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20 June 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re: Submission/Observation on the Proposed Tirawley Wind Farm Strategic Infrastructure Development

Submission/Observation to An Coimisiún Pleanála

Re: Planning permission for the construction of Tirawley Windfarm consisting of 16 no. wind turbines, a permanent 110kV substation, 110kV underground cable and grid connection, and ancillary development in the townlands of Ballymurphy, Ballynaleck, Barnhill Lower & Upper, Barroe, Billoos, Carn, Carrickanass, Carrowmore, Castlelacken Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

We are writing as homeowners who will be surrounded by wind turbines if the Tirawley Wind Farm project, submitted by Constant Energy Limited, is given planning permission. We wish to make this submission/observation on this Strategic Infrastructure Development application. This development poses significant and irreversible risks to the local environment, biodiversity and local residents. In particular the proposal threatens critical habitats for protected species such as the hen harrier, involves substantial habitat removal including over 4 km of hedgerow, and raises serious concerns regarding visual impact, traffic disruption, and inadequate community consultation. These issues, coupled with shortcomings in the Environmental Impact Assessment Report, justify a refusal of permission for this project.

Having reviewed the public information provided and engaged with the community consultation materials, we raise the following concerns:

1. Residential and Property Impact

The proposed wind turbines are located uncomfortably close to existing homes. Despite the stated 540m buffer, the visual impact, noise pollution, and potential shadow flicker effects will significantly disrupt our residential amenity and quality of life. There is also a genuine concern about the likely devaluation of property prices due to proximity to large-scale industrial turbines.

(Reference: Appendix 1.6 Community Engagement Report, Pages 7–13)

Per the applicant's documents, our house has been identified as H48. We would like it noted that we have an issue with the term "receptor" as it appears to detach the development from the fact that it is being proposed for an area that is home to so many people. The area is not a barren site; it's our home and our community.

Our house is located approximately:

- 806m from Turbine AT07 – Table 15.1
- 821m from Turbine AT08
- 1405m from Turbine AT09

We are very concerned that the EIAR assessment does not adequately address the real-world residential impact of having two large-scale turbines located within one kilometre of our home, and a third within 1.5 kilometres.

Noise Impact Concerns

The proposed turbine AT07 is located only approximately 806 metres from our house (H48). We consider this distance insufficient to protect residential amenity, particularly given the scale of modern turbines and the quiet rural environment in which our home is located.

The assessment relies heavily on predicted modelling. We request that An Coimisiún Pleanála carefully examine whether the modelling fully represents the actual conditions experienced at H48, including:

- night-time noise impacts when background noise levels are naturally low;
- periods with specific wind direction where turbines AT07, AT08 and AT09 may all contribute simultaneously;
- amplitude modulation ("blade swish" or changing character of turbine noise);
- low-frequency noise impacts;
- the cumulative noise contribution from multiple turbines.

A predicted compliance with a numerical noise limit does not necessarily mean that there will be no significant loss of residential amenity. A change from the existing quiet rural soundscape to continuous operational turbine noise has the potential to materially affect our enjoyment of our home, garden and surrounding property.

We request that a more precautionary assessment be applied to H48 given its proximity to AT07 and the combined influence of three turbines.

Shadow Flicker

The EIAR identifies our house, H48, as being approximately 806 metres from turbine AT07. Table 15.3 of Chapter 15 predicts that H48 will experience:

- 48 hours 17 minutes worst-case shadow flicker per year
- 8 hours 57 minutes expected shadow flicker per year
- 35 minutes maximum expected shadow flicker per day

This exceeds the 2006 Wind Energy Development Guidelines recommendation of no more than 30 minutes per day.

We consider this significant because the applicant's own modelling confirms that our home is one of the receptors where the guideline threshold is exceeded. The issue is not a theoretical concern — the impact has already been identified within the EIAR.

While the EIAR refers to mitigation measures in Section 15.2.9.3, including turbine control measures/shadow flicker control systems, we do not consider reliance on future mitigation alone to be sufficient justification for permitting a development that exceeds guidelines.

