a boilerplate approach to the cumulative assessment rather than a considered, species-specific analysis.

The Development Applications Unit has itself warned the Commission against precisely this approach. Its submission of 25 May 2026 (ref. SID-CK-2026-011)² criticises the applicant's cumulative methodology in terms that apply with full force here:

DAU SUBMISSION ON ACP-324165-26, 25 MAY 2026 (REF. SID-CK-2026-011)

"...this misses the point of cumulative impact and in combination effects... A conclusion of no individual significance so no cumulative is a concern. Displacement effects are often not calculated for or mitigated for."

The DAU further observes that the applicant's documents do not appear to take into account the other 28 wind farms within 25 kilometres of the site, 8 of which are within 10 kilometres. A cumulative assessment that cannot even settle on which neighbouring developments form its baseline — including or excluding Dreenacreenig West according to the chapter — cannot begin to answer that criticism.

We respectfully submit that An Coimisiún Pleanála cannot rely on a cumulative assessment that applies different baselines to different subject matters without methodological justification. The Commission should require the applicant to provide a consistent cumulative baseline across all EIAR chapters — including landscape and visual impact, noise, and aviation lighting.

¹ The RtO uses the spelling "Dreenacreenig West". This development is referred to elsewhere, including in its own planning application, as the Derreenacrinig West Wind Farm (An Coimisiún Pleanála Ref. 501243; Cork County Council Ref. 25/6052), a three-turbine development on the southern ridge of the Mealagh Valley. Both spellings refer to the same development; when quoting the RtO we retain its spelling.

Displacement and Landscape-Scale Effects on Upland Birds are Understated

2.1 The RtO relies principally on collision risk; displacement and habitat modification are inadequately addressed

Section 4.3.2 of the RtO addresses the Development Applications Unit's (DAU's) concerns principally through collision risk modelling. For each species – white-tailed eagle, hen harrier, chough, kestrel, red grouse, snipe, buzzard, sparrowhawk – the response concludes with a variant of “no significant impacts are anticipated at the county, national or international scale”. This conclusion rests primarily on low predicted collision rates.

However, peer-reviewed research conducted specifically in Ireland identifies displacement and habitat modification as effects at least as significant as direct collision risk for upland bird communities – and these effects are largely absent from the RtO's analysis.

Fernández-Bellon et al. (2019),³ using a control-impact and gradient design comprising 506 point count surveys across 12 wind-farm and 12 control sites in Ireland over two breeding seasons (2012 and 2013), found that:

- **Total bird densities were lower at wind farms than at control sites**, with the greatest differences occurring close to turbines;
- **Open-habitat species' densities were lower at wind farms but were not related to distance from turbines** – and were negatively related to the size of the wind farm – leading the authors to conclude that, for these species, “wind-farm effects may occur at a landscape scale”. Open-habitat species include the upland birds of most concern in this application (hen harrier, red grouse, snipe, chough);
- **The scale and intensity of displacement effects** depends on species' habitat associations, with observed effects “mediated by changes in land use associated with wind-farm construction” – highlighting the importance of the construction effects and infrastructure siting that the RtO largely dismisses.

FERNÁNDEZ-BELLON ET AL. (2019) – DIRECTLY APPLICABLE TO THIS SITE

This is not a generic European study: it was conducted at Irish upland wind farm sites during Irish breeding seasons, using Irish bird population data. The Maughanaclea site – upland commercial forestry and open moorland in West Cork – falls squarely within the habitat types studied, and at 14 turbines the proposed development is precisely the kind of larger wind farm for which the study found open-habitat species' densities to be most depressed. The RtO's Section 4.3.2 does not reference this study, despite its direct relevance and its Irish provenance.

2.2 Open-habitat species require landscape-scale cumulative assessment

The finding that displacement effects for open-habitat species operate at landscape scale is particularly significant in the Meallagh Valley context. The proposed Maughanaclea development sits on the northern ridge; the proposed Dreenacreenig West development sits on the southern ridge. Open-habitat upland species – including hen harrier, red grouse and snipe, all of which feature prominently in the DAU's concerns and the RtO's responses – that currently use the valley floor and both ridgelines for foraging, roosting or movement could face displacement effects from both developments simultaneously, creating a barrier or squeeze effect across the full valley cross-section.

