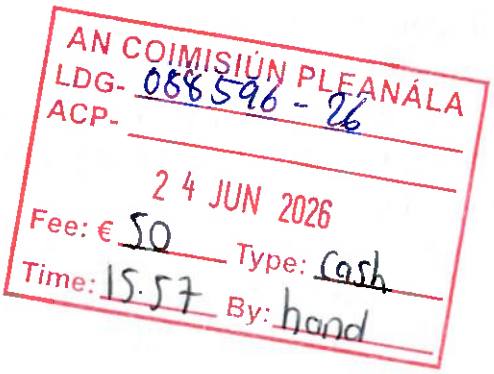


Brian and Jessie Brogan
Rathfran
Carrowmore Lacken
Ballina
Co Mayo
F26 P9T3
bumbledeebee@hotmail.com
23rd June 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1.
D01 V902

Re: Objection to the Proposed Tirawley Wind Farm Strategic Infrastructure Development Objection Submission to An Coimisiún Pleanála
Re: Planning permission for the construction of TirawleyWindfarm consisting of 16 no. wind turbines, a permanent 110kV substation, 110kV underground cable and grid connection, and ancillary development in the townlands of Ballymurphy, Ballynaleck, Barnhill Lower & Upper, Barroe, Billoos, Carn, Carrickanass, Carrowmore, CastlelackenDemesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,
My husband and I are writing as a residents living in the area within proximity to the proposed Tirawley Wind Farm project, submitted by Constant Energy Limited, and we wish to formally lodge our objections to this Strategic Infrastructure Development application.

My husband and I are both artists and writers by profession/vocation really. Over the years we have had the great joy of living a kind of "gypsy life", travelling, settling, moving again through some of the most spectacular parts of this country. Co Sligo- Mayo-up to Co Donegal by Sliabh Liag, in to Co Leitrim by Glenade Lough, over to Donegal near Ballyshannon and then back to Co Mayo. We were overjoyed to to be able to return again to North West Mayo- just over two years ago- right back to the place we love most.

Our creative work depends on deep immersion in the land, in the raw natural elements and contact with its wild denizens, the culture, the people, music, folklore, history and heritage of the area are the bedrock of our professional

creative lives and life passions. During our travels, we have witnessed a lot of "'deep-sea changes" wrought on Ireland through infrastructure development. Not least among these- Wind Farms. We have direct experiences of what, at first was a slow insidious encroachment of mechanical infrastructure with attendant noise and visual pollution, increase to a daily assault of environmentally misaligned projects- in what were once legally protected places providing health and peace to the inhabitants and visitors, chiefly through the respite parts of the west, still so freely gift- and "far" from the increasingly overwhelming elements of urban Life in today's world.

Ten years ago we lived just a 1km from where we are now by Rathfran Abbey. We were delighted to come back to stay, and to find the place unspoilt and then quickly horrified to hear of the proposal to install a massive wind farm right in the heart of such an outstanding part of Co Mayo. As an illustrator of animals, birds and plants along with Irish folklore themes. I was scheduled this year, to begin writing and illustrating a book focused on the landscape and heritage treasures, right here in NorthWest Mayo.

Time is now divided between that creative vision and working to protect the source of it, our "'mother habitat" from misaligned and destructive development enterprises.
Sometimes, here below the muffled but constant roar and ceaseless lullaby of the Atlantic, you can still " hear the grass grow" in North West Mayo.

Please note-I wish to adopt and support the detailed submission made by the Lacken Ballycastle Community Landscape Protection Group in relation to the proposed Tirawley Wind Farm development (PAX16.324258). In particular, I endorse the concerns raised regarding cumulative wind farm development across North Mayo, impacts on the Céide Fields cultural landscape, effects on tourism and recreation, biodiversity impacts, inadequacies in community consultation, and the assessment of the Battery Energy Storage System. While I do not repeat those detailed arguments in full, I request that they be considered as forming part of this submission.

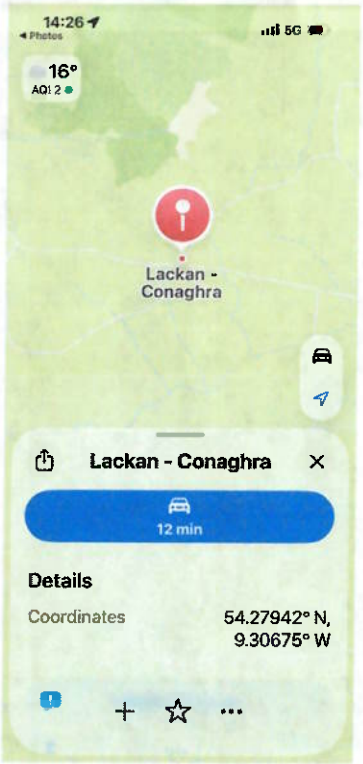
This development poses significant and irreversible risks to the local environment, biodiversity and local residents. In particular the proposal threatens critical habitats for protected species such as the Hen Harrier, involves substantial habitat removal including over 4 km of hedgerow, and raises serious concerns regarding visual impact, traffic disruption, and inadequate community consultation. These issues, coupled with shortcomings in the Environmental Impact Assessment Report, justify a refusal of permission for this project.
Having reviewed the public information provided and engaged with the community consultation materials, I wish to raise the following concerns:

Observation on Biodiversity Chapter 6 EIAR, for proposed Tirawley Wind Farm

I would like to register three Positive Confirmations of Marsh Fritillary Butterfly at two areas within the boundaries of the site.

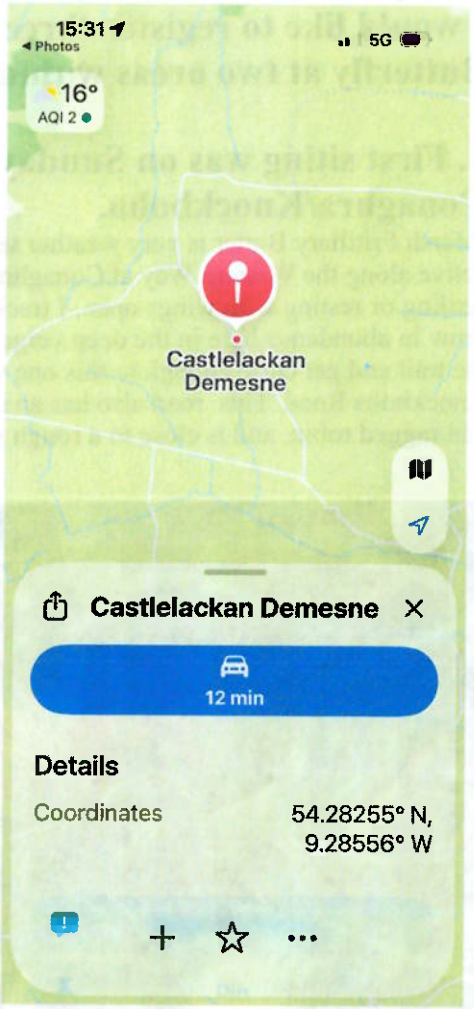
1. First siting was on Sunday 14th June 2026 involving four individuals at Conaghra/Knockboha.

Marsh Fritillary Butter is very weather sensitive, but the midday heat brought them out and made them active along the Western Way at Conaghra as well as round onto Knockboha Road. The breeze stopped them settling or resting with wings open. I tracked the individuals foraging on their preferred wild plants which grow in abundance here in the deep verges, for nearly the entire length of the road.I only managed to keep on the trail and get close enough to this one when it eventually settled within reach, on a Meadow Thistle on the Knockboha Road. This road also has an abundance of forage plants particularly tormentil at this time of year and ragged robin, and is close to a rough pasture likely, suitable for Devils-bit-Scabious, which could be

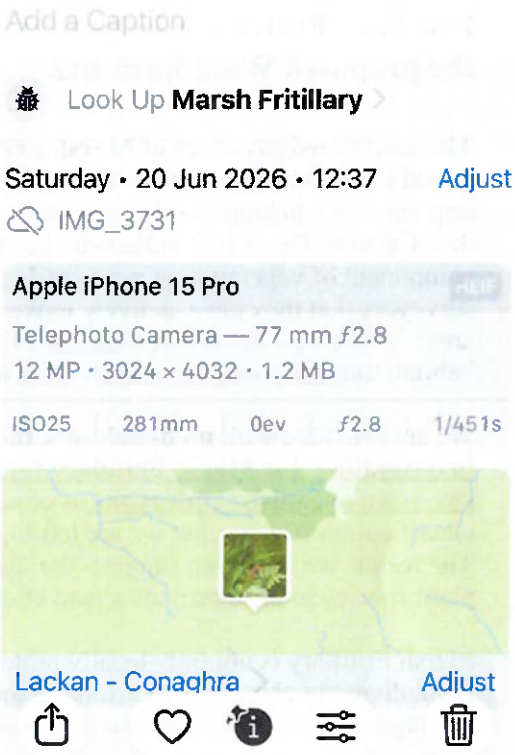


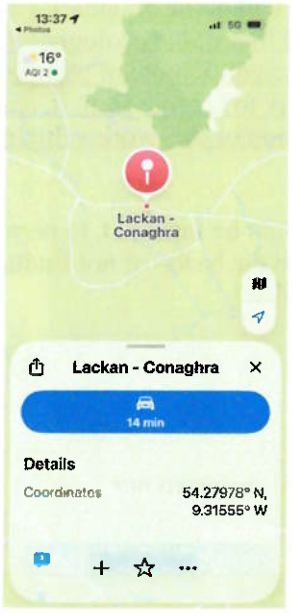
2.Second confirmation of Marsh Fritillary Butterfly was on Friday 19th June 2026 on the Lacken Trail in Castlelackan Demesne.

Again, with this location, there are excellent verges, flora filled ditches adjacent or close to meadows abundant with Marsh Fritillary's preferred forage plants. I have seen adults at distance on good days earlier in the month but this is the first time I had luck with a close photo capture for confirmation.



3. Observation number three of Marsh Fritillary was Saturday 20th June 2026 .We went up to the Conaghra western way and Knockboha Road to see if the adults were still present, which they were, though only two adults this time and photographed both, one with a Small Heath Butterfly- also heat sensitive species, resting beside it.





In regards to this evidence of Marsh Fritillary Butterfly - I would like to observe that: Without a clearly documented baseline dataset being provided by the EIAR, for any period from 2022- April 2026, the planning authority cannot be satisfied that the population of Marsh Fritillary within the proposed site boundaries has been properly accounted for.
There is serious potential for habitat loss and destruction of the protected species along with forage plants and larval plants, which would have a disastrous impact on local populations. These facts have not been properly assessed and or datasets provided to ABP and the community.
In the wider context of local biodiversity impacts on this protected species and others within the area, there is no clear evidence provided for us to verify that the mitigation hierarchy ('avoid-reduce- offset) has been meaningfully applied in the EIAR.
May I respectfully request ABP, to ask for full season-ecological surveys for Marsh Fritillary Butterflies be professionally undertaken before considering their decision on the proposed Wind farm site.

The confirmed presence of Marsh Fritillary Butterfly which is a clear indication of the presence of its larval plant food has not been thoroughly surveyed and documented. The species only appears as the required "box ticking" exercise associated with legally protected species when surveying before a development.The EIAR acknowledges the presence of Devil's-bit Scabious, noting it as a localised component of vegetation in wet grassland and marginal bog areas. However, that is not a statement by the surveyors that they have actively looked for or found it in **our** "localised wet grassland and marginal bog areas.". However the report concludes that the plant's density did not meet the criteria for Marsh Fritillary habitat, thus removing the requirement for further surveys, which I don't think ABP should accept.

We are provided with **no details of a focused walk-over survey, or, specific dates specifically focused on investigating for Marsh Fritillary forage and larval plants as well as for potential habitat within the site as an organised endeavour** as opposed to a general "keep a professional eye out"approach during land classification surveys, but we are left to guess. One way or the other, **there is no evidence provided.**
The results we are given suggest- the focus during walkovers had a more narrow view- to list dominant plant species so as to provide a land classification for the potential turbine locations.

Marsh Fritillary is our only legally protected insect and its habitat requirements should be key considerations in biodiversity conservation efforts in this location, as opposed to potentially destroying its habitats and then putting effort into enhancement proposals as a reactive measure.

Devils bit Scabious is acknowledged in the EIAR chapter -6, as growing within the boundaries of the potential turbine locations, but there is no report provided for us to verify that if, the ecologists did actively look for Devils- bit- Scabious (larval stage plant) -did they then made a scientific note of proximity to Marsh Fritillary forage plants within the expected flight radius of the adults likely to emerge from it, and further-the relation of these forage plant locations to turbine locations, and construction or the work/vehicles making heavy use of our narrow roads.

I have attached below, all the information in the EiAR that pertains or might be intended, to pertain to Marsh Fritillary Butterfly -which appears to have been dismissed entirely on the the basis- of not finding the larval plant- Devils bit Scabious- or - not finding enough of it, it is not clear which?

"6.2.7 Field Surveys
6.2.7.5 Marsh Fritillary
An assessment of the status of the food plant (devil's-bit scabious Succissa pratensis) of

marsh fritillary Euphydryas aurinia was carried out at the time of the botanical survey of the site. This was in accordance with the following:
"Ireland's Butterfly Series: Habitat management for the Marsh Fritillary" (Phelan et al. 2021) – in this reference, the following is noted:
LHabitats that are in good condition for Marsh Fritillary should have three or more well-developed Devil's-bit Scabious plants per square metre, across more than twenty percent of the habitat.
"Ireland's Butterflies: A Review" (Nash et al. 2012), in this reference, for marsh fritillary the following is noted (pg. 186):
"All 'good sites' should have a very substantial amount of Devil's- bit Scabious."
From EIAR_ Chapter 6, Biodiversity (Pages 19 and 20)

"Tirawley Wind Farm,EIAR,Chapter 6- Biodiversity
6.2.7 Field Surveys
6.2.7.1 Habitats, vegetation and flora
The site of the Proposed Tirawley Wind Farm Development was visited on various dates between May 2022 and February 2024, as follows: 19th & 20th May 2022, 12th & 13th August 2022, 9th September 2022, 15th & 16th May 2023, 7th September 2023, 15th December 2023 and 25th February 2024. A final cursory visit was made to the site on 16th April 2026. The prolonged survey period reflected the various design changes during the planning of the Proposed Development.
Walkover surveys were carried out where proposed Wind Farm infrastructure is located, with focus on the location of each turbine and associated new Site Access Tracks from public roads. The surveys also included the Permanent Operations Buildings, the proposed…….
……Habitats within the study area were classified in accordance with 'A Guide to Habitats in Ireland' (Fossitt 2000). The dominant plant species present in each habitat type were recorded during the field surveys. This is considered sufficient to allow accurate classification of the habitats present. The extents and details of classified habitats were recorded and mapped using GIS. Where relevant, linkages with the EU Habitats Directive classification system are given."
(Pages 10-11)

No data is provided to confirm if they found the Devils-bit Scabious and if so-where?

The forage plants of Marsh Fritillary were never surveyed or accounted for, this illustrates how the Rural margins within the landscape do not get the required ecological respect and attention they should receive in the Biodiversity chapter of the EiAR.

Our local landscape supports a mosaic of interconnected natural habitats that contribute to the entire local ecological resilience.
According to The Biodiversity Intactness Index (BII)-Irelands National biodiversity Intactness is minus -53%. Our National Biodiversity Data Center confirms that the decline in Biodiversity is ongoing.

There is nothing in the EIAR chapter six, that acknowledges the hefty role of ecological importance provided by the roadside verges in this very quiet rural area, and, also how these wild corridors connect with the scrub ecotones and mosaics of bog land habitats through the landscape. Fragmentation, damage and destruction is a huge threat to our intricately connected ecosystems from this development

The potential for destruction from the in combination impact of the heavy construction and infrastructure vehicles , their gross and lengthy increased traffic and manoeuvring along roads used mostly by wildlife and walkers, along with the proposed road and entrance widening to destroy roadside margins -food and habitat, crucial for all the insects birds and mammals- is starkly clear.

Below is the only consideration given to roadside verges through the entire study area. It is a required element of the EIAR but is worded as if it came out of a book describing typical road margin plants, because, the names of so many native plants actually thriving and present all through our landscape -in our verges are glaringly missing from the list, and are not included in BEMP appendix either. Maybe it was the

wrong season to make a properly comprehensive survey of local flora likely to be impacted by the Windfarm?

But the same ecological surveyors, have been trusted with the responsibility to fully identify protected plant species that might be present as well as insects. I am not confident, that efforts were more than limited in this regard and ;
I don't think ABP have been provided with fully comprehensive up to date and complete survey data.

