



An Coimisiún Pleanála,

64 Marlborough Street, Dublin 1, D01 V902

24 June, 2026

Submission on a Strategic Infrastructure Planning Application

Re: Proposed Tirawley Wind Farm Strategic Infrastructure Development

Applicant: Constant Energy Limited

Development: 16 wind turbines, permanent 110kV substation, 110kV underground cable and grid connection, and associated ancillary works in the townlands identified in the application, County Mayo.

Case reference: PAX16.324258

Date: 24 June 2026

Dear Sir or Madam;

Friends of the Irish Environment [FIE] do not object to the development of wind energy in alignment with the objectives set out in Ireland's national energy and climate action plans. Our submission only addresses concerns specific to the proposed location, scale, and environmental impacts of the Tirawley Wind Farm, and should not be taken as a general opposition to wind power as an element of national policy.

However, FIE are concerned with the development and location of these proposed 16 wind turbines on the North Mayo Coast and believe the environmental impacts have not been fully assessed. The Wind Farm Site has a total area of 119.12 ha. comprised of peat bog, coniferous forestry, transitional woodland scrub and agricultural pastures.

According to the April 2026 Planning Statement, "A planning application was previously submitted on this site under ACP-323778-25 for 16 turbines, however, as the EIAR had been prepared for 18 turbines, the planning application did not meet the completeness check requirements and returned as incomplete."

The Planning Statement concludes that "The EIAR concluded that the Project will have no significant effects on population and human health, biodiversity, aquatic ecology, soils and

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geology, hydrology and hydrogeology, noise and vibration, landscape and visuals, air quality and climate, archaeology and cultural heritage, material assets and traffic and Transport.”

However, the EIA is undermined by five factors:

- 1. It defines the impact on residents by relying on outdated and inadequate decibel-based Irish Guidelines which the Irish Courts have recently rejected when considering the impact on resident, instead using the UK Guidelines - highlighting a current gap in Irish environmental and planning practice.**
- 2. It does not fully identify and assess the loss of carbon currently stored in the peat soils of the site**
- 3. It relies on mitigation to eliminate the loss of protected avian life**
- 4. It will allow damage to the scenic amenities which affects key views and the economies of tourism in this area**
- 5. The Developer’s statement that ‘Public consultation was generally supportive of the Proposed Development’ is not supported by media reports or local knowledge. There are currently no significant local supports found for the Tirawley Wind Farm.**

The Arguments

1. Analysis relying on inadequate and outdated decibel-based Irish Guidelines

The Environmental Impact Assessments (EIA) for Irish wind farm projects, including the current application, do not reference the UK Defra Wind Farm Noise Statutory Nuisance Complaint Methodology [1] of 2025 as these are not part of Ireland’s national regulatory framework. They rely instead on the original 2008 UK Guidelines [2].

However, in a recent High Court wind farm nuisance case [3], the Court deliberately used this revised methodology because it provides a more comprehensive and practical approach to assessing the real-world impacts of wind turbine noise. According to the Environmental Impact Assessment Report for Tirawley Wind Farm, there are 132 residential receptors (homes) within 1.17 km of any proposed turbine location that could potentially be affected by shadow flicker, noise, or other impacts. [4]

Unlike Irish planning guidelines, which focus narrowly on achieving specified decibel limits, the Defra guidance considers both quantitative sound measurements and qualitative factors—such as intrusive amplitude modulation, variability, and the effects on sleep and daily living:

The UK Department for Energy Security and New Zero explains ‘The aim of this document is to provide technical guidance to developers, planners and other stakeholders on the environmental assessment and control of operational noise from wind turbines. This document is a targeted update and replacement for the original document, ETSU-R-97 ‘The Assessment and Rating of Noise from Wind Farms’. This targeted technical update was undertaken to reflect evolutions in turbine technology and developments in wind turbine noise assessment methodologies since 1996, as well as established best practice and the latest available evidence in the field.’

The Court determined that these qualitative impacts are critical for evaluating nuisance, especially where residents experience substantial disturbance despite the operator’s compliance with national noise thresholds. By relying on the revised Defra methodology, the Court recognized the need for an impact-driven, resident-focused analysis that more accurately

reflects the complexities of wind turbine noise, highlighting a current gap in Irish environmental and planning practice.

In proceeding to make a decision that will affect at least the 132 listed residents by failing to apply the standards to address the possible nuisance as identified in our Courts' use of UK Guidelines, the application must be reassessed to ensure a robust protection from nuisance and avoid the risk of subsequent successful legal challenges.

2. Does not fully assess the loss of carbon currently stored in the peat soils of the area, including protected bogs and forestry removals.