The RtO does not address this valley-scale displacement geometry. Its cumulative collision figures address mortality rates at county scale; they do not address the local and landscape-scale displacement effects on upland species that move between the ridgelines on which both developments are proposed. We submit that this is a material gap in the cumulative ecological assessment that the Commission should require the applicant to address.

Quantified displacement evidence is already before the Commission in the DAU's submission:² hen harriers show significant avoidance of apparently suitable habitat within 250 m of turbines, with a predicted 53% reduction in flight activity within 500 m (Pearce-Higgins et al. 2009); breeding snipe density falls by 50% within 500 m of turbines; wintering golden plover avoid turbines at distances of 50–850 m, with displacement distance positively correlated with turbine height; and hen harrier foraging behaviour may be influenced at distances of up to 11.4 km. At 169 m tip height on one ridge, with a further three turbines consented on the opposing ridge, these figures describe displacement fields that span the Meallagh Valley cross-section.

Cumulative adverse ornithological impact is, moreover, an established stand-alone ground of refusal. In March 2023 An Bord Pleanála refused permission for the ten-turbine Cahermurphy wind farm in west Clare (Case ABP-311044-21)⁴ for the express reason that, taken in conjunction with other wind farms in the area, the development would result in unacceptable cumulative adverse ornithological impacts, and for hen harrier in particular, the inspector having concluded that the development would have significant adverse impacts by way of collision, mortality, disturbance and displacement of protected bird species. We acknowledge that that decision was subsequently quashed on judicial review and remitted for fresh determination; the Board's stated reasoning nonetheless demonstrates that cumulative ornithological effects – and displacement in particular – are treated as capable of being decisive, and that they must be assessed on a coherent cumulative baseline. No such assessment exists in this case.

OBSERVATION 3

The White-Tailed Eagle Assessment Warrants Scrutiny

3.1 Two observations in three years may understate site usage

Section 4.3.2.1 of the RtO dismisses white-tailed eagle collision risk primarily on the basis that only two observations of the species were recorded across three years of surveys (April 2022 to March 2025), both greater than 500 m from the proposed turbines. The RtO states:

"Because of the absence of flights within the Proposed Wind Farm site, it was not possible to calculate a formal estimate of predicted collisions..."

We note the following in response:

- The white-tailed eagle is a wide-ranging species whose individual home ranges can extend to several hundred square kilometres. The absence of recorded flights within the turbine footprint during survey periods does not establish that the site lies outside the foraging or movement range of local individuals. The DAU's submission² records that this stretch of the Cork-Kerry border has been regularly used by white-tailed eagles over the years, with a number of casualties — **the most recent an adult female killed at the nearby Grousemount wind farm in 2025, approximately 5 kilometres to the north**; that three fatalities were recorded between 2007 and 2014 at the Sillahertane and Lettercannon-Coomagearlahy wind farms; and that 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). The RtO's reliance on two site observations in three years does not engage with a confirmed fatality at an adjacent wind farm, within the home range of local birds, in the year the surveys concluded.
- White-tailed eagle survey methodology is subject to detection-probability limitations: the species is not reliably detected during standard point-count or vantage-point surveys because of its low encounter rate within any given survey period relative to its actual area of use. Two detections in three years at a single site is consistent with occasional use by a low-density, wide-ranging population; it is not evidence of confirmed absence. The DAU further notes² that soaring eagles may even be slightly attracted into the rotor-swept zone of turbines, and that the siting of turbines on ridges above valleys — where eagles use rising air currents for orographic lift — is an additional concern. Both Maughanaclea and Dreenacreenig West are ridge-sited above the Mealagh Valley.
- The cumulative context is significant. The RtO itself acknowledges (§4.3.2.1, p. 34) that "white-tailed eagle collisions have occurred in the State" and that the species "may be more susceptible than some other species to collisions". The clustering of operational, permitted and proposed wind developments across the Cork-Kerry uplands — including Maughanaclea, Dreenacreenig West and the other developments listed in the applicant's own cumulative tables — increases the probability of encounters between eagles and turbines across a landscape the species demonstrably uses.

