

North Mayo Hillwalkers
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23 June 2026

An Coimisium Pleanála
64 Marlborough Street
Dublin D01V902

RE: Proposed Tirawley Wind Farm - PAX16.324258

Dear Sir/Madam

The North Mayo Hillwalkers formally opposes the proposed Tirawley Wind-farm Strategic Infrastructure Development as detailed above.

For over two decades our 30+ members have walked the hills, bogland and landscapes of north Mayo. Club members cover a range of ages, abilities and backgrounds; we walk weekly, benefiting from the natural beauty of the area and have come to know a flora, fauna and birdlife that enriches all our lives. We have found a way to stay fit, manage stress, enjoy social interaction and appreciate our natural environment.

However, the proposed windfarm would, we believe, have significant adverse effects on the tranquility, scenery, biodiversity, archaeology, heritage and birdlife of the landscape; the very elements that make the area such an invaluable recreational, cultural and tourism facility.

Ecology and Birdlife:

To accommodate the 16 turbines, a substation, battery storage facilities and connecting grid lines, the developer proposes removing four kilometres of existing hedgerows, trees and vegetation. This will impact bird habitat and biodiversity, altering the character of the area considerably and impacting its current recreational advantage.

Over the years, club members walking this area have observed and heard many species of birds, some of them listed in Birdwatch Ireland's Red and Amber List of Birds of Conservation Concern. These include the red-listed curlews, cuckoos, grouse, pheasant, snipe and the amber-listed larks, sparrowhawks and choughs. The construction of turbines, with its attendant traffic, will result in increased disturbance to sensitive bird species during breeding and foraging periods.

The developer suggests that putting restrictive zones around nests within 500m of the site will reduce the disturbance effect completely. However, although such mitigation might leave nests untouched, the construction noise and activity will raise birds' stress levels, reduce nest attendance and lower reproduction success.

A study by the British Ecological Society, published in the *Journal of Applied Ecology* in April 2012, found that grouse, snipe and curlew populations declined on windfarm sites during construction. While the grouse populations recovered over time, snipe and curlew populations did not. The same study found that the construction phase of the windfarm can have greater impact on birds than the actual operational phase.

Another study, by Dr Fernandez Bellon of University College Cork, published in the journal *Conservation Biology* found that breeding bird densities in upland terrain similar to the Tirawley site dropped by up to 53% within 500 metres of a turbine. The same study found that upland windfarms reduced bird populations by at least 10%.

Multiple turbines in the wider area mean bird populations are at increased risk from turbine blade collision, breeding ground disturbance, and displacement.

Based on our observations and bird studies referenced above, the potential wildlife risks of both the construction and operational phase of the project should be more carefully considered.

Tourism and Economic Effects:

Failte Ireland's recently-published Key Overseas Visitor Survey concludes that our landscapes remain the key reason visitors come here. When asked what satisfied them most, the beautiful scenery (89%) scored highest and, secondly, the unspoilt environment (79%). Over 81% say 'exploration' is a key motivator for their holiday.

Currently, the Tirawley windfarm area generously meets these tourist criteria, and is central to the area's tourism development. Indeed, the EIAR Chapter 13, Material Assets, describes the area's archaeology as a 'critical component of the emerging Ceide Coast experience'.

However, the EIAR does not appear to have adequately assessed the windfarm's effect on these high value assets, especially concerning visibility issues and construction effects.

For instance, according to the EIAR's ZTV mapping there is potential visibility of nine turbines from Downpatrick Head. This is possibly the area's most

iconic site, and one Failte Ireland promotes extensively. In 2023, Mayo County Council records reported 63,000 visitors to the site.

This issue is reinforced by the growing number of other windfarms, granted or planned, in the wider area.

Landscape and walking routes

- *Wild Mayo tourism plan*

Mayo County Council's 5-year tourism plan for the area, The Wild Mayo Destination and Experience Development Plan (DEDP), was launched this year in Ballycastle. It identifies North Mayo area as a priority area for new walking trails and increased visitor numbers.

