

1. The Environmental Impact Assessment Report (EIAR) presents a range of mitigation measures for bats, including turbine buffer zones, retention of treelines, lighting controls, and operational curtailment. While these measures broadly reflect a basic awareness of best practice, their adequacy and effectiveness are open to question. The proposed 50 m vegetation-free buffer between turbine blade tips and nearby trees represents the lower end of current guidance (BCT 2019; Eurobats 2014). In heterogeneous, semi-wooded landscapes typical of North Mayo, such a distance may be insufficient to prevent foraging and commuting activity within the rotor-swept zone, particularly for *Myotis* and *Pipistrellus* species that regularly navigate along treelines and hedgerows. Similarly, while retention and compensatory planting of vegetation is positive in principle, the EIAR provides no assurance that replacement planting will be located outside high-risk turbine envelopes, creating the potential for newly established habitat to attract bats closer to operational turbines.

The operational measures—feathering of blades at low wind speeds, increased cut-in thresholds, and the planned transition to smart curtailment from the second operational year—are possibly helpful. However, the EIAR fails to specify critical operational parameters, including acoustic monitoring protocols, seasonal and temperature thresholds, and curtailment triggers. Delaying smart curtailment until year two is particularly concerning, as collision mortality often peaks during the initial period of turbine operation (Arnett et al., 2016; BCT 2019). Furthermore, the absence of a robust post-construction monitoring programme, clearly defined mortality thresholds, and adaptive management commitments undermines confidence that these measures will deliver measurable reductions in bat fatalities. Without quantified performance standards, enforceable monitoring obligations, and site-specific justification, the mitigation package cannot be considered sufficient to ensure compliance with national or European biodiversity legislation or to prevent significant adverse effects on local bat populations.

In conclusion, the mitigation strategy as currently presented lacks the specificity, enforceability, and evidence base necessary to demonstrate effectiveness. The planning authority should require a detailed Bat Mitigation and Monitoring Plan, including: (i) clear, site-specific curtailment thresholds based on wind speed, temperature, and season; (ii) real-time acoustic monitoring at representative turbines from the start of operation; (iii) a minimum three-year post-construction monitoring programme with annual reporting; and (iv) adaptive management triggers mandating curtailment or additional mitigation if bat fatalities exceed agreed thresholds. Compensatory planting schemes must also be located outside turbine buffer zones to prevent attraction effects. Without these additional safeguards, the proposed mitigation measures cannot be considered sufficient to avoid significant residual impacts on local bat populations.

2. We suggest that the Board review its and Mayo County Council's reasons for refusing planning permission for a previous wind farm development in the area. The ACP reference is PL 16.239901 and Mayo County Council reference is P11/409. The reasons for this previous refusal are even more valid for this application as the turbines proposed are more numerous, bigger in dimension including height and are thus more visually intrusive.

3. As of October 2025, there are multiple operational, approved, and pending wind farm developments along or near the Sligo-to-Achill coastal zone under the jurisdiction of Sligo County Council, Mayo County Council, or An Bord Pleanála. When all relevant projects are included, the total turbine corridor stretches roughly 100–105 km along the coastline, from Dromore West (Co. Sligo) to Achill Island (Co. Mayo). With the addition of Tirawley, Keerglen, and the Bunnyconnellan/Carrowleagh corridor, the Sligo-Mayo coastline now represents one of Ireland's densest renewable energy development zones, reflecting coordinated submissions across Mayo County Council, Sligo County Council, and An Bord Pleanála. The combined proposed and operational infrastructure effectively links Sligo Bay to Achill Sound over a nearly continuous 95–105 km renewable corridor. There has been no Environmental Impact Assessment done on the cumulative impact of the totality of these developments which represent one of the highest densities of Windfarms in Europe. Until this is done no more Windfarms should be granted planning permission. Failure to do so is contrary to EU planning law and the Aarhus Convention.

4. Further to the general point 3 above a significant portion of the coastline between Sligo and Achill overlaps with major migratory routes and protected habitats for both birds and bats. These ecological corridors have been documented in national ornithological and ecological assessments used in recent Environmental Impact Assessments (EIARs) for wind farm projects in the region.

Bird Migration Routes and Key Habitats

The northwest coast of Ireland, particularly between Killala Bay, Broadhaven Bay, and the Mullet Peninsula, is one of the country's most important stretches for migratory seabirds, waders, and wildfowl. These coastal and island zones are designated EU Special Protection Areas (SPAs) under the Birds Directive (2009/147/EC).