The national evidence since the survey period closed makes the point empirically. Between October 2024 and May 2025, three white-tailed eagles were killed by wind turbines in south Donegal — two tagged males at the same turbine at Meenacloghspar, Inver, and a female at Cornacahan near Killybegs — with post-mortem examinations under the NPWS RAPTOR protocol confirming injuries consistent with turbine strikes.⁵ The Department has stated in the parallel Graffy wind farm case that these strikes cast doubt on the validity of collision risk modelling that had predicted just 0.09 collisions per year (one bird every 10.8 years); that the turbines which killed the three birds were considerably smaller than those now proposed (Maughanaclea's are 169 m); and that actual mortality may be higher than recorded, since deaths of untagged eagles may go undetected. Precisely the same pattern — confident model, contradicting carcasses — is what the DAU warns of in this case: it

observes that white-tailed eagle impacts in other EIAs “have been ruled out regarding significant effects even where subsequent collision mortality has then occurred”, and reminds the Commission that assessment “cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt”.²

We do not assert that white-tailed eagle collision risk is individually decisive. We submit that the combination of (a) confirmed regional presence, (b) survey methodology limitations, (c) the DAU’s specific concern, and (d) cumulative landscape-scale turbine density warrants a more precautionary approach than a bare conclusion of “no significant effects are predicted”.

OBSERVATION 4

The Bird Assessment Omits the Mortality Risk from Aviation Obstacle Lighting

4.1 A distinct and unassessed impact pathway

The applicant’s Section 4.3.2 response addresses bird impacts entirely through three daytime pathways: direct habitat loss, displacement/barrier effects, and collision risk modelled from diurnal survey data. It does not address a fourth and distinct pathway: the attraction and disorientation of nocturnally migrating birds by the permanent aviation obstacle lighting that the Maughanaclea EIAR itself confirms will be installed. Chapter 15, Section 15.2.4.3 of the EIAR records the Department of Defence’s scoping requirement, and the same condition is reproduced – and expressly accepted by the applicant – at Section 4.2 (p. 34) of this very RtO:

MAUGHANACLEA EIAR CH. 15 §15.2.4.3; RESTATED AT RTO §4.2, P. 34 – DEPARTMENT OF DEFENCE CONDITION

“All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week.”

Section 15.2.5.3.2 of the EIAR confirms the applicant will comply with this requirement, and at Section 4.2 of the RtO the applicant “confirms that they are agreeable to these conditions”. That is all 14 Maughanaclea turbines, at tip heights of up to 169 m, carrying permanent medium-intensity fixed-red lights, burning every night of the year. The Chapter 15 assessment evaluates this lighting solely for its effect on aviation safety – concluding the residual effect is “Long-Term, Imperceptible, and Neutral” – without any assessment of its effect on the night environment, on dark-sky receptors, or on nocturnally migrating birds.

NatureScot’s information note, *The Effect of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures*,⁶ identifies the principal species susceptible to aviation obstruction lighting as burrow-nesting seabirds and nocturnally migrating passerines, and sets out the mechanism:

“Artificial light is known to have many effects on birds which may be positive... and negative effects, including attraction to lights (phototaxis), disruption of photoperiodicity and increased opportunities for visually active predators.”

Phototaxis — the attraction of birds to artificial light sources, and the principal effect addressed in the NatureScot note — is a mortality mechanism entirely separate from the collision-risk modelling approach used throughout Section 4.3.2 of the RtO. It is not captured by point-count or vantage-point surveys conducted during daylight hours. It is not addressed anywhere in the applicant's response.

4.2 Current peer-reviewed evidence on artificial light at night and nocturnal migration

Recent research in *Biological Conservation* confirms the mechanism and its relevance to fixed high-intensity lighting of the type this development will install.

