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19th June 2026

**Objection to Strategic Infrastructure Development Application:
Tirawley Wind Farm (Your Ref: PAX16.324258/ Case 324258)**

Dear Sir / Madam,

We are directly affected local residents and write to formally object to the Strategic Infrastructure Development application by **Constant Energy Ltd** to develop **Tirawley Wind Farm** (ACP Ref: PAX16.324258/ Case 324258), proposed location between Ballycastle and Killala, County Mayo.

We fully and unequivocally support the transition to renewable energy and urgent action on climate change. However, as ACP is aware, if transition is to deliver measurable environmental improvement, development must be carefully considered and appropriately evidenced. Hastily conceived projects - however well-intentioned - present serious risks to the very environments they purport to protect. Collateral damage inflicted on the unique habitats and the precious cultural heritage of this island may well be irreversible. In light of this, proposals such as Tirawley deserve an especial level of scrutiny.

The proposal from 'Constant Energy' raises several grave planning concerns. This application entails numerous detrimental environmental impacts which, when considered together, represent significant material degradation to a location which is *globally* recognised as holding historical, cultural and environmental import.

There are several material grounds for refusal of the current application including, but not limited to: (1) Procedural Deficiencies; (2) Failure to Consider Alternatives; (3) Environmental Impact; (4) Failure to Comply with Requisite Planning Frameworks; (5) Infrastructure Issues; (6) Impact on Human Population and Residential Amenity.

Full reasoning and evidence in relation to each of these grounds is established in detail in the sections that follow.

We have tried to keep this observation as concise as possible. Unfortunately, the number, and gravity, of deficiencies within the application currently before ACP make complete brevity impossible. However, to assist with consideration, the summary table below provides a ‘high level’ overview of the principal grounds and points that will be made in this objection.

Table 1: Principal Grounds for Objection to Tirawley Wind Farm: An Overview

	Ground	Key Points
1	<i>Procedural Deficiency</i>	<i>Failure to consult</i>
2	<i>Failure to Consider Alternatives</i>	<i>Failure to fully consider suitable alternative locations</i>
3	<i>Environmental Impacts</i>	<i>Failure to consider all relevant European sites</i> <i>Material weaknesses in NIS</i> <i>Failure to demonstrate the absence of adverse effects on European site integrity</i> <i>Failure to properly consider other impacts on habitats, flora and fauna</i> <i>Failure to appropriately consider unique archaeology/ heritage</i>
4	<i>Failure to Comply with Planning Frameworks</i>	<i>Conflict with National Planning Framework Objectives</i> <i>Conflict with Mayo County Development Plan</i> <i>Failure to acknowledge significant adverse impact on tourism</i>
5	<i>Infrastructure Issues</i>	<i>Failure to appropriately assess adverse impacts on traffic and transport (including safety concerns)</i> <i>Failure to acknowledge significant adverse impacts on accommodation</i>
6	<i>Impact on Human Population and Residential Amenity</i>	<i>Failure to identify and consider impacts on human health</i> <i>Failure to properly consider effect on residential amenity</i>

Given the number of deficiencies and areas of concern prima facie evident in this application, we respectfully request that An Coimisiún Pleanála refuse permission for the proposed development.

Each ground is established with further specific evidence in the sections that follow, below.

Ground 1: Procedural Deficiencies

There has been no meaningful public consultation.

Prior to this application, very limited information was made available to those most directly affected by the proposed development. There is also little publicly available information regarding the applicant’s experience and standing within the renewable energy sector.

This lack of transparency has contributed to significant uncertainty, concern and distress amongst residents, landowners, businesses and visitors to the area.

National and local guidance has consistently emphasised the importance of meaningful community engagement in the development of wind energy projects. The Wind Energy Development Guidelines (2006) and Draft Revised Guidelines (2019) both stress that local communities should be afforded a genuine *“opportunity to comment upon and to have an input into the planning and design of the scheme”* (pg. 19). Renewable Energy Policy 4, in Mayo County Council's (MCC) County Development Plan similarly emphasises the importance of consultation from project inception and working in *partnership* with the local community (pp. 216-7, Ch. 11, REP 4; REO 5). Communities should not merely be informed of decisions taken but should be actively engaged at a point where their views can meaningfully influence the development.

Constant Energy's own evidence demonstrates that efforts to engage the local community were, at best, negligible and may more properly be described as tokenistic. The consultation falls substantially short of the standards envisaged in national guidance. The application references door-to-door contact with residents and outreach to community groups; however, no residents or groups in the directly affected area appear to have knowledge of this and no evidence has been provided to support the applicant's assertions (pg. 36; EAIR Ch.1, Section 1.11.1; Non-Technical Summary, pg. 5).

Similarly, verbal assurances were provided to ABP during the first pre-application meeting on the 5th April 2023 that a 'community liaison officer' had been appointed (pg. 5, Meeting ABP 315864-23). However, there appears to be no record of this, no publicly available contact details and no evidence of any liaison having taken place.

The applicant's Pre-Application Community Consultation Report (*Appendix 1.6*) demonstrates that 'community engagement' consisted principally of a single 'Public Information Day' which, according to the current application, was held on the 6th June 2023 and involved 31 residents. Notably, the PID details in the application do not correlate with those reported to An Bord Pleanála (ABP) at the 2nd pre-application meeting of 14th August 2023 (*Meeting ABP 315864-23; ACP-Pre-App-Meeting-Minutes*). In this meeting, Constant Energy reported that the PID was held on the 4th of June and involved 38 residents. Inconsistencies of this nature raise concerns about the reliability of the consultation record.

Regardless of which account is correct, the consultation process itself was manifestly inadequate.

Firstly, it was not held in the local community and was inaccessible to many. The PID was held in Ballina Manor Hotel approximately 15 kilometers from the proposed development site. There is an attempt to retrospectively justify this location on the basis that Ballina is a regional economic centre. Accessibility, however, ought to be assessed from the perspective of those most directly affected. Numerous venues exist within the affected area, including Lacken Community Centre, which would have been much more accessible to residents, particularly older residents, those with limited mobility and those without access to private transport.

Secondly, the consultation was inadequately publicised and there was very little awareness of the event. The applicant's own report confirms the event was advertised through a single newspaper notice published one week prior to the event. No evidence has been provided of any broader communications, direct engagement with affected households, public meetings, online consultations or feedback opportunities, follow-up events or workshops. As will be outlined in later sections of this observation, very little publicly available information exists regarding the applicant, or ways in which they may be contacted.

Thirdly, participation levels were exceptionally low. The applicant records attendance of only 31 individuals (*pg. 3, Appendix 1.6; pg. 37, Ch. 1 EIAR*). 2022 electoral data suggests at least 2,676 people reside within the area directly affected by the proposed development. Using the applicant's own figures attendance represented approximately 1% of the local population. More significantly, only 14 feedback forms were submitted, representing approximately 0.5% of affected residents (*pg. 37; EAIR Ch.1, Section 1.11.1.1*). Just 4 people – 0.1% of affected residents - are visible from the photographic record (*pg. 3-5, Appendix 1.6*). Even if An Coimisiun Pleanála (ACP) accepts the applicant's consultation record, the location of the event means that there can be no certainty that attendees were residents of the directly affected community. The applicant's account simply indicates that they pursued a consultation process that failed to reach almost all of those most affected by the proposed development.

The single recorded consultation event detailed in this application appears to have been designed principally to explain an already developed proposal rather than gathering community input on key matters (such as site selection, turbine locations, scale or alternatives). Appendix 1.6 repeatedly states that feedback was 'carefully considered'. However, Table 5.1 (*Appendix 1.6, pp. 8-10*) identifies few, if any, substantive modifications to the development that arose directly from the community consultation. The changes identified in this table largely consist of references to technical assessments, future management plans or explanations of existing design decisions. There is little, if any, evidence that concerns raised by residents resulted in any

meaningful alterations or indeed that there were any efforts made by to address specific issues raised at the PID or in the feedback forms (*as illustrated in Appendix 1.6, these included concerns relating to: residential amenity; noise; visual impact; biodiversity; peatland impacts; traffic; and, overall site suitability*). Neither were any attempts made to provide additional consultation or engagement in the three years between that single event and this application.

The manifest inadequacy of the consultation process is especially striking given the advice repeatedly provided to the applicant in the initial stages of this development. In March 2023, the Department of Public Health indicated that: “*consultation with the local population should be conducted*” (pg. 39, 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. 32, 29th March 2023 Appendix 1.3.)

ABP also emphasised the importance of transparency and effective communication with the local community to the applicant during pre-application discussions as early as 2003. (pg. 5, Meeting ABP 315864-23; ACP-Pre-App-Meeting-Minutes (pg7)). ABP specifically queried the applicant’s decision to hold the PID at a distant location from the affected community, yet no subsequent action was taken to address these concerns (pg. 8, Meeting ABP 315864-23; ACP-Pre-App-Meeting-Minutes). In January 2026, ACP again reminded the applicant of the importance of good practice in this regard, recommending an additional consultation event given the development which is now proposed (which is different to that originally consulted upon, pg. 7, ABP-323906-25 - 1st Meeting Record). There is no indication of any efforts being made by the applicant to address this recommendation which, in effect, means there has been no consultation on the *actual proposed development* now before ACP.