Based on the information in the EIAR and supporting reports, most of the Tirawley Wind Farm site is mapped as peat or blanket bog by Corine and the OSI national databases, not just the 7.65 hectares rated as "Local Importance (higher value)" because of peat depth and quality at turbine bases.

The Environmental Impact Assessment for this project does not therefore fully address the loss of carbon currently stored in peat soils across the proposed wind farm area, including 40 hectares of forestry removals or its contribution to sequestration that would be lost over the lifetime of this project. Peat concerns are restricted to Annex I Bog Habitat. [5]

The EIA lacks a detailed accounting of long-term carbon release from both drainage and excavation of even shallow peat and associated forested areas given forestry sequestration is in the soil. These are recognised threats—resources recognized for their critical roles in carbon storage and ecosystem stability.

The EIAR hasn't consider the alternative of using the land for a solar energy generation; potentially this would greatly reduce both the impact of peat disturbance and drainage, and the visual impact, especially with the inclusion of mitigation actions of vegetative screening etc.

The assessment overlooks the fact that once peatlands and forests are disturbed, much of their carbon is released rapidly and restoration may not recover their full sequestration potential within the wind farm's operational life. This omission risks underestimating the real climate and biodiversity cost associated with developing on these vulnerable soils.

While the EIA models some greenhouse gas emissions from peat disturbance, it relies on the Scottish Carbon Calculator to estimate these emissions. [6] This tool has serious limitations when applied to Irish sites as its default assumptions can underestimate peat depth, drainage effects, and site-specific hydrology, thus producing an overly optimistic carbon payback period. The calculator typically does not account for the greater losses associated with more degraded or deeper Irish peat.

As a result, GHG emissions from peat disturbance—and the associated loss of biodiversity, flood control, and habitat—may remain underreported, creating a dangerous knowledge gap in planning decisions. True climate accounting for turbines on peat soils must address both these direct and methodological uncertainties to avoid locking in long-term environmental harm.

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UN Peatlands Survey

Specifically, The UN Peatlands Survey of 2023 [7] urged nations to minimise the depth of peat soil disturbed, given that it has 3 times the storage capacity of a similar area of rainforest. Ireland's use of the 50cm threshold [8] was reduced at the insistence of EU's DG Clima in the current round of CAP negotiations to 30cm. The UN is seeking a 10 cm limit which indicates that it is not just 'deep peat' or 'high bog' that sequesters substantial GHGs.

The percentage of organic matter in soils to qualify for 'peat' and its protection is currently 20% in Ireland while the UN recommends 8%. This difference added to the depth differential means a significant portion of carbon-rich soils in Ireland currently fall outside the strict national protection framework. [9]

It also entirely undermines the EIAR's categorisation of the area of bog as rated not more than 'Local Importance (higher value)' as it is 'a relatively small area (7.65 ha) of shallow bog.' Redefined to meet UN standards, the percentage of peat soils would undoubtedly look very different.

If the protection threshold was refined to include soils with at least 8.5% organic matter and a depth of just 10 cm—as recommended by recent UN, European, and scientific guidance—rather than the traditionally higher Irish threshold, the area qualifying as sensitive organic soils could extend across most, if not all, of the wind farm site. This would dramatically increase the proportion of the project's footprint considered worthy of protection and subject to additional ecological or climate policy scrutiny, rather than just the small area recognized in the present application.

The incoherence in Ireland's protection of peatlands is illustrated by the Department of Agriculture's current GAEC Pillar 2 standards which have set the depth of peat prohibited for AD Crops at 45cm on undrained land with 30% organic matter required – a long way from the best available scientific information that sets protection at 10cm and 8.5% organic matter. [9]

The balance between the value of these peatlands to sequester GHG into the future must be weighed independently against potential for GHG savings through the provision of renewable energy.

These calculations must also include the total emissions of the proposal, construction, transport, site preparation roads, and drainage. This assessment is absent from the EIA, and the Coimisiún should require clarity on this issue.

3. Relies on mitigation to eliminate the loss of protected avian life which are of limited value.

Certain mitigation measures such as clearing the ground of suitable habitat around the turbines to discourage the hen harrier have led to some wind farms reporting breeding success for hen harriers in proximity to turbines.

However, peer-reviewed studies reveal that such measures cannot fully eliminate risks. Hen harriers tend to avoid turbines, leading to a displacement effect and loss of available habitat for foraging and breeding, especially within 250–500 meters of turbines. [10], [11].