6.3.3.3 Dry meadows and grassy verges (GS2)

Unmanaged grassland, classified as Dry meadows and grassy verges, occurs along road margins throughout the study area.
The grassland verges along roads are typically rank swards and dominated by widespread plant species including creeping buttercup *Ranunculus repens*, white clover Trifolium repens, red clover *Trifolium pratense*, narrow leaved-plantain *Plantago lanceolata*, self-heal *Prunella vulgaris*, bush vetch *Vicia sepium*, meadow vetchling *Lathyrus pratensis*, common mouse-ear *Cerastium fontanum*, yarrow *Achillea millefolium*, common knapweed *Centaurea nigra*, meadowsweet *Filipendula ulmaria*, wild angelica *Angelica sylvestris*, silverweed *Potentilla anserina*, common nettle *Urtica dioica*, as well as common grass species such as *Deschampsia flexuosa*, *Holcus lanatus* and *Dactylis glomerata*. Coarser species, such as thistles (*Cirsium spp.),* docks (*Rumex spp.*), ragwort *Jacobea vulgaris* and nettle *Urtica dioica*, are also present in the sward. (pg.40)

To finish these observations....

These plants in what appears to be a "cut and paste" list of (GS2) flora are not native wild plants which receive conservation status that does not mean that they are not recognised by conservationists and ecologists as absolutely crucial ecologically specifically to safeguard protected species but not only.
All of these plants are high value to local insects and pollinators and the many birds and mammals that then live on those.The fact that they are 'widespread species" should not be read as a negative, or reason to think they don't matter. It means they do not have conservation status but they do have ecological value- because they are the "mother habitats" and foundation level supporting all our local wildlife and food chains within the greater environs of our SAC and SPA.

Very briefly;
Nettles and Plantains alone are considered by ecologists to be "keystone " plants within local food webs.

Stinging Nettles- (urtica dioica)-so good the list above named them twice

- **Larval Food Source**: Nettles are the primary host plant for the caterpillars of several of Ireland's most recognizable butterflies, including the **Peacock, Red Admiral, Comma, and Small Tortoiseshell**. All but the Comma are species which have experienced severe acute population crashes in Ireland
- **Invertebrate Hubs**: A single nettle patch can support over **40 different species of insects** and invertebrates. Which feed our bats and birds.
- **Predator Attraction**: They host large populations of aphids, which provide an essential early-season food source for **ladybirds, hoverfly larvae, and blue tits**.
- **Avian Foraging**: In autumn and winter, the dense seed heads of mature nettles provide high-fat nutrition for seed-eating birds like **finches and sparrows**.

Plantains (*Plantago* species)

- **Pollinator Forage**: Wild plantains (such as Ribwort Plantain and Greater Plantain) produce copious amounts of pollen that feed a vast array of **solitary bees, hoverflies, and beetles**.

- **Moth Host Plant**: Their leaves are crucial food plants for the larvae of many macro-moth species, including the **Narrow-bordered Bee Hawk-moth** and various tiger moths. Bee Hawk-moth depends on Devils bit Scabious as well. **Ruby Tiger Moth** is abundantly present in the abandoned quarry (photo below)

- **Winter Bird Feed**: The tall, robust seed spikes persist into the winter months, offering an accessible, nutrient-dense food resource for **declining farmland bird species**.

Appendix one

Note's on my Marsh Fritillary observations.

Because the species has a short flight window (May–June) and weak flight capabilities, adults do not wander across the countryside searching for forage. They remain tightly bound to their breeding patches usually moving no more than 50-100meters from their larval habitat.
Clearly there is a small meta population with a viable patch of Devils -bit Scabious somewhere nearby to both areas I have visually confirmed.

As yet, I have not been able to confirm the locations of Devils- bit- Scabious-Succisia Pratensis, but will endeavour to when the plants blooms this year, possibly from July to October. Then record these findings online with National Biodiversity Data Center and with NPWS.

Peak blooming period will be mid August to September when it will be easier to spot them from their purple pin cushions, but- about this time of the year June- the mated adult female will be in flight looking for the large green basal leaves of Devils bit Scabious to lay her eggs.

July to August is the hatching period, this is when the more visible silk webs that the caterpillars live and feed in also will appear although they are hidden very low to the ground.

Weather Impacts on Other Life Stages

- Spring Larvae (Caterpillars): In early spring (March–April), caterpillars emerge from hibernation and require sunny days to bask. Because they are black, their bodies absorb solar radiation, allowing them to raise their body temperature well above the air temperature so they can digest their food and grow.
- Autumn Larvae: Similarly, caterpillars in late summer and autumn construct communal silk webs and need periods of dry weather to bask and feed. Heavy, continuous rainfall and flooding are known to be destructive and can kill larvae directly.

At the time of writing these observations, the three sightings were made on long stretches of lushly biodiverse roadside verges. Ditches and margins full of what -sadly now a days we often refer to nostalgically -as old fashioned wildflowers and plants.These were either right beside- or- connecting in stepping stone fashion to semi natural wet grasslands and bog land fringes, that are lightly grazed or not degraded to unsuitable rank sward, and which will likely host the crucial larval plant- Devils -Bit Scabious. I observed that the meadows currently have the right kind of uneven patchworks of short grass with taller clumps and small patches of barer soil.

Thc Marsh Fritillary butterflies are very weather sensitive, most active on calm sunny days.Adults require bright, direct sunlight and warm ambient temperatures, relatively sheltered conditions to become active and take flight. Their peak flight season is from late May to the end of June, but they are highly sensitive to the weather during this window. The local colonies have been fortunate this year 2026, that the weather improved during this mating period.

&Appendix two

According to Pollinators.ie, 97% of Irelands wildflower meadows have disappeared. Some of the remnants of these old meadows exist now only on our roadside verges. Insect numbers and abundance have drastically plummeted by up to 75% in some places , we are very fortunate here locally to have retained some really healthy ecotones and verges, left to go wild and away from herbicides and agricultural drift, so they have retained an abundance of native plants and biodiversity.

Any form of destruction to our rural road margins risks permanently fracturing the networks of generational local pollinator and insect habitats, leading to collapse of the bird and bat populations, amphibians and mammals.

The All-Ireland Pollinator Plan, -have a specific campaign- "Life on the Edge" to address the need for progressive ecological management of roadside verges. They argue that these act as crucial nature refuges against intensive agricultural spraying and monoculture grass farming.

The Irish Wildlife Trust- run an educational project - Networks for Nature" training local communities to protect roadside verges as key biodiversity shelters. Both the verges, ecotones and hedgerows house up to 10% of Irelands native flora and provide generational linear pathways for rare insects and small

The NPWS influences the funding and protection of marginal land and roadside verges through specific initiatives and collaborations as listed below. **I don't think that ABP or the local community should be expected to accept the limited surveys for local flora habitats within the EIAR especially with the clear adverse long term negative impacts on our roadside margins by this huge development.**

-

- **The All-Ireland Pollinator Plan (AIPP):** The NPWS is a key stakeholder and partner in the All-Ireland Pollinator Plan. Through this initiative, the NPWS advises local councils and State agencies on reducing mowing frequencies, avoiding pesticide use, and altering cutting schedules on verges to create linking ecological corridors.

- The All-Ireland Pollinator Plan, -have a specific campaign- "Life on the Edge" to address the need for progressive ecological management of roadside verges. They argue that these act as crucial nature refuges against intensive agricultural spraying and monoculture grass farming.

- **Wildlife Act Restrictions:** The NPWS enforces Section 40 of the Wildlife Act, which strictly prohibits the cutting or destruction of hedges and uncultivated vegetation during the main bird nesting season (March 1 to August 31). This inherently protects marginal roadside and boundary habitats during critical wildlife periods. [1, 2, 3, 4, 5]

- **The Grasslands Trail:** The NPWS highlights the importance of species-rich marginal grasslands, some of which interact with verges, by managing and promoting the Grasslands Trail to educate the public and councils on preserving these vulnerable habitats. [1]

Observations on Biodiversity focused on Bats

The observations I would like to raise to ABP, are focused on Appendix 6.2, Bat Survey Report for Tirawley Wind Farm April 2026 pages 1-180) by Eire Ecology and also Appendix 6.5, Note on Baseline Surveys Lifespan- by the same and incomplete surveys.

The foundation of my concern is Eire Ecology's heavy use of 2022 EIAR baseline survey datasets which are critically out of date and consistent lack of completeness
I would have liked to make detailed observations on all the impacts to local biodiversity, but due to the volume of documents related to Tirawley Wind Farm, along with obvious time constraints in which to thoroughly read and digest the material before the submission deadline,I am focusing on the relevant parts of **EIAR, chapter -6 Biodiversity that relate to our local bat colonies.**

I respect the work of professionals and appreciate an opportunity to make observations about a landscape, flora and fauna that mean the world to me, and at no point in my observations is any offence intended.
I perceive the out of date baseline survey data and April 2026 reports has having serious fundamental issues and I will do my best to try to show what I (respectfully) observe these to be.

For your convenience I have tried to gather relevant quotes for your own consideration.
I have also put a small set of appendixes at the end of these observations should any further elaboration be required.

Bats1.EIAR 2022 survey data is badly out of date-

I am concerned by the amount of stale baseline survey data on bats still being presented as an alternative to the legally required up to date EIAR.
-and that this stale static monitoring baseline data from April 2022 has been combined with suboptimal April 2026 data. April is not a prime activity month for bats, slowly emerging from torpor and rather crucially, the weather this year-April 2026 was definitely volatile when these CIEEM guideline surveys were meant to have been undertaken using best practice guidelines. Nature Scot, and BCI guidelines dictate very strict weather conditions because bats do not forage in high winds or driving rain which impairs their echolocation and suppresses their prey.

I want to observe-that any attempt to bridge a three and a half to four year data gap with "incomparable" 2026 data, gathered in a seriously suboptimal April, must surely violate the intent of CIEEM Guidelines for mobile protected species such as bats. Site risk assessment, mitigation / curtailment measures are calculated on this combination of out of date 2022 data possibly diluted with suboptimal April2026 surveys.

Additionally, Eire Ecology propose, on behalf of the developer, **to not only bypass providing an up to date EIAR but to defer making the required surveys until the time of construction, and I don't think ABP are legally supported to accept that.**

The EU Habitat Directive via the EIA Directive statement on environmental impact assessment reports is - that **it is strictly required to evaluate the environments state at the time of the developments consent decision.** It is my understanding that An Bord Pleanála are not legally supported to grant permission on the promise that the developer will gather the missing data or perform foundational surveys later as a reactionary procedure. It could likely be viewed as a serious point of legal failure on the part of Constant Energy to not provide a complete definitive baseline EIAR at the application stage, and, to defer real population monitoring, activity tracking for risk analysis until the construction phase.

The purpose of the April 2026 surveys as stated by Eire Ecology on (p19) Appendix 6.2 Bat Survey Report April 2026- was under best practice guidelines , to perform. "*A fresh round of static monitoring*"

which "was conducted in spring of 2026 aiming to verify that the landscape for bats remained similar, and to provide more accurate location-based data with multiple statics placed at the final turbine locations."

The ecologist draws our attention to the standard industry statements of the potential limitations of the legally required round of surveys performed in April 2026. But these do stand as stated declarations that Eire Ecology followed "'best practice" and that all monitoring was done in the correct weather conditions.

"3.5 Assumptions and Limitations
Bat survey results and the subsequent assessment of potential effects are based on a series of assumptions and constraints that are inherent to ecological field surveys and data interpretation. These are outlined below to ensure transparency and to provide appropriate context for the interpretation of survey findings and impact predictions.

3.5.1.1 Survey Design and Temporal Coverage
Bat surveys were designed and implemented in accordance with recognised best practice guidance current at the time of survey, including SNH (2021), and were considered sufficient to characterise baseline bat activity at the site. It is assumed that the survey effort undertaken is representative of typical seasonal bat activity patterns for the locality. However, bat activity can vary between years due to weather conditions, prey availability, land management practices, and wider population dynamics. As such , survey results represent a snapshot of activity during the survey period rather than a complete account of all bat use of the site."

"3.5.1.2 Weather Conditions
*Bat activity is strongly influenced by weather variables including temperature, wind speed and rainfall. Surveys were undertaken during periods considered suitable for bat activity in line with guidance; **however**, short -term weather variability may have influenced activity levels recorded on individual nights. As a result, absolute activity levels should be interpreted as indicative rather than definitive."*

For clarity, In April bats are generally observed to emerge from torpor, this will be quicker or slower depending on the warmth and prey availability that spring, this has a direct bearing on Bat passes per hour likely -or not -to be recorded on static survey monitors. This year the presence in **April 2026 of Storm Dave** certainly caused extreme, *"weather variability* " and was certain to *"have influenced activity levels"* of both hunter and prey insects.

BCI guidelines dictate strict weather limits for survey data to be considered valid. Collecting 13 nights of static survey data during a storm and followed by gales again on the 11th does not meet those guidelines. (Met Eireáns April weather statement is attached in observation 2.)
No mention is made of the Storm or that the "bat absences" -likely to have been registered by detectors in April 2026, would potentially result in data diluted with "false negatives".
Additionally-there is no open declaration from Eire Ecology that any suboptimal data will be filtered out of the baseline survey data.

According to professional standards-CIEEM guidelines, for reports older than three years,a compliant, fresh assessment is expected to use a structured, evidence-based process that could translate ecological data into objective evaluations and legally binding mitigation/ avoidance requirements. A purely or primarily qualitative assessment (PEA) is only acceptable during the very earliest, non-determinative stages of a project. For protected or priority species (e.g., bats, birds, badgers), surveys must provide a fresh record of quantitative data such as population counts, peak counts, or activity indices (e.g., bat passes per hour).

If false negatives were included in final calculations, the baseline will be diluted and artificially lower the facts of bat presence and the allocation risk metrics. Also this round of static monitoring in April 2026 is crucial to confirm that the baseline 2022 data is remotely valid to the current turbine layout, there is a lot of life depending on it.

I respect that the surveyor is operating within current accepted guidelines and industry standards, and also on the assumption that signing off on the summary table serves as their professional declaration that the detectors functioned correctly and surveys datasets were gathered during optimal weather parameters. **I do not accept that ABP or members of the community should be expected to accept a subjective**

professional sign-off in place of complete comprehensive, verifiable, and up-to-date field data. All reasonable scientific doubt regarding the developments impact on this protected species and habitats is a core requirement of planning authorities.

Bats 2.I am concerned by the lack of transparency in regards to a named Storm during the April 2026 surveys-

This is a synopsis of Met Eireáns climate statement for April 2026. 'Storm Dave hit Co Mayo on 4th April 2026 Met issued yellow wind and rain warnings for the entire Easter bank holiday weekend.
Furthermore, Met Eireáns climate statement for April 2026 reports two weeks of active Atlantic Low Pressure

- Persistent Storm Systems: Atlantic low pressure heavily dominated the first two-thirds of April 2026. Storm Dave was simply the first in a sequence of unseasonably deep low-pressure systems that targeted the west and northwest coasts.
- Ongoing Heavy Rain: Following the storm, consecutive weather systems routinely moved across the country, with heavy continuous rain specifically over the West of Ireland, keeping soils saturated and local flood risks elevated.(note, by me-impacting insects/ bat forage)
- Extended Gale Warnings: The severe wind conditions did not entirely disappear with Storm Dave's passage. Met Éireann logged additional strong gales hitting the country well into the following week, including another major gale event in our area, on Saturday, April 11th.('yellow warning) which hit Mayo

The wet and windy conditions finally broke on April 18th, 2026. At that point, a dominant high-pressure system positioned itself to the north of Ireland, cutting off the Atlantic fronts. This shifted the airflows to the east, introducing much drier, calmer, and sunnier conditions for the final third of the month. "

I am concerned that the period in April 2026 when bat surveys were undertaken was largely unsuitable-The fresh round of bat surveys (two emergence studies, one on the 1st and one on the thirteenth of April plus Static Survey no.5- for 13 nights were conducted 1st to 13th of April 2026.

"Bat activity surveys should be carried out over several months from March/April to October/November inclusive, during optimum weather conditions. Survey during very heavy rain, strong winds (> Beaufort Force 5), mists and dusk temperatures below 7°C is not recommended. Should unsuitable weather conditions be encountered, surveys can proceed but subsequent additional surveys may be required. The number of survey nights required per visit will depend on the size of the site, number of proposed turbines etc. It is recommended that a minimum of five months across the active bat season are surveyed."
Source:Bat Conservation Ireland -BCI- Wind Turbine/ Wind Farm Development Bat Survey Guidelines Version 2

This is what happened and the professional conclusions-

"4.5 SPRING 2026 STATIC SURVEY
"Bat activity recorded during the April 2026 survey was lower than that recorded during the 2022 baseline surveys. .....
*Analysis of four co - located detectors indicates that mean activity levels. decreased from approximately 2.6 bat passes per hour (BpHr) in *May 2022 to approximately 0.3*
BpHr in April 2026, representing an order of magnitude reduction (mean ~8.5×; range approximately 4–29× across individual locations). This reduction is considered to reflect seasonal timing and weather variations , with early spring surveys typically associated with reduced bat activity.
In light of this, the 2026 dataset is not considered directly comparable to the 2022 baseline in terms of absolute activity levels. Accordingly, no direct scaling or correction of activity levels has been applied across the dataset. Instead, the 2026 surveys are used to provide a qualitative validation of the spatial distribution of bat activity across the site."
Source: Appendix 6.2 Eire Ecology bat survey report (pg.42)

Several times through the reports, the ecologist states that April data can't be compared, and what was possibly a largely unsuitable surveying period goes unstated, and Storm Dave on the 4th (Easter weekend) and the severe gales which followed again on April 11th are never openly acknowledged.