Key bird migration features include:

- ☐ Spring and autumn migrations (March–May; August–October) bring large movements of shearwaters, petrels, skuas, gannets, terns, and auks, pushed close to the shore by prevailing northwest winds.
- ☐ Overwintering routes for Barnacle Geese, Greenland White-fronted Geese, and Whooper Swans, which travel between the Inishkea Islands, Termoncarragh Lake, Broadhaven Bay, and Killala Bay.
- ☐ Breeding seabird cliffs (Annagh Head, Blacksod Point, Erris Head) hosting Kittiwakes, Guillemots, Fulmars, and Razorbills.
- ☐ The Killala Bay–Lacken–Inishcrone complex (at the Sligo–Mayo border) supports large intertidal populations of oystercatchers, plovers, gulls, and terns, making it part of the migratory flyway network between Donegal Bay and Clew Bay.
- ☐ According to Ireland's ENR 5.6 Bird Migration Notice, large flocks of swans and geese migrate along this exact corridor during October–November and February–April each year.

In the Tirawley Wind Farm EIAR (2025), detailed vantagepoint monitoring confirmed regular activity of Whooper Swan, Greenland White-fronted Goose, Lapwing, and Golden Plover across Ballycastle to Killala during migration seasons.

Bat Migration and Habitat Use

While Ireland's bat population is primarily resident, several species—including Leisler's Bat, Nathusius' Pipistrelle, and Common Pipistrelle—use the northwestern coastal plain for longdistance dispersal and seasonal feeding. Typical patterns include:

- ☐ Riparian corridors, such as the Moy River, Garavogue River, and associated wetlands, providing major foraging and commuting routes.
- ☐ Roosting sites identified within derelict stone buildings and forest edges, especially around Killala, Ballina, Crossmolina, and parts of Sligo Town, where six of Ireland's nine bat species have been recorded.
- ☐ Nathusius' Pipistrelle, a partial migrant, is known to move seasonally along the Atlantic coast, with flight paths overlapping proposed wind energy zones.

Recent environmental monitoring programs for operational and proposed wind farms include collision risk surveys and acoustic monitoring to track both migratory and resident species, ensuring compliance with EU Habitats and Birds Directives. **(The Board needs to review that these programs are actually in place and examine the results occurring as part of its assessment of this proposed development.)**

Overall Ecological Sensitivity

Approximately 60–70 km (or twothirds) of the Sligo–Achill coastline zone falls within or adjacent to internationally protected migratory corridors for birds and/or holds recorded bat foraging or roosting activity.

Most turbines currently proposed or active in the region are required to maintain:

- ☐ Minimum 1–2 km buffer zones from designated SPAs.
- ☐ Seasonal shutdown or curtailment measures during peak migration months (October–April).
- ☐ Continuous postconstruction bird and bat mortality monitoring. **(The Board needs to review that this monitoring is actually in place in all operational Windfarms in this area and examine the results occurring as part of its assessment of this proposed development.)**

This makes the Sligo–Achill corridor one of the most ornithologically monitored coastal regions in Ireland, situated directly along the North Atlantic migratory flyway and critical for numerous species reliant on western Europe's coastal habitats.

The Mayo and Sligo coasts are critical components of the East Atlantic Flyway, one of the world's most important migratory bird corridors. Each spring and autumn, millions of seabirds, waders, geese, and passerines transit this region. Both counties support a blend of breeding, passage, and overwintering species using headlands, estuaries, and offshore islands.

Major Migratory Waterfowl and Waders

These species use the extensive wetlands and tidal areas between Killala Bay, Broadhaven Bay, and Sligo Bay:

- Whooper Swan (*Cygnus cygnus*) – a winter migrant from Iceland, with key populations in Lough Gara (Sligo) and lowland Mayo wetlands.
- Greenland Whitefronted Goose (*Anser albifrons flavirostris*) – overwinters around Killala Bay, Termoncarragh Lake, and the Mullet Peninsula.
- Barnacle Goose (*Branta leucopsis*) – shelters on the Inishkea Islands and western Mayo coast during winter.
- Greylag Goose, Wigeon, and Teal – common winter visitors in estuarine zones.
- Golden Plover, Lapwing, and Curlew Sandpiper – wide-ranging passage migrants on coastal flats and machair grasslands.
- Redshank, Knot, and Bartailed Godwit – regular migrants feeding in Killala Bay and Sligo estuary systems.