Whether or not formal compliance has been achieved by the applicant, the volume and technical complexity of the planning documents present a significant barrier for non-specialist members of the community. This development has been proposed in a rural community, populated principally by farming families. The social demographic includes high levels of older and vulnerable residents. That this community’s sole substantive opportunity to comment on the proposals only arises at this juncture of the planning process constitutes a significant lapse in procedural fairness. The documentation submitted extends to thousands of pages, predominantly written in specialised professional discourse requiring high levels of technical literacy. It is not only

inappropriate but also unfair to expect those most affected to fully grasp the implications of the plans or to participate meaningfully in the decision-making process.

Any approval of the current application would serve as an endorsement of a project that has not only failed to follow best practice and principles of planning policy in respect of meaningful local consultation, but also one that has paid scant regard to procedural fairness. This proposal has generated a number significant concerns in the local community, which remain unresolved at this formal application stage.

Ground 2: Failure to Consider Alternatives

This application pertains to a development in a particularly unique location with especial environmental considerations. The area between Ballycastle and Killala, together with Downpatrick Head are noted for their exceptional scenic, archaeological, and cultural significance and are considered unsuitable for industrial-scale windfarms by Mayo County Council (*Ch. 5 pp. 16-19; Ch.13, 26-27; Tirawley WF- Mayo Preplanning Notes March 2026, pp. 2-3*). There are seven European designated sites within 15km of the site; it lies within 10km of the Ciede Fields visitor centre, with 85 recorded archeological sites within 1km; and several protected structures lie within 1km (*see Ch.14*). Conspicuously, the proposal contains absolutely no reference to the importance of the location for artists, or the fact that there is an art centre and hub of international significance within 3km of the red line boundary (Ballinglen Arts Foundation).

The current application is remarkable by the extent to which it fails to consider the cumulative environmental, cultural and heritage value of the location. Instead, it adopts a cursory and disparate approach to identifying 'features' and fragmented impacts. This approach has clearly been conceived in the absence of any real understanding of the location or the communities it sustains. The deficiencies of the proposal in relation to specific aspects of the EIAR will be considered further below. However, it is important to identify from the outset that the application fails to properly identify the worth of the storied landscape, or the ecological and cultural significance of the proposed location. Given the internationally recognised importance of this landscape it is a matter of grave concern that there is no proper consideration of an alternative location for the proposed development.

The prospect of alternative locations is dismissed by the applicant on pg. 23 of Chapter 3:

“The initial screening exercise as outlined above identified only one potential viable area....other wind farm sites include 5 no. potential wind farms located between c. 11.7 km and c. 43 km southwest of the Proposed Development. No other viable sites were found during the assessment and all five sites are being developed by the Developer.”

The fact that the applicant wishes to undertake multiple developments cannot provide a valid justification for the failure to consider alternative locations in Mayo or elsewhere for this project.

In the same section, the applicant also goes on to assert *“The Wind Farm Site is not located in, or close to any European designations such as Special Protection Areas (SPA) or Special Area of Conservation (SAC)”*. This claim stands in direct contradiction to Ch. 14, where 7 such sites are identified within 15km.

Notably, the development is opposed by Mayo County Council (pp. 24-28, Ch. 13, see also MCC’s submission to ACP Ref.: PAX16. 323778). A Senior Executive Planner from MCC has asserted that the current proposals pose ‘a material contravention to the Mayo County Development Plan’ (Western People, 18th June 2026 ‘Council Opposes North Mayo Wind Farm’).

Each of the iterations of this Windfarm design have placed the overwhelming majority of the turbines in locations not deemed suitable for development. Indeed, the final design presented in the current application before ACP contains a *greater* proportion of turbines in non-designated areas than previous versions (pg.26, Ch. 13). The application fails to provide sufficient detailed explanation as to these turbines should be permitted outside the areas identified by the MCC as suitable for renewable energy developments.

In 2023, ABP representatives emphasised to the applicant that a strong, location-specific justification is required for turbines outside designated zones and that the justification for the layout must be clear (pp. 5-7, Meeting ABP 315864-23; pp. 5-8, ABP-323906-25 - 1st Meeting Record); this was a recommendation that, again, had to be stressed to the applicant three years later in January 2026 (pg. 4, ABP-323906-25 - 1st Meeting Record).

European Commission (2017) guidance on the application of Art. 5 clearly states:

“...it is very important that the identification and consideration of Alternatives should not be treated as a mere formality.” (pg. 52)

The guidance goes on to state:

“Consultation with the public is usually very important both for identifying and assessing Alternatives. A clear presentation of Alternatives, and how they have been assessed, also lends transparency to the process and can improve public acceptance and support for Projects.” (pg. 55)

As established above, the applicant did not engage in any consultation on alternatives (see ground (1), above). On the basis of the information provided in Chapter 3, it is difficult to characterise the applicant’s treatment of alternatives as anything other than a ‘mere formality’.

This application does not provide a robust consideration of reasonable alternatives; nor does it contain the particularly strong reasoning ACP identified as necessary for development at this location.

The applicant has not provided sufficient evidence for ACP to be reasonably satisfied the site selected is either the least environmentally damaging or most appropriate choice.

Ground 3: Environmental Impacts

In our view, the EIAR provided with this application does not provide the information necessary to enable ACP to make an appropriate assessment of the environmental impacts of the proposed development (ss. 171A(b) & 172(1J)(b) *Planning and Development Act 2000*; Article 3(1) *Directive 2014/52/EU*). As established in *Commission v Ireland (2019)*, C-261/18, an appropriate environmental assessment *must* be in place before consent can be given.

The EIAR is deficient in numerous respects, omitting various important considerations. Generally, throughout the report: baseline data collection is inadequate; levels of significance and risk are consistently underestimated; and, proposed strategies of mitigation lack detail and plausibility.

Key deficiencies in relation to specific areas of the EIAR are detailed in the sub-sections that follow:

i) European Designated Sites

A NIS is required for the proposed development. The applicant has prepared this based on identified hydrological connectivity with Lackan Saltmarsh and Kilcummin Head SAC, Killala Bay/Moy Estuary SAC and Killala Bay/Moy Estuary SPA. However, the screening and NIS do not appear to provide sufficient justification for excluding other European sites screened at an earlier stage, particularly having regard to the wider Killala Bay/Moy Estuary system and the project's location across multiple WFD sub-catchments.

The applicant identifies hydrological pathways via the Cloonalaghan and Cloonaghmore systems and acknowledges the project spans Glencullin, Cloonaghmore and Abbeytown sub-catchments (*eg. pg 25, Ch.9*). The application also notes several areas of high to extreme groundwater vulnerability (*ss.9.3.9, EIAR, see also the comments made by Inland Fisheries on pg. 17, Ch.9*). Taking these factors into account, it is difficult to accept the conclusion that adverse effects will be confined to just the three European sites considered. Further and more detailed evidence is required to support this conclusion. No such evidence is provided in this application.

Notably, the NIS is characterised by a reliance on qualitative descriptions and conclusions based on assumed mitigations. Little quantitative analysis or evidence is supplied. As such, the NIS merits especially close examination and questioning at this stage. In particular, the applicant's conclusion that there will be 'no adverse effect' on the three identified sites appears largely unsubstantiated. In light of this, it does not appear the NIS as submitted offers an adequate basis from which ACP may robustly assess impacts (*Kelly v ABP [2014] IEHC 400; Sweetman v ABP (C-258/11)*).

ii) Habitats, Flora and Fauna

As in other areas, the baseline data provided in Ch. 6 *Biodiversity* is inadequate with a number of important omissions. Consequentially, there is a failure to fully identify the significant, detrimental ecological effects that would result from this development. Biodiversity risks and residual ecological effects are consistently underestimated. Concomitantly, the proposed prevention and mitigation measures are fundamentally inadequate to address the harms that would be caused should consent be granted.

Specific areas of concern in relation to flora and fauna are outlined below. However, at a general level, we observe the Zone of Influence (ZOI) is far too narrowly defined from the outset. The applicant has confined the: *"Zoi in relation to direct impacts on habitats and flora and fauna will be confined to the area within the Redline Boundary of the Proposed Development, including the Grid Connection and TDRs...[and] The Zoi of general*

construction activities ...not likely to extend more than several hundred metres from the proposed Redline Boundary...” (Ch. 6., pg. 8)

No acceptable justification is provided for this limited focus, despite the conflict with best practice guidance. The ZOI should be defined to reflect the maximum extent of potential impacts, not simply the project boundary or other arbitrary distances (*see, inter alia, C.I.E.E.M, 2024 and EPA, 2022*). There is no developed reasoning explaining why such an approach has been taken and, consequentially, there is a significant risk that some important ecological effects of the potential development have not been fully identified or assessed.