The ecologist does state this- "*Bat activity is governed by the activity of their insect prey and insect abundance is in turn governed by weather conditions and climate. Insects, and therefore bats, are unlikely to be present at temperatures below 7°C or during periods of strong winds or heavy rainfall so surveying in such conditions is not possible. All field surveys were undertaken within the active bat season and during good weather conditions (dry conditions and sunset temperature at 8°C and greater 1).*"(pg.18)*

And then there is this *statement which is made as a footnote in very small type way down on the very bottom of page 18
*" **Emergence surveys carried out on the 1st of April 2026 were cool with sunset temperature of 7 degrees. Bats were recorded flying however it is acknowledged these surveys were suboptimal"**
Source:Eire Ecology-Bat Survey Report,Appendix 6.2 (pg. 18)

Not a whisper of storm force winds.
It is important to please note that the statement highlighted as a footnote with a * symbol, only refers to weather influencing emergence surveys it does not acknowledge how the low temps, driving rain and the status Yellow warning weather which hit a few days later on the 4th April likely also had a negative impact on the required static monitoring surveys too. ('and possibly the equipment?)
Under BCI and Nature Scot guidelines, the recommendation would be that the static survey windows be extended and emergence surveys should be postponed and rescheduled. I am not satisfied that the datasets from these studies are fully compliant and might not have been weather limited in a very significant way.

Extending the Survey Window: Nature Scot guidelines state *"Surveys should capture a sufficient number of nights with appropriate weather conditions for bat activity (i.e. temperatures of 10°C and above (8°C in Scotland) at dusk, maximum ground level wind speed of 5m/s4 and no, or only very light, rainfall to fulfil the minimum requirements in Section 5.2.1.*"

In Section 5.2.1, the text explicitly notes: *"In practice, particularly in more northerly latitudes, there will be limitations on the number of suitable nights and some surveys may need to take place over longer periods".* If a 10-night static detector window gets hit by a storm, you cannot stop the survey; you must leave the equipment out for additional nights until you capture enough valid data.

Pausing and Rescheduling: For manual dawn/dusk emergence and activity surveys, the NatureScot Standing Advice for Bats aligns directly with Bat Conservation Trust-. Bat Surveys for Professional Ecologists: Specifically ,"weather Conditions"- operational framework which is found in Chapter 7 Acoustic Surveys, and, Chapter 11 Reporting and Documenting "

The core rule in those guidelines states that bat surveys must be timed to coincide with the period of peak bat activity, and field surveys must only take place during favourable weather conditions. The synopsis of this operational protocol dictates: [1]

- The Dusk Baseline: Surveyors must assess local meteorological data immediately prior to deployment. If heavy rain, strong winds, or a rapid temperature drop below 10°C occur in the hours leading up to dusk, the survey must be aborted and rescheduled. [1]
- The "Invalid Data" Rule: The guidelines explicitly state that recording "zero bat activity" during sub-optimal weather does not prove that bats are absent from a site. Instead, it indicates that weather conditions suppressed their normal behaviour. Therefore, the data collected on that night is considered scientifically invalid for the purpose of a planning application.
- The Invertebrate Link: The BCI text justifies this by noting that nocturnal flying insects (the sole food source for European bats) undergo a catastrophic drop in flight activity when air temperatures drop below 9°C–10°C or when heavy rain physically knocks them down.

To repeat-the ecologist for Eire Ecology, only states "Emergence surveys carried out on the 1st of April 2026 were cool with sunset temperature of 7 degrees. Bats were recorded flying however it is acknowledged these surveys were suboptimal"
Source:Eire Ecology-Bat Survey Report,Appendix 6.2 (pg. 18)

I can find no indications of deferral, no rescheduling, no extension of static survey blocks.
What may concern me even more is that, far from being the required "accurate location based datasets", it is this very suboptimal data that is combined with the 2022 baseline datasets, to calculate the turbine risk assessment. (The initial site risk is classed as High-4.)

The precautionary principle should be applied

Bats 3.Fragmented and Incomplete bat season Baseline bat Surveys 2022-

The surveys that were provided in the 2022 EIAR - Chapter 6 - Biodiversity, focused on bats were intended to cover four full seasons of bat activity within the proposed site. BCI guidelines are -"Bat activity surveys should be carried out over several months from March/April to October/November inclusive, during optimum weather conditions."
Different parts of Eire Ecology's reports/appendices confusingly-chop and change the textual presentation of the months/ seasons their bat surveys covered. It is hard to verify if the procedures genuinely captured the three/four active seasons, and if the data was used in a compliant manner. For example:-

"Static bat activity surveys undertaken in 2022 form the primary baseline for assessment of bat activity across the site, having been conducted during the optimal survey period May- October, and prior to refinement of the turbine layout. These data were used to characterise spatial patterns of activity and inform the original turbine risk assessment."..... Eire Ecology Bat Survey Report April 2026,Appendix 6.2 (pg.41)

Then....
"The results of the static detector surveys deployed over four survey periods (Spring, Summer and two periods in Autumn) in 2022 and one survey period in Spring 2026 are shown..." (Appendix 6.2 section 4.4 (pg.35)

Then....In the Executive Summary (pg.3)of appendix 6.2 by Eire Ecology
This is the statement about when static monitoring surveys were conducted (in line with Nature Scot guidelines, in which Eire Ecology give another classification of what they are actually calling the bat seasons. This one sounds reasonable.
"Twenty one static detectors (SNH 2021) were placed within the site for 10 nights in each of: spring (April - May), summer (June - mid - August) and autumn (mid - August - October) of 2022"

There is an overlap of the same -data-mid August data is being repeated/ re-used as both summer and as autumn.

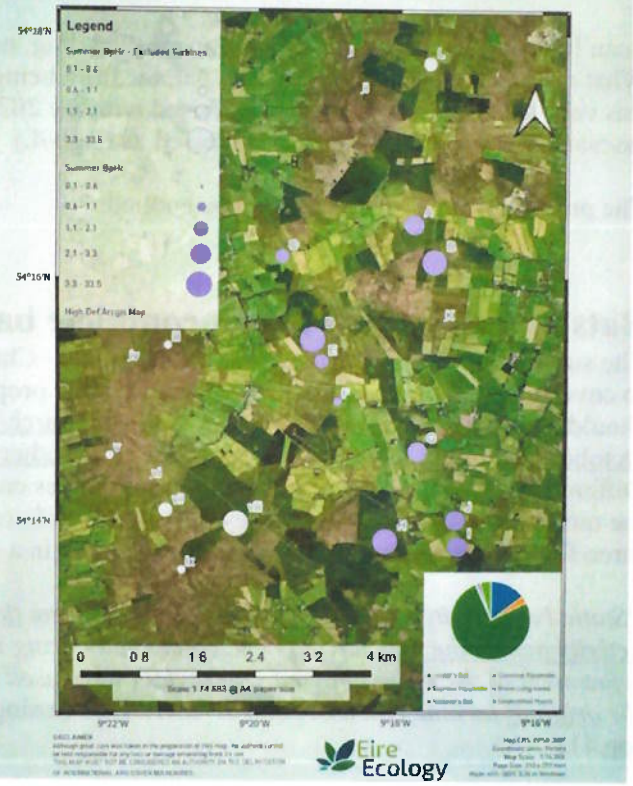
NB-Please note, the Executive Summary quote you read mentions Spring/April -surveys, these are put forward here and there through the documents but the documents do not provide ABP with April 2022 bat surveys in any form and so we cannot verify anything in regard to it, including whether excluded/omitted April data was used in calculations for mitigation proposals.
I appreciate that the omission of some April data was likely due to the reduction and rejig of the original turbine layout- which is reasonable, but the constant naming of a month as defunct and then included again in the various iterations in regards to survey periods seems to -my mind- to misrepresent facts, and facts that I am unable to reference or verify. It's hard to not acknowledge that the repeating of "'April" also suggest to the mind a full compliant Spring Survey period 2022 which textually aligns the stale 2022 datasets with the 13 days of April 2026.

The presentation of seasonal survey periods gets more confusing....
If you refer to the images on (pages 104- 108)of Appendix 6.2 (Eire Ecology Bat Survey Report -April 2026) you will note further skewing of data presentation

The images are titled **"5 Appendix- Combined Static Detector Results"** for each season, just a specific month is indicated at the top of these, with a statement at the bottom of what month/s are covered. (I am including the pertinent screen shots here for your convenience-see below)

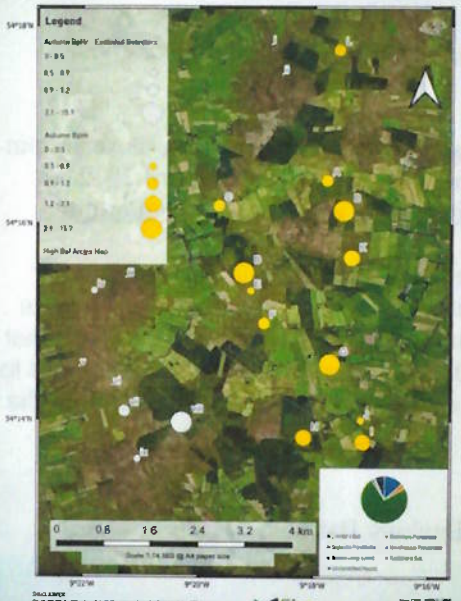
Tirawley Spring Static Results

Tirawley Summer Static Results



Eire Ecology

Tirawley Autumn 1 Static Results



Combined August to Sept 2022 activity rates (Bp/Hr)

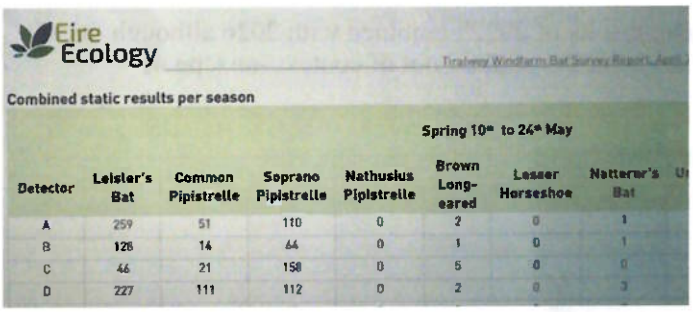
Eire Ecology

Tirawley Autumn 2 Static Results

Combined October 2022 activity rates (Bp/Hr)

"Spring combined results"-this time does not specify what months they used.
"Summer- is combined July. "
Autumn is classed as Autumn 1 and Autumn 2. "Autumn 1 is -combined August- September"
"Autumn 2 is combined October" (I assume "'combined with itself?)

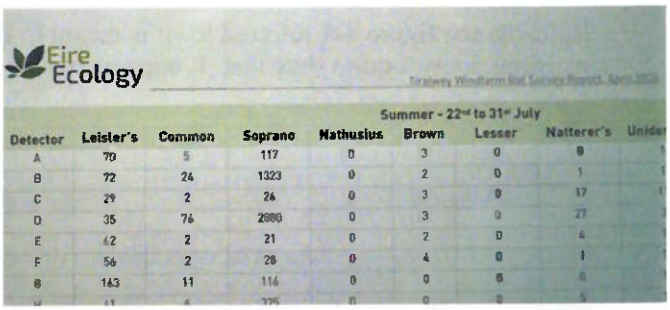
A look at the titling of this data in table format (images below) which directly follow on pages (109-113) shows further reframing and odd classifications of seasons:-
Spring is-10th-24th May.
Summer is-22nd to 31st July
Un-named is - 30th August - 8th of September
Autumn 2 is- 5th - 16th October


Eire Ecology

Combined static results per season

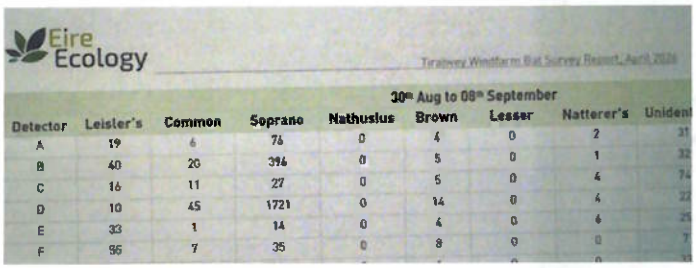
Spring 10th to 24th May

Detector	Leisler's Bat	Common Pipistrelle	Soprano Pipistrelle	Nathusius Pipistrelle	Brown Long-eared	Lesser Horseshoe	Natterer's Bat	Un
A	259	51	110	0	2	0	1	
B	128	14	64	0	1	0	1	
C	46	21	158	0	5	0	0	
D	227	111	112	0	2	0	3	


Eire Ecology

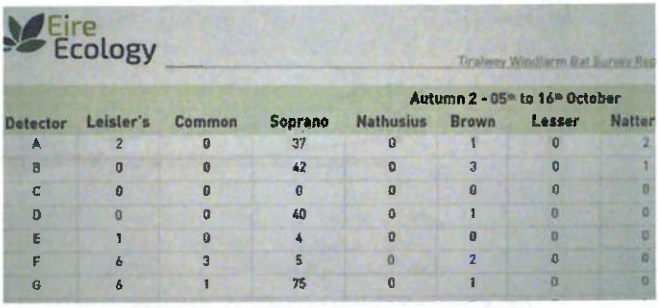
Summer - 22nd to 31st July

Detector	Leisler's	Common	Soprano	Nathusius	Brown	Lesser	Natterer's	Unider
A	70	5	117	0	3	0	0	1
B	72	24	1323	0	2	0	1	1
C	29	2	24	0	3	0	17	1
D	35	76	2980	0	3	0	27	1
E	42	2	21	0	2	0	4	1
F	56	2	28	0	4	0	1	1
G	143	11	116	0	0	0	0	1


Eire Ecology

30th Aug to 08th September

Detector	Leisler's	Common	Soprano	Nathusius	Brown	Lesser	Natterer's	Unident
A	19	6	76	0	4	0	2	31
B	40	20	396	0	5	0	1	32
C	16	11	27	0	5	0	4	74
D	10	45	1721	0	14	0	4	22
E	33	1	14	0	4	0	6	25
F	96	7	35	0	8	0	0	7


Eire Ecology

Autumn 2 - 05th to 16th October

Detector	Leisler's	Common	Soprano	Nathusius	Brown	Lesser	Natter
A	2	0	37	0	1	0	2
B	0	0	42	0	3	0	1
C	0	0	0	0	0	0	0
D	0	0	40	0	1	0	0
E	1	0	4	0	0	0	0
F	6	3	5	0	2	0	0
G	6	1	75	0	1	0	0

It is all rather jumbled, and rather than providing scientific verity the presentation leaves everything open to conjecture, because seasonal datasets are presented in inconsistent fragmented and oddly collated formats which rather obfuscate facts.

I am concerned that the critical seasonal window of Autumn is insufficiently surveyed and that ABP are not presented with comprehensive compliant survey . Autumn is the roost/ nursery site dispersal and swarming / mating season, and an intensely active period throughout the proposed Windfarm site. High flying Leisler bats do behave very differently and it is unclear from Eire Ecology's various presentations if Autumn-September to October have been properly surveyed in line with BCI and other authorities guidelines- that October/November inclusive- suggesting a full late season block of surveys is still necessary.

The datasets ABP is presented with, is -part of spring-May, part of high summer- July, then -the last two days of Summer- August specifically- which are added to the first week(8days only) of September. Autumn is classed by Eire Ecology as two weeks of October in isolation.

Why is the critical Autumn swarming window of September to October not comprehensively surveyed when there is such a clear presence of bats in the proposed development site.

To my understanding of all available guidelines, it is left questionable as whether the 2022 baseline surveys fully capture the legally required ecological picture of the key-seasonal shifts and changes of how the bats are using the landscape along with numbers present, and then this scattered anomalous data is combined with the suboptimal April 2026 monitoring and studies, and in all respect neither set of data seems adequate to meet the lowest bar of BCI and Nature Scot professional guidelines for Bat Surveys.

Bats 4.I am concerned about the way Autumn bat season particularly October has been handled and what could generally be perceived as "cherry picking"and framing of datasets.

This is from Appendix 6.2, ('pg. 39)

"Figure 4 - 4 shows the seasonal activity rates per species. Overall, activity was highest in July with an average rate of 4.1Bp/Hr, dropping to 2.5 for Summer , 1.9 for Spring and very low activity in October (0.3) . When excluding detectors not used in the risk assessment the overall average Bp/hr rate increases from 1.9 to 2.5Bp/Hr."