Hirschhofer et al.,⁷ in a radar study of nocturnal spring migration along the Croatian coast in 2023 and 2024 published in *Biological Conservation*, put the risk plainly:

HIRSCHHOFER ET AL., *BIOLOGICAL CONSERVATION* (RADAR STUDY OF NOCTURNAL MIGRATION)

“Artificial light is a pollutant of growing global concern. For nocturnally migrating birds, the consequences can be fatal. Attracted and disoriented by illuminated infrastructure, birds can become victims of collisions, especially when visibility is reduced by fog and clouds.”

The study found that migrating birds exhibit an in-flight response to artificial night-time lighting **even at low levels of illumination**, and that low cloud cover and fog amplify the response. West Cork's Atlantic climate — characterised by frequent low cloud, mist and coastal fog — represents precisely the poor-visibility conditions under which phototaxis risk is at its highest.

A second 2025 study in *Biological Conservation*, by Osterhaus et al.,⁸ using nocturnal flight call monitoring, summarises the established behavioural mechanism:

OSTERHAUS ET AL. (2025), *BIOLOGICAL CONSERVATION*

“Locally, migrants may exhibit positive phototaxis and deviate from normal migratory flight to circle around lights, especially under poor weather conditions or when lights are extremely bright, installed high above ground-level, and are unshielded or upward-facing.”

The same study notes that attraction of migrants to artificial light at night has been implicated as an important contributing factor in the injury and death of migrants through collisions with infrastructure, and found that lights altered migrant behaviour even on nights with favourable weather. Bright, unshielded lights installed high above ground level are exactly the configuration this development proposes: 2,000 cd fixed red lights at nacelle height, visible in all directions of azimuth, on 14 turbines of up to 169 m.

The specific configuration mandated here — **fixed, steady-burning red light** — is the configuration with the worst record in the peer-reviewed literature. Gehring et al. (2009),⁹ in a controlled field

comparison of obstruction lighting systems at 24 towers during peak songbird migration, found that structures of 116–146 m carrying steady-burning red lights caused a mean of 13.0 avian fatalities per season, against 3.7 at structures of the same height class lit by flashing lights only, and concluded that removing steady-burning red lights would reduce avian fatalities by an estimated 50–71%. United States federal obstruction-lighting guidance was subsequently changed on foot of this evidence. Rebke et al. (2019)¹⁰ likewise found in controlled offshore experiments that continuous light attracts more nocturnally migrating birds than blinking light, with attraction strongest under overcast conditions.

We emphasise that no bird-friendlier lighting configuration is available within the terms of this application. The Department of Defence condition requires fixed red lighting, operational 24 hours a day, and the applicant has confirmed its acceptance of that condition. The phototaxis risk is therefore not merely unassessed – on the application as made, it is **unmitigable**. Where mitigation is unavailable, siting is the only remaining control: the very point the DAU makes, citing Dahl et al. (2013), in respect of white-tailed eagle collision risk.²

4.3 Particular relevance to species raised by the DAU

The DAU's nature conservation concerns, and the RtO's responses, address chough, hen harrier, golden plover, whooper swan, snipe, merlin, curlew and other upland and migratory species. Several of these – particularly migratory waders and waterfowl using the Cork-Kerry uplands as movement corridors – undertake nocturnal flight movements during migration seasons. The applicant's cumulative collision risk figures for these species are derived exclusively from daytime surveys. They provide no data on nocturnal flight activity at or near the site, and no assessment of the degree to which permanent high-intensity red lighting at nacelle height may attract, disorient or increase the collision exposure of nocturnally active individuals.

We further note that the Mealagh Valley corridor – between Maughanaclea to the north-east and the Derreenacrinnig site to the south-east – forms part of an Atlantic flyway approach used by migratory species moving between coastal and upland habitats. The Derreenacrinnig West EIAR (§13.8.5) likewise commits to permanent 2,000 cd fixed red aviation lighting on all three of its turbines. The cumulative effect of permanent aviation lighting on both ridgelines has not been assessed for any species in any EIAR.