- **Habitats**

The proposed development would result in the loss of blanket bog (significant adverse effect of permanent duration, pg. 77, Ch.6). Whilst the applicant repeatedly attempts to minimise this loss (*eg. pp. 55, 73, 75, Ch.6*), this cannot alter the fact that this aspect of the development is in direct conflict with the aims of Directives 92/43/EEC; 2009/147/EC and Ireland’s National Peatland Strategy. Such losses cannot be adequately ‘offset’ – they are permanent and, importantly, not justifiable when developments can be located outside these precious environmental areas.

The proposed development would result in the loss of over 4km of hedgerow habitat (significant adverse effect, over 25% of permanent duration, Ch. 6, pp. 77 & 115). Again, this is in direct conflict with the priorities of the EU Habitats Directive. Concerningly, there is no commitment within the application that removal of hedgerows would take place outside the nesting season; in which case, the proposed development would also fail to comply with existing safeguards. Whilst national and European protections recognise the importance of hedgerow to ecological connectivity, this application consistently fails to consider the cumulative effects of hedgerow destruction in combination with the other impacts of the development. For example, hedgerows are critical ecological corridors for bats (*see, inter alia, Bat Conservation Ireland, 2026; Chavez et al., 2025*) yet the cumulative effect of hedgerow destruction and other potential detrimental effects of windfarm construction and operation (examined further below) is not fully considered. Such absences ensure that habitat risks are repeatedly and significantly underestimated throughout the E.I.A.R.

- **Terrestrial Mammals**

The construction and development of this windfarm would have a deleterious effect on several 'red-listed' mammals in this delicate ecosystem; significant risks are overlooked.

The location proposed for the development is a delicate eco-system that supports numerous 'red-listed' species, including: badger, bat, deer, hare and pine marten (*Marnell, Looney and Lawton, 2019*). Some red-listed species, such as pine marten, are dealt with in a cursory manner whilst the impacts on others are downplayed based on extremely limited data collection.

Pine martens are an important 'red-list species' resident in the proposed location; the fact that none were recorded during the applicants' 'surveys' (*Ch. 6, pg 59-60*) speaks more to the quality of the surveying than the actual presence of the species. Locals and visitors often see this recovering species, once in danger of extinction in Ireland and still critically endangered in England and Wales.

Below are pictures of a young family of pine martens, recorded in late 2024, just over 1km from the proposed locations of turbines 12-14:



As well as numerous local sightings, the presence of recovering populations of marten in Mayo has been recognised in relevant national reports (see, for example, *N.P.W.S., 2019*).

The pine marten is a 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 prohibits: deliberate disturbance of protected species; deterioration or destruction of breeding sites or resting places.

Pine martens are woodland-dependent, using continuous scrub, treelines and hedgerows for foraging, denning and movement, and they are extremely sensitive to habitat fragmentation and disturbance. Clearance of woodland, scrub and hedgerow such as that proposed in this development (*Ch. 6, pp. 77 & 115*) will remove cover, reduce denning opportunities and fragment home ranges. Marten rely on linear vegetated corridors and this type of fragmentation will have significant impacts on the species (*Mergey, Helder and Roeder, 2011*). Construction noise, lighting and sustained human presence will disturb breeding females at den sites and will cause displacement from otherwise suitable habitat (*NatureScot, 2024*). Increased traffic will also elevate collision risk and create barrier effects (*Gonzalez et al., 2014*).

Despite the applicant accepting that it is ‘probable’ that the marten would occur in the study area (*p.60, Ch. 6*) no further survey work was undertaken and the risks to this protected species are simply dismissed as ‘not significant’ in one line (*pg. 80, Ch. 6*). The applicant’s justification for this patently inadequate consideration is that the marten will simply go elsewhere (*ibid.*). Nowhere in this application is there any serious attempt to assess the (many) risks this development would pose to marten, or provide a proper account of how these obvious and serious risks could be reasonably avoided.

Overall, the report fails to demonstrate that the proposal will not result in direct adverse impacts on pine martens (contrary to requirements of R. 51 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011))

Bats are also amongst the red-listed species found at the suggested site (*Marnell, Looney and Lawton, 2019*). The applicant’s own assessment contained in this application indicates that there is a **high site risk for bat populations** in the location (*pg. 48, Appendix 6.2*). Three bat species recorded in the area are recognised as being of the ‘highest conservation concern in Ireland’: Lesser Horseshoe Bat, Leisler’s Bat and Nathusius’ Pipistrelle. The Lesser Horseshoe Bat is ‘near threatened’ in Europe (*ibid, pg 29.*).

Despite the accepted importance of the site for bats, and the high risk posed to protected species, the assessment approach chosen by the applicant is

fundamentally deficient. The defined study area is just 200m from turbine locations, and the emphasis is predominantly on surveys conducted within the red-line boundary (p 7, Chapter 6). This is a flawed baseline that conflicts with current best practice. As noted in the 2025 C.I.E.E.M Bat Mitigation Guidelines:

“It is rarely acceptable for the consideration of impacts to be limited to the red line boundary...” (Reason and Wray, 2025, pg. 27)

The extremely restrictive approach taken to the assessment ensures the wider impacts on flight corridors and roosting habitats are overlooked. The various bat species affected by this development are highly mobile, with commuting and foraging ranges well beyond the areas examined in this assessment.

Notwithstanding this flawed baseline, none of the 16 turbines proposed are classified as less than medium risk for bats, with over half presenting the highest level of risk (Table 5.1., pp. 49-50 Appendix 6.2).

Despite identifying a high risk to species of the utmost conservation concern in Ireland, the surveying in this application is heavily dependent on data collected four years ago (Appendix 6.2, s.3.3). While limited additional work (emergence surveys and a ground level roost assessment) was undertaken in June 2024 and April 2026, this additional work appears primarily directed towards validate earlier findings rather than establishing a reliable, contemporary baseline (Appendix 6.2, ss. 3.2 & 3.3).

The datedness of the survey data stands in stark juxtaposition to a wealth of guidance emphasising the importance of using current data reflective of the present site conditions (Collins (Ed), 2023, pg. 26; Irish Wind Energy Association (IWEA) and Bat Conservation Ireland 2019). The most recent Bat Conservation Ireland (BCI) guidance notes baseline survey data is only valid in the season it is conducted, and the immediately subsequent season (BCI, 2026, s.3.9). The applicant has not demonstrated that the 2022 baseline remains representative of current site conditions, nor has a comprehensive baseline refresh been undertaken.

The overwhelming majority of the bat survey data does not provide reliable, contemporary insight to site conditions. Consequently, the application does not provide the required evidence base from which likely impacts on protected bat species may be properly evaluated.

The applicant's limited survey effort inevitably increases the risk that the species of greatest conservation concern have been under-recorded. These species have been *repeatedly documented* in the wider area (*see, inter alia, NPWS, 2022; Marnell et al. 2019*). The applicant also fails to recognise that many particular characteristics of the site landscape mean it is potentially especially important for supporting Lesser Horseshoe Bat populations and an important part of the wider coastal habitat network needed to support Leisler's Bat and Nathusius' Pipistrelle (*Wright et al., 2026; Fialas and Roche, 2025*).

Even on the basis of the applicant's basic assessment, Table 2.1. (s. 2.3.3., *Appendix 6.2*) indicates that all 16 turbines are located in areas of moderate or moderate to high suitability for Leisler's Bat (*Nycatalus Leisleri*). This is especially troubling given that Leisler's are a species recognised as having a particularly high collision risk (*see, for example, s. 4.4.1, BCI 2026*). A review undertaken by Rydell et al (2010) indicated that 98% of bat mortalities at windfarms pertained to open air foraging bats such as Leisler's, with mortality rates highest in landscapes similar to that of the proposed site. Ireland's population of Leisler's bats is, of course, recognised as of international importance, entailing concomitant responsibilities to protect this species (*see, inter alia, BCI, 2026; Boston et al., 2015*). These responsibilities do not appear to have been considered in the design of the proposed windfarm.

The treatment of the Lesser Horseshoe Bat within the assessment is also particularly concerning. The applicant's own survey report confirms that the Lesser Horseshoe Bat was recorded during surveys of the site location (*pg. 51, Appendix 6.2 and Executive Summary*). As ACP will be aware, concern over the Lesser Horseshoe Bat has led to targeted conservation efforts in Ireland, including a National Species Action Plan focused on preventing habitat loss and maximising landscape connectivity (*NPWS & VWT, 2022*). Troublingly - despite identification of this protected species at the proposed location – the applicant's report seeks to minimise the significance of this finding via claims the site is outside the species' geographical range (*pg. 51, Appendix 6.2.*). Such an approach cannot be justified. Once a protected species has been recorded, it cannot simply be dismissed as anomalous; rather, further surveying is necessitated. The relevant question ought to be whether this development is likely to adversely impact habitats on which the protected species depends. These issues are not adequately addressed in the report provided by the applicant.

