



Turasóireacht Iorrais Teo
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Submission/Observation to An Bord Pleanála

Re: Application Reference: PAX16.324387
Muingmore Wind Farm Project – Formal Observation

From: Turasoireacht Iorrais Teo, Carne, Belmullet, Co. Mayo

Date: 9th July 2026

Background:

Turasoireacht Iorrais Teo is a not for profit Company established in 1989, whose main aims and objectives are to promote and foster the development of tourism in the Erris region of North Mayo and to develop and provide amenities and facilities for tourists to develop inward tourism (both national and international) to the region.

The Company operates Carne Golf Links as it's flagship development, a championship links golf course, located in Carne, Belmullet, approximately 3km outside the town of Belmullet in Erris. Carne Links was developed in the late 1980s/early 1990s to drive tourism into the remote Mullet peninsula and surrounding areas, at a time when there were extremely high levels of unemployment and emigration/migration from the region, with very little local industry or employment opportunities, with the area being classified as both economically and socially disadvantaged, particularly in terms of infrastructure, economic opportunities and access to services, **as is still the case**. The Company also have a dual role to develop the wider tourism infrastructure and industry in the region, and to market the region as a tourism destination.

Carne Golf Links is operated as a social enterprise, both as a major piece of tourism infrastructure in the region which attracts high end golfing tourists to the area, and to generate revenue to help achieve the Company's wider aims and objectives. The facilities at Carne are currently ranked at number 63 in Golf Digest Top 100 courses in the world, and at number 6 in Ireland. It attracts upwards of 16,000 unique visitors to the region and makes a significant contribution to the local and wider Mayo economy. All supplies and services are sourced from the Mayo region where possible, and the Company also provides significant permanent and seasonal local employment opportunities.

Carne Links now provides 27 holes of championship Links golf, offering two separate 18 hole course routings, (currently ranked at number 63 in Golf Digest World rankings, and number 6 in Ireland), with associated facilities including a Clubhouse bar and restaurant, Golf Shop, storage sheds, and offices, providing 30 full time permanent jobs, rising to 80 with seasonal staff employed every summer from April through to October. It attracts 16,000 unique golfing visitors to the region every year (between April and October), 80% of whom are international visitors, many of whom are accompanied by their families, with an average length of stay from 7 to 14 days in the region. It has also hosted the Irish PGA Championship on three occasions in 2021, 2022, and 2023, which is the oldest, largest, and most

prestigious Irish PGA tournament in Ireland, and was the first time it was hosted in either County Mayo or a Gaeltachta region since its' inception in 1907. It's vision is to host the Irish Open, as a major golf tournament, at Carne, within the next 5-10 years, and planning is currently underway to achieve this objective, with both the European Tour and Mayo County Council.

To provide some context of the economic impact of Carne Links to the local economy, and it's importance to the tourism offering in the region, we have calculated the economic data below using various income multipliers, as per standard economic analysis methodology, to estimate the total economic effect, which is calculated across the following categories:-

- Direct economic impacts : the immediate financial effects on the economy as a result of the operations at Carne;
- In-direct economic impacts : secondary effects from the initial economic activity i.e. supply chain and support services that benefit from the operations at Carne;
- Induced economic impacts: tertiary effects - the broader economic activity generated as a result of spend from income generated by both the direct and in-direct impacts of operations.

Direct:

- **Green fees:** Failte Ireland analysis illustrates that golf tourists are typically high end tourists with an average spend of €1,800 for a three day stay, which is three times higher than the average leisure tourist. Only 20% of this spend is on green fees or golf related activities, with the remainder going directly into local economies on non-golf expenditure such as accommodation, food and beverage, transport, and other tourism attractions. Therefore the economic worth of 15,000 unique golfing tourists at Carne, based on a conservative estimate of an average three day stay is €27m;
- **Golf equipment hire/golf shop activities/caddy services:** The value of golf equipment hire, golf shop sales activities (branded merchandise etc.), and caddy services (averaging 7,000 rounds per year requiring caddy services), amounts to an overall economic impact of €2.4m;
- **Clubhouse activities :** The bar and restaurant economic activity amounts to an overall economic impact of €1m;
- **Overall payroll** provides for economic impact of €900k.

