

Re: Proposed Tirawley Wind Farm Development

Case Number: 324258

I wish to make an observation on the proposed Tirawley Wind Farm development.

While I support the transition to renewable energy and recognise the importance of reducing greenhouse gas emissions, I am concerned that this development has been proposed in an unsuitable location and does not comply with Mayo County Councils County Development Plan. It will have significant adverse effects on protected habitats, bird species, the wider ecological network of north Mayo, and the area's tourism resource. I am not satisfied that the applicant has demonstrated compliance with the Habitats Directive and Birds Directive, particularly in relation to cumulative impacts, protected habitats, bird species and the integrity of nearby European sites. In the absence of certainty, and in accordance with the precautionary principle, permission should be refused.

I respectfully request that An Coimisiún Pleanála carefully scrutinise the application.

1. TOURISM AND AMENITY

North Mayo is recognised for its natural landscapes and heritage, coastal scenery, wildlife and outdoor recreation opportunities. These qualities contribute significantly to the local tourism economy.

The area's attractiveness to visitors is derived in large part from its open landscapes, coastal scenery, biodiversity and sense of remoteness.

These attractions include:

1. Ceide Fields Neolithic Archaeological Site (Plans for Designated UNESCO World Heritage Site)
2. Down Patrick Head
3. Lacken Beach and Ross Beach
4. Lacken Sensory Garden
5. Killala / Killala Round Tower. Killala widely known as one of Ireland's most important rural rebellion landscapes
6. Rosserk Friary

7. Moyne Abbey

8. The Mullet Peninsula

I am concerned that the cumulative visual impact of successive wind farm developments may contribute to the progressive industrialisation of the landscape.

This issue is particularly relevant in the context of Nature-based tourism, birdwatching, walking and outdoor recreation, breathtaking scenic viewpoints and the wider visitor experience associated with the Wild Atlantic Way.

The Board should carefully examine whether the cumulative landscape and visual impact assessment adequately reflects the long-term implications for tourism and the area's natural heritage resource.

2. PROTECTED HABITATS AND EUROPEAN SITES

The proposed development is situated within a sensitive ecological landscape and in proximity to several designated European sites, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated under the Habitats and Birds Directives.

The legal test for Appropriate Assessment requires that the competent authority be satisfied beyond reasonable scientific doubt that the proposed development, either individually or in combination with other plans and projects, will not adversely affect the integrity of any European site.

Having reviewed the application documentation, I am not satisfied that this standard has been fully met.

The precautionary principle requires that scientific uncertainty should be resolved in favour of environmental protection. Where uncertainty remains regarding bird movements, habitat connectivity, cumulative effects or indirect impacts on qualifying interests, permission should not be granted unless such uncertainty is removed.

I am concerned that the assessments may underestimate indirect impacts arising from habitat disturbance, drainage alterations, sedimentation, hydrological changes and construction activity.

The precautionary principle should be applied rigorously where uncertainty remains. In my view, the applicant must demonstrate beyond reasonable scientific doubt that the development, either alone or in combination with other projects, will not adversely affect the integrity of any European site.

3. IMPACTS ON BIRDS

I am particularly concerned regarding the potential impact of the development on bird species of conservation importance.

The north Mayo landscape provides habitat, feeding areas, commuting routes and seasonal use by a range of protected species. These include species associated with nearby designated sites and species protected under the EU Birds Directive.

Wind energy developments can affect birds through:

- Collision risk with turbine blades.
- Habitat loss and fragmentation.
- Disturbance and displacement from feeding and breeding areas.
- Barrier effects on flight paths.
- Long-term behavioural changes.

Particular attention should be given to the SPA species such as:

1. Golden Plover,
2. Whooper Swan
3. Hen Harrier
4. Merlin

Together with any other Annex I species recorded during surveys.

I am concerned that surveys conducted over limited time periods may not fully reflect the long-term use of the area by these species. The absence of large numbers during survey periods should not automatically be interpreted as evidence that the site lacks ecological significance. Do the survey results fully capture occasional, seasonal and cumulative use of the site by SPA-linked species?

The Board should be satisfied that all bird surveys are comprehensive, current and sufficient to assess year-round impacts before granting permission.

4. CUMULATIVE IMPACTS

I believe cumulative impacts represent one of the most significant concerns associated with this proposal.

The proposed development should not be assessed in isolation. North Mayo has already experienced substantial wind energy development together with associated infrastructure such as substations, grid connections, forestry operations and road works.

The cumulative impact of multiple developments may be significantly greater than the impact attributed to any individual project. This is particularly relevant in relation to:

- Protected bird populations.
- Habitat fragmentation.
- Landscape character.
- Ecological connectivity.
- Disturbance of sensitive species.
- Visitor experience and tourism.

I am concerned that the cumulative assessment may not fully capture the combined effects of existing, permitted and proposed developments across the wider region.

5. PEATLANDS AND ECOLOGICAL CONNECTIVITY

The development area forms part of a broader peatland and upland habitat network that contributes to biodiversity, carbon storage and ecological resilience.

Construction of turbines, access roads and associated infrastructure may result in permanent habitat loss and fragmentation. Disturbance of peatland habitats can have long-term consequences for biodiversity and carbon storage.

I request that the Board carefully examine the proposed mitigation and restoration measures capable of fully compensating for habitat loss and whether sufficient safeguards are in place to prevent long-term degradation of peatland ecosystems.

6. NO STANDALONE MAJOR ACCIDENT HAZARD ASSESSMENT

The EIARs include a chapter on "Major Accidents and Natural Disasters," which is now standard practice for wind farm developments. However, it is legitimate to question whether this constitutes a comprehensive MAH assessment or merely a high-level screening exercise.

-No formal Major Accident Hazard Register appears to have been published.

-No bow-tie analysis or equivalent barrier analysis has been provided.

-No demonstration has been made that major accident risks have been reduced to a level that is as low as reasonably practicable (ALARP).

In particular, insufficient information has been provided regarding battery energy storage system hazards, turbine fire scenarios, emergency response arrangements, cumulative accident risks, and the consequences of extreme weather events. The Board cannot be

satisfied that all major accident risks have been identified, assessed and reduced to an acceptable level, nor that adequate emergency response measures are available for the lifetime of the development

7.RESIDENTS:

I am concerned that residents living in proximity to the proposed development will experience adverse effects arising from operational noise, shadow flicker, visual intrusion, construction disturbance and the cumulative industrialisation of the landscape. Given the quiet rural character of North Mayo, I am not satisfied that the application has demonstrated that residential amenity can be adequately protected over the lifetime of the development.

CONCLUSION

I respectfully submit that significant concerns remain regarding the adequacy of the assessment of impacts on protected habitats, bird species, cumulative environmental effects and tourism.

I am not satisfied that it has been demonstrated beyond reasonable scientific doubt that the proposed development, either alone or in combination with other developments, will not adversely affect the integrity of nearby European sites, protected species or the wider ecological network of north Mayo.

Given the proximity of the project to the Killala Bay/Moy Estuary SAC /SPA, I am not satisfied that the assessment fully demonstrates that there will be no indirect impacts on supporting habitat, flight corridors, feeding areas or commuting routes used by SPA species.

For these reasons above, I request that An Coimisiún Pleanála give careful consideration to the concerns outlined and grant permission refusal.

Yours faithfully,

Ríognach Ní Mhurchú
Ballymachola,
Crosmollina,
Co.Mayo