Certain mitigation measures are proposed by the applicant in relation to bats. Taken together, the measures proposed are inadequate and will not materially address the high levels of risk this development would pose to protected species.

Overall, whilst the range of mitigation measures mooted indicate some awareness of good practice there is a notable absence of detail, specificity and currency throughout. For example, there are no detailed accounts of monitoring protocols or mortality thresholds; neither are any performance measures identified for any of the proposed actions. Whilst mitigation is frequently described as ‘robust’ in the application, it is difficult to see how any reliable conclusions may be formed regarding the adequacy of the measures based on the limited information provided. The absence of a detailed Bat Mitigation and Monitoring Plan is particularly concerning. The most recent Bat Conservation Ireland guidance (2026) recommends long-term, post-construction mortality monitoring, at-height acoustic validation, adaptive management triggers and regular review mechanisms to ensure the effectiveness of mitigation measures. There is no recognition of this in the application.

Buffer zones are proposed as one mitigation measure. The 88/94m buffers proposed are less than half that suggested in the ‘Eurobats’ guidance for windfarm development (*Rodrigues, et al., 2015*) and substantially below the ‘blade-tip plus 50m separation’ recommended in the 2026 Bat Conservation Ireland guidance. More generally, a failure to use the most recent guidance in the formulation of buffers appears to have resulted in separation distances derived primarily from vegetation height rather than ecological function. Given the nature of the site location, the distances suggested are unlikely to deter foraging and commuting activity within the rotor-swept zone (especially when considered alongside the coterminous removal of extensive swathes of hedgerow and forestry). This is particularly the case with respect of Leisler’s bat, detailed above. Accordingly, the applicant has failed to demonstrate risk has been reduced to the extent that is reasonably achievable.

In the operational phase, the applicant’s proposal to mitigate via ‘smart curtailment’ from year two also merits close inspection. Research indicates bat mortality peaks during the initial operational period of wind developments (*Arnett et al., 2016; BCT, 2019*). The 2026 Bat Conservation Ireland guidance indicates that smart curtailment should only be implemented where supported by baseline datasets, at-height monitoring and extensive validation data. If this is not present, standard curtailment protocols need to be applied alongside intensive validation monitoring.

As noted earlier in this observation, the applicant has failed to supply robust baseline data; nor are there any detailed plans for monitoring.

The application also, again, fails to properly recognise the cumulative effects of the development when suggesting mitigation measures to alleviate the high risk posed to bat populations. Best practice recommends a cumulative impact assessment zone extending to 15km in recognition of the documented foraging range of Leisler's Bat and notes that population-level effects should be considered where risks to Leisler's are identified (*Bat Conservation Ireland, 2026*). The assessment provided by the applicant falls far short of these recommendations.

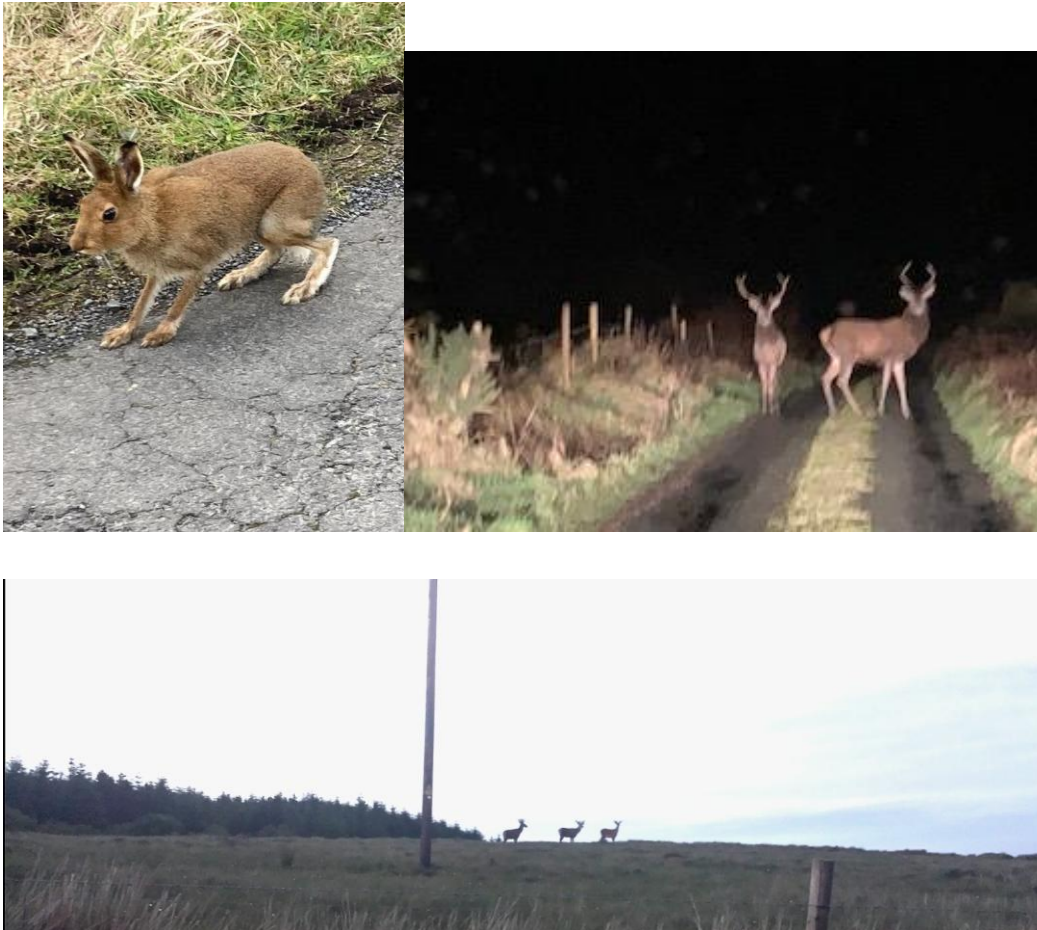
The construction of this development requires the removal of approximately 4km of hedgerow and extensive forestry clearance, which will inevitably lead to habitat fragmentation and corridor severance. Most bats, including the near threatened Lesser Horseshoe Bat found in the study area, "*are known to be highly dependent on linear landscape elements such as hedgerows ... for commuting from their roost to foraging areas.*" (*Lacœuilhé et al, 2018: 72*). Moreover, the applicant has expressly preserved the possibility of night work on the development, with all its associated risks to bat populations (*pg. 100, Ch. 6*). Such dangers present clear risks to bat populations that extend the threat of the development beyond simple collision risk and habitat loss, to a more extensive detrimental effect on the ecological connectivity of the wider area.

Guidance repeatedly stresses the need for certainty in the assessment of wind farm impacts on protected bat species and the application of the precautionary principle where uncertainty remains.

The mitigation measures suggested in this application fail to demonstrate that significant, adverse effects on bat populations will be avoided. They are insufficient to address the 'high risk' identified to protected species, including those of 'utmost conservation concern'. Where there is a lack of scientific evidence and residual uncertainty regarding impact on bat populations – as is manifest in the Tirawley application – further work must be undertaken to gather necessary evidence *prior* to any planning consents.

The effects on other 'redlisted' mammals, such as badger, deer, rabbit, hare, hedgehog, otter and shrew are summarily dismissed in section 6.3.4. as 'not significant' on what seems to be an assumption by the applicant that they will 'go elsewhere' or they are not prevalent because limited survey efforts failed to reveal them. Anecdotal evidence and national reports all attest to the prevalence of these species at the proposed location (*see, inter alia, N.P.W.S., 2020; Lysaght and Marnell (Eds), 2016*). In relation to badgers, for example, a simple NBDC data

search shows 46 records for the G21 grid square and 39 for the G22 grid square. Whilst the limited surveying undertaken failed to detect badger activity, the applicant accepts it is likely that badger are present in the area, given the wealth of evidence (*pg. 59, Ch.6*). The pictures below show hares and deer active within the project boundary and within a kilometre of suggested turbine sites:



As with the other redlisted mammals considered in this section, the proposed development is likely to have significant effects on populations both in the construction phase (destruction of key habitats and ecological corridors, as above) operation (*Lopuki, 2017*). This is especially the case in light of the cumulative effects of multiple developments in this area.

The applicants' conclusions regarding the effects on redlisted mammals dependent on the proposed location are premature and lack rigorous evidence. There is a clear and obvious risk that the construction and development of the proposed windfarm will disturb and destroy the habitat of numerous species.

In this respect, the application does not demonstrate compliance with best practice, nor national and international protections.

iii) *Heritage, Archeology and Culture*

The cultural heritage assessment substantially understates the - internationally acknowledged - exceptional archaeological sensitivity of the landscape proposed as the location for this development. Chapter 14 includes a desk-based review and site visits; however, this methodology is inadequate in the context of this peatland landscape and it's recognised archaeological significance.