Key Seabird Migrants

Mayo's western headlands—Downpatrick Head, Kilcummin Head, Annagh Head, and Erris Head—are renowned for seabird movement during the autumn passage (August–October), when strong northwest winds push migrants close to land :

- Northern Gannet (*Morus bassanus*) – highly visible along the Mayo coast; breeding adults from nearby colonies use offshore foraging areas before migrating to the Atlantic and West Africa.
- Manx Shearwater, Sooty Shearwater, and Storm Petrel – seen passing during August and September migrations from southern breeding colonies.
- Great and Arctic Skua, Common and Arctic Tern, Guillemot, Razorbill, and Fulmar – common migratory species seen along the Mullet and Sligo coasts.
- Slavonian Grebe and Great Northern Diver – winter offshore species frequenting Blacksod Bay and Sligo Bay.

Land and Wetland Migrants

Several small migratory birds use inland and nearcoastal habitats each spring and autumn:

- Swallow, House Martin, and Swift – return from Africa between April and May.
- Chiffchaff, Willow Warbler, Whitethroat, Grasshopper Warbler, and Cuckoo – arrive from Mediterranean or African wintering grounds.
- Corncrake (*Crex crex*) – a globally vulnerable migratory breeder, thriving mainly on the Mullet Peninsula and Roonagh Quay near Louisburgh.
- Waxwing and Fieldfare – irregular winter migrants from northern Europe during cold snaps.

Ecological Significance

Both coasts serve as critical stopover, breeding, and overwintering zones for Atlantic migratory species. Their combination of estuaries, tidal flats, machair, and offshore islands supports exceptional species diversity—mirroring patterns seen at Ireland’s leading bird sites. This makes the Mayo–Sligo coastline indispensable for flyway conservation and for environmental impact assessments related to wind energy or coastal development.

Many of the migratory bird species using the Mayo and Sligo coasts are officially recognized as protected under the EU Birds Directive (2009/147/EC), the Irish Wildlife Acts (1976–2018), and on the Birds of Conservation Concern in Ireland (BoCCI 4: 2020–2026) Red and Amber lists. These designations highlight species that are endangered, vulnerable, or of international importance.

Conservation Summary

More than 15 highpriority species using the Sligo–Mayo coast are included on at least one protected list, with Curlew, Lapwing, Corncrake, Razorbill, and Greenland Whitefronted Goose facing the greatest conservation challenge. These species depend on the tidal flats, offshore islands, and coastal wetlands that coincide with much of the proposed and existing windfarm corridor, reinforcing the need for rigorous ornithological impact mitigation.

Topic 3 – cumulative effect of all these windfarms and EU conservation laws

Current evidence from ecological assessments and legal guidance shows that the cumulative impact of multiple wind farm projects along the Mayo–Sligo coastline could bring certain bird species—especially already declining or Annex II listed migratory birds—close to or beyond acceptable thresholds under European conservation law if not properly mitigated.

Legal and Scientific Position

Under Article 6 of the EU Habitats Directive (92/43/EEC) and Article 4 of the EU Birds Directive (2009/147/EC), Ireland and other Member States must ensure that

projects individually or in combination do not adversely affect the integrity of Special Protection Areas (SPAs) or the favourable conservation status of protected species.

As this application does not examine or comment on the cumulative (and / or combined) impact of the totality of the Windfarms in Mayo \ Sligo on birds and bats including the impact as they traverse the important migratory corridors in this area the Board must reject this application. Alternatively it must undertake a study and assessment itself to ensure that this project individually or in combination with other similar developments do not adversely affect the integrity of Special Protection Areas or the favourable conservation of protected species. It should not be sufficient to give an opinion based on other areas it must be underpinned by scientific fact based on a study of this particular area.

European Court of Justice rulings (notably ECJ C418/04) have clarified that this duty extends outside SPA boundaries when migratory and wetland species rely on surrounding habitats.

Relevant Irish case law and Environmental Impact Assessment Reports (EIARs) in west Mayo and Sligo now routinely apply “incombination assessments” within at least a 15 km radius of each project to capture overlapping effects on birds. We do not consider 15km to be sufficient.

Key Scientific Concerns

Environmental data compiled by BirdWatch Ireland, An Bord Pleanála, and BioSphere Environmental Services identify the following mechanisms of risk :

- ☐ Collision mortality – particularly for large, lowmaneuverability species (Whooper Swan, Greenland Whitefronted Goose, Curlew).
- ☐ Displacement and barrier effects – seabirds and waders avoiding turbine arrays, reducing feeding range.
- ☐ Habitat fragmentation – alteration of bogs and coastal wetlands used as foraging or resting areas.
- ☐ Flyway disruption – cumulative “barriers” along migration corridors from Donegal Bay through Broadhaven and Killala Bay to Clew Bay.