Below is the figure 4-4 referred to -it is meant to illustrate results of 2022 combined with 2026 although its wording doesn't quite state that. It appears two pages later which is slightly out of context -on ('pg.41)

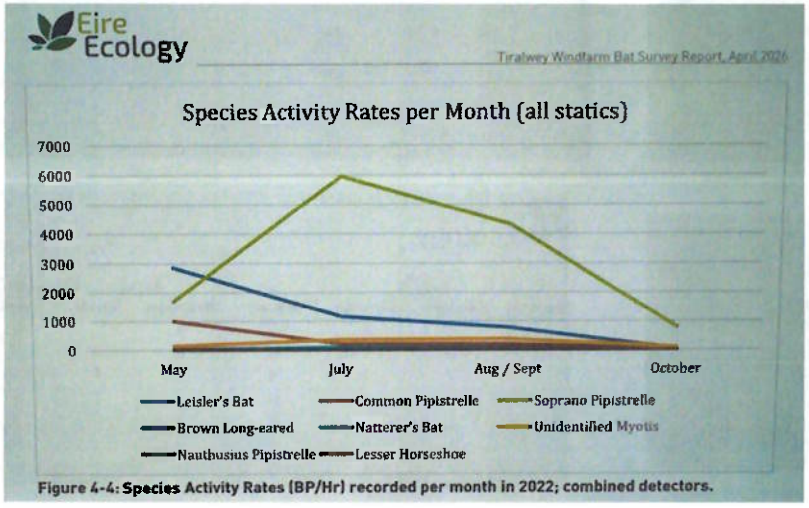


Figure 4-4: Species Activity Rates (BP/Hr) recorded per month in 2022; combined detectors.

Surely the accompanying textual description of this baseline data of activity rates. should be presented as beginning wit the bat emergence survey period in Spring, April - May 2022-and not as coming after Summer as outlined above- surely this is a misuse of data?

Laid out logically- it would read -Spring 2022 as healthy emergence activity 1.9,
Summer climbing to 2.5 not dropping,
high summer July- very healthy 4.1 Bp./Hr.
But then where is the autumn -it is is left out entirely and so October is presented textually as a sudden drop of presence!

Could you tell me when July came before summer?

I am concerned by the constant mix and match, and what could be perceived as "textual -manipulations" of survey data. I appreciate, I may be in error-that maybe these make clear logical sense. For me, a lot is being said by the presentation of information.

Also I am concerned as to why October was entirely excluded from the autumn- September datasets and is treated in this rather contrived and isolated manner?

And if it was done to scientifically highlight a change in bat behaviour specifically in October why is there no accompanying statement of that along with the weather variables. The fact is that Leisler bats behave very differently in autumn, which is the mating, swarming relocation season as well as a heavy foraging season to fatten for winter periods of torpor.

It is also a fact that it is statistically likely that high flying fast moving species of bats are still moving through the site at nacelle heights on milder nights, but not being captured on Eire Ecology's static monitors, sitting unchecked at just two meter heights above ground level and unable to capture vertical data.

If September and October had been fully surveyed would that not have provided ABP with more complete precise definitive scientific data for Autumn.

Then there is a statement I find odd, a few pages later, which suggests the two weeks of October are left out for the safety of bats- followed by a sudden leap of circular logic that their completely unverifiable absence in previous numbers means "minimal mitigation is required"
"October data was excluded from the analysis as this low level of activity would reduce the average percentile activity. This data was useful to demonstrate that minimal bat mitigation is required at this time."
Eire Ecology Bat Survey Report April 2026, appendix 6.2, (pg.43)

October is very oddly handled…stating its inclusion would dilute data. Would it dilute data if it was surveyed properly as part of the autumn season- which it is.
We have no verity that suboptimal data has not already been included -as outlined in my previous observations, and that datasets being used are not already diluted.

Could it be said that purposely creating an isolated two week October dataset would artificially create a suboptimal baseline dataset.

It then appears reasonable/conservative for an ecologist to omit it because when such a disproportionately suboptimal dataset is combined with the already fragmented and truncated seasonal data 2022 , then further added to the suboptimal "'incomparable" April 26 data, the true activity levels of bats in the proposed site are entirely skewed. At that point the surveyor uses circular logic in Appendix 6.5. stating that the natural drop off in activity three and a half years ago-supports **excluding the October data and proves no more than minimal mitigation is necessary for the entire month of October.**

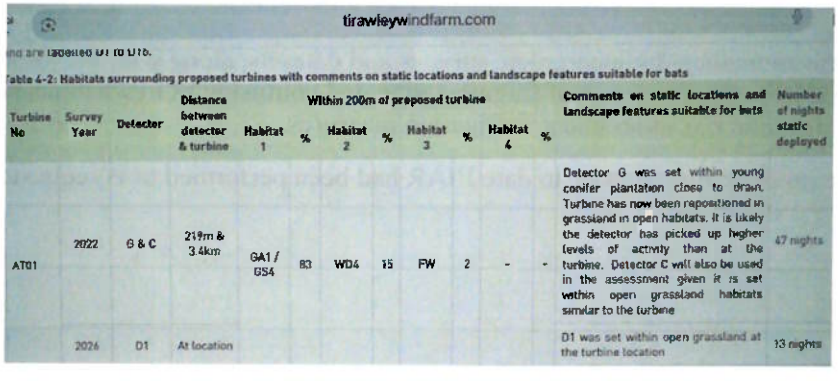
The fact is, that actually the exclusion of a manufactured dataset only alters the statistical average of the active summer season surveys for 2022. Full Spring and autumn data was never gathered or provided. Low activity is still activity. Turning down mitigation entirely for October based on an artificial statistical exclusion violates the Precautionary Principle, because high risk species highlighted by the surveys remain active on the milder late autumn nights.

I am concerned that the various mitigation proposals which are proposed in Eire Ecology's report, are based on such stale, skewed datasets
All Mitigation proposals in Eire Ecology's report, intended to avoid harm to protected species are entirely built on what I (in all respect) perceive as an incomplete skewed baseline dataset from 2022 combined with an entirely incomparable suboptimal April 2026, static survey period conducted over 13 nights.

Bats 5 Observation-I am concerned that there is evidence of a Faulty static detector or corrupted SD card?

(Could you please refer to the four colour images illustrating the seasonal layout of static detector locations that are attached with observation no 3)
These were from pages 104-108 of Appendix 6.2 Eire Ecology April 2026 Bat survey report,

On these Static Detector C appears as symbol @ not letter on the images. This detector was set in 2022, in "'open grassland habitat" close to turbine AT01. For the ecologists description of static detector and turbine location see table 4.2, from page 29 of appendix 6'.2, attached below.



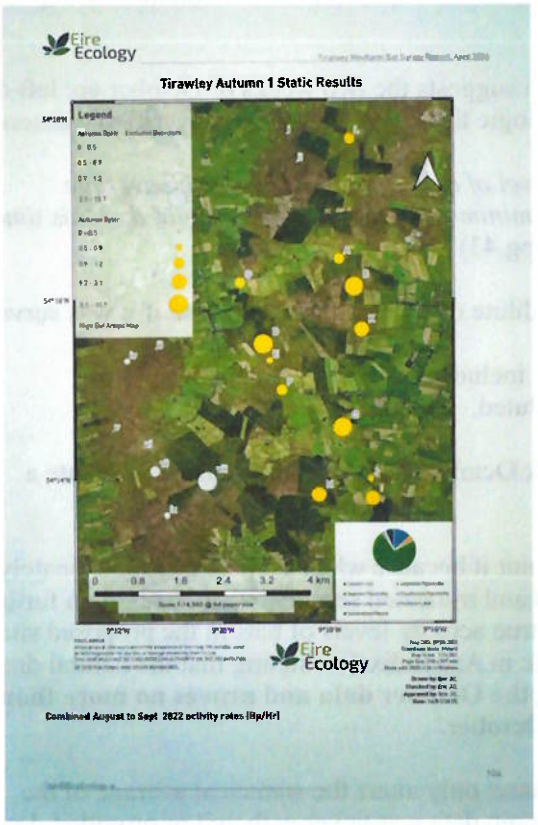
tirawleywindfarm.com

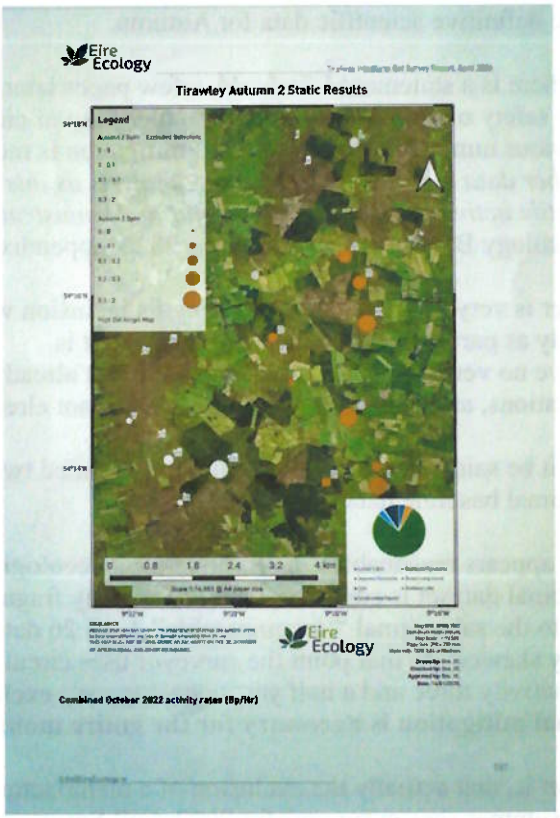
…ng are labelled D1 to D16.

Table 4-2: Habitats surrounding proposed turbines with comments on static locations and landscape features suitable for bats

Turbine No	Survey Year	Detector	Distance between detector & turbine	Within 200m of proposed turbine: Habitat 1	%	Habitat 2	%	Habitat 3	%	Habitat 4	%	Comments on static locations and landscape features suitable for bats	Number of nights static deployed
AT01	2022	G & C	219m & 3.4km	GA1 / GS4	83	WD4	15	FW	2	-	-	Detector G was set within young conifer plantation close to drain. Turbine has now been repositioned in grassland in open habitats. It is likely the detector has picked up higher levels of activity than at the turbine. Detector C will also be used in the assessment given it is set within open grassland habitats similar to the turbine	47 nights
	2026	D1	At location									D1 was set within open grassland at the turbine location	13 nights

If you glance at the four images attached in my observation 3, you will note the images show detector C/@ retains rather unvarying activity in every image- then- "Autumn 2 -October", suddenly it has nothing- @/C vanishes, ('see attached below) whereas in all the other images October retain presence/activity as do the other static monitor locations.





So, I double-checked the tables in appendix 6.2 on page 122 titled "Static Results by Night" and looked specifically at turbine C for October - and you will note there are just two nights of survey details provided- namely the 5th and 6th October- are listed. At every other location October had 16 nights. Why suddenly two. Also there are always some passes per hour recorded as well. Did the detector at location C break down or is SD card corrupted, is that why it is a blank in the image "Tirawley Autumn 2" and only two nights of data provided on page 122. (See below.)

Eire Ecology — Tiralwey Windfarm Bat Survey Report, April 2026

Turbine	Total days per turbine	Days per season	Date	Leister's Bat	Common Pipistrelle	Soprano Pipistrelle	Nathusius Pipistrelle	Brown Long-eared	Lesser Horseshoe	Natterer's Bat	Unidentified Myotis	Total
C	34	9	7th September	2	0	2	0	0	0	1	3	8
C	35	10	8th September	3	1	3	0	0	0	0	2	9
C	36	1	5th October	0	0	0	0	0	0	0	0	0
C	37	2	6th October	0	0	0	0	0	0	0	0	0
D	1	1	10th May	18	1	7	0	0	0	0	3	29
D	2	2	11th May	0	0	1	0	0	0	0	0	1
D	3	3	12th May	23	49	49	0	0	0	1	1	145

I am concerned by these anomalies- by incomplete surveys and datasets, along with the jumbled presentations, which add up to another layer of fragmentation and confusion as to what has been used and how, when calculating accurate risk assessment/ mitigation measures.

Perhaps there would be no issue if a clean up to date EIAR had been performed or is requested.

Bats6.Observation I am concerned that -There is no mention of mid-survey checks on automated equipment

In light of the previous observation 5, neither ABP, or the public can confirm that the static monitors installed at locations remained fully functional for the duration of survey periods.

- *Note: as mentioned before in Observation 4. If you glance at Eire Ecology Appendix 6.2, on (pg.122) Turbine C records only two nights the 5th and 6th October-why is this? Every other turbine lists 12 nights in October.
- **From-Nature Scot Guidelines ~Bats and onshore wind turbines- survey, assessment and mitigation. Section,5.2.5 Deployment and testing of automated static bat detectors**

"Wind energy sites often have extreme weather conditions that can affect microphone integrity. Prior to deployment all static bat detectors, cables and microphones should be checked, and the microphones tested and adapted to operate at the same level of sensitivity. Equipment should be checked at regular intervals to ensure they have been operational and sufficient data are collected."

We have are provided no evidence.

Bats 7-Observation-I am concerned about being asked to accept various blanket statements in Eire Ecology's report April 2026 that bat monitoring/ surveys were undertaken within optimal surveying conditions. With no empirical evidence provided to show if these were weather compliant surveys.

a~Un-Verifiable Weather

The documentation states the surveyors followed standard static placement procedures:

- *"3.5.1.5 Static Detector Survey Limitations*

Static bat detectors record activity at a fixed height and location and do not capture vertical flight behaviour or activity at turbine blade height. Detection ranges vary between species and are influenced by call intensity, frequency, and environmental conditions. As a result, static detector data may under - represent high - flying species or activity occurring outside the effective detection range. Static survey results are therefore interpreted in combination with walked transects, emergence surveys, habit at assessment and professional judgement."

Appendix 6.2 Eire Ecology (pg.20)

These 13 targeted static detectors for the downsized 16-turbine layout—where, as is typical, fixed at a standard 2-metre height using standard survey poles or tripods, and do not gather data of vertical flight or of bat activity in the danger zone at nacelle height.

Up to date Guidance Alignment: While newer best practices (such as Bat Conservation Ireland 2026 Onshore Wind guidelines) strongly recommend using automated weather meters to ground-truth site conditions. Such as Davis Vantage Pro2 or a Meteo- 40 logger.
Only acoustic data loggers are used in the Eire Ecology 2022/26 bat surveys- Song Meter Mini Bat and SM4BAT full spectrum recorders.

There is no mention anywhere of on -site portable weather stations being used for weather tracking through the night at the various monitoring locations. This would have provided second by second exact local wind speed, temperatures and rainfall metrics to independently verify that conditions met the required standard. Also, If the on-site weather station logged a 3hour block were rain exceeded 5m/s or heavy rain fell, then any "'zero bat activity " recorded on the Song Meter during those exact hours would be discarded to satisfy the best practice guideline's of Nature Scot. Then we could be somewhat assured that weather limited data was not included in calculations, thus entirely avoiding diluting the facts and the subsequent "avoidance-mitigation" measures would be more accurate before construction.

Like many standard baseline assessments in Ireland, Eire Ecology likely utilised publicly available local weather data to cross-reference the bat activity levels at the proposed site. What stations was this data obtained from and how relevant was it to the proposed site? Was it perhaps obtained from regional meteorological datasets, such as Met Éireann station, Belmullet or Knock Airport? Certainly, no mention is

made of a portable microclimate mast erected alongside the detectors surveying the potential site of high elevation clusters of turbines above 100m OD, in mostly wild exposed terrain and no data is shared for us to verify the survey conditions were optimal.

The lack of transparency about Storm Dave and the gales of April have heightened the concerns in this observation.

Bats 8.I am concerned that the extent of mitigation proposals confirm the gross unsuitability of the proposed wind farm in this landscape:Twelve of sixteen turbines (75%) and three of those in particular require specific curtailment procedures because of the gross misalignment of the turbines with location.

"Robust mitigation is proposed in order to negate the potential for high casualty levels including feathering turbine blades in low wind conditions, curtailment of twelve turbines, cut - in speeds, creating buffers surrounding the turbines and a post construction monitoring program designed to examine the effectiveness of these mitigation measures."
Appendix 6.5 Eire Ecology Report 2026, Executive Summary (pg.3)

And....

Appendix 6.2, section 6.4.6.2 (pg 83) Overall risk assessment
Opens with the clear statement that: *"At present, there is no accepted methodology for predicting bat collision rates at proposed wind energy development" and goes on to state:-*

...Due to the levels of nightly bat activity at each of the static locations, 9 turbines are considered of high risk to either soprano pipistrelle or Leisler's bats based on median results. Based on SNH 2021, turbines AT02, AT03 and AT04 are considered high risk for soprano pipistrelle. Turbines AT05, AT06, AT09, AT10, AT12 and AT15 have now also been considered high risk for Leisler's bat based on the new BCI 2026 guidelines."

The necessity of blanket curtailment on 12 out of 16 turbines during peak biological seasons is, in itself, empirical proof that this site is a high-risk ecological corridor for bats.If a site requires three-quarters of its infrastructure to be systematically shut down or altered for half the year just to avoid mass mortality of European Protected bat Species, the site itself is fundamentally mismatched with the development type.