The application repeatedly acknowledges that the site area contains numerous recorded monuments and areas of archeological significance. Additionally, the applicant accepts that this peatland landscape – proximate to the world renowned Céide Fields complex— may be home to preserved but hitherto undiscovered archeological material of significance (*pg. 6, Ch. 14*). The paucity of previous archeological investigation in the area is also noted by the applicant. Following such acknowledgments, it is consequently most concerning that the applicant choses to confine field assessments to simple walkover surveys. The applicant has not employed any methodologies capable of identifying the type of peat-covered or sub-surface archeology which is highly likely to be present.

Mayo County Council (MCC) raised this very issue during pre-planning consultation in 2023. At that initial stage, MCC indicated that this was a critical factor in their refusal to support any such development:

“The turbines will be visible to/from the Céide Fields which is on tentative UNESCO Tentative World Heritage Site. The development plan seeks to protect the Céide Fields from inappropriate development. The full extent of the Céide Fields archaeology site is unknown and may reach as far as the windfarm site.” (pg.2, 18th August, Tirawley-WF-Mayo -PrePlanning Notes)

ACP also specifically noted the need for archeological test excavations and geophysical surveys during pre application consultation (*pg. 4, ABP-323906-25 - 1st Meeting Record*). Notwithstanding these recommendations, the applicant has chosen to proceed with this application *without any* such preliminary investigation. Rather, they have chosen to defer using any methodologies that would be capable of identifying sub-surface archeology to a post-consent stage. The applicant seeks to justify this approach by referencing the lack of mandated guidelines for such assessments (*pg. 2, Ch, 14*). These are weak assertions given both the recommendations provided pre-consultation, and the wealth of extant guidance regarding not only archeological assessments in peatland, but also management of archeological risk in infrastructure projects. From this perspective, it

appears that the assessment in this application is principally focused on achieving consent as opposed to addressing the core cultural heritage concerns posed by this development.

The archeological sensitivity of this location and high likelihood of undiscovered sub-surface archeology means that the methods deployed for archeological assessment are inadequate. Accordingly, the conclusions reached by the applicant must be regarded as purely speculative.

In light of the limited information provided, the applicant has not provided a robust evidential foundation from which ACP can, at this stage, properly assess the cultural heritage risks presented by this development, or the adequacy of proposed mitigations.

The treatment of ‘known’ sites within this application is also problematic, with the effects on the wider landscape settings of monuments underestimated. One example of this is the treatment of *Rathlacken Court Tomb*, a heritage amenity site with an interpretive board (pp. 60-61, plate 14.2, Ch.14). Here, the applicant fails to recognise that this is a Cairn site located in a specific context, with elevated position (see, *inter alia*, Caulfield et al, 2009, pp. 47, 42-44). The applicant accepts the significant effect of introducing industrial infrastructure on the intervisibility of some sites, such as Rathfran Abbey (NM 269) and Carn House (RPS 187), and the fact that such effects cannot be mitigated (pp.69-70, Ch. 14). It is unclear however why *Rathlacken Court Tomb*, and other sites, with significant positioning within this storied landscape, are excluded from this assessment. Indeed, in the earlier part of Chapter 14, the applicant notes that elevation and intervisibility may have been important with regard to the placing of Court Tombs (pg. 21, Ch. 14). In the absence of any further reasoning explaining why some elevated/positioned sites are considered and not others, the reliability of this assessment must be questioned.

The lack of any meaningful consideration of wider impacts in the context of *Rathlacken Court Tomb* raises broader questions about the reliability of the assessment in relation to heritage assets with significant landscape positioning. The Landscape and Visual Assessment (Ch. 12) and Cultural Heritage Assessment (Ch. 14) largely assess landscape, visual and heritage effects in isolation, with limited consideration of intersectionality. Section 12.3.7.6 acknowledges that this is a ‘complex issue’ but, troublingly, rather than robust (or, indeed, community) engagement with these issues, the applicant makes a number of sweeping and unsupported statements such as:

“The sensitivity of this type of visual receptor is ... in the case of heritage features, whether these are discerning experts or lay tourists” (Ch 12, pg. 37).

It is unclear why the applicant thinks that it is not important for residents and visitors to have opportunities to appreciate cultural assets in their authentic context, or why they may not have the ‘discernment’ to appreciate the significance of these contexts. It is axiomatic that important elements of Ireland's cultural heritage – including any context significant aspects - should be made as accessible as possible to the widest number.

There is no reference to *Rathlacken Court Tomb* in the LVIA (*Ch.12*). This is indicative of the lack of systematic identification of locally significant ridgelines and viewpoints and, critically, the intersections between such landscape, heritage and viewpoints. These limitations become particularly evident with regard to the treatment of Lacken Gazebo, which will be considered separately below.

There are several inaccuracies and apparent contradictions in application as it relates to *Rathlacken Court Tomb*. In Table 14.4 (*pp. 40-50, Ch. 14, Field Survey*) AT 13 and 14 are described as being 790m and 495m north-west of a court tomb (presumably Rathlacken), but the reference number given is MA007-057 – which does not relate to a court tomb (*pg. 46*). Conversely, in Table 14.5 (*pp. 23-26*), *Rathlacken Court Tomb* (with the correct SMR) is described as being 935m north-west of AT13. This is confusing and it is very difficult, from this contradictory information, to form a reliable impression of the likely impact on this important heritage site.

Even using the *furthest* potential distance provided by the applicant, the picture below provides a clear visual indication of the very significant impact AT13 would have on the tomb:



To permit construction activity in this location would not only potentially destroy finds of potentially global importance, but also deprives future generations of the possibility of forming a better understanding of the unique significance of these interconnected sites.

Another area of concern in the applicant's assessment of cultural heritage impacts is the omission of Ballinglen Arts Foundation and its associated community of artists. Ballinglen is not considered in this Chapter, nor anywhere else in the application (*see also, ground 2, above*). This is an omission redolent of the the applicant's lack of understanding of the community in which they seek to place this development. The omission is as a serious material deficiency in the cultural assessment and the socio-economic consideration provided in this report.

Ballinglen is a centre of artistic excellence of international standing, whose creative identity is intimately bound to the surrounding landscape and its unspoiled visual character. The Ballinglen Museum of Art centre lies within 4km of the site boundary.

The Foundation's residencies attract artists from across the world, who come to work in the wider landscape. Indeed, it was President Mary Robinson who formally opened the studios on the 10th August 1997. The social and cultural importance of Ballinglen is formally recognised in the funding allocated from the Arts Council and wider international support for its work. Local authorities provide specific funding schemes to enable their

visual artists to benefit from the unique environs of Ballinglen (*see, for example, Cork County Council Ballinglen Arts Foundation Bursary*).

The work, exhibitions, and teaching of the artists who visit Ballinglen contributes significantly to the cultural and economic life of north Mayo. The residency programme annually attracts around 40 artists from a global applicant pool of circa 400, evidencing its international standing and cultural draw (*Irish Times, 20th August 2022*). Indeed, Michelle Pfeiffer was a resident in the Summer of 2022.

The omission of Ballinglen from the EIAR ensures that the applicant has failed to disclose that the proposed development conflicts with national and local cultural policy objectives by adversely impacting an internationally significant artist retreat, recognized as part of Ireland's intangible cultural heritage under the UNESCO Convention for the Safeguarding of Intangible Cultural Heritage (2003). Both the Planning and Development Act 2000 (as amended) and the Mayo County Development Plan 2022–2028 (Objectives BEO 9 and BEO 10) mandate the protection of sites of artistic and cultural importance, including their setting and character. Likewise, the National Planning Framework (NPF) highlights the safeguarding of cultural and creative infrastructure as vital to fostering sustainable communities. Consequently, any development that diminishes the environmental, aesthetic, or contemplative qualities essential to an institution like the Ballinglen Foundation would constitute a material adverse cultural impact, violating Ireland's obligations under national heritage policy and international cultural protection frameworks.

In summary, the fundamental methodological flaws and major omissions within Ch. 14 represent material deficiencies which call into serious question the conclusions reached.

Ground 4: Failure to Comply with Requisite Planning Frameworks

In addition to the areas mentioned in other sections of this objection, Tirawley Development would conflict with a number of additional key objectives in National and Regional Planning Frameworks. As ACP will be aware, Mayo County Council (MCC) oppose the development (detailed above) and there is strong evidence of opposition across the local community (*see, for example, Western People 'Opposition to Windfarm in Historic Mayo Area' 10th June 2026*).