In-Direct:

- Operational activity supply chain and support services spend (including service providers and excluding payroll, taxation and utility bills), resulting in further stimulation of the economy, is valued at €2.2m

Induced :

- Induced economic impacts are a vital part of the overall economic benefit of operations, and supports jobs and businesses in sectors not directly tied to tourism i.e. in the context of other businesses benefiting from the spending of wages via both direct and in-direct employment, creating a ripple effect throughout the economy, providing for an induced economic impact of €450,000 from operations at Carne Links.

Taking direct, in-direct, and induced economic impacts from the operations at Carne Links, this provides for a total economic value to the local/regional economy of €33.9m, (calculated via a conservative methodology).

Other additional benefits from the current operational activities at Carne include:

- Job creation: not just in the Company, but also in local businesses due to increased demand;
- Taxation revenue to the State;
- Community Development : more spending leading to improved infrastructure, services and quality of life.

Carne Links has significant further capacity to grow its' visitor numbers, due to its' unique structure as a tourism facility (as opposed to a golf club with membership), and could cater for 40,000 plus visitor rounds of golf per year, which is more than double its' current tourism numbers. The current main barrier to this growth, and subsequent increased economic benefits and job creation opportunities, is the lack of tourism accommodation in the area. To that end, Turasoireacht Iorrais Teo are currently in the process of submitting planning to Mayo County Council for on-site tourism accommodation at Carne Links, and this proposed development fits within the parameters of the County Development Plan and other national plans for sustainable development of tourism facilities and accommodation, and will, when complete, remove barriers to additional tourism growth at Carne Links and the wider region.

However, a major risk to the expansion of the tourism offering at both Carne Links and in the region, is the proposed development of the Muingmore Wind Farm proposal, which will have significant detrimental effects on Carne Links and on the whole tourism offering in the region, as it will significantly undermine our unique selling points, and will result in a decline in tourism numbers in the region, which will be disastrous from a socio economic perspective. Evidence is already available in that the investors in the proposed on-site tourism accommodation are already asking us to review our projections on occupancy levels due to this development, which is clear evidence that it is already impacting our proposed expansion plans.

1. Executive Summary

This observation sets out a formal submission to the proposed Muingmore Wind Farm on the basis that it would:

- Cause significant adverse visual and landscape impacts on a nationally and regionally important tourism destination.
- Undermine the tourism economy of the Erris Peninsula, particularly high-value golf tourism associated with Carne Links.
- Undermine the recently launched "Wild Mayo Destination and Experience Plan" for the region, which has been developed on a partnership basis between the local community and Failte Ireland. This proposed development puts critical aspects of the Plan at risk and therefore the sustainable development of tourism in a socio-economically deprived region.
- Undermines the Department of Enterprise, Tourism & Employment's recently published (2025) Government vision for the development of Ireland's tourism sector to 2031 which includes the following targets (to achieve these targets all areas must significantly increase their tourism revenue, particularly in regards to regional growth). This proposed development puts the tourism economy and offerings in the Belmullet region at high risk of decline:-
 - Grow total tourism revenue (overseas and domestic combined) from €9.6bn in 2024 to €14.8bn by 2031, equivalent to annual growth of 6.4%;
 - Increase overseas tourism revenue from €6bn to €9bn by 2031, representing a 50% increase on 2024 levels, equivalent to 6% average annual growth;
 - Regional growth: targeting a minimum annual increase of 7% in visitor numbers in less mature and emerging regions, of which Erris is defined as such, whilst managing growth in a sustainable and regionally balanced manner;
 - Support 250,000 jobs in the tourism sector by 2031 (up from 228k in 2024)
- Create a material risk of long-term economic decline in Belmullet and surrounding areas. Carne Links currently contributes €34m to the local economy, sustaining 30 full time jobs throughout the year, increasing to 80 in the high season (making us one of the largest employers in the area, which has higher than the national average rates of unemployment). We currently attract 16,000 unique golfing tourists from April to October each year, and are the main driver of tourism into the region, supporting in-direct jobs and benefits across all sectors of the economy in the region, but particularly hospitality and retail.
- Adversely affect the unique value proposition of Carne Links and the region as a tourism destination, which is built on being wild and rugged, golf at the edge of the earth, an ancient landscape, remote, authentically West of Ireland. The scale and number of the wind turbines associated with this proposed development is completely adverse to our tourism

value proposition and will, without doubt, adversely affect our visitor numbers. It is often described as one of the last unspoilt regions in the West and the visual impacts of this proposed development puts these unique selling points at risk, as will the environmental, ecological, construction, and operational impacts across both Blacksod Bay and Broadhaven Bay, which are both within designated SAC/SPA .