SUMMARY – OBSERVATION 4

The applicant's Section 4.3.2 response addresses bird impacts through daytime collision-risk modelling only. It does not consider the phototaxis pathway identified by NatureScot as the principal concern arising from obstruction lighting; it provides no nocturnal flight activity data; and it does not address the cumulative effect of aviation lighting from Maughanaclea and Derreenacrinnig combined on nocturnally migrating species. This is a material gap in the nature conservation assessment that the Commission should require the applicant to address.

Conclusion and Requests

This submission has identified four matters arising from Section 4.3.2 of the applicant's Response to Observations:

- **First**, the applicant's own ecological cumulative assessment includes Dreenacreenig West as a baseline development, contradicting its exclusion from the landscape, visual and noise cumulative assessments. This internal inconsistency undermines the integrity of the entire cumulative assessment.
- **Second**, the RTO's nature conservation response addresses collision risk but does not engage with landscape-scale displacement effects, which Irish field research (Fernández-Bellon et al. 2019, conducted at Irish upland wind farm sites) identifies as a significant and distinct impact pathway for open-habitat species. The valley-scale geometry — with Maughanaclea and Dreenacreenig West on opposing ridgelines — creates a displacement and barrier risk for upland species that has not been cumulatively assessed.
- **Third**, the white-tailed eagle assessment relies on an absence of turbine-zone flight records for a species with proven regional presence, from a survey programme with known detection-probability limitations. A confirmed fatality at the adjacent Grousemount wind farm in 2025, approximately 5 km distant; a national record in which turbine strikes now account for 19% of established-cause casualties; and three further confirmed turbine fatalities in Donegal between October 2024 and May 2025 at turbines smaller than those proposed here together demand more than a conclusion of "no significant effects". The precautionary principle requires it.
- **Fourth**, the bird assessment omits entirely the phototaxis mortality pathway associated with the confirmed permanent aviation obstacle lighting (2,000 cd fixed red, operating 24 hours a day, 7 days a week) — a configuration the peer-reviewed evidence identifies as the highest-mortality obstruction lighting type known, and one that cannot be varied within the terms of the Department of Defence condition the applicant has accepted. No nocturnal flight activity data has been gathered; no assessment of attraction and disorientation risk for nocturnally migrating species has been carried out; and the cumulative effect of aviation lighting on both the Maughanaclea and Dreenacreenig ridgelines for nocturnally active species using the Meagher Valley corridor has never been considered in any EIAR.

We respectfully request that An Coimisiún Pleanála:

- 1 **Require the applicant to provide a consistent cumulative baseline** across all EIAR chapters that either includes or excludes Dreenacreenig West, with reasoned methodological justification;
- 2 **Require the applicant to address landscape-scale displacement effects** for open-habitat upland species, including across the full Meagher Valley cross-section between Maughanaclea and Dreenacreenig West;
- 3 **Apply the precautionary principle to the white-tailed eagle assessment**, given the confirmed regional presence and casualties of the species — including at Grousemount in 2025 — and the cumulative turbine density of the Cork-Kerry uplands; and

- 4 **Require the applicant to provide nocturnal flight activity data and a phototaxis assessment** for nocturnally migrating species, in accordance with NatureScot's information note on obstruction lighting and birds, and to assess the cumulative aviation-lighting mortality risk across both the Maughanaclea and Derreenacrinnig developments.

Submitted by:

Amy & John O'Sullivan

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Date: Thursday 27th August 2026

