

Objection to Strategic Infrastructure Development Application: Tirawley Wind Farm (Your Ref: PAX16.323778)

To: The Planning Department, Mayo County Council

Dear Sir or Madam,

I wish to lodge a formal objection to the proposed Tirawley Wind Farm development. This objection is based on environmental, cultural, archaeological, hydrological, and social grounds, in accordance with the Environmental Impact Assessment requirements (EPA, 2022) and national planning law (European Communities (Environmental Impact Assessment) Regulations, 1999).

The proposed site lies within an area of high environmental sensitivity, containing peatlands, wetlands, and habitats for protected species, as identified in the Guidelines for Ecological Impact Assessment (CIEEM, 2024). Construction of turbines, substations, and associated infrastructure poses a significant risk to peat stability, biodiversity, and watercourses — concerns demonstrated in the Derrybrien landslide case (Wikipedia, 2003).

Ecological and Wildlife Impacts

There are no 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).

Despite the importance of the location for bats, the applicant's assessment was limited to "200 m from works area; Up to 6 km for bat roost desk review" (Ch. 6, pg. 8). This is a fatally flawed baseline that conflicts with current best practice. As noted in the 2025 C.I.E.E.M. Bat Mitigation Guidelines (CIEEM, 2025), such limited assessments fail to consider the full foraging ranges and sensitivity of protected bat species.

The effects on other red-listed mammals — such as badger, deer, rabbit, hare, hedgehog, otter, and shrew — are summarily dismissed by the applicant as "not significant", apparently based on limited or absent surveys. Anecdotal evidence and national reports all attest to the prevalence of these species in the proposed location (NPWS, 2020; Lysaght & Marnell, 2019). The application therefore fails to comply with the ecological standards required under Irish and EU law.

Cultural and Archaeological Heritage

As is apparent from the documentation, Mayo County Council raised the impact on Céide Fields and its setting in the 2023 pre-planning meeting (Tirawley-WF-Mayo Pre-Planning Notes, 18 August 2023), as a key reason why such development could not be supported (Mayo County Council, 2023).

To allow industrial-scale construction and development at this location without any proper archaeological assessment would risk destroying artefacts of global significance. The current application contravenes multiple planning requirements that mandate the full identification, protection, and assessment of archaeological and architectural heritage and their settings (Heritage Council, 2021).

The project area lies adjacent to the Céide Fields and the wider Neolithic landscape, whose value has been internationally recognised for its archaeological and heritage significance. The industrialisation of this landscape conflicts with the principles of sustainable development set out in the National Planning Framework and the Heritage Council's recommendations for wind farm siting (Heritage Council, 2021; NPF, 2025).

Landscape, Tourism, and Planning Conflict

Proposed development at this location, situated on the Wild Atlantic Way (WAW), would be in conflict with several aims and objectives identified in the National Planning Framework (2025). The framework notes the importance of maximising “the quality and integrity of the visitor experience and the added benefit in economic terms, especially for rural and local communities” (NPF, 2025).

What the Board needs to understand is that this proposal is different to others because it is in one of the most scenic beach and marsh areas in Ireland, with particularly significant archaeological and historical sites related to our national Saint, our largest rebellion's landing site, and a remarkable network of mapped but unexplored Neolithic and early Christian sites. There are over 80 national monuments in the area.

Large amounts of State money have been invested in the Wild Atlantic Way, Downpatrick Head, and the Ballinglen Foundation, attracting artists like myself to the area. Indeed, a local councillor recently celebrated the investment of €200,000 on a scenic walk in Kilcummin (Mayo County Council, 2023).

The proposal is in a place that is special and of national and international significance, proximate to the renowned Downpatrick Head. Its degradation would be an act of national self-sabotage and vandalism.

Planning, Process, and Legal Context

Furthermore, the cumulative visual, ecological, and hydrological impacts have not been adequately assessed. As per the EPA's EIA Guidelines (2022) and SEAI's Community Planning Toolkit (SEAI, 2020), the assessment must address full lifecycle impacts, including the extensive quantities of concrete, road construction, and habitat disruption inherent in wind farm development.

Local community consultation has also been insufficient. The Office of the Planning Regulator (2018) requires meaningful engagement and transparency in the planning process. The lack of consultation contravenes principles affirmed in *Grace v An Bord Pleanála* [2017] IESC 10.

Given these deficiencies, I respectfully submit that permission should be refused or that a new Environmental Impact Assessment be required, with full hydrological, ecological, and archaeological studies carried out by independent experts.

Sincerely,

Chris Doris

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Fee enclosed.

References & Sources

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2. Office of the Planning Regulator. Environmental Impact Assessment – The Planning Process. (2018).
3. European Communities (Environmental Impact Assessment) (Amendment) Regulations, 1999 (S.I. No. 93/1999).
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8. Chartered Institute of Ecology and Environmental Management (CIEEM). Bat Mitigation Guidelines. (2025).
9. National Parks and Wildlife Service (NPWS). Status of EU Protected Habitats and Species in Ireland. (2020).
10. Lysaght, L. & Marnell, F. (Eds). Atlas of Mammals in Ireland 2010–2015. National Biodiversity Data Centre, Waterford. (2019).
11. Mayo County Council. Tirawley-WF-Mayo Pre-Planning Notes (18 August 2023).
12. National Planning Framework (NPF). Project Ireland 2040. Updated (2025).
13. Wikipedia. 2003 Derrybrien landslide.
14. Irish Supreme Court. Grace & anor v An Bord Pleanála & ors [2017] IESC 10.