- Conflict with established national, regional, and local planning policy relating to tourism protection and landscape preservation

Whilst renewable energy development is supported in principle, this proposal represents inappropriate siting in a tourism-sensitive landscape. The North West Mayo region already sites the Oweninny Windfarm in Bellacorrick and its' surrounds, which is one of the largest windfarms in Ireland, but is located inland from the main tourism amenities and has a much smaller visual impact on key tourism attractions in the region. As the region already supports significant renewable energy infrastructure, the overall sustainable development of such infrastructure should be fully considered given its potential impacts in relation to the Muingmore proposal, including the over concentration of such infrastructure into one region, creating industrialisation in an unspoilt region.

Furthermore, as both Blacksod Bay and Broadhaven Bay are designated SAC under the EU Habitats Directive and form part of the EU Natura 2000, alongside SPA designations under the EU Birds Directive for the protection of important populations of wintering wildfowl, migratory birds, including divers, Brent geese, Scoters, Grebes, Waders and breeding tern populations, both the construction and operation of the proposed wind vanes would adversely affect the protections afforded by these designations, and are another reason for refusal of this development . Further, the impacted area also form part of the Blacksod Bay and Broadhaven Ramsar site designation under Ramsar Conservation of wetlands, which recognises wetlands of international importance particularly for waterbirds and biodiversity.

In addition, the area is renowned for its' blanket bog/raised bog/peat bog landscapes which are of key importance ecologically, and are priority habitats, whilst also providing centuries worth of carbon storage. The proposed development will impact Bangor Erris Bog NHA, a statutory Natural Heritage Area designated for peatland habitat. It lies within a landscape that drains towards and sits close to several Natura 2000 sites, with hydrological connections to the SAC/SPAs and associated Ramsar wetland sites as noted above. With an estimated 107,080 cubic metres of peat to be excavated for the proposed development, the impacts on nearby land, drainage, streams and Blacksod Bay itself, as well as the hydrological connections to ecologically sensitive areas as noted above, particularly given the wet West of Ireland weather, have the potential to be hugely detrimental to the region. The movement of the peat is a major concern, particularly given the occurrences during the removal of peat during the Corrib Gas project, and the accidents/incidents that occurred at that time.

Given these designations and impacts on peat bogland, it is clear that this proposed development and its' impacts, both visual, and during construction and operation, is proposed for a wholly unsuitable site at Muingmore and its' surrounds.

2. Standing and Interest

This observation is made from the perspective of stakeholders connected with Turasoireacht Iorrais Teo and Carne Links Golf Course, one of Ireland's most significant links courses, currently ranked number 63 in the Top 100 Golf courses in the World, and number 6/11 in Ireland respectively, and in the interests of the broader tourism network within Belmullet and the Erris region.

Carne Links is:

- An internationally recognised golf destination.
 - A major driver of inbound tourism to North Mayo.
 - Directly linked to employment and revenue across multiple sectors.
 - Currently contributes €34m to the local economy, supporting 30 full time jobs rising to 80 in the summer season, and is a major driver of tourism into the region.
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3. Strategic Importance of Tourism in Erris

Tourism in the Erris Peninsula is not supplementary — it is **structurally critical, from both an economic and social sustainability perspective.**

3.1 Economic Dependence:

The local economy relies heavily on:

- Overseas golf tourism.
- Domestic and international leisure travel.
- Adventure tourism, particularly surfing and other marine activities in both Blacksod and Broadhaven Bays.
- Walking tourism.
- Seasonal visitor spending.

This revenue sustains:

- Accommodation providers.
- Hospitality and retail businesses.
- Transport and service providers.
- Significant local employment in a socio-economically disadvantaged area and designated as such, with some of the highest unemployment levels and labour market challenges both within Mayo and nationally, therefore being an economically fragile region, and more susceptible to adverse impacts from the proposed development.