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” as a key priority for this region (pg. 37, N.P.F.). Specifically, windfarm development at this location conflicts with National Policy Objectives 23 and 34, namely:

“Protect and promote the sense of place and culture and the quality, character and distinctiveness of the Irish rural landscape including island communities that make Ireland’s rural areas authentic and attractive as places to live, work and visit.” (Objective 23 N.P.F. pg. 64)

“Continue to facilitate tourism development and in particular the Strategy for the Future Development of National and Regional Greenways, and a Blueways and Peatways Strategy, which prioritises...projects on the basis of their environmental sustainability: achieving maximum impact...while ensuring their development is compliant with the National Biodiversity Action Plan...” (Objective 34 N.P.F. pg. 74)

The proposed development will impact on six identified greenways: Lackan Trail; Kilcummin Loop Walk (3); Rathlackan Court Tomb Trail. If permitted, the windfarm would be visible from a *signature* discovery point of the Wild Atlantic Way (WAW), Downpatrick Head. There are only 15 designated ‘signature’ discovery points in Ireland, and they are chosen as: *“...places [that] are especially unique and shape the image of Ireland’s remarkable west coast” (Wild Atlantic Way, 2025)*. The windfarm would also impact three further discovery points. Further, if one considers the *cumulative* effect of all windfarm development in the wider area, windfarm developments will impact upon all ten ‘*Wild Atlantic Way*’ designated discovery points in the Erris region.

Siting this development in this location, together with other developments planned in the area, is *prima facie* conflict with the priorities outlined in the NPF, which emphasise the need to preserve the ‘quality and integrity of the visitor experience’, develop greenways and blueways, and maintain the distinctiveness of the Irish Rural Landscape. As is implicit in the NPF, such preservation is critical to support the visitor and tourist experience that underpins the economic health in the communities of the North-West. On the 3rd November, 2025 a further €200,00 was allocated by the Dept. for Rural and Community Development to upgrade the Kilcummin Loop walks; an investment that will be misspent if visitors are deterred from the area by the proposed development.

A development of the type proposed at this location would also be in contravention of regional planning frameworks and identified priorities. As the applicant themselves identifies, Mayo County Council do not support this development at this location (MCC 2023 Pre-Planning Notes, pg. 3; Ch. 17, pg 7). Councillors and planners have been united in their opposition to Tirawley, with Senior Executive Planner Brendan Munnelly

contending that the proposals pose ‘a material contravention to the Mayo County Development Plan’ (*Western People*, 18th June 2026 ‘*Council Opposes North Mayo Wind Farm*’).

Notably, MCC is in general extremely supportive of wind energy projects (*MCC, 2022 County Development Plan*, pp. 226-230). That this particular application is not supported is compelling evidence that the Tirawley proposal does not achieve the ‘balance of environmental impacts’ required (*ibid.*) Also, as noted in relation to ground 1 above, the proposed development has – even from first inception – been sited outside areas identified by MCC as preferred for wind energy developments (*MCC, 2022, ch. 11 and 2011, map 1*).

The proposed development directly conflicts with MCC’s strategic priority of ‘protecting and enhancing natural heritage and biodiversity... with emphasis on maintaining ecological networks, designated sites (Natura 2000), and habitats’ (*County Development Plan*, Vol. 1, p. 178-184). The detrimental effects on biodiversity that would inevitably accompany this proposal were outlined in reference to ground 3, above.

Tourism is also a significant strategic priority identified in the County Development Plan; tourism is one of the most important elements of the economic health of the region:

“Mayo aims to be a premier tourism destination, leveraging its natural beauty, cultural heritage, and strategic location on the Wild Atlantic Way.” (2002, Vol. 1. p.54-55, 97)

This proposal is incompatible with the County Development Plan strategic priorities regarding tourism. The applicant’s prediction of the likely effect on tourism (*slight negative, Ch. 5., pg. 63*) significantly underestimates the detrimental impact the proposed development would have in this location. It is an assessment that has been made on the basis of partial data, of limited relevance, without a true understanding of the particular local context.

Several important tourist attractions **within** the proposed site are omitted from the discussion of tourism, which chooses to focus on ‘selected’ attractions. The omitted attractions include, but are not limited to, the Lacken Loop walking trails (recently improved); Rathlacken Court tomb (as discussed above, recommended stop from Ciede Fields visitor centre); Castlelackan Gazebo; and, Castle Lacken Demesne. Under the current proposals, turbines are visible and situated within 1km of these attractions. The applicant accepts there is a ‘high medium’ VP sensitivity for the Gazebo, stating: *“The full extent of the proposed wind farm development will be visible here to the west and*

south, with the most prominent turbines located directly to the west at a distance of approximately 300 m” (pp. 27-28, Appendix 12.1.a & b).

The applicant seeks to minimise the prominence of the turbines at this important vista by claiming: *‘they do not generate a strong sense of being overbearing in the context of the wider panoramic outlook’ (pg 27, Ch. 12, see also, pg. 58).* Not only is this a purely subjective assertion, but also it is a statement that focuses solely on scale at the expense of focus. One of the detrimental impacts of placing the turbines in this location is that they will become focal points in and of themselves. They represent industrial focal points, not in keeping with the wider landscape, that will be visible from across the wider region and beyond. In Chapter 14, the applicant identified that the Gazebo “...still retains a landmark quality to the area...” (Ch. 14, pg. 39, 59). This quality will be extinguished, together with its renowned ‘mystery’ (Mayo North Tourism, 21st Feb, 2022), if the turbines become focal points across the skyline.

The treatment of the Gazebo within the application provides another powerful example of how the *cumulative* and *intersectional* effects of this development are not considered fully. For example, in Chapter 14 the applicant notes the Gazebo is “*on the edge of an elevated ridge*” and is a structure specifically designed “*to be seen and to see*” (p.56, Ch.14). Yet, in the LVIA, the ridgeline on which the Gazebo sits is not identified. Rather, the Gazebo has been solely assessed as ‘representative viewpoint’ *from* which the turbines may be seen. This is despite ‘prominent ridge lines’ being identified as a critical landscape factor (p.24, Ch. 12) and ACP recommending that the applicant should specifically consider such features (pg. 4, ABP-323906-25 - 1st Meeting Record). Thus, the conclusion of the ‘moderate significant’ effect is based entirely on the visual effects experienced by viewers *at* the Gazebo and does not take into account the (more important) effects on the elevated ridgeline, or how the Gazebo was originally intended to be experienced. Such partial considerations provide some explanation of how the applicant came to assesses the ‘visual effects at amenity, tourism and heritage receptors as ‘Not Significant’ (pg. 57, Ch.12). Such a conclusion could only be reached via an insubstantial consideration of the relationships between visual, landscape and heritage features.

The EIAR also contains little acknowledgement that the areas’ principal visitor appeal lies not in ‘attractions’ but rather the natural beauty, unspoilt environment and panoramic views of hills and coast. This appeal is a core feature of ‘Wild Mayo’ and Mayo’s Tourism Strategy (2020, *see also County Development Plan, 2022*). Situating turbines here is likely to decimate visitor numbers during both construction and operation of the development. Mayo County Council raised the issue of visual impact as a key reason why this development could not be supported in the 2023 pre-planning meeting held on the 18th August (*Tirawley-WF-Mayo -PrePlanning Notes*):

“The larger turbines are highly visible from the N Coast Road which is a Scenic Route & has Designated Scenic Views and the development plan objective is that development should not impinge in any significant way on the character, integrity and distinctiveness of the area...The RES was written in 2011 when turbine size, height and rotor dia. were much smaller and had less visual impact” (MCC, 2023, pg 1)

The applicant, using general research, claims public attitudes to windfarms have little impact on national patterns of tourist activity and satisfaction (ss. 5.3.5.3., Ch. 5). This analysis lacks an appreciation of the particular and significant features of the proposed location. Visitors come because it is one of the few remaining places in which some rare native species, such as pine martens and golden plover, still thrive undisturbed. Visitors come to rediscover the peace that is so important to human well-being but increasingly difficult to access in more populous areas. As noted in relation to cultural heritage (*ground 3, above*) the area has a large visiting community of artists who are drawn to the unspoilt, natural environs.

In the LVIA, the applicant places undue reliance on a previously approved development near the Blackwater Way in Cork (*pp. 56-57, Ch.12*). It is unclear what the evidential value of this is. As ACP will be aware, landscape and visual impact are inherently site-specific. A conclusion reached regarding a different development in a different context cannot be assumed to establish any sort of precedent. It is also worth noting that, within this application, the applicant seeks to rely on the fact that the development will not remove distant views. Whilst this may be the case, this does not in any way address the extent to which these turbines will alter the fundamental character of the landscape and visitor experience. In the applicant’s own assessment:

“In ... commercial wind energy developments and the associated introduction of new moving structures within rural and upland areas, the quality of landscape and visual effects will almost always be negative” (pg. 15, Ch, 12)

Considering this, it is difficult to see how this development, with its coterminous negative impacts on the landscape, vistas and associated heritage assets, could have anything but a negative impact on tourism, visitor numbers and, in turn, the local economy in North Mayo.