The national population of harriers has fallen by one third between 2015 and 2022, dropping to a maximum of 106 breeding pairs, the lowest recorded in the last 25 years. Survey data show a 27% contraction in breeding range and a 54% decline within Special Protection Areas (SPAs) designated for the species since 2007. [12]

The Environmental Pillar report (2023) and the Natural Research review (2017) referred to above highlight that wind farm developments can significantly reduce habitat usage by hen harriers, with field data indicating a 53% decline in foraging and breeding activity within areas disturbed by turbines.

The 2022 National Survey of breeding Hen Harrier in Ireland [NPWS Irish Wildlife Manuals 147] advises about the Nagles that ‘former hen harrier breeding areas have been planted and/or are now matured forest and largely unusable for hen harrier. Surveyors report that harrier winter roosts have declined to zero occupancy in the last three to four years and that both proposed and consented wind energy developments in the region may further reduce suitability of habitat for hen harrier.’

The Irish Environmental Pillar has highlighted Ireland’s failure to seriously protect this iconic bird: “The current draft plan and the status of the Hen Harrier and its habitats represents an unacceptable failure by the State, to deliver on both Irish and EU law in respect of the species and its habitats.”

4. Will allow damage to the scenic amenities which is undeniable, irreversible, and affects the economies of tourism

Allowing wind farm development at the proposed Tirawley site will result in undeniable and irreversible damage to scenic amenities, directly affecting key views, the landscape character, and the economies of tourism in North Mayo, dominating views from local sites in the area stretching from Lacken to as far as the Enniscrone coast. This “high quality tourism product” encompasses the Wild Atlantic Way, coastal paths, routes and the sensitive archaeological and heritage landscape associated with the Céide Fields complex.

The EIAR acknowledges that turbine structures will intrude upon these highly sensitive vistas. The scenic areas of West Mayo, including Westport, Achill and Louisburgh, were designated as unsuitable for windfarms. Areas of North Mayo were not categorised as such as this development will make any economic revival unlikely.

In some instances, the assessment underestimates the scale and permanence of visual intrusion by categorizing certain impacts as “moderate” or “not significant.”

Independent expert review and Mayo County Council’s own planners have described the scale of the proposed turbines—up to 180 meters tall—as “dominant” in the open, protected landscape, warning that they will transform panoramic views and diminish the area’s natural and cultural tourism appeal. [13]

The preapplication meeting with the Board demonstrated at the outset [6 November, 2023] that the issue of visual impact is admitted by the developer: “Since the previous meeting held on August 2023 the number of turbines has been reduced to 21 [from 25] with 4 larger turbines

being removed. The removal of the 4 larger turbines has been undertaken with the aim of reducing the visual impact from Downpatrick Head and the Ceide Fields.”

The reduction was triggered, according to the developer, after a 2023 pre-planning meeting with the local authority raised these concerns. The relevant entry in the minutes of that pre planning was “The larger turbines are located in Landscape Policy Area 1 where it is unlikely that the visual impact of windfarms can be ameliorated.”

The Board’s comment was: “While noting that some turbines had been omitted from previous iterations of the proposed layout, the Board’s representatives advised that landscape and visual impact would remain a primary consideration in the assessment of any future application”.

The local authority conclusion of the 2023 meeting was “MCC would not be in favour of such a proposal at this location.” The subsequent meeting on 9 March 2026 confirmed this position, in spite of new proposals: “In the context of the visual sensitivity of the area and the coastal landscapes MCC does not consider the proposal suitable at this location”.

Critically, claims in the EIA that landscape impacts are mitigable by planting, layout adjustments, or localized screening ignore the open topography and wide visibility of turbines, which makes mitigation ineffective from most key viewpoints. The larger turbines are located in Landscape Policy Area 1 where it is unlikely that the visual impact of windfarms can be ameliorated.

The EIS further exaggerates the temporary nature of construction impacts and underrepresents the cumulative visual effects by assessing turbines individually rather than as a group, despite evidence that clustered projects have compounding adverse effects on visitor perceptions and tourism outcomes. Local residents and tourism stakeholders have consistently argued that such damage cannot be reversed.

The Developers statement ‘Public consultation was generally supportive of the Proposed Development’ is not supported by media reports or local knowledge.

There are currently no significant local supports found for the Tirawley Wind Farm; most public and official sentiment in North Mayo leans toward opposition based on landscape, heritage, and community concerns. Lacken/Ballycastle Landscape Protection Group have organized meetings and campaigns. Councillors in Mayo have unanimously supported a report presented to them by Mayo County Council’s planning department recommending against granting planning permission for the proposed Tirawley Wind Farm. Less scrupulous suggestions on social media have raised the issue of introducing Japanese Knotweed to render the site unsuitable.

The larger turbines are located in Landscape Policy Area 1 where it is unlikely that the visual impact of windfarms can be ameliorated.