It's my understanding that Under Irish planning law, in line with the EU Habitats Directive, environmental protection follows a strict hierarchy: 1. Avoid, 2. Minimise, 3. Mitigate.
Blanket curtailment across 12 turbines for spring and summer is not a minor, localised adjustment—it is massive, systemic mitigation in an attempt to comply with law, as well as evidence of improper site selection. I would refer you to the Planning Report from Mayo County Council in Observation A- which unanimously said they did not support this development in this landscape.
I think the legal requirement of an up to date EIAR report is justified.

Additional mitigation
Additionally, specifically three of the twelve need further/alternative mitigation measures due to the potential decimation of the mature ecotones, particularly rich in biodiversity(plants habitat and wildlife) in their proposed location. Those turbines will also potentially have a disastrous impact on a stunning part of the Lacken Trail and to the Gazebo, both are immense tourism assets and possibly more importantly- they are local treasures.

Appendix 6.2, section 6.4.6.2 continued (pg 100)
"6.5.6.1.3 Measures Specific for Turbine AT08
Turbine AT08 has a thick southern hedge bordering a stream to the south within the 88 m buffer. Instead of felling these areas, curtailment will be implemented, offering an alternative protection to bat species.
6.5.6.1.4 Measures Specific for Turbine AT14
Turbine AT14 has a number of trees and scrubby woodland of good quality within the 94 m

buffer. Instead of felling these areas, curtailment will be implemented,} offering an alternative protection to bat species.
6.5.6.1.5 Measures Specific for Turbine AT16
Turbine AT16 is located within an abandoned quarry that contains scrub around its border and within the quarry itself. Instead of felling a buffer around the turbine, additional curtailment measures will be implemented to offset potential effects on bats and monitoring will be conducted post construction to maintain this quarry as a wildlife diversity area."

-Please note that is blanket curtailment at twelve turbines of the sixteen.
It should be remembered that according to BCI guidelines alone-
"Surveys should be conducted on-site at the earliest possible opportunity. This should help decide the location of turbines, define exclusion zones and ensure that turbines are positioned outside areas of highest bat activity."

Rather than "avoidance", even by the standard of this EIAR, entirely Inappropriate turbine locations are still being actively proposed by Constant Energy.

Bats 9.Further observations and concerns I have relate to Mitigation proposals specifically being reliant on Buffer zones and the potential risk of "key-holing"

Creation of Buffer Zones.
Ten of the sixteen turbines in the current layout are in conifer plantations and require buffer zones.
AT02, AT04, AT03, AT06,AT08, AT09 AT10, AT11 AT12 AND AT15.
"Areas of conifer plantation should be felled in order to discourage bat species from flying close to turbines. Various publications provide guidelines on buffer zones surrounding turbines to reduce the favourability of the site for bat activity.... Thus turbines will have either a 88m or 94m buffer ."
Appendix 6.2, (pg.54) Section7, 7.1.1 Buffer

Three points I would like to bring to your attention:

One-is that Buffer zones are the current industry standard when bats are present on a proposed wind farm site and naturally the deployment of buffer zones for bats is actively proposed by Eire Ecology as necessary through the entire site for ten turbines (as stated above), but at the same time the surveyor tells us directly that there is no proof they are effective prevention of casualties. And by casualties he means death.

Two-he also highlights for our attention that the destruction of habitat to create the buffer zones is considered to cause considerable additional adverse negative impact and should be avoided. However overall the report proposes considerable loss of mature hedges and ecotones for buffers -1,604kms for this part of the project alone!

Three- due to the entirely inappropriate siting of the three turbines highlighted by surveyor within an undeniably high value habitat -which should be avoided in the first instance, buffer zones cannot be applied. The only mitigation proposal likely to be acceptable to ABP if they even accept the location as appropriate for wind turbines is blanket curtailment at a further three turbines as well.

"While the creation of buffers has been used as a mitigation measure extensively, Berthinussen (2021) shows that no detailed study has been conducted showing its effectiveness. Barré (2018) highlights habitat loss (potentially due to creation of buffers) impacts can be considerable in windfarm development and proposes no net loss of high biodiversity value landscape features. So As an alternative to the loss of the trees and scrub adjacent to AT08,AT14 and AT16 it is proposed to strengthen curtailment at these locations."
Source: Eire Ecology, Appendix 6.2 (6.5.6 Bats , 6.5.6.1 Construction phase mitigation for bats , 6.5.6.1.1 Buffer zones (pg.99)

Despite these contradictory statements, buffer zones for bats are the mainstay proposal, along with the long term destruction of the generational habitat and established interconnected ecosystems providing foraging and more for local bats- and of course this is impacting all birds and mammals within the site at the foundational level-and destroying biodiversity with the diverse insect populations.

"Mitigation for bats requires that trees, hedging and scrub are removed from a minimum of 85m around turbine locations (where required) and that the ground is maintained as a mowed sward or near bare (gravel) for the lifetime of the Proposed Development. Such habitat will be of minimum value to local wildlife."
Appendix 6.2 pg 80 section 6.4.4.4 Changes to Existing Habitats

There is something so fundamentally wrong with implementing renewable energy measures to stop the loss of biodiversity and create climate resilience by creating dead zone habitats and fragmentation of the ecological corridors in a fully functional healthy natural landscape.

Bats10.I am concerned by the proposal for buffer zones creating "Key-holing" and intensifying the risk of mortality. Also that they do not adequately account for the behaviour of Leisler Bats which was likely not fully picked up by static monitors during the various survey periods.

"Leisler's Bats are a relatively large and fast-flying species and have been recorded to have relatively large territories and to travel significant distances to reach preferred foraging habitats (Shiel et al., 2006). While strong habitat associations for the species have been difficult to identify in an Irish context, there is evidence to suggest a positive association with pasture and freshwater habitats (Roche et al., 2014).
Buffer zones as mitigation measure is unlikely to be effective for leisler bats which are in the open, high flyers."
Quote from-O'Donnell Environmental Ballycar wind Farm 2024 Bat Survey report to ABP (Pg.32)appendix 6A

The two specific peer-reviewed sources cited in this 2024 Wind farm report for ABP, quoted above and highlighting Leisler's bat behaviour are major baseline publications in Irish ecology:

1. The Shiel et al. (2006) Citation
The text is referencing "Seasonal changes in the foraging behaviour of Leisler's bats (Nyctalus leisleri) in Ireland as revealed by radio-telemetry". [1]

What it found: This was a foundational study where researchers attached miniaturised radio-transmitters to Leisler's bats from nursery colonies in Ireland. It proved that they commute directly to foraging sites up to 13.4 km away and fly at high speeds (often exceeding 40 km/h), mapping out just how massive their home territories are. [1, 2]

- Authors: C. M. Shiel, R. E. Shiel, and J. S. Fairley. [1, 2]
- Journal: Journal of Zoology (London). [1, 2, 3]

2. The Roche et al. (2014) Citation
The text is referencing the landmark book "Irish Bats in the 21st Century". [1]

What it found: This book synthesised over a decade of data collected from national monitoring schemes (including national car-based bat detector transects). It statistically modelled habitat preferences across the island, finding that while Leisler's bats are highly adaptable and found everywhere, they show a distinct positive association with pasture, riparian (freshwater) zones, and broadleaf woodland edges in the Irish landscape. [1, 2, 3, 4, 5]

- Authors: Niamh Roche, Tina Aughney, Ferdia Marnell, and Mathieu Lundy.
- Publisher: Bat Conservation Ireland.

Why this matters to Eire Ecology's bat survey report
The Eire Ecology surveyor never highlights studies like these or the behavioural differences of protected bat species within the proposed Tirawley site. Yet ecologists have long established that because Leisler's bats travel huge distances (Shiel) over wide-open habitats like pasture (Roche), you cannot simply cut a small 50-85 metre tree buffer around a turbine to protect them. They are high-altitude, open-air fliers that will intersect with the turbine blades regardless of nearby forestry edges. [1, 2, 3, 4, 5]

Vulnerability to Collision addressed by Nature Scot

"*(In this context the term "collision" is taken to mean any form of injury or mortality associated with the operation of wind turbines, i.e. it includes mortality due to barotrauma.)...*

..."Siting turbines within woodland ('key-holing') can present additional risk through the creation of edge-effects attracting greater bat activity, as demonstrated by various studies showing that natural and logged clearings create edges that many species of bat favour. For example, see Kirkpatrick et al. (2017) in which Nyctalus spp. (Noctule bat such as Leislers bat)-activity significantly increased following clear-felling of sitka spruce stands. Furthermore, the size of the felled area influenced activity with 90% higher activity in smaller felled stands compared to larger felled stands. The Eurobats guidance also urges caution in this respect, citing the potential risk presented by key-holed turbines to high flying species above the canopy."

Nature Scot Industry Guidance Document 2021/2024

'Bats and onshore wind turbines:surveys, assessments and mitigation."

Link https://www.nature.scot/doc/bats-and-onshore-wind-turbines-survey-assessment-and-mitigation#6.2%C2%A0+Vulnerability+to+collision8

Kirkpatrick et al. (2017) found that clear-felling in Sitka Spruce plantations creates, rather than destroys, high-value foraging habitats for bats, causing significantly higher activity in recently cleared areas. The study concludes that "key-holing" turbines in these areas acts as an ecological trap by concentrating bat activity around hazardous turbines, necessitating strict buffer zones. Read the full study at ScienceDirect. [1, 3, 4]

Here is an Extract from that short peer reviewed paper mentioned by Nature Scot

"Commercial coniferous plantations are often assumed to be poor habitats for bats. As a result, the impact of forest management practices on bats, such as clear felling, has received little attention, particularly in Europe. However, there is growing evidence from multiple regions that bats do make use of plantation landscapes, and as interest in siting onshore wind turbines in upland conifer plantations grows, there is an urgent need to examine whether felling prior to turbine installation is likely to put foraging bats at risk of collision.....

....There is overwhelming evidence to suggest that wind turbines cause both direct and indirect mortality through barotrauma, collision, and avoidance resulting in changes to habitat use (Voigt and Kingston, 2015), although the extent to which such effects can exert population level impacts is likely to vary greatly between regions. Therefore, a further consideration of this work was to investigate how bat activity changed in response to the size of the clear felled area and the time since felling, and relate this to forest management practices carried out to install wind turbines in commercial plantations.....

We predict that in the short-term activity is likely to increase post felling with the creation of new edge habitats. Furthermore, we predict that it is likely that the greater increases in activity will occur in the smaller stands compared to the larger stands. Finally, bat activity could be expected to increase as time since felling increases due to the short term change in vegetative structure which may support more invertebrate prey. As we are looking at changes within two years of harvesting, substantial regeneration is unlikely to have occurred which would be likely to reduce bat activity (Law and Law, 2011)."

https://www.sciencedirect.com/science/article/abs/pii/S0378112717301524

The layout of turbines in the Tirawley site features significant commercial coniferous forestry and clear-fells (around 64%). Eire Ecology sets the site risk based on this layout, yet the quote above from Kirkpatrick et al. (2017) warns that clear-felling creates "edge-effects" that artificially attract 90% more bat activity to smaller felled stands. [1]

- The Flaw: If the site layout actively creates preferred foraging edges (ecological traps) near the turbines, an assessment could easily be argued as High Risk, rather than Moderate.

Bats 11.Observation, I am deeply concerned about the permanent loss of 2,438 meters (0.73 hectares) of hedgerow, 0.29 hectares of scrub/ecotone for bat buffers, and 31.86 hectares of commercial forestry for infrastructure.

(please note I include Pine Martin within the observations in this section)

Environmental and Ecological Concerns

The Lacken area includes sensitive habitats such as blanket bogs and areas with ecological significance under the Habitats Directive. The large volumes of peat to be extracted and the disturbance to these habitats could have long-term detrimental effects on biodiversity and peatland restoration efforts.
(Reference: Appendix 1.6 Community Engagement Report, Pages 13-14; Planning Statement, Pages 69-71)

Serious threat to biodiversity within the local landscape for a minimum of ten years.

Chapter-6 of the Tirawley Wind Farm EIAR details a permanent loss of 2,438 meters (0.73 hectares) of hedgerow, 0.29 hectares of scrub for bat buffers, and 31.86 hectares of commercial forestry for infrastructure. A 1:1 baseline replacement scheme is mandated to mitigate these impacts through native species replanting.

"The permanent loss of hedgerows and trees shall be offset through a planting scheme. The planting will follow best practice, including guidance from the Department of Agriculture, Food and the Marine ACRES scheme.
As noted in Section 6.4.4.1, the estimated permanent losses are as follows:
New entrances from public roads 800 m
Internal breaches of hedgerows by infrastructure 355 m
Losses for bat buffer mitigation at turbines (inc. forest edge) 449 m
Total estimated linear loss 1,604 m

"Taking into account the value of local hedgerows and that the new plantings will take up to 10 years to equal in structure and diversity the hedges removed, a greater area will be replanted than is removed…."
As noted in Section 6.4.4.2, the TDR will require the removal of 2,504 m of hedging from along roads to facilitate road widening. While this will be replanted along the extended road edge when works are complete, the temporary loss is significant as there will be an interval of up to ten years before the replanted hedging attains similar value to what will be removed. Due to the ecological value of hedgerows, additional mitigation is required for this temporary loss and it is considered appropriate that 50% of this figure, i.e. 1,252 m, is replanted."
EIAR- Chapter 6, Biodiversity (pg.93)

This is like chopping down a forest to plant trees.

The true ecological value of Ecotones/scrub for bats and for all local biodiversity that bats depend on is to be addressed by this legal 1.1 replanting , but still acknowledges the lack of value for up to ten years- I do think ecologists support the claim that after ten years the replanted hedgerows will have attained a similar value. In actual fact- ecologists state it takes considerably longer than that.)

Biologists and conservationists state that a completely replanted hedgerow takes 15 to 30 years to attain a biodiversity and ecological value similar to a mature, ancient hedge.
The recovery timeline breaks down into specific ecological milestones:

- Years 1–5 (Establishment): During the first few years, newly planted whips (young saplings) offer almost no nesting cover or foraging value. In Ireland it is not a solution- simply a legal requirement to attempt to offset the destructive impact, by replanting twice the length of the removed hedge, but these new plants take 3 to 5 years of formative pruning and proper care to develop a dense, bushy base. [1, 2, 3, 4, 5]
- Years 5–10 (Initial Canopy): With proper care- the whips might have reached a sufficient height to provide basic shelter for perching/nesting sites for common bird species. [1]
- Years 15–30 (Ecological Maturation): Structural diversity is returning. Biologists highlight that it takes well over a decade for mosses, lichens, and specialist insects to colonise the bark, and for the ground flora (remnant species) to fully establish in the hedge base. [1, 2]
- 30+ Years (Ancient/Veteran Stage): True "heritage" hedges with mature, hollow trees and rich, undisturbed soils that can support cavity-nesting birds, rare invertebrates, and bat roosts may be

emerging. A **new hedge replanted from scratch can take over a century to mirror these specific, complex micro-habitats.**

Modern Conservation Rules

Because mature hedgerows provide critical **wildlife highways and are irreplaceable carbon sinks,** biologists highly discourage removal. If removal is absolutely unavoidable for safety or development reasons, strict regulations apply: [1, 2, 3, 5]

- **Translocation: In** some cases, to prevent the total loss of mature ecosystem value, specialised contractors perform hedgerow translocation, lifting and replanting the mature soil and plants together, which jump-starts the recovery time. [1, 2]

Biodiversity in Ireland is already strained by industrial pollution fuelled -rapid climate change, so destroying the landscapes on which our bats and all our local wildlife depend will only serve to actively cripple natures ability to adapt and can- as is happening to varying degrees within Ireland- rapidly cause complete collapse.

Protection of all our mature, established scrub,swards and ecotones within this landscape has got to be simultaneously prioritised when making proposals to protect species under legal protective ordinances. **Bats no1 threat is hedge removal.** It's not only the loss of the feature it's the sudden complete absence of all the life that hedgerow, or scrub ecotone supported -and provided to myriad creatures.

'Scrub is an extremely valuable habitat, one on which many species depend for their survival. *These ecotones/transitional zones create habitats between conifer plantations, various grades of heather and heath, rush/grass fields and pasture, open bog land and wet and dry environments. They provide a variety of isolated, dense or more open thickets, these naturally occurring gradations generously provide for many more subtle changes in aspects soil quality, vegetation structure/variety of colonisation, type and topography- which encourages "more species diversity and abundance"*
Kent Wildlife Trust.org

"There is no ecological equivalence between removing an older hedgerow and replanting with young whips *which can be as thin as a finger width. Hedgerows take years to mature and to develop their tree, shrub and grass layers.... older hedgerows are often composed of several tree and shrub species which support a wider diversity of wildlife. Removal of hedgerows eliminates an established component of the local ecology and results in fragmentation of habitats and consequential local impacts to bird life, insects and other wildlife.*
It takes years for their ecological value to develop. Research also shows that organic carbon retained in the soil under old hedgerows ('over 37 years old) is 57.2% higher than under new hedgerows."
Oonagh Duggan, Head of Advocacy at Bird Watch Ireland, July 2022
HTTPS:// www, science direct.com/science/article/pii/S0301479722000573

'Older hedgerows *often have richer shrub community which increases their value as source of seeds, fruits and invertebrates for small mammals, as well as providing greater micro habitats complexity and protection from potential predators."* Gelling et al 2007

'The mature and also taller areas of scrub and hedge ecotones are positively associated with bat diversity and activity....These are important stepping stone habitat especially in fragmented landscapes." (Schinkert et al. 2016)

"A large proportion of the predator community such as foxes, irish stoats and Pine Martins require these mature margins and scrub zones for the high level of local prey." (Emerson 2016) (Michel et al. 2006) Further more Pine Martins favour the dense undergrowth and scrub dominated transitional zones of bog land, pasture and conifer plantation.Their presence is an indication of a healthy functioning ecosystem."