The 2025 Tirawley Wind Farm Natura Impact Statement concluded that individual impacts may be mitigable, but combined regional development pressure, especially across the northMayo–Sligo corridor, could be significant for Annex I species such as Curlew, Lapwing, Golden Plover, Kittiwake, and Whooper Swan. BirdWatch Ireland’s 2024 policy briefing further warns that without stronger cumulative oversight, Ireland could breach its obligations under the Birds Directive for migratory and coastal species. The Board must satisfy themselves that Ireland is not currently breaching its obligations in this area before it grants planning permission to any further windfarms in this area including this one.

Compliance Thresholds and Current Risk

Conservation Criterion	Directive Standard	Current Assessment along Sligo–Mayo Coast	Risk Level
SPA integrity	No adverse effects on site structure/function	Potentially compromised where projects lie within 10 km of coastal SPAs (Killala Bay / Broadhaven Bay)	High
Annex I species protection	Avoid significant disturbances inside and outside SPAs	Frequent Whooper Swan, Goose, Curlew flights intersect consented wind corridors	High
Cumulative impact (“in combination”)	Must be assessed for all overlapping projects	Increasing number of overlapping EIA zones (Kingsmountain → Achill)	High
Alternative solutions	Required under Art. 6(4) if significant effects found	Often reliant on curtailment or timing; limited spatial alternatives But no proof that this works as dependent on Developer policing himself when not in his financial interest.	

Conclusion

The expanding network of coastal and inland wind developments between Sligo Bay and Achill Island creates overlapping environmental pressures on Annex I-listed migratory and wetland birds.

While each project may include mitigation (e.g., turbine curtailment during migration months), the cumulative total—spanning more than 100 km of coastline—now approaches an unacceptable ecological risk under the EU Birds and Habitats Directives unless coordinated regional planning, adaptive management, and enhanced monitoring are enforced.

The Board cannot rely on localised individual mitigation which are self- policed by developers to protect birds and bats from a cumulative and regionalised ecological risk to their habitat and migratory journeys. In the absence of knowledge about the risk it must reject this application.

4. Recently in Mountpellier, France EDF Renouvelables and 9 subsidiaries were found guilty of causing the deaths of 160 protected birds and bats at their Aumelas including the lesser kestrel (*Falco Naumanni*). The court imposed €500,000 in fines, ordered a four month shut down of the turbines during breeding season, and imposed a six month suspended prison sentence on a former CEO of the business. This case proves that wind turbines and the people responsible for their operation kill birds and bats including protected species. The Board should examine this case in detail and the planning process that proceeded its construction

including the EIAR and EIA and any measures promised by the developer and \ or planning conditions imposed by planning authority to ensure protected species were protected and assess if this proposal offers any more protections to endangered species. If this proposal does not it should be rejected as protections in this French Windfarm were insufficient.

7. The photomontages are an exercise of deceit. We cannot believe that they comply with any appropriate standards. If they do these standards in turn are standards of deceit and should not be accepted. There are numerous examples of constructed Windfarms where the Board can get a sense of the difference between original photomontages and actual reality of what was constructed. The Board should conduct its own investigation into the standards of photomontages used in historic applications and resulting reality following construction so that it can properly assess visual impact of this development. If the Board continues to accept photomontages of the standard included in this application it becomes complicit in deceiving the public.

In addition, the developer should not be able to choose the locations for photomontages as this gives rise to further deceit. They invariably do not choose places where impact is greatest. Some of the locations chosen are ridiculous including behind bushes and in the middle of a graveyard obscured by buildings. The Board should reject the applicants photomontages and conduct its own investigation and assessment using locations chosen in consultation with the public.

A further deceit is that the sky is invariably shown to be grey to further hide visual impact of turbines. While some days are grey all are not and maximum impact needs to be shown in montages.

Some particular issues

- Several of the photos used in the montages were taken standing in the bushes to obscure the view of turbines - Photo Montage Book 3 pages 29, 31, 41

8. We call into question the accuracy and validity the list of landowners supplied by the applicant. We do not believe that it is a full list of all the land and property owners involved in this development, neither do we believe that all letters of consent are legally valid. No details of the property held by each individual on supplied list have been provided to enable detailed auditing of property ownership and the legality of consent letters. It is incumbent on An Coimisiun Pleanála (ACP) to independently audit and confirm the completeness and accuracy of the information supplied and satisfy itself that supplied listing is complete and accurate and letters of consent are legally valid. It should not be sufficient to just ask the applicant to confirm otherwise what is the point of ACP review if it just accepts everything the applicants says as true without independently checking and auditing the information supplied. In the same vein if it accepts statements of the applicant as being true without independently checking it should also all observations as being true otherwise this is blatant discrimination.