Conclusion

On all these grounds, we urge An Coimisiún Pleanála to seek Further Information about the EIAR’s methodology to ensure that the proposed development meets the standards of sustainability.

Yours, etc.,

Tony Lowes on behalf of Friends of the Irish Environment

NOTES

[1] Department for Environment, Food & Rural Affairs (Defra), "Assessment and Rating of Wind Turbine Noise: Technical Guidance," UK Government, July 2025. Wind Farm Noise Statutory Nuisance Complaint Methodology 2011; UK Department for Environment, Food and Rural Affairs (the 'Defra guidance').

[2] Nayak, D.R., Miller, D., Nolan, A., Smith, P., Smith, J. (2008). "Calculating carbon savings from wind farms on Scottish peat lands: A new approach." Scottish Government, Edinburgh.

[3] Webster & Anor v Meenacloghspar (Wind) Limited IEHC 136, High Court of Ireland, judgment delivered on 8 March 2024 [See also: Byrne & Moorhead v ABO Energy Limited & Ors, 2025]

4] Rural Residents Wind Aware and Environmental Group & Ors v An Coimisiún Pleanála & Ors IEHC 600, High Court of Ireland; and <https://www.pinsentmasons.com/out-law/news/wind-farm-liable-for-nuisance-in-ireland-for-the-first-time>

[5] Number of residential receptors affected by noise/shadow flicker: EIAR and Chapter 15 - Shadow Flicker.

[6] Tirawley Windfarm, Planning Statement, September 2025].

[2] ClimateXChange. (2025). "Carbon Calculator for wind farms on Scottish peatlands: Technical Assessment and Review." Scottish Government, hosted by SEPA

[7] Food and Agriculture Organization of the United Nations (FAO), United Nations Environment Programme (UNEP), & Global Peatlands Initiative (GPI). (2023). "The Global Peatlands Initiative (GPI): Assessing, Measuring, and Preserving Peat Carbon. Project Findings and Recommendations." Rome: FAO & UNEP.

[8] Department of Agriculture, Food and Rural Development (Ireland). (2007). "Forestry Standards Manual." Forest Service, Dublin.

[9] Department of Agriculture, Food and the Marine (2025). "GAEC 2 Standard: Protection of Wetlands and Peatlands." This should be reported to DG Clima.

[10] Environmental Pillar (2023), "Requirements for delivering an effective Hen Harrier Threat Response Plan for Ireland":

<https://www.environmentalpillar.ie/wp/wp-content/uploads/2023/12/Requirements-for-delivering-an-effective-Hen-Harrier-Threat-Response-Plan.pdf>

[11] Natural Research (2017), "A review of the impacts of wind farms on hen harriers *Circus cyaneus* and other raptors":

<https://www.natural-research.org/wp-content/uploads/2017/09/NRN-Review-Hen-Harrier-Wind-Farms.pdf>

[12] Ruddock, M., Wilson-Parr, R., Lusby, J., Connolly, F., Bailey, J., & O'Toole, L. (2024). "The 2022 National Survey of breeding Hen Harrier in Ireland." Irish Wildlife Manuals, No. 147. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.

[13] Mayo County Council. (2025). "Planning Report to An Coimisiún Pleanála regarding Tirawley Wind Farm (PAX16.323778)." Mayo County Council Planning Department, November 2025.

Documentation unavailable on website on 23.06.26

Cover Letter ACP

[Tirawley_Application Cover Letter to An Coimisiún Pleanála_Rev0_April.docx \[DOCX\]](#)

1. Annex

Friends of the Irish Environment CLG (FIE) is a non-governmental charity formed in 1997 by a group of environmental activists from across Ireland, with the company limited by guarantee established in 2001, towards the following goals:

- monitoring the full implementation of European law and assisting in its development, ● advocating for changes in the Irish planning laws,
- encouraging the implementation of the right to full public participation and access to justice,
- supporting individuals, local groups, and the wider public in understanding environmental issues, and
- seeking the proper implementation of environmental and planning laws to support sustainable communities, including pursuing concerns and cases in both the built and natural environments.

In recent years, FIE has taken legal action to hold the Irish Government accountable for meeting national and international commitments to reducing carbon emissions, including the “Climate Case Ireland” on the adequacy of the Government's Mitigation Plan [4]. FIE conducts policy research, advocacy, and public awareness campaigns alongside litigation.

As an independent and principled environmental advocate, FIE strives to be both challenging and cooperative, effective yet respectful. A commitment to factfinding, truth-telling, integrity, and transparency drives FIE. FIE is a member of the Irish Environmental Network and the European Environmental Bureau,