3.2 Nature-Based Destination Identity:

The area's value proposition is based on:

- Wild, unspoilt Atlantic landscapes
- Absence of large-scale industrial infrastructure
- Perceived remoteness, tranquillity, and authenticity

Any erosion of these attributes directly affects visitor demand.

4. Impacts on Golf Tourism and Carne Links:

Golf tourism represents a high-value, low-volume sector that is exceptionally sensitive to landscape quality.

4.1 Unique Value Proposition of Carne Links:

Carne Links is internationally marketed on:

- Golf at the Edge of the Earth – one of the most westerly golf courses in Europe situated on a remote peninsula, within a raw and natural setting, on an ancient landscape, with the highest dunescape on any golf course in Europe – truly a unique landscape and the lack of visual intrusion is vital to our continuing sustainability and future growth. We have spent many years developing this tourism facility on an environmentally, economically, and socially sustainable model, and the visual impacts of these huge wind turbines along Broadhaven Bay would negatively impact our operations hugely, and therefore tourism in the whole region and our indigenous industry built around our emerging tourism potential.
- Immersive coastal and bogland scenery.

The proposed development would:

- Introduce large-scale turbines into key sightlines of Blacksod Bay, and Broadhaven Bay.
- Alter the visual experience across multiple holes and vantage points, in areas of outstanding natural beauty.
- Diminish the course's international brand positioning as an "unspoilt links experience"

4.2 Economic Sensitivity:

Carne Golf Links is not a Golf Club, it is a tourism based facility which is reliant on visitor income for 99% of its' revenue, and anything that detracts from the visitor experience has the potential to reduce our visitor numbers, thereby reducing revenue and our overall sustainability, and therefore the economic sustainability of the Belmullet region. We are very exposed to reductions in our visitor numbers as we are so reliant on our overseas and domestic visitors to keep the doors open at Carne Links. We attract over 16,000 unique golfing visitors to the region between April and October every year, and contribute over €34m to the regional economy. We are a vital part of the tourism sector in the region and support the economic viability of local hotels, accommodation providers, pubs, restaurants, shops, and other tourism attractions in the region, whilst also sourcing all our supplies locally where possible and supporting local fishermen and other food suppliers in the region. Both

the scale and location of the proposed development at Muingmore threatens our unique value proposition and therefore our very existence at Carne. The region already has significant inland windfarms located at Oweninny, Bellacorrick, and Alt in Glencastle, and this really is a case of over industrialisation of the region. The visibility of these large wind turbines from both Blacksod and Broadhaven Bay will destroy our business and viability, and we object strongly on behalf of all the tourism stakeholders in the region to this development. It is too large and in the wrong location and will have significant negative impacts on a region which is reliant on tourism for its social and economic sustainability.

Golf tourists:

- Spend significantly more per visit than average tourists.
- Travel specifically for landscape-driven experiences.
- Participate in other tourism activities in the region.
- Are highly influenced by destination perception.

Even a modest decline in visitor numbers would have:

- Disproportionate financial consequences on the region
 - Immediate effect on local employment and the viability of multiple local businesses.
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5. Landscape and Visual Impact

5.1 Character of the Receiving Environment:

The Belmullet Peninsula is characterised by:

- Open, expansive bogland
- Low-lying horizons
- Panoramic coastal views
- Minimal built intrusion

5.2 Nature of the Proposed Development:

The wind farm would introduce:

- Tall, highly visible turbines.
- Continuous blade movement creating visual dominance in an area of outstanding natural beauty.
- Associated infrastructure (roads, cabling, substations).

5.3 Significance of Impact:

Given the open landscape:

- Visibility would extend across wide areas of outstanding natural beauty.
- The development would become a defining feature of the landscape.
- Impacts would be ineliminable and permanent.

This represents a fundamental transformation of landscape character, not a marginal change.

6. Tourism Impact – Evidence-Based Considerations

Tourism research consistently shows that:

- Scenic quality is a primary driver of destination choice.
- Perceived industrialisation reduces visitor appeal and satisfaction.
- Repeat visitation is highly dependent on landscape integrity.