International research demonstrates that in locations where nature, heritage sites or scenic views are the principal appeal (such as the proposed site): *“...wind farms are perceived as especially unsuitable by tourists” (Tverijonaite and Saeporsdottir, 2023, pg.*

10). Visitors from European countries with higher densities of wind turbines, such as Ireland, the U.K. and Germany, are especially keen not to have 'wind turbines visible during their nature travels' (*Tverijonaite and Sæþórsdóttir, 2023 pg. 20, citing work by Sæþórsdóttir et al., 2015.*). Available literature suggests impact differs with age - older visitors are particularly likely to avoid areas of windfarm development (*Beer et al., 2023*). Mountaineering Ireland have publicly expressed concern over the way in which windfarm 'industrialisation' of landscapes in some areas detracts from the quality of recreational experiences (*Mountaineering Ireland, 2025*). At a community level, it is well understood from frequent interactions that the majority of visitors to the proposed development area come for 'nature travels', history and unspoilt views. They are predominantly older, and come from the U.K., Germany and Ireland; an understanding borne out by available data (*Failte Ireland, 2010*). It is frankly implausible the Ballinglen artists will continue to come to paint and draw a landscape newly dominated by turbines.

In addition to the failure to appreciate the particular impacts on tourism in this specific location, there appear to be substantial gaps in the baseline data adduced in this section of the report. For example, the applicant states at 5.3.5.2. that:

"At the time of writing there is no available data providing a tourism breakdown for Study Area 1 or Study Area 2 from 2018 to date" (Ch. 5, pg. 31)

In fact, there is a wealth of publicly available data that could have been considered. For example, the Office for Public Works issues regular reports of visitor numbers to the Ceide Fields which were in excess of 30,000 in 2023 (*O.P.W., 2025*). Indeed, Failte Ireland provided the applicant with links to key tourism data in their response to scoping in December 2025 (*Appendix 1.3, 64-66*) The inadequacy of the baseline data used here means that there is insufficient information from which to provide a robust assessment of the risk presented to tourism and the local economy by the proposed development.

The national and regional focus of the discussion in the EIAR serves to obscure the profound impact that even a moderate change in visitor numbers in the area could have on this local economy. Scottish research shows that whilst windfarm developments may not have an impact at a national level, visitor displacement can result in significant levels of job losses where local economies are dependant on nature- based tourism (*Riddington et al., 2010; Marire, 2024*)

The failure of the EIAR to consider relevant tourism types and visitor demographic seriously undermines the applicants' risk assessment. The impact on tourism and the local economy is likely to be significant should this application be approved.

Ground 5: Infrastructure Issues

i) Roads and Traffic

The Traffic and Transport Assessment and the associated Traffic Management Plan (*Ch. 17, EIAR, Appendix 2.1, CEMP Management Plan 7*) give rise to a number of serious concerns: baseline evidence is limited; construction impacts are underestimated, particularly with regards to road safety; and, the mitigation framework lacks specificity. At the very earliest stages of this proposal, Mayo County Council pointed out the unacceptable impacts that such a project would have on transport, traffic and safety in the location:

“The use of narrow county roads for the protracted length of proposed haul route will be problematic given their generally poor structural condition and restricted carriageway width.” (Tirawley-WF-Mayo -PrePlanning Notes, pp.2-3)

The picture below is illustrative of these points and the condition of the local roads around the proposed site. It is a picture of the blind summit just south (less than 500m) of the proposed operations building (no 12, *Site Layout, pg 3*) in Lecarrowntemple:



Taken as a whole, the traffic assessment does not appear compliant with extant best practice. Specifically:

- Traffic assessment proceeds from a flawed baseline and is riven with methodological weaknesses. Baseline traffic data is limited and partial. It derives from a very short-term classified count at Palmerstown Bridge (*Ch. 17, 11-16*). This cannot be considered to provide an accurate picture and fails to account for seasonal variation or visitor peaks along the R314 (part of the *Wild Atlantic Way*). The applicant has not demonstrated that the survey period is representative of seasonal traffic conditions on a route that has multiple uses (tourism, agricultural, recreational, commuting). Spatial coverage is also inadequate: no comprehensive traffic counts have been taken along the full delivery network (Turbine Delivery Routes, Grid Connection Route, and minor L-roads). The assessment uses a simple capacity ratio which is inappropriate for narrow rural roads that lack pedestrian or cyclist facilities.
- There is significant underestimation of construction impacts on traffic. The applicant identifies that during the construction phase, there will be peak HGV traffic of up to 150 daily movements (*Ch. 17, pg 50-51*). This equates to one HGV every 3–4 minutes during working hours, which is substantial on these local rural roads. The applicant themselves notes that this “*could be considered as a significant increase on the numbers of HGVs which are predicted to use the existing R314 in 2027*”; indeed, this would be a **65%** increase on AADT estimates. They also indicate that at peak times, the onsite workforce will be as many as 63 (*Ch. 17, p. 56*) As identified by Mayo County Council at the 2023 pre-planning meeting:

“The traffic generated by the development (construction materials, labour-force, turbine deliveries etc) will cause serious disruption to local road users.” (Tirawley-WF-Mayo -PrePlanning Notes, pp. 2-3)

The conclusion that the effect magnitude is 'Very Low' is difficult to reconcile with the predicted level of HGV traffic and duration of construction, particularly on narrow local roads. As with other areas of the assessment, seasonal variations (which are likely to be significant in terms of tourism, agriculture and school transport) have not been properly considered for the construction phase. The construction period of 21-months is described by the applicant as ‘temporary’ or ‘minor’ (*eg. Ch. 17, pp. 39, 52, 65*). In reality, this will be a serious and sustained disturbance for both locals and visitors to the area. The assessment significantly understates long-term cumulative disruption. The application contains a detailed

structural assessment of Palmerstown Bridge but no equivalent assessment appears to have been provided for other structures located on the haul route.

- In relation to the longer term impacts of the proposed roadworks, the applicant's conclusion that there will be 'positive residual effects' from road widening (Ch.14, pp. 65) is entirely unsupported. The widening undertaken would be solely for the benefit of the proposed project rather than responding to any local need. Neither is any evidence presented that the 'benefits' of these roadworks would outweigh the adverse environmental impacts that would accompany them.

Moreover, the application does not appear to contain any clear commitment to pre/post-construction condition surveying. Relatedly, no details are provided with regard to reinstatement inspection, responsibility, or funding arrangements. There are also cultural impacts on the protected structure of Palmerston Bridge, which were identified by Mayo County Council as of concern:

"Palmerstown Bridge is a Protected Structure in the County Development Plan. It is an objective of the development plan to protect those structures in the RPS together with the integrity of their character and setting. The setting of bridge is affected by the land-take for the road widening haulage." (Tirawley-WF-Mayo - PrePlanning Notes, pp. 2-3)

- The deficiencies within the Traffic Management Plan (TMP, CEMP Appendix 2.1) are such that the ACP cannot reasonably be satisfied that the development's traffic impacts have been properly assessed or mitigated. The TMP is descriptive and lacks quantitative modelling or baseline validation. It repeats EIAR content without stand-alone analysis. It defers critical route planning and mitigation design to the contractor post-consent (pp, 4, 27, 29, Appendix 2.1). Temporary Traffic Management (TTM) provisions rely on flagmen and stop-go systems only, with no safe pedestrian facilities or alternative routes. Rather than proving a robust pre-planning assessment, the TMP is littered with vague references to 'trial runs' and 'post-planning' designs.
- The roadworks and industrial-scale transport activity required for construction present significant road safety concerns at this particular location; concerns that are neither recognised nor addressed in the application. The location under consideration is frequented by walkers and cyclists and encompasses school routes. The environs of the development have a disproportionately older and more vulnerable community; and a greater prevalence of disability (Census, 2022). This is a community particularly sensitive to disruption, noise, and access constraints arising from heavy construction traffic and roadworks. These features are largely

accepted by the applicant in Chapter 5 (*pp.19, 55*). It is concerning then, that in this context no clear Road Safety Audit has been supplied. There is no assessment of impacts on pedestrians, cyclists, equestrians, or school transport users, despite the predominance of narrow, verge-less roads. There is no discussion of agricultural or seasonal traffic interactions. The safety measures that are outlined (signage, flagmen, stop-go) are generic and provide no confidence that the applicant either appreciates the safety risks or will address them in a robust manner. It should also be noted that despite vague cross references, no further analysis is provided in Ch. 5, which purports to consider population and human health. These are material deficiencies: the application fails to explicitly consider the effects of traffic and transport activity on human health and vulnerable groups in the location.