9. The Applicant states that “There is an abandoned quarry located within the site, which closed circa 2006.” We question the accuracy of this statement as we believe that it may have been used more recently possibly as a rubbish dump. ACP

should independently establish in conjunction with Mayo County Council if the quarry has been in use more recently than 2006 and for what purposes. If dumping has occurred in the quarry, it should be established if it has occurred legally and what if any dangerous materials have been dumped in the quarry including but not limited to asbestos.

10. The applicant has stated “yes” to the question on the Application Form “Are you aware of any valid planning applications previously made in respect of this land \ structure. He further has supplied a list of developments that have been granted planning permission on this land ranging from houses, cattle sheds to windfarms \ data centres \ hydrogen plant and energy centre \ electricity generation station \ bulk storage silos. This is completely wrong as all these permissions relate to areas are miles away from the land in question. As the application form is obviously wrong planning permission should be denied. Given that the applicant cannot even provide a correct application form it calls into question the accuracy of all the application documentation. It is possible that the applicant is trying to give the impression that the lands in questions are the subject of significant development including windfarms so that ACP will be more inclined to grant planning permission. ACP should not allow itself to be swayed or influenced by false information within application.
11. We would suggest that the developer is incorrect in his assessments at question 15 of application form.
 - ACP should make itself aware of how close work will occur to curtilage of Lacken Gazebo which is a very delicate structure given its age and method of construction.
 - ACP should make itself aware of how the development takes place on a site which is part of the extended Ceide Fields neolithic farming area and which may in the future become a World Heritage site.
 - Given the proposed presence of a battery storage site and presence of related chemicals to operate and also the presence of lubricant oils and other chemicals within individual Turbines we contend that an EPA licence is required for pollution prevention and control.
 - We consider that major accident regulations apply to this development given the presence of dangerous chemicals in both battery site and turbines. In addition, height of turbines adds to major accident risk given that no capability on site or in the country to fight a fire at hub height. In addition, presence of a Windfarm in a residential area also heightens the risk of a fire spreading to residential buildings.
12. The applicant did not advertise the development in a local paper as required. The only local paper in the area in the Western People. The Mayo News is a West Mayo paper centred in Westport and is not generally available or read in the Lacken Area. If ACP accepts this shortcoming it will once again demonstrate its continued discrimination

against local communities and how they are treated by Windfarm Developers in terms of consultation prior to application and keeping them informed about various stages of development.

13. I as part of the community of North Mayo contend that no Public Consultation Occurred and the Developer is incorrect in stating that it did within application Form. ACP cannot just accept word of developer that it occurred over communities' word that it did not. To do so would represent blatant discrimination on the part of ACP.
14. The bridge on the access route at junction of R315 and L51654 is structurally unsound. The issue is the wall on the west side of the bridge does not tie into the bank on the southern end. When the bridge walls were repaired a few years ago the west wall was never completed properly and is currently in danger of falling into the river as job was not done properly. ACP needs to carry out an independent assessment of this bridge as Mayo CC cannot be relied upon to do so. Mayo CC were notified of this issue but did nothing about it.
15. The issue of infrasound and its danger to human and animal health has not been properly assessed in this application and thus ACP must carry out its own assessment. We refer you to the recent study by Delft University of Technology in The Netherlands into infrasound which has led to a crucial institutional recognition; long term exposure to low frequency noise causes serious health complaints. ACP cannot allow development like this to harm people's health.
16. The developer has not taken account of the position of the tip of blades when positioned and spinning in direction of houses. This means that wind turbines are actually nearer than developer has stated. This has consequences for distance regulations and calls into question accuracy of sound assessments made by developer.
17. This development is illegal as the related energy infrastructure to bring the power out namely the underground line being built by Eirgrid from Ballina to Ballaghaderreen was granted planning permission separately without including all related windfarms. This is what is commonly known as project splitting and is illegal under planning regulations.
18. The backup power generation required to place the power generation from this development when no wind has also not been included in the assessment for this development.
19. The option of Nuclear energy has not been considered as an alternative to this development. This is an option as nuclear energy currently will shortly be imported from France. Even though a nuclear power station is not legally possible in Ireland building one in France and importing through interconnector is a possible alternative.

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