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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 Tirawley Windfarm 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, Castlelacken Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

I respectfully object to the proposed Tirawley Windfarm development on biodiversity, ecological and environmental grounds.

This submission is based on concerns arising from the Environmental Impact Assessment documentation, which identifies sensitive habitats and ecological features including blanket bog habitat, hedgerow removal, forestry felling and the presence of protected bird species including the Hen Harrier.

The scale of the proposed development, together with associated roads, excavation works, drainage works, cable routes and ancillary infrastructure, has the potential to result in significant and long-term biodiversity impacts.

2. Ireland's Biodiversity Crisis

Ireland is experiencing a documented biodiversity crisis, with many habitats and species in decline. The National Biodiversity Action Plan 2023–2030 acknowledges the urgent need to halt biodiversity loss and protect ecological resilience.

Against this backdrop, development proposals must demonstrate not only compliance with environmental legislation but also consistency with national biodiversity objectives.

3. Legislative Framework

The proposal must be assessed having regard to:

- EU Habitats Directive (92/43/EEC)
- EU Birds Directive (2009/147/EC)
- Wildlife Acts 1976–2023
- European Communities (Birds and Natural Habitats) Regulations
- National Biodiversity Action Plan 2023–2030
- Planning and Development Acts
- Precautionary Principle of European environmental law

Where uncertainty remains regarding impacts on biodiversity, consent should not be granted unless adverse effects can be ruled out beyond reasonable scientific doubt.

4. Blanket Bog Habitat

Blanket bog is one of Ireland's most important habitats and provides ecological, hydrological and climate functions.

Blanket bog supports specialised flora and fauna, stores significant quantities of carbon and contributes to flood attenuation and water quality. Peatland habitats are highly sensitive to disturbance and can take decades or centuries to recover.

The proposed development raises concerns regarding habitat fragmentation, drainage alteration, peat disturbance and cumulative degradation of peatland ecosystems.

5. Hen Harrier

The Hen Harrier is listed under Annex I of the Birds Directive and is afforded special protection under European law.

Wind energy developments have been associated with habitat displacement, disturbance, barrier effects and collision risk. The existence of suitable habitat within and around the development area necessitates a precautionary approach.

The applicant should demonstrate that the development will not adversely affect Hen Harrier populations or ecological function.

6. Hedgerow Removal and Habitat Fragmentation

The proposal includes hedgerow removal.

Hedgerows are recognised as essential biodiversity assets. They provide nesting opportunities, food sources, shelter and ecological corridors linking habitats across the landscape.

The loss of hedgerows contributes to habitat fragmentation, reducing connectivity for birds, bats, mammals and pollinators. Such impacts can extend well beyond the footprint of the works themselves.

7. Forestry Felling

Forestry habitats support a broad range of species including breeding birds, bats, mammals and invertebrates.

Forestry clearance can remove habitat, alter species behaviour and reduce ecological connectivity. These effects should be considered cumulatively with all other habitat losses arising from the development.

8. Bats

All Irish bat species are protected under European legislation.

Bats frequently utilise hedgerows, forestry edges and linear landscape features as commuting and foraging routes. Wind turbines are associated with collision mortality, barotrauma and habitat avoidance.

The loss of habitat connectivity through hedgerow removal and forestry felling may exacerbate these impacts.

9. Pollinators and Invertebrates

Pollinators and invertebrates underpin ecosystem health and agricultural productivity.

Habitat disturbance, vegetation removal and fragmentation can negatively affect pollinator populations. The cumulative ecological consequences of such losses should not be underestimated.

10. Ecological Connectivity

The ecological value of the landscape lies not only in individual habitats but also in the connections between them.

The combined effects of blanket bog disturbance, hedgerow removal, forestry felling and turbine infrastructure risk reducing ecological connectivity and landscape resilience.

11. Cumulative Effects

The cumulative impacts of the proposal must be carefully assessed.

Habitat loss, disturbance, ecological fragmentation, peatland impacts and operational turbine effects should not be considered individually but collectively. The overall impact may be significantly greater than the sum of individual effects.

12. Conclusion

The proposed Tirawley Windfarm raises serious concerns regarding biodiversity protection and ecological sustainability.

The identified impacts on blanket bog habitat, Hen Harrier, hedgerows, forestry habitats, bats, pollinators and ecological connectivity are inconsistent with the precautionary approach required by European environmental law.

Accordingly, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development.

Yours faithfully

John Caden