Hedgehogs- *For these mammals, a lack of connectivity, through disturbance fragmentation and destruction is an adverse significant effect. Due to the crucial role of migration as a gene pool necessity for hedgehogs, hedgerows and mature scrub/ ecotones are the most important dispersal corridors. providing the primary pathway into and through unfamiliar territory.* (Moorhouse et al 2014)

"*In addition* ***pollinator abundance*** *in greater numbers of individuals observed in hedgerows located in simplified landscapes. Suggesting these structures act as the last refuge.*" (Garrett et all.)

Field boundaries- including hedgerows, drystone walls and ditches or sheughs- are an iconic characterful feature of Irelands rural landscape and a vital lifeline for wild species such as bats but also birds-badgers, irish stoats, long-tailed field mice hedgehogs, shrews to name a few.

I recognise that Eire Ecology is possibly meeting legal requirements and industry standards but I do not think they have properly understood and surveyed the environment. The out of date 2022 baseline surveys and subsequent April 2026 period of surveys have failed to fully or comprehensively survey for protected species- including:-

Observation on Pine Martins living within the proposed site

- Vincent WildlifeTrust.ie state "increased forestry has provided a more suitable environment for the return "of the protected Pine Martin, which **are here but were not detected by ecological surveyors for Eire. ecology**, but members of the community will be providing photographic evidence of our local population living within the boundaries of the wind farm proposal.

"Despite their remarkable recovery, the Irish pine marten population still faces genetic challenges due to historical genetic bottlenecks, which occurs when a population is severely reduced in size, often due to environmental events (like natural disasters) or human activities (like hunting or ***habitat destruction****)."*
As a result of environmental fragmentation-*"Studies of pine martens in Ireland indicate a low genetic diversity, which could affect their long-term viability."*

According to the the EIAR, Chapter 6 Biodiversity (pg.59) section 6.3.4
"Pine marten Martes martes was not recorded within the study area *during the various ecological surveys. As the species has a presence in north County Mayo and has been recorded in the hectad G13 (at Kilbride), it is probable that it would occur in the conifer plantations within the study area."*

Pine Martin are an important red listed species that is living within the boundaries of the proposed site, and is often spotted by locals and visitors alike. The fact that the surveyors never recorded it- is yet more testimony to the inadequacies of the baseline surveys. A family of Pine Martins have been seen living less than 500m from one of the proposed turbines ('evidence will be provided by a member of the community who has them in her garden)

The pine marten is a legally protected species under the Wildlife Acts 1976–2018 and the EU Habitats Directive. Regulation 51 of the Birds and Natural Habitats Regulations 2011 (S.I. 477 of 2011) specifically prohibiting: deliberate disturbance of protected species; deterioration or destruction of breeding sites or resting places.

The limited temporal/spatial survey provided in this EIAR report is insufficient to confirm non-presence, particularly given abundant contradictory evidence. There is a complete lack of robust, seasonally appropriate field surveys undertaken by suitably qualified ecologists. **As a whole, the report fails to demonstrate that the proposal will not result in direct adverse impacts on pine martens in breach of regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011)**

12 observation-Impact on Hen Harrier Habitat

I apologise from diverging from my stated focus on bats. But I find I have a little time left before the submission deadline and I would like to address the impact to Hen Harrier -referring to EIAR-Biodiversity -chapter 6.

I am particularly concerned about the impact of the proposed development on the hen harrier, an Annex I protected species under the EU Birds Directive and one whose Irish population has declined significantly in recent years. The EIAR acknowledges that hen harriers are present within the study area and that the site provides suitable autumn and winter foraging habitat. The site contains a combination of blanket bog, scrub, wet grassland, semi-improved grassland and hedgerow networks, all of which are important habitats for foraging and roosting hen harriers.
Of particular concern is that a winter hen harrier roost was recorded within the study area, yet no comprehensive winter roost survey appears to have been undertaken across the wind farm site itself. The applicant's roost surveys focused primarily on areas outside the development footprint, despite evidence

that hen harriers utilise habitats within the proposed development area. In the absence of a robust assessment of winter roosting activity, it is difficult to conclude that the impacts on this protected species have been fully assessed.

The development will result in the permanent loss and fragmentation of habitats used by hen harriers, including substantial hedgerow removal, loss of blanket bog habitat, forestry felling and the construction of extensive site roads and infrastructure. While mitigation is proposed, there remains uncertainty as to whether replacement habitats can adequately replicate the ecological value of the habitats being lost, particularly in the short to medium term.

I am also concerned about the cumulative effects of habitat loss, construction disturbance and operational displacement. Research has shown that hen harriers may avoid otherwise suitable habitat in the vicinity of operational turbines, resulting in a reduction in available foraging area. **The application does not appear to adequately assess or mitigate this displacement effect.**
Given the conservation status of the species, the acknowledged presence of suitable habitat and recorded winter roosting activity within the study area, **I do not believe sufficient scientific certainty has been provided to demonstrate that the proposed development will not adversely affect the hen harrier population using this landscape. The precautionary principle should therefore apply.**

That is the conclusion of my observations for chapter six, there is some appendix material at the very end of this document which is pertinent and may be helpful in your considerations.

Observations on the unsuitability of wind farms in this landscape in the North West of Co Mayo

Lack of Site Suitability and Landscape Impact

The area includes sensitive landscapes, visible from the Wild Atlantic Way and other designated scenic routes, which would be adversely affected by this wind farm. The visual intrusion on the unique coastal and rural
The area includes sensitive landscapes, visible from the Wild Atlantic Way and other designated scenic routes, which would be adversely affected by this wind farm. The visual intrusion on the unique coastal and rural landscape is unacceptable and contrary to the policies outlined in the Mayo County Development Plan regarding landscape protection and visual amenities.
(Reference: Mayo County Council submission, EIAR Chapter 17 - Traffic and Transport, Pages 9-10; Planning Statement, Pages 69-71)

The Cumulative Impact and Strategic Considerations

The project overlaps with areas where other developments are planned or existing, increasing cumulative environmental, visual, and infrastructural pressures. The scale and height of modern turbines, as noted by Mayo County Council, raise questions about the suitability of this site compared to previous assessments.
(Reference: Mayo County Council submission, EIAR Chapter 17, Pages 9-10)

Tirawley Wind Farm development by Constant Energy Ltd is not in accord with the current Mayo Renewable Energy Strategy 2011. I fully support Mayo Co Council in regard to this development, and I believe the finalised Renewable Energy Strategy for the county is going to designate all of this area as unsuitable for wind farms.

Mayo County Council already considered that only three turbines proposed were in a -preferred tier. Also it should be noted that the EIAR for Tirawley Wind Farm, states that twelve of the sixteen turbines (75%) will require blanket curtailment measures from April to October inclusive- in alignment with what they have designated as the active flight season for our local bat colonies. (See observations on Bats)Additionally

three of those twelve need further additional mitigation measures due to the fundamental misalignment of the proposed wind farm development in this landscape in the first instance.

Attached below are relevant sections of The Planners Report for Tirawley Wind Farm-Section 8.1 [Excerpts page 36 - 40 incl]

'The following is noted:
-"Of the 16 no. turbines, only 3 no. turbines (AT02, AT03 and AT04) are located within a preferred area i.e. Tier 1 Preferred Large Wind Farms.
-8 no. turbines (AT17, AT18, AT16, AT15, AT13, AT12. AT11 and AT06) are located within an area identified as 'Tier 2 Open for Consideration',
-5 no. turbines (AT01, AT05, AT09, AT10 and AT14) are located in the open countryside, an area that is unclassified as per the Mayo Renewable Energy Strategy 2011.
In principle, only a small portion of the proposal is considered acceptable in principle i.e. turbines located within Tier 1 Preferred lands.

In relation to Tier 2 lands - The Mayo RES 2011 states that lands within the Tier 2 - Open for Consideration classification may be considered for wind farms or small clusters of wind turbines but the visual impact on sensitive or vulnerable landscapes, listed highly scenic routes, scenic routes, scenic viewing points and scenic routes (as defined in the Landscape Appraisal for Co Mayo) will be the principal consideration.
In this regards, it is of concern despite advice at preplanning stage that half of the proposed development (8 no. turbines) are proposed to be located on Tier 2 lands, and another 3 turbines are to be located in the open countryside.
*While it is put forward by the applicants that the RES makes provision for the Local Authority to consider proposed renewable energy developments on a case-by-case basis. It is observed that in pre-planning consultations, An Coimisiún note and refer to matters regarding the number of turbines proposed outside of any areas designated as appropriate for the provision of wind energy development. In addition, it should be noted that the applicants were advised in pre-planning consultations with MCC, albeit with a proposal for a greater number of turbines, **that the proposed development would not be considered favourable at this location, owing to its proposed location in a highly scenic and sensitive coastal landscape,**"*

The location of the proposed development is in a visually sensitive landscape with many vulnerable features, including the north mayo coastline, its designated scenic routes, highly protected and protected views, the Wild Atlantic Way tourist route and the north mayo Céide Fields coastal landscape, including Downpatrick head, Lacken Strand, Rathfran Priory, Killala and Moyne Friary.
The Mayo Landscape Appraisal for County Mayo sets out policy with regard to Scenic Routes (3.6(b)). It states that sightseeing visitors are more likely to be concentrated along these routes. The onus should be on the applicant...to demonstrate that there will be no obstruction or degradation of the views towards visually vulnerable features nor significant alterations to the appearance or character of sensitive areas.
It also sets out policy (3.7(b)) with regard to Protected Views, stating that - development located between the public road and the seashore, lakeshore or riverside should be subject to strict visual criteria. New development should only be considered where it can be demonstrated that it does not obstruct designated highly scenic vistas nor alters or degrades the character of the surrounding landscape...

*It should be noted that the Renewable Energy Strategy for County Mayo is currently under review, and that - lands once considered acceptable for wind energy, as identified in the Renewable Energy Strategy 2011-2022, may now not be suitable for such development owing to the significant heights of modern turbines and scale of development being proposed. The Renewable Energy Strategy for Mayo 2011-2022 is considered to be outdated, though still in operation. The new Renewable Energy Strategy for County Mayo will take greater account of the impact arising from wind energy development and its potential negative impacts on the unique landscapes of North Mayo. Given the intensity of interest in wind energy projects in the north of the County in more recent years, **the new Renewable Energy Strategy aims to balance the need for renewable energy with the needs and requirements of other important economic sectors, such as its tourism industry and The Wild Atlantic Way, within the County.** In this*

regard, the impact on visually sensitive landscapes and locations that play an important role in the economic and tourism sectors of the County and wider Region will be a priority consideration."

And in their Conclusions and Recommendations [page 39]

> *"Mayo County Council is generally supportive of renewable energy projects within the County. Based on the current policy, as reflected in the Renewable Energy Strategy for County Mayo 2011,* ***the proposed location is not considered appropriate for the development proposed, as it is located in a landscape that does not adequately provide for a wind energy development as proposed.***
> *The North West of County Mayo has become a particular focus for wind energy projects with several existing and proposed projects in the general area of the proposal. In considering this SID proposal, ACP should note that the Renewable Energy Strategy for County Mayo was adopted in 2011 where Wind Power was its main focus.* ***Since it was adopted, renewable energy technologies have evolved considerably – of greater scale and greater height as reflected in this SID*** *application. The RES for County Mayo is currently at review stage, and the document will reflect the updated policies pertaining to Renewable Energy, transmission networks and advances in renewable energy technologies since 2011.*
>
> *In assessing this proposal An Coimisiún should consider* ****the multiplicity of renewable energy developments (existing, permitted and pending decision) in North Mayo area, and the overall cumulative impact of such development in the north Mayo area, including its potential to have a significant negative impact in terms of the high quality tourism product along the WildAtlantic Way, coastal paths and routes and the sensitive archaeological & heritage landscape associated with the Céide Fields complex.***
> *For the reasons outlined above, Mayo Co. Council would strongly advise ACP to give full consideration to the potential adverse impacts the proposed development might have, both by itself and in conjunction with other existing and potential developments as well as the precedent it may establish, on the tourism and heritage based economy in an otherwise marginal location in arriving at its decision on this proposal.*
>
> ***In conclusion, MCC would again direct ACP's attention to the notes on the pre-planning consultation that took place with the applicant in August 2023 (see Appendix), where it is stated that Mayo Co. Council would not be in favour of such a proposal at this location, a view that still pertains"***

*[please note that there are 17 wind farms at different stages located within 20km of the proposed site, there are 52 turbines SW of Ballycastle and 16 between Ballycastle and Killala]

I support these views and the views of Lacken- Ballycastle Landscape Protection Group in their submission.

Observation - I object to the object to the lack of consultation and clear communication with the community.

It is clear from our community perspective that Constant Energy Ltd did as little as possible to meet the minimum of strict legal requirement for public/community consultation.

Our experience of Constant Energy Ltd is that they have been less than transparent with us and that what was provided to ABP by them, also falls very far below best/ fair practice as laid out by ABP and amounts to hasty and disrespectful-albeit -legal compliance only. There has been no genuine concern for, or attempt to answer the fundamental concerns and direct requests made by members of the community.

In all respect, given the scale and potential impact of the proposed development, this should not be accepted as adequate.

"It is a policy of the Mayo County Development Plan 2022-2028 - 'To ensure that developers of proposed large-scale renewable energy projects carry out community consultation in accordance with best practice and commence the consultation at the initiation of project planning' (REP4)."

Constant Energy reference that they actively consulted with the Lacken Community, that they have engaged with local residents via contact-door to door, and that they reached out to community groups. (pg.37, EIAR Chp 1, section 1.11.1, Non- Technical Summary, pg9). There is zero auditable evidence, and in fact, no residents of the local community are aware of any contact, quite the contrary and absolutely no one reached out at any juncture to the local Community Groups. (Lacken- Ballycastle Landscape Protection Group actively sought contact)

~where are the logbooks of contact: dates and details of home visits by the Community Liaison Officer-in point of fact- who is the CLO?
~ where is the proof of distribution of project information leaflets, or booklets delivered to nearby homes?

During the first pre- application meeting on April 5th 2023 (page5, Meeting APB 315864-23, ACP-Pre-App-Meeting- Minutes (page7)verbal assurances were given to ABP that a community liaison officer was appointed , again auditable evidence was never sought further or provided to ABP and rather oddly- no one knows their name or has the contact details. Residents and members of the local community group, who took the initiative and reached out themselves via email, could find no publicly available contact details for this officer , either on Constant Energy's website or elsewhere.

"National Wind Energy Development Guidance (2006, and draft 2019) firmly endorse meaningful dialogue and active consultation with local affected communities during any proposed wind farm development. Local communities and residents should be given "the opportunity to comment upon and to have input into the planning and design of the scheme."(pg.19)

The sole evidence of public/ community consultation provided by Constant Energy relates to just one "'Public Information Day". Not for the first time, in their application documents, there is confusion in information provided by them. The current application states this meeting was held on June 6th 2023 ,attended by 31 residents but in the at the second pre- application ABP meeting Constant Energy report that this public consultation happened on June 4th and was attended by 38 residents .(Meeting APB 315864-23, ACP-Pre-App Meeting Minutes)

What is verifiable is that-
~ **Publicity was limited** to two announcements in the classified section of two newspapers, (neither of which were the specifically local paper-"Western People" -one poster and one event in Ballina Town at which 14 feedback forms were collected on the day by Constant Energy.
~it was not held in a venue convenient to the local community, eg: at the available, Lacken Enterprise Centre. The PID was held instead at Ballina Manor Hotel 25km away from the proposed site, thus excluding many residents particularly the older more vulnerable members of the community

During pre-application meetings, ABP representatives directly queried the decision to hold the PID at such a distant location (pg. 8, Meeting ABP 315864-23; ACP-Pre-App-Meeting-Minutes),

~if 31 people attended that amounts to only 1% of residents likely to be affected (Electoral Date 2022 shows 2676 people reside within the proposed development area)
~the only evidence of attendance provided by Constant. Energy is 14 feedback forms representative of 0.5% of our community.

A crucial element of the PID is to give the community a voice. Three of the fourteen feedback forms verbally illustrate the inadequacy of proactive engagement on the part of Constant Energy .