References and Sources

Footnoted references

- ² Development Applications Unit, Department of Housing, Local Government and Heritage (2026). Submission to An Coimisiún Pleanála on ACP-324165-26, ref. SID-CK-2026-011, dated 25 May 2026. Available on the public case file at pleanala.ie. Sources cited therein include the *White-tailed Eagle Phase II release: report 2025* (NPWS); Pearce-Higgins, J.W. et al. (2009), *Journal of Applied Ecology* 46, 1323–1331; and Dahl, E.L. et al. (2013), *Wildlife Society Bulletin* 37, 66–74.
- ³ Fernández-Bellón, D., Wilson, M.W., Irwin, S. & O'Halloran, J. (2019). 'Effects of development of wind energy and associated changes in land use on bird densities in upland areas.' *Conservation Biology*, 33(2), 413–422. doi: 10.1111/cobi.13239.
- ⁴ An Bord Pleanála (2023). Decision refusing permission for a ten-turbine wind farm at Cahermurphy and other townlands, Kilmihil, Co. Clare (MCRE Windfarm Ltd), Case ABP-311044-21, March 2023; decision quashed by Order of the High Court (perfected 26 October 2023) and remitted for fresh determination under Case ABP-318525-23.
- ⁵ Department of Housing, Local Government and Heritage submission on the reactivated Graffy wind farm appeal, An Coimisiún Pleanála Case PL05E.322673 (Cuilfeach Teoranta; reactivated 4 June 2025 following the quashing of the decision in PL05E.312385 by Order of the High Court, 3 March 2025), setting out NPWS post-mortem findings under the RAPTOR protocol. The appeal file, on which the Department's submission sits, remains before the Commission and becomes publicly viewable on determination. Contents as reported: 'Three white tailed eagles killed by wind turbines in South Donegal', *Donegal Daily*, 2 October 2025.
- ⁶ NatureScot. *Information Note: The Effect of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures*. NatureScot, Inverness. Available at: www.nature.scot.
- ⁷ Hirschhofer, S., Ranacher, P., Weibel, R., Helm, B., Čiković, D., Barišić, S., Taylor, L., Bjelić Laušić, M. & Schmid, B. (2026). 'When nocturnally migrating birds encounter low-level light pollution patches: a case study from the Croatian coast.' *Biological Conservation*, 313, 111620 (available online 2025). doi: 10.1016/j.biocon.2025.111620.
- ⁸ Osterhaus, D.M., Boland, K.C., Lawson, A.J., Horton, K.G., Van Doren, B.M., Cutler, P.L., Wright, T.F. & Desmond, M.J. (2025). 'Nocturnal flight call monitoring reveals in-flight behavioral alteration by avian migrants in response to artificial light at night.' *Biological Conservation*, 312, 111441. doi: 10.1016/j.biocon.2025.111441.
- ⁹ Gehring, J., Kerlinger, P. & Manville, A.M. II (2009). 'Communication towers, lights, and birds: successful methods of reducing the frequency of avian collisions.' *Ecological Applications*, 19(2), 505–514. doi: 10.1890/07-1708.1.
- ¹⁰ Rebke, M., Dierschke, V., Weiner, C.N., Aumüller, R., Hill, K. & Hill, R. (2019). 'Attraction of nocturnally migrating birds to artificial light: the influence of colour, intensity and blinking mode under different cloud cover conditions.' *Biological Conservation*, 233, 220–227. doi: 10.1016/j.biocon.2019.02.029.

Planning and EIAR documents cited

- Maughanaclea Ltd (2026). *Environmental Impact Assessment Report: Maughanaclea Renewable Energy Development, Co. Cork*. Prepared by MKO (McCarthy Keville O'Sullivan), Project No. 240225. Lodged with An Coimisiún Pleanála March 2026. Chapters cited: Ch. 7 (Ornithology); Ch. 15 (Material Assets), particularly §15.2.4.3 and §15.2.5.3.2.
- Maughanaclea Ltd (2026). *Response to Observations*, Section 4.2 (Department of Defence) and Section 4.3.2 (Nature Conservation). Received by An Coimisiún Pleanála 14 July 2026. ACP Case Ref. ACP-324165-26.
- Development Applications Unit, Department of Housing, Local Government and Heritage (2026). Submission to An Coimisiún Pleanála on ACP-324165-26, ref. SID-CK-2026-011, dated 25 May 2026 (public case file at pleanala.ie/en-ie/case/324165).

Derreenacrinnig West Wind Farm Limited (2025). *Environmental Impact Assessment Report: Derreenacrinnig West Wind Farm, Co. Cork*. Chapter 13 (Material Assets and Other Issues), §13.8.5. An Coimisiún Pleanála Ref. 501243; Cork County Council Ref. 25/6052.

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