- The assessment fails to properly consider cumulative effects. The potential exacerbation of the traffic and transport issues detailed above from cumulative traffic from other large-scale projects in the area (Oweninny II, Bellacorick Peaker, Killala Battery) is dismissed as 'slight' without any attempt at combined modelling (*Ch. 14, pgs. 62, 65*). Neither is there any assessment of cumulative disruption from concurrent grid or cable works occurring on the same routes (*pp. 10, 57, Ch. 17*)
- There are a number of technical inaccuracies in the TMP provided. R314 and R315, for example, are incorrectly classified in sections of this document as national roads. There are drafting anomalies and apparent template-derived text, including indications that material has been adapted from other projects without sufficient revision to the local context. For example, Plate 3 (*pg. 10*) contains a reference to the N20 national road, which is wholly unrelated to Tirawley and located in a different part of the State. Elsewhere, there is heavy reliance on generic material that has been insufficiently applied to this particular location (*eg. pg 8 and plates 5 & 6*). These factors call into question the level of *site-specific* assessment that has been undertaken, as with other areas of the application.
- The Traffic Management Plan as supplied is only an outline; at best the TMP can only be seen as a post-consent framework. The applicant themselves describes it as a 'live' document subject to development, with several key factors (including traffic management arrangements) deferred to post-consent stage. The TMP does not demonstrate accordance with County Development Plan Objective MTO 23 that requires such developments to conduct full assessments and ensure that impacts on road safety and capacity are properly evaluated (*MCC, 2022, pg. 131*).

ii) Accommodation and housing

The applicant suggests that negative effects on visitors and tourism may be offset by the economic benefits of increased employment opportunities and increased use of accommodation in the area, stating:

“Anecdotal evidence received by the Developer on other wind farm construction projects shows that local businesses such as accommodation providers welcome the enhanced level of occupancy that is achieved due to the construction contractors using their accommodation on a year-round basis, including periods of the year that are traditionally considered ‘low season’...the benefits to individual businesses serving the tourism economy will be substantial and significant.” (Ch.5, pg 60.)

The claims made in this section of the EIAR are contradictory and lack credibility. As indicated in s.1, above, the social demographic of the proposed location suggest that few, if any, community residents possess the technical and professional skills that would be required to secure employment at the windfarm. This is implicitly acknowledged by the applicant’s own reference to increased demand on ‘accommodation’.

The applicant asserts that increased demand on accommodation in the location would be a ‘substantial and significant’ benefit. Critically, however, they make no attempt to assess whether sufficient capacity exists to absorb that demand without adverse impact on the levels of accommodation available for tourism or housing supply.

Tourist demand has been outstripped accommodation availability in Mayo for a number of years. This lack of accommodation is stymying potential growth in visitor numbers, and increasing capacity has been identified as an urgent priority for regional development (*Mayo County Council, 2022 County Development Plan, Ch. 5*). It is also widely known that the Mica crisis and severe housing shortage is a major, ongoing issue for local residents (*see, inter alia, Connaught Telegraph, 5th August 2025*).

The claim of economic benefit is therefore another claim that has not been evidenced or fully considered in this application.

Ground 6: Impact on Human Population and Residential Amenity

i) Health and Wellbeing Considerations

A number of potentially significant considerations in relation to health and well-being are overlooked or underestimated in this application. As a preliminary point, it should be noted that in 2023, Health Service Executive West recommended the applicant undertake ‘early and meaningful’ consultation with the community to address potential health impacts (*pg. 26, 29th March 2023 Appendix 1.3.*). Yet, as evidenced earlier in this observation, the consultation undertaken was insufficient to either identify or assess any community health and well being concerns (*see Ground 1, above for further evidence*).

Indeed, it is difficult to accept the material presented in Ch.5 as an ‘assessment’ when the approach taken is that of justificatory (and partial) literature review. It is generic with contains little specific consideration of sensitivities particular to this location. No empirical data is used in the assessment and the literature that is adduced is international rather than nationally or regionally specific. Therefore, the applicant’s conclusions that there will be ‘no significant effect’ are unsubstantiated (*pp. 68-69, Ch. 5*).

The assessment undertaken also proceeds from a very limited understanding of health and wellbeing. Whilst EU and EPA guidance are referenced, there is little, if any, substantive consideration of mental, social or cultural wellbeing. This is troubling in the context of a location recognised as providing unique opportunities accessing natural landscapes. EU guidance defines “human health” as encompassing *physical, mental and social wellbeing*. Opportunities to remove from urban/ industrial environments and exposure to nature are critical to mental and social well-being, and an increasing wealth of research evidences this importance (*see, inter alia, Haywood et al 2024*). By removing yet another opportunity for such experiences, the proposed development is capable of having a significant adverse impact on mental and social wellbeing. This impact will not be limited to the communities in which the development is situated, but will also affect all of the visitors who are drawn to the area to experience the positive effects of the natural environment (*see further above, ground 4, tourism*). Such risks should have been assessed prior to this application being presented to ACP.

Ground 3, above, demonstrated the significant effect that the construction and development of the windfarm will have in relation to culture, with particular reference to archeology and the impact on the artistic community centered in Ballinglen. The failure to consider Ballinglen and wider cultural impacts, is of course, also a significant omission from any full consideration of the impact of the development on human health, as

understood in its proper, full sense (*ie. in accordance with current World Health Organisation and Environmental Protection Agency, 2015 Guidelines*).

The loss or degradation of a Ballinglen and a wider cultural retreat would significantly harm psychological health, sense of place, and community well-being—key determinants of health (WHO, EPA, 2015). Such impacts may manifest indirectly through increased stress, loss of amenity, and reduced cultural participation, particularly affecting those who depend on these spaces for reflection, creativity, and community identity. Therefore, this would constitute a significant adverse effect on mental and social well-being, contrary to Ireland’s wider commitments to fostering healthy, resilient, and culturally enriched communities.

ii) Property values

Whilst not a core material consideration in itself, the applicant suggests that there will be little impact on residential property values in and around the area of the proposed development. It is worth noting that this is another erroneous conclusion, based once again on flawed baseline data and selective presentation of material.

With the exception of the 2023 University of Galway working paper, the research used to form the conclusion is over a decade old with the majority of the discussion focused on findings from the United States. Meta-analyses demonstrate that the impacts of windfarms on property values in the U.S. are much less significant than in a European context (*see, inter alia, Parsons and Heintzelman, 2022*) and thus represents an inappropriate focus for any such discussion. This is a fact the applicant should be aware of, as the well-known differences in European and U.S. research is clearly identified in the Galway paper (*Gillespie and McHale, 2023, pp. 2-3*). This is just one of the significant points made in the Galway paper that are overlooked by the applicants. Considering a range of more relevant, recent studies, the Galway paper notes: “*Of the 10 key studies in Europe, results consistently indicate significant negative reductions in house values within 2km of turbines*” The Galway study itself - the only local, empirical study examined in the application - notes that, for properties within a 1km radius, property values can fall by up to 14.7%.

The discussion in section 5.3.7 of the report fails to consider some of the most significant findings from recent research conducted in more germane contexts and as such should be disregarded in consideration of this application.

Final Observations

As the foregoing sections have demonstrated, the application before ACP gives rise to multiple concerns. As a whole, the application is poorly conceived, poorly evidenced and it is surprising that it has reached this stage. That it has done so raises questions about the ability of the applicant to implement and deliver the proposed development.

There is little publicly available information regarding the applicant company, Constant Energy (No. 453771); their governance and structure is opaque. Whilst, very recently, 'Constant Energy' has had success in securing county planning permission for some, smaller projects these remain unexecuted. 'Constant Energy' does not have an established track record in the *implementation* and *delivery* of large scale energy projects. Constant Energy first applied for planning for Bellacorick in 2009, yet this project remains pre-construction (*Global Energy Monitor, 2025*).

The applicant's lack of proven track record in implementation and delivery is a relevant contextual consideration, particularly in light of the extremely poor application submitted. The successful delivery of a windfarm requires extensive expertise in technical design, environmental management and community engagement. Effective developments are usually initiated by established companies in the sector, such as S.S.E. No evidence has been provided that the applicant has either the ability to anticipate or manage the numerous complex challenges inherent in the proposed project. Rather, the substandard quality of the application before ACP suggests quite the reverse. Given the unique environmental challenges of the location selected, this is a matter of some concern.

The applicant's unproven delivery record is a significant risk that must be carefully considered when evaluating this application. The generic commitments to best practice and mitigation, which underpin much of this application, must be weighed against the developer's inexperience and lack of good faith demonstrated in the earliest stages of this project.

Finally, we would like note our adoption of, and support for, the submission made by the Lacken Ballycastle Protection Group in relation to this development (PAX16.324258) In particular, in addition to all the points made in this observation, we endorse the concerns raised regarding cumulative windfarm development across North Mayo, impacts on the cultural landscape of the Ceide Fields complex and the assessment of the Battery Energy Storage System. Whilst we do not repeat these arguments in full here, we request that they are considered as part of this submission.

On all of the grounds detailed above, **we respectfully urge An Coimisiun Pleanála to refuse permission for the Tirawley Wind Farm.** The location and scale of this project would result in significant and irreversible harm to the environment. Hitherto, the applicant has repeatedly failed to demonstrate compliance with relevant regulations and best practice. Approval of such a proposal has the potential to substantially damage public confidence in the planning system and due process.

Thank you for considering this submission.

Yours sincerely,

Kathryn Dutton and Maria Edmondson (via electronic submission)