Comments from individuals at the PID identifying as local residents
~would have appreciated "more publicity"
~"Is there another consultation day for people working shifts or on holidays, better advertising of consultation days"
~"The timing of the event was very low key"

The superficiality of this one public consultation is further illustrated by twelve out of fourteen who indicated how they heard about the Consultation day. The result was overwhelmingly by *"word of mouth"* (no5 forms), closely followed by *"community group"* (no4 forms) and one by poster in local area, two from newspaper)

Constant Energy`s feedback form is titled "To record your views and help us improve future information days."
There were no *"future information days"* and in fact, the evidence suggests that the information provision of this one PID was woefully inadequate at relaying even basic fundamental facts.
~*"not clear which townlands involved"*
-*"Unclear of exact location, construction, disruption afterwards (will there be) access to all roads for hillwalking, horse riding"*
-*"really close to residential house"*
-*"would have liked an information package"*
~*"please forward a copy of maps"*

Residents attending the PID, who, indicated no support for TWF on the form, stated :-
~ *"too close to residential house",*
~*'' definitely not",*
~*"devaluing our house, noise pollution, local enviroment, etc",*
~*"Unsure of exact location, construction, disruption, afterwards access to all roads for hillwalking/ horse-riding"*
~*'' Too destructive to the local area SAC and environs".*

Best practice as outlined by ABP urges developers to engage transparently during pre planning meetings on highly sensitive topics.
Clearly at the end of the PID in June 2023 there were meaningful foundational concerns left entirely unaddressed.

Advice provided to Constant Energy at the earliest stages of the project's genesis was disregarded. In March 2023, the Department of Public Health indicated to the applicant that: *"consultation with the local population should be conducted"* (pg. 32, Appendix 1.3. Scoping Opinion). The Environmental Health Service (H.S.E. West) further recommended:
"Early and meaningful public consultation with the local community should be carried out to ensure all potentially significant impacts have been adequately addressed. All parties affected... must be fully informed...." (pg. 26, 29th March 2023 Appendix 1.3., see also Ch. 5 EIAR pg. 14-15)
On 5th April 2023, ABP representatives reiterated the importance of transparency and good communication with the community to the applicant (pg. 5, Meeting ABP 315864-23; ACP-Pre-App-Meeting-Minutes (pg7)).

No opportunities were provided by Constant Energy Ltd for the community to meaningfully influence the development of the current application and, despite the low engagement and negative feedback at the one PID, there has been zero effort by them to reassure local residents or to involve them in the development of this application.

Instead, the entire community has had to wait and worry until the EIAR was published, we then have just over five weeks to digest and interrogate the contents of a one thousand page document full of unfamiliar terminology and technical complexity. Obviously this presents as a distressing and overwhelming barrier for some members of the community, who will be, adversely affected by the proposal-but are working flat out, or, cannot access or decode the documents to voice their real concerns. This is precisely why ABP urge best practice-a respectful human framework, urging that early sharing of "plain English" technical concepts along with a constant loop of communication be established between the developers and community residents. This way, as many community members as possible would have had a fair chance of grasping the implications of the plan and a chance to participate meaningful in its decision making process.

"Although wind power project approval does not require local citizens to perceive decision making processes as fair, comprehensive statistical research undertaken on behalf of International and European Wind Energy Developers consistently give "results which, underscore that it is an important determinant of local attitudes. More specifically, we find that when citizens who are 'engaged' to the point of being aware of a potential

project feel they have been given more than a mere voice, and are actually heard, they are more likely to have a positive attitude toward a local project. "...

'Developer adoption of open and transparent approaches is critically important too; we find it to be a more important component of the fair process perception than the extent of participation provided." ...

"The results indicate that jurisdictions should consider developing procedures that ensure citizens are consulted and heard and establish benchmarks or best practices for developer interaction with communities and citizens." (Firestone et al., 2017)
(Reconsidering barriers to wind power projects, community engagement, developer transparency and -place." Pub by Taylor and Francis. The Journal of Environmental Policy and Planning Dec 2017 Authors Richard C Stedman, Jensen, Hubbell and Jacquet)

To conclude, it must surely be recognised by ABP, that Constant Energy's proposal represents a radical alteration to a much loved, familiar homeland environment of multiple generations within families and of people. This is literally our "home turf" and the level of distress caused, particularly to our elder and vulnerable members by being forced to handle this prospect with zero transparency from Constant Energy Ltd should be as unacceptable to ABP as it is to us.

As things stand there is significant opposition to this development from the local community and MCC. In the pre-planning meeting held in August 2023, Mayo County Council (MCC) indicated: "they would not be in favour of such a proposal at this location" (pg. 3, Appendix 1.3). There is an active local action group, the Lacken-Ballycastle Landscape Protection Group, with over 100 members, that has been established to challenge the Tirawley development and there has been extensive media coverage of community concerns and opposition (see, inter alia, Western People, 14th October 2025; 1st December, 2023; Connaught Telegraph, October 22, 2024; Irish Independent, 7th November, 2024 and more recently in 2026.)

"Most problematically, while environmental and health and safety (e.g., noise) concerns can largely be mitigated or for the most part avoided, there are no technical fixes for changes to landscapes—changes that are all that more important because they can affect an individual's sense of those landscapes, including the relationship of a landscape to farming, solitude, recreation, or history, etc. (Pasqualetti, 2012).
See me, Feel me, Touch me, Heal me: Wind turbines, culture, landscapes, and sound impressions" Journal: Land Use Policy

- Publication Date: July 201 Volume: 4 Pages: 241–249

Observation-I object to the potential for this development to seriously undermine the local tourism sector, cultural heritage and the connected but un excavated archaeological structures and material extending from the Cèide Fields and through the potential wind farm site.

I am concerned about the cumulative impact the Tirawley wind farm will have on tourism in not only the Lacken Area but also in Ballycastle. Recently wind farm has been approved by An Coimisiún Pleanála for 22 turbines. The coast road from Lacken to Ballycastle is an extremely important part of the Wild Atlantic Way and is a extremely important economic asset to the area. The cumulative effect of Tirawley, Glenora, Keerglen and potentially Clydagh will have on tourism in the area cannot be ignored. The communities involved have worked extremely hard over the years to promote the areas, and recently launched Failte Ireland and Mayo County Council tourism plan for the area is a significant boost for the area. **This cumulative wind energy development that is planned for the north west coast of Mayo is eroding the future that our communities can have.** The Lacken Ballycastle coastline is impressively historic with the Céide fields complex and down Patrick head, the future that residents could have will become negligible it

ACP do not consider fully the cumulative impact of all projects in the area. **I do not believe that the applicant has fully considered all the cumulative effect.**

For your convenience-Planners Report on Tirawley Wind Farm ('pg.33) Tourism
The report received from the Tourism, Recreation and Amenity Section of MCC raises concerns regarding the potential negative impact of the proposal on the Wild Atlantic Way, and most specifically the 15km Ceide Coastal Trail and the internationally recognised Ceide Neolithic field system.
The report highlights the fact that this area has been identified by Mayo County Council and Fáilte Ireland as a key tourism asset, with ongoing development plans and potential investment of up to €10 million over the coming years. The Céide Coastal Trail is a cornerstone of the Fáilte Ireland Draft Destination and Experience Development Plan (DEDP) for North Mayo and is also included in Mayo County Council's draft Tourism Strategy.
The report feels that the introduction of industrial-scale infrastructure in this area would compromise the integrity of these plans and diminish the long-term value of the destination. Furthermore, the area is home to the internationally recognised Céide Fields, one of Europe's most significant Neolithic archaeological landscapes.
The report also considers that the development would also threaten the visual integrity of Downpatrick Head, one of Ireland's most iconic coastal landmarks. The sea stack and surrounding cliffs are a major draw for domestic and international visitors, offering a dramatic and immersive experience of the Atlantic coastline.
The report reiterates that Ballycastle region forms a vital part of the Wild Atlantic Way, specifically the 15km Céide Coastal Trail which received planning approval in 2025. These Coastal Trails showcase unspoiled landscapes, dramatic sea cliffs, and panoramic views. The proposed wind farm development in close proximity to this location poses a direct conflict with these tourism objectives and risks undermining the quality of the visitor experience.
For the reasons outlined above, the report concludes by asking ACP to give full consideration to the potential adverse impacts on tourism and heritage before making any determination on this application.

This development also contravenes the core objectives of the Proposed Draft Variation No. 2 of the Mayo County Development Plan 2022–2028 to balance national climate obligations with local impacts.

- **Weighing Local Impact**: Under core objectives (such as Objective 4.1), Mayo County Council mandates that developers must demonstrate that the advantages of a proposed renewable energy development outweigh the disadvantages for the majority of the individuals and communities residing in that area.

- **Spatial Safeguards**: The draft RES is establishing a clear operational framework to ensure that developers steer major commercial infrastructure away from sensitive visual, environmental, or community landscapes. It restricts large developments near highly scenic routes, architectural conservation zones, or densely populated rural clusters to safeguard individual quality of life.

- **Early Engagement Expectations:** Developers are required to engage in meaningful, transparent consultation with local communities long before submitting formal planning applications. This is designed to address issues regarding visual impact, proximity to residential dwellings, and potential noise or light pollution.

~ This development risks being entirely destructive to such a sensitive high value environment~
Construction naturally builds on a foundation of destruction which is why regulations are heavy and best practices seek to be "sensitive" to the right development in the right place, broadly the focus is mutual enhancement. However, this proposal ~a geo engineering project with a disproportionate insensitive footprint, not only on the ground locally, but due to the scale of the turbines in a landscape incapable of absorbing them they ***"present in a clear and unambiguous manner"*** the lived experience particularly for full time residents is -ill proportioned mechanical monoliths-looming into the sky and dominating in an over bearing manner all below them, filling a broad visual envelope, polluting high value scenery for approx 20kms. Walking through ***"the central parts of the wind farm site-will afford clear views of the turbines from near distance."***

Put simply, the development proposed by Green Energy is so comprehensively inappropriate to the intricate and diverse mosaic of landscapes that is the Barony of Tirawley, that it could even be conceived of as a good idea to build an industrial scale wind farm so close to homes and local places of community, in a SPA, SAC and NHA environment- seems to not only fly in the face of good civil and geo-engineering but could also be read as a declaration of wanton vandalism and-ill intent towards the health and wellbeing of a thriving community.

~Mayos wildscapes, its habitats and species are loved by us and important not just locally but in an international context and justly under protective ordinances,. This is not an industrial landscape or available terrain open for consideration for wholesale industrialisation as proposed by Green Energy Ltd. *"Locals, tourists and "hill walkers (alike) directly engaged with the landscape enjoying changing sequential views over it."* We actually enjoy a peaceful natural soundscape -the soughing of the wind, the voices of water in myriad forms, the ever present song of skylark, the drone of insects fast disappearing from other parts of the country, breezy rushes of birdsong the ceaseless roar and constant lullaby of the sea....We are rich here, enjoying ever changing visual wildscapes-a full sensory experience, a chance for contact with the wild denizens -stag and hare, kestrel and shrew...and a chance for communion between person and place.
Our landscape provides solace and healing to heavy hearts and minds fractured by the overwhelming pressures of "'modern-life"- people pay good money to travel here to find themselves in a landscape that is lost in so many parts of Ireland and Europe. And people come here for inspiration too- artists poets writers and musicians. All of which will be shattered and polluted by the constant sight and sound of these mechanical monoliths striding down the valley and looming over the quiet pastoral home spaces of the people who live here. There will be NO getting away from them, No clipping them out of our holiday photographs or peace for our minds.

Far from being a visionary modern development promising providence for all, the Tirawley Wind Farm is so out of context with this landscape that it is more suitable example of a dystopian nightmare. But you could frame it differently-eg:
"12.2.6.4-....the quality of landscape and visual effects will almost always be negative, rather than positive or even neutral. Unless otherwise stated, the quality of landscape and visual effect judgements herein can be taken as negative."(pg.15)

"In terms of landscape character, additional wind energy developments might contribute to an increasing sense of proliferation. A new windfarm might also contribute to a sense of being surrounded by turbines with little relief from the view of them. The term 'sky-lining' is used in the SNH Guidelines to describe the effect:
"Where an existing windfarm is already prominent on a skyline the introduction of additional structures along the horizon may result in development that is proportionally dominant. The proportion of developed to non-developed skyline is therefore an important landscape consideration." (Pg.16)

"Wind energy developments in these landscapes should be relatively small in terms of spatial extent. It is important that they do not dominate but achieve a balance with their surrounds, especially considering that small fields and houses are prevalent." (12.3.4 pg 21)

The quantitative scales for applying values and predicting impacts on the people and landscape environment consistently rely heavily on reducing the perceived and actual beauty and integrity of the environment it seeks to over exploit-and then applies a low impact score. One needs to endeavour to keep in mind, this statement from chapter twelve-*"12.2.6.4-....the quality of landscape and visual effects will almost always be negative, rather than positive or even neutral. Unless otherwise stated, the quality of landscape and visual effect judgements herein can be taken as negative."*

The facts of the matter- the true nature of the landscape and the gross scale and type of development are down played yet evidenced by the need to downsize and the rejigs along with heavy reliance on mitigation proposals, recognised by a growing percentage of society as **"greenwashing" the immediate and long term -highly adverse impacts on land water animals and people.**

The poor localised photographs of proposed turbine locations ('the entire area seems to consist of bushes briar's conifers and rushes - you would wonder why so many international travellers pay good money to come to visit!) and VP'S selected by Eire Ecology to illustrate the larger impact of the industrial wind site, heavily employ visual mitigation bias, cynical marketing strategies attempting to manipulate the perception of suitability and visual integration with an entirely unsuitable environment.

The landscape appraisal by Mayo County Council, expressly notes the high sensitivity of bog land landscapes in the Mayo County council policy framework, clearly stating that such areas are "particularly sensitive to inappropriate development "
Overall these turbines are entirely unsuitable and disproportionate to this landscape. Words are engineered by the planner along with poor photographs in a cynical attempt to make this development fit the landscape. A landscape they describe as "industrial" and "rugged".
The working people here are "industrious"- the landscape is NOT "industrial"

In respect to the engineering of language/perception prevalent in the EIAR report, would like to respectfully remind ABP-not that it's necessary- that Co Mayo is renowned for its big skies- its *space*- up and down and around!
Visitors and locals alike frequently note the lack of light pollution at night, but also during the day the feeling of immense, open skies stretching over the regions dramatic mountains and coast, lakes and hinterland. The kind of peace and quiet that just wraps itself around you lives here. Family members who visit and travellers we meet, have all commented on the "silence ringing in their ears"- the "deafening quiet" and the resulting deep and undisturbed sleep they experience here, and how refreshed they are by days wherein the majority of sounds are no higher than a birdsong. North West Mayo has rare and precious qualities, and along with my community I have the deepest appreciation for the quality of life we live here and share. **We have vision, we have space to live, to share-and that is why investment in tourism, culture and heritage and the arts should is a better direction of vision and investment, it will support the true wealth of North West Co Mayo and in a ways that the entire community can benefit from and build a future.**

Observation- I am concerned about the potential destructive impact specifically on The Ballinglen Arts Center in Ballycastle, and, this along with the impact to tourism in our entire North-West area has not been given consideration by the Tirawley Wind Farm EIAR when outlining its visual impact conclusions.

The Ballinglen Arts Foundation (and its adjoining Ballinaglen Museum of Art) in Ballycastle has a massive international reputation, particularly within the global fine art, painting, and printmaking communities. ***Not***-despite-being located in a remote coastal village in North Mayo, but with its amazing location, it is widely considered a world-class institution due to several unique factors:

- **Global Artist Fellowships**: Since its founding in 1992, Ballinglen has hosted over 500 prestigious international artists for multi-week residencies. These "Ballinglen Fellows" travel from the United States, Europe, and across the globe to live and work in Ballycastle, drawing direct inspiration from the North Mayo landscape. [1, 2, 3, 4, 5]
- **The First of its Kind in the West**: It features the first museum entirely dedicated to contemporary art in the West of Ireland. The museum houses a permanent, globally unique archive of more than 850 contemporary artworks gifted to the foundation by visiting international fellows over the last three decades. [1, 2, 3]
- **International Masterclass Workshops**: The foundation regularly runs educational workshops and open-air masterclasses led by internationally renowned visual artists. These attract serious art students and collectors from all over the world to the Mayo coast. [1, 2]

- **Elite Creative Destination**: Among landscape painters and printmakers, Ballinglen is highly prized on international residency directories (like Rate My Artist Residency) for its top-tier print studios, purpose-built workspaces, and undisturbed creative immersion. [1]

The specific, raw qualities of our North Mayo landscape—its dramatic cliffs, shifting Atlantic light, vast blanket bogs, and ancient archaeology—are the primary reasons international artists seek out fellowships at Ballinglen.