The EIAR's Chapter 5, Population & Human Health section, points out the County Council's goal to develop the area into a primary national and international tourist destination. We fully endorse its observation that *"the protection of the recreational amenity and the 'sense of place' associated with these specific sites is a key consideration for the long-term economic and social health of the local population"*.

However, the construction phase alone of the Tirawley project will be impactful; two years' HGV traffic, increased noise levels, heavy construction work and associated timber felling and transport will occur at crucial points like the Western Way, the Lacken Gazebo and the Rathlacken court tomb, as well as the R314 linking Ballycastle to Killala.

Once completed, the 16 Tirawley turbines will have a negative visual impact in the area which will no longer be the 'environmentally unspoilt' landscape visitors seek. The knock-on diminution of visitor numbers will impact the local population's long-term economic and social health.

- *The Western Way*

The Western Way is a 32-kilometre route from Ballycastle to Killala, popular with walkers and cyclists. Its extensive panoramic views over coastline and mountains will be affected. Turbines AT11, AT12, AT13, AT14 directly line the route itself, along with six site entrances. The nearby turbines AT15 and AT16, as well as AT9 and AT10 on the adjacent L31142 mean that eight 135m turbines will visually and aurally dominate the walkway, substantially reducing the tranquility and pristine naturalness that draws people here.

Failte Ireland has committed major resources to supporting sustainable tourism growth in the area and *'continued progress on the Western Way'*. The negative impact of the Tirawley windfarm on the Western Way, other local walking routes, and the landscape in general, is at odds with this plan.

- Rathlacken Trail

This trail was established well over a decade ago as an easily-accessible route for people to exercise and discover the wealth of historical and archaeological features in the area. The excavated, nationally-important Rathlackan Court Tomb, the Gazebo, the Greenhill mound of medieval stone cists, a Cillin or children's burial ground, and Castlelacken demesne all feature on the route.

The proposed windfarm would substantially affect the visual integrity and recreational amenity of this well-used and popular trail. In EIAR Chapter 17, reference is made to temporary diversions along the route, but no timescale or specific roadways are given.

- Gazebo

The nearby 18th century Gazebo is listed in the National Inventory of Architectural Heritage (No. 31300708). Long a popular picnic spot and iconic viewpoint, it is slated to have two turbine and three new site entrances.

Aside from dwarfing the heritage feature, the industrial look of the sites will significantly reduce any recreational, scenic and tranquil qualities of this section of the Western Way.

- Rathlacken Court Tomb

At very close proximity to the Gazebo is the Rathlacken Court Tomb, one of only a handful of easily-accessible, excavated court tombs in the country. Registered in the National Monuments Service and associated with the nearby Ceide Centre, it is exceptionally well preserved compared with many other court tombs, and popular with tourists. Both it, and the nearby Gazebo are highlights of the Rathlacken Court Tomb walk. However, the very close presence of 135m turbines will considerably diminish these important heritage assets.

- Ceide Coast Walk

We agree with the EIAR's conclusion in Chapter 12 that the project will have noticeable adverse visual and landscape effects close to the site, as we detail above. However, its conclusion that such adverse visuals reduce with distance is contrary to the experience of ourselves and other walkers.

Turbine visibility from the many walking routes of the area may have been underestimated in the EIAR. In addition to the Tirawley windfarm, multiple other windfarm projects are planned in the wider area (Glenora, Keerglen, Clydagh, Aries, etc). The cumulative effect of these will mean that many walking route are likely to include turbine visibility from many angles.

This is not in accordance with Mayo County Council's proposed Development Plan 2022-2028 and its aim to capitalise on the area's pristine, natural beauty as outlined above.

Amenity loss

Having walked in many counties of Ireland and many countries abroad, our members often reflect that this particular part of Ireland benefits from an easily accessible remoteness and tranquility not readily found elsewhere. Coastline, hillside, bogland, forestry - all are accessible and offer recreational value to a variety of abilities. As such, it is of great benefit to both local residents and visitors.