In the context of Erris/Belmullet:

- The brand is built on being “off the beaten track” and unspoilt.
- Any shift toward perceived industrialisation risks loss of competitive advantage.
- Recently launched “Wild Mayo Destination and Experience Plan” by Failte Ireland in partnership with local stakeholders, including ourselves at Carne Links, which bases the heart of the sustainable development of tourism in the region in the Wild Mayo experience, which will be negatively impacted by this development before it even gets off the ground, in particular the areas around the Ceide Fields and the cliffs at Ballycastle, including DunBriste Head – such visually intrusive developments would never be allowed to visually impact the Cliffs of Moher, or the Carrick Reide rope bridge in Northern Ireland, both of which are similar to the proposals in the Wild Mayo Tourism Plan, There would be widespread outrage at any such proposals on a national level, and rightly so, therefore the same principles

should apply to the negative impacts on our current and emerging tourism offerings in Co. Mayo, and on the overall tourism industry in the region which is equally important to our region as the Cliffs of Moher etc are to West Clare, and to our overall social and economic sustainability in an already vulnerable region.

7. Wider Economic Consequences

A reduction in tourism would trigger multiplier effects:

- Declines in accommodation occupancy.
- Reduced viability of restaurants, pubs, and shops.
- Loss of seasonal and permanent employment.
- Reduced local spending leading to economic contraction.
- Removal of growth opportunities both for Carne Links, wider golf tourism in the region, and the overall emerging tourism offering in the region.

This is particularly critical in a region with:

- Limited alternative employment
- Existing challenges relating to rural depopulation

8. Cumulative and Perceptual Effects

Even beyond direct visibility:

- The perception of the area as industrialised can deter visitors.
- International and domestic marketing efforts by Failte Ireland and Tourism Ireland and local operators would be undermined.
- Competing destinations without such infrastructure would gain advantage.

Tourism is perception-driven, and once reputational damage occurs, it is difficult to reverse.

9. Planning Policy Context

The proposal is inconsistent with key planning principles:

9.1 Protection of Tourism Assets

Planning policy supports:

- Safeguarding of established tourism destinations.
- Protection of scenic landscapes that underpin economic activity.

9.2 Sustainable Development

Sustainable development requires:

- Balancing renewable energy with economic and social impacts.
- Avoiding disproportionate harm to existing livelihoods.

9.3 Landscape Protection

The scale and visibility of this development conflicts with:

- The need to protect landscapes of high amenity value.
- The preservation of regional character and identity.

10. Inadequacy of Assessment

It is submitted that:

- The tourism impact assessment (if provided) does not adequately reflect:
 - The economic importance of golf, adventure, and marine tourism in the region, and the direct and in-direct impacts on the local and regional economy, and the dependency of the region on tourism for socio and economic sustainability.
 - The sensitivity of the local tourism model to any impacts that detract from our natural, wild, raw, unique attractions and our ancient landscape.
 - Long-term reputational impacts
 - Environmental concerns in regards to existing designations within both Blacksod Bay and Broadhaven Bay and the surroundings.

A more robust, independent assessment is required across all areas.

11. Conclusion

The proposed Muingmore Wind Farm would:

- Fundamentally alter a high-value tourism landscape.

- Negatively affect both emerging and established tourism facilities in the region in an area of socio-economic vulnerability.
- Put at risk a sustainable and established local economy
- Undermine the international reputation of Carne Links and the Erris Peninsula

The location is therefore unsuitable for this scale of development, regardless of the broader need for renewable energy, particularly given that the region already has significant wind farm developments in place at Bellacorrick, Alt, and both the size and location of the proposed additional development at Muingmore will overload one area unfairly with disproportionate impacts on our remote region, which is entirely dependent on tourism.

12. Request to An Bord Pleanála

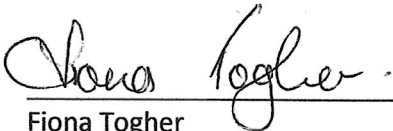
It is respectfully requested that the Board:

Primary Request

- Refuse permission for the proposed development

Alternatively

- **Require:**
 - A comprehensive, independent Tourism Impact Assessment
 - Detailed visual impact re-evaluation from key tourism receptors
 - Full consideration of economic displacement effects, with adequate and full compensatory replacement of tourism economic activity displaced in the area by the development



Fiona Togher

General Manager

Turasoireacht Iorrais Teo (Carne Links)