The foundation explicitly designs the residency to foster deep immersion in this specific environment:

- **Geographic Isolation as a Tool**: Located in the heart of Ballycastle, far from major urban art centre's, Ballinglen provides unique opportunities for intentional "productive solitude." Artists are removed from daily distractions to focus entirely on how the landscape shapes their visual language.
- **The Ballinglen Studio Experience**: Visiting fellows are given massive, purpose-built private studios with floor-to-ceiling windows. These spaces are specifically oriented to flood the workspace with our notoriously changeable West of Ireland light, allowing the landscape to actively penetrate the creative process.
- **Unrestricted All-Weather Exploration**: Rather than remaining indoors, artists are encouraged to walk, sketch, and explore the exposed coastline around Downpatrick Head and the Céide Fields, Lacken Salt Marsh, Kilcummin head and all environs. This opportunity for visceral interaction with harsh Atlantic weather patterns heavily influences the textures, colours, and mediums used in their resulting paintings, photography, and printmaking.
- **The "Sense of Place" Archive:** This landscape connection is so profound that it forms the core criteria of the permanent collection. Every piece gifted to the Ballinglen Museum of Art by a departing fellow reflects an interpretation of, or response to, their immersive experience in our North West Mayo environment.
- The words below by Robert Lloyd Praeger (the Irish naturalist and botanist who walked around Ireland "with reverent feet") remain so pertinent to our landscape today that they were the foundation of a 2021 Contemporary Art Exhibition at the Ballinglen Museum of Art:."The Way That We Went" a play on the title of his classic 1937 Travelography- The Way That I Went which covered his Mayo travels during 1895-1911 and 1930

"The long summer days spent in the Limestone Plain, where the gentle undulations of the ground only occasionally hid the distant rim of brown and blue hills; the marshy meadows, heavy with the scent of flowers; the great brown bogs, where the curlews alone relieved the loneliness... the savage cliffs of the Mayo coast; the flower-filled sand-dunes which fringe the Irish Sea.. all have left memories that can never be effaced."

The Way That We Went' – by Robert Lloyd Praeger

Along with its massive global reach, the Ballinglen Arts Foundation is deeply woven into the local fabric of North Mayo and operates extensive, free public programs to benefit the immediate community. https://www.ballinglenartsfoundation.org/education/

Their local outreach operates through several dedicated initiatives:

- **The Free Schools Programme:** Ballinglen provides completely free, day-long art and printmaking experiences to local primary school children. They host classes in their professional printmaking studios, completely funded by the foundation so that cost is never a barrier for local families. [1, 2, 3, 4]
- **Interactive Studio Visits**: Local residents can walk in and engage in interactive studio visits with the international Fellowship artists. This bridges the gap between rural Mayo and global contemporary art techniques, allowing locals to see works in progress. [1, 2]
- **Free Public Community Events**: The foundation regularly hosts open community events, including public lectures, family activity days, film screenings, and musical performances. Most of these require no entry fee. [1]
- **Adult Craft Workshops**: They run accessible, localised arts and crafts workshops geared toward adults in the community, providing an important social and creative outlet for residents in rural North Mayo. [1]

- **Specialised Health Outreach:** Programs have expanded to offer tailored creative sessions for highly specific local groups, including young people and individuals living with dementia. [1]
- **Local Economic Support: By drawing over 4,000 additional overnight visitors to Ballycastle every year, Ballinglen brings vital footfall to local B&Bs, pubs, and shops, anchoring the village's tourism economy.[1]**

I respectfully ask ABP please, do give special consideration to the potential negative impact on Ballinaglen Arts Center which is of such profound value and service to our local community as well as carrying huge international love and respect. The center supports Northern West Mayo arts, culture heritage tourism and community.

In conclusion, I respectfully submit that the proposed Tirawley Wind Farm project is not appropriate for this location due to the significant negative impacts on residential amenity, local landscape, ecology, infrastructure, and the community. I urge An Coimisiún Pleanála to refuse permission for this development in the interests of proper planning and sustainable development.

Thank you for considering my submission.

Yours faithfully,

Jessie Brogan

And Brian Brogan

Relevant Appendixes for Observations on Bats

Appendix 1 -official guidelines for bat survey conditions etc.

Nature Scot Guidelines ~Bats and inshore wind turbines- survey, assessment and mitigation.
"5.2.1 Ground-level static surveys
The minimum level of pre-application survey required using static detectors is 10 nights in each of: spring (April-May), summer (June-mid-August) and autumn (mid-August-October). Surveys in adjacent seasons should not be contiguous, i.e. they should be spaced out to include a reasonable time gap between them and should aim to include periods when migration could be taking place. Ideally, surveys should aim for 10 consecutive nights, but in practice weather conditions may preclude this particularly early or late in the year and in more northerly latitudes. The objective is to complete these surveys within a single calendar year, but in a few situations it is accepted that this may not be possible. In such cases, surveys can be split over two successive calendar years, but a justification must be provided to explain the reason(s) for this.*
**Ideally mid-August to mid-September. There is evidence that this 4 week period often corresponds with a substantial seasonal peak in bat activity"*

And from Bat Conservation Ireland
Source: BCI- Wind Turbine/ Wind Farm Development Bat Survey Guidelines Version 2

"Bat activity surveys should be carried out over several months from March/April to October/November inclusive, during optimum weather conditions. Survey during very heavy rain, strong winds (> Beaufort Force 5), mists and dusk temperatures below 7°C is not recommended. Should unsuitable weather conditions be encountered, surveys can proceed but subsequent additional surveys may be required. The

number of survey nights required per visit will depend on the size of the site, number of proposed turbines etc. It is recommended that a minimum of five months across the active bat season are surveyed."

"It is recommended that all aspects of the yearly life cycle of bats and their associated movements are considered in any field studies and a decision on the most site appropriate survey methodology to be employed be based on the recommendations of the appointed bat surveyor.. A four-season approach allows the confirmation of potential hibernation sites, where these are present in the locality, to be made during the winter months."BCI

This table provided by BCI is helpful for understanding the need for full season surveys

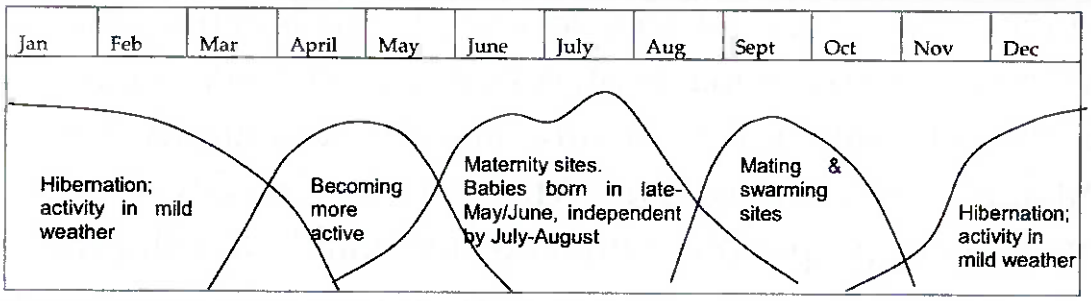


Figure 7 The bat year. Although there are species-specific differences, the bat year can be divided into the two major phases of breeding and hibernation, with other activities interspersed.

Brief description of seasonal behaviour of bats by BCI

"In September and October they ('bats) put on weight and then, as the weather gets colder, they seek out appropriate sheltered roosts, (hibernacula). let their body temperature drop to close to that of their surroundings and slow their heart rate to only a few beats per minute. This greatly reduces their energy requirements so that their food reserves last as long as possible. Bats don't hibernate right through the winter but may wake up and go out to feed and drink on mild evenings when some insects are about. Even on very cold nights, bats may be seen on the wing as they move to more sheltered roosts. Waking up and flying in winter uses up lots of energy which the bats can't easily replace, so hibernating bats should not be disturbed as this might reduce their chances of surviving the winter.
During this spring and summer period female bats gather together into maternity colonies for a few weeks to give birth and rear their pups. Once the pup is independent, the colony breaks up and the bats generally move to other roosts. Bats may gather together from over a large area to form these colonies, so any disaster at this summer breeding site can affect all the females from this area. Many of these maternity sites are used every summer and bats have a strong tradition of returning to the same site year after year."

The full Winter period-November to march inclusive, is generally omitted in Ireland as bats are mostly in torpor, please note that this does not infer bat species are absent and do not move about though the site.

The three Ecological Seasons are accepted provided there is a continuous coherent baseline.
1. Spring (emergence and transit)
2. Summer ('maternity and foraging)
3. Autumn (mating and swarming)

5.2.6 Weather data

Weather data including wind speed, temperature and rainfall are important for the interpretation of bat activity data, and should be recorded nightly for all types of bat survey. The use of automated weather meters is strongly encouraged, and it is suggested that more than one unit is deployed per site to allow for equipment failures. Wind speeds from existing turbines or met masts are extremely valuable, and it is important that requests for these data are made to the turbine operator/developer at the start of the project, (accompanied by information on the height at which the data were collected). Note that such data are often only stored on a temporary basis, and so may not be available if data requests are made retrospectively

Appendix 2 -
Issues with Ecobat Tool

In Appendix 6.2, the surveyor for Eire Ecology employs the Ecobat tool to quantify bat risk levels (thus generating the "Moderate" rating for Leisler's bats). However, statutory bodies like the Northern Ireland Environment Agency (NIEA) and NatureScot have explicitly warned that the Ecobat tool contains a severe geographical bias toward Great Britain/Scotland data and currently lacks an accurate repository for Irish bat assemblages. Particularly the protected high risk Leislers Bat which is rare outside of Ireland.Furthermore, the official Ecobat platform has faced extensive offline periods. [1, 2]

Details about Ecobat Tool from Nature Scot (2021)

Nature Scot recommends the use of an online tool, 'Ecobat' to provide a measure of relative bat activity. The tool compares site specific inputted data to a comparator database to provide an interpretation of the level of bat activity compared to other sites in Britain. The tool is not considered to be appropriate for use as yet in an Irish context (data is heavily weighted by data collected in the UK where there are a different range of bat species and differing ecology)

In relation to Ecobat, NIEA (2022) states that "caution should be exercised when using the tool as it has a significant bias towards results from Great Britain and there is a paucity of data from Ireland where we have a significantly different species assemblage. Therefore, it is currently unlikely to produce results which accurately reflect the species composition and bat activity levels normally encountered on wind turbine sites in Ireland"

At the time of creating the baseline surveys the EcoBat tool was offline and has been since

Appendix 3

Observation-The mathematical foundations used to calculate the risk matrices in Chapter 6 -EIAR and Appendix 6.2, are fundamentally unreliable for an Irish context. The surveyors potentially relied on an uncalibrated tool for Irish bats, to generate risk metrics, meaning the resulting mitigation boundaries are arbitrary rather than evidence-based. [1, 2]

The omission of the Static Survey Data no. 4 for October 5th -16th 2022

The Math Behind the Matrix

The risk matrix works by multiplying the Site Risk Score against the Species Activity Score. The final product determines the overall threat level, which scales from 1 to 25.

$\text{Overall Risk} = \text{Site Risk} \times \text{Species Activity}$

Here is how the numbers play out in the report's assessment:on page

Species / Activity Profile	Site Risk (Constant)	Activity Score (Survey Data)	Overall Matrix Score	Final Risk Rating
Common Pipistrelle *(Low Activity)*	4	1	4	Low Risk
Soprano Pipistrelle *(Medium Activity)*	4	2	8	Medium Risk

Leisler's Bat *(High Risk Behaviour, Low*	4	1	4 Low Risk

How the Matrix Downgrades the Threat

By running this math, the developer shifts the narrative through three specific arguments:

- Diluting the Danger: A site risk of 4 is inherently dangerous. However, because their acoustic detectors recorded low bat passes, they assign an Activity Score of 1 or 2. When multiplied, a score of 4 or 8 pushes the final classification firmly into "Low" or "Medium" territory.
- The Leisler's Loophole: Leisler's bats fly high in the open air, putting them at extreme risk from spinning blades. They are universally considered a "High Risk" species. The developer is bypassing this by arguing that because the total number of Leisler's calls recorded on the ground was low, the overall threat calculation stays low.

The developer's bat survey report [Appendix 6.2 Eire Ecology 2026,Bat Survey Report, Tirawley Proposed Wind Farm] employs a risk assessment methodology that mathematically dilutes the high physical site risks (Value of 4) by multiplying them with low activity scores, actively obscuring the actual danger to protected bats.
The report further introduces contradiction by rejecting the effectiveness of buffer zones at specific turbines [Appendix 6.2 Bat Survey Report, Tirawley Proposed Wind Farm] while relying on those same, supposedly unproven measures for mitigation across the rest of the site. Documentation indicates this approach downplays the significant collision threat to Leisler's bats, which, as high-flying, open-air foragers, face disproportionately high danger within the rotor swept zone
Appendix 6.2 Bat Survey Report, Tirawley Proposed Wind Farm

Appendix 4

Some new observations wind turbines being attractive regardless of buffer zones

The unpredictability of animals versus mitigation/ control proposals, you may clear fell 50-100 m (85m is close to the bare minimum which is proposed by Eire Ecology) around turbines, but bats and birds may very well still fly straight through the landscape after prey. They may swarm and go through various impulsive aggressive and mating behaviours, the conclusions of the report are largely predictions not facts. Scientific Peer reviewed studies on the impact of wind farms on insects also have increasingly come online, which have scientifically proven that that turbines in themselves are attractive to flying insects and therefore to bats particularly- but not exclusively-the high flying species thriving within the proposed wind farm site.

Bats may utilise the turbines to call to mates…..

New research -male Common Noctule and Nathusius Pipistrelle sing inside the rotor sweep of turbines to attract female mates.
This is very relevant to the proposed Tirawley Wind Farm. While Leisler bats are extremely rare in Germany and are generally only found -when dead -at turbines, the **Common Noctule bat which is a rare bat to find in Ireland and naturally was not identified in Tirawley, is a close cousin of our Leisler Bats. Leisler Bats are sometimes referred to in historical contexts as Lesser Noctule.**

Emerging ecological research in peer reviewed papers, shows that both common noctules and Leisler's bats can actually be **attracted to wind turbines**. Scientists hypothesise that because these bats naturally seek out the tallest structures in a flat landscape (like ancient trees) for mating or roosting, they may misidentify a standing wind turbine as a prominent landscape feature to investigate. Additionally, the heat emitted by turbine nacelles can attract swarms of insects, inadvertently turning the rotor zone into an active feeding ground. [1, 2, 3, 4, 5]

There was a registration of Nathusius Pipistrelle Bat in the proposed Tirawley Wind Farm, also recognised as a high collision risk species, was identified during the initial baseline surveys in areas that have since been removed from the current proposed site boundaries. We can only hope they do not decide to migrate inwards again.

A brief synopsis of the short article attached (link at end.)

Additionally the German researchers in the short article attached, have detected that male bats sing in the rotor- swept zone of turbines. The researchers detected bat song at all wind turbine study sites and through the entire study period, indicating that this is not a local phenomenon or a one off.
Remarkably, songs of the Common Noctule and Nathusius Pipistrelle were recorded most frequently and these are the two species which collide most often with turbines in Germany- a clear behavioural link to the known fatality patterns.
" From a study by our colleagues in the north west German Coastal region. We know that during the mating season more female than male, Nathusius' Pipistrelles are found dead beneath wind turbines," says Martina Nagy, the studies lead author. "'Our results offer a coherent possible explanation for the high proportion of females among the fatalities."

Male bats sing in the rotor-swept zone of wind turbines, potentially raising collision risk

https://phys.org/news/2026-03-male-rotor-swept-zone-turbines.html

Clear felled areas attract significant rises in bat activity....
This article is very pertinent:-

"An Updated Review of Hypotheses Regarding Bat Attraction to Wind Turbines"

https://pmc.ncbi.nlm.nih.gov/articles/PMC8833423/

Synopsis

Patterns of bat activity and mortalities at wind energy facilities suggest that bats are attracted to wind turbines based on bat behavioural responses to wind turbines. For example, current monitoring efforts suggest that bat activity increases post-wind turbine construction, with bats making multiple passes near wind turbines. We separated the attraction hypothesis into five previously proposed explanations of bat interactions at or near wind turbines, including attraction based on noise, roost sites, foraging and water, mating behaviour, and lights, and one new hypothesis regarding olfaction, and provide a state of the knowledge in 2022. Our review indicates that future research should prioritise attraction based on social behaviour's, such as mating and scent-marking, as this aspect of the attraction hypothesis has many postulates and remains the most unclear. Relatively more data regarding attraction to wind turbines based on

lighting and noise emission exist, and these data indicate that these are unlikely attractants. Analysing attraction at the species-level should be prioritised because of differences in foraging, flight, and social behaviour among bat species. Lastly, research assessing bat attraction at various scales, such as the turbine or facility scale, is lacking, which could provide important insights for both wind turbine siting decisions and bat mortality minimisation strategies. Identifying the causes of bat interactions with wind turbines is critical for developing effective impact minimisation strategies.

Key Conclusions

- **Attraction is evident: Bat activity increases post-construction.**
- Noise is unlikely: Sound emissions do not heavily attract bats.
- Light is unlikely: Lighting does not seem to drive attraction.
- Social factors lead: Research should prioritise mating and scent-marking.
- **Species analysis needed: Different species exhibit distinct behaviour's.**
- Scale data missing: Studies lack turbine versus facility-scale comparisons. [1, 2, 3]