However, the number of windfarms envisioned for the area will mean few routes will be turbine-free, thus reducing their value as an amenity to residents and visitors alike.

Negative effect of construction period

We are concerned by the two-year construction period. The Construction Haul Route cited in the EIAR traverses our regular walking routes. Temporary accommodation requirements are cited on roads in Annagh Beg, Creevagh Mor, Garranare and Billoos, all of which we walk frequently.

The heavy construction of turbines and site entrances in the area risk making it unsafe and unusable for walkers. The turbines AT11, T12, AT13, AT15, AT16, AT9 and AT10 and the eight site entrances planned along the Western Way route alone, risk impacting the safety, accessibility and enjoyment of the Rathlacken Court Tomb walk and the Western Way during the construction period.

To facilitate construction work, the EIAR predicts 11,022 heavy goods vehicles will be involved as well as those employed in the felling of 110 acres of trees, and resulting transport of 14,500 tonnes of timber. We believe that the resulting noise, building works and road traffic will mean safety concerns on the surrounding roads and routes.

Cumulative Effects

As well as Tirawley's 16-turbine project, other nearby windfarm projects in the area include: Glenora (22 turbines, 6.5 kilometres distance to Tirawley); Keerglen (8 turbines, 6k away); Clydagh (22 turbines, 3k away); Aries (11 turbines, 18k away).

While it might be argued that a windfarm in isolation could be somewhat absorbed by the landscape, multiple windfarms tend to overwhelm the eye and seriously diminish the sense of remoteness that has hitherto been this area's strength. We appreciate the necessity of expanding our renewable energy sources, but such a high concentration of windfarms in this particular area diminishes that remoteness and its potential for tourism development.

Although each of these windfarm projects is judged in isolation, residents and visitors experience the area as a whole; its landscape, its tranquility (or otherwise); its flora and fauna. To fully assess this project, it should be looked at in the context of the many other nearby windfarms - whether granted, planned or yet to come.

Conclusion:

For the reasons outlined above, the North Mayo Hillwalkers believes the proposed Tirawley windfarm will result in considerable adverse change to the landscape; its character, biodiversity, amenities, flora and fauna. This change will be reinforced by the number of similar projects in surrounding areas.

Our club has long appreciated the tranquility, remoteness, cultural heritage and wildlife found here, qualities which benefit the community as a whole, as well as underlying its economic survival as a tourism destination.

The many heritage assets in the area have been insufficiently considered and this project, with its turbines, associated infrastructure and construction activity will significantly diminish the value of these assets.

An Coimisiún Pleanála should also consider whether this project is in keeping with Mayo's County Development plan 2022-2028 relating to the conservation of landscape, archaeology, biodiversity (Chapter 12), and the development of recreational and tourism facilities (Chapter 5).

In summary, we consider this project contrary to proper planning and sustainable development, due to:

- damage to the visual landscape;
- insufficient assessment of recreational amenity;
- unrealistic assessment of effect on tourism, given the 2026 Wild Mayo tourism plan by Mayo County Council;
- not enough consideration for heritage assets in the area;
- threat to sensitive bird species.

I also wish to adopt and support the detailed submission made by the Lacken Ballycastle Community Landscape Protection Group in relation to the Tirawley application (PAX16.324359).

In particular, I endorse concerns raised regarding:

- cumulative windfarm development across North Mayo;
- the impact on the Ceide Fields cultural landscape,
- effects on tourism and recreation;
- biodiversity impacts;
- inadequacies in community consultation;
- the assessment of the Battery Energy Storage System.

While I do not repeat those detailed arguments in full, I request that they be considered as forming part of this submission.

Thank you for considering our submission

Marion Galt, Chairperson/Kevin Tighe, Secretary/Peter Murphy, Treasurer