The mitigation proposal effectively acknowledges that turbines have the potential to cause unacceptable shadow flicker impacts unless active intervention occurs. This raises concerns regarding:

- long-term reliability of control systems;
- monitoring and enforcement arrangements;
- responsibility if mitigation fails;
- whether shutdown will occur automatically or only after complaints;
- how compliance at H48 will be independently verified throughout the lifetime of the wind farm.

We further note that the Draft Revised Wind Energy Development Guidelines (2019) recognise that modern turbine technology can prevent shadow flicker and move towards a zero shadow flicker approach at sensitive receptors.

Given that H48 is already predicted to exceed the 2006 daily guideline, we submit that the appropriate standard should be prevention rather than management.

2. Site Suitability and Landscape Impact

The location has been described as scattered and not suitable for a development of this scale. The area includes sensitive landscapes, visible from the Wild Atlantic Way and other designated scenic routes, which would be adversely affected by this wind farm. The visual intrusion on the unique coastal and rural landscape is unacceptable and contrary to the policies outlined in the Mayo County Development Plan regarding landscape protection and visual amenities.

This concern is grounded in current policy, not only past practice. The Mayo County Development Plan 2022–2028 and its Landscape Appraisal for County Mayo (Volume 4) identify the vulnerable features of this landscape — including prominent ridgelines, skylines and watercourse corridors — and set a clear policy of preserving the character and distinctiveness of such areas, particularly as viewed from scenic routes. Mayo County Council’s own planners have recommended against this application, citing the visual impact on this scenic location and its proximity to Ballycastle, the Wild Atlantic Way, Downpatrick Head, the Céide Fields and residential areas. We share and endorse that assessment.

There is also direct precedent for refusal in this landscape. In 2012, An Bord Pleanála refused permission for a wind farm in this same north Mayo coastal landscape, in the vicinity of Killala Bay (An Bord Pleanála Ref. PL16.239901; Planning Authority Ref. P11/409, refused 5 September 2012). The Board found that, by reason of its height, scale and extent in an exposed location overlooking Killala Bay, the development would have a “disproportionate and obtrusive visual impact”, contrary to the landscape-protection policy of the Mayo County Development Plan then in force and contrary to the proper planning and sustainable development of the area. The Board also had regard to the fact that the site lay outside the areas identified as most appropriate for renewable energy development in the Renewable Energy Strategy for County Mayo. The same landscape sensitivities — an unspoilt, exposed, scenic coastal setting — apply to the Tirawley site. While the specific development-plan policies have since been updated, the underlying planning principle endures in the current Mayo County Development Plan, and we respectfully submit that the Commission should determine this application consistently with that previous assessment of this landscape.

(Reference: Mayo County Council submission; Mayo County Development Plan 2022–2028 and Landscape Appraisal for County Mayo (Volume 4); EIAR Chapter 17 – Traffic and Transport, Pages 9–10; Planning Statement, Pages 69–71; An Bord Pleanála Ref. PL16.239901 / Planning Authority Ref. P11/409, refused 5 September 2012)

3. Environmental and Ecological Concerns

The site includes sensitive habitats such as blanket bogs and areas with ecological significance under the Habitats Directive. The large volumes of peat to be extracted and the disturbance to these habitats could have long-term detrimental effects on biodiversity and peatland restoration efforts.

(Reference: Appendix 1.6 Community Engagement Report, Pages 13–14; Planning Statement, Pages 69–71)

4. Impact on Hen Harrier Habitat

We are particularly concerned about the impact of the proposed development on the hen harrier, an Annex I protected species under the EU Birds Directive and one whose Irish population has declined significantly in recent years. The EIAR acknowledges that hen harriers are present within the study area and that the site provides suitable autumn and winter foraging habitat. The site contains a combination of blanket bog, scrub, wet grassland, semi-improved grassland and hedgerow networks, all of which are important habitats for foraging and roosting hen harriers.

Of particular concern is the adequacy and scope of the winter hen harrier roost survey. Although the application includes a winter hen harrier roost survey (Appendix 7.8, Winter Hen Harrier Roost Survey Details, 2022–2023), and a winter roost was recorded within the study area, the survey effort appears to have concentrated on areas outside the development footprint. We are concerned that roosting activity within the proposed development area itself has not been comprehensively assessed, despite evidence that hen harriers use habitats within it. In the absence of a robust assessment of winter roosting activity across the site itself, it is difficult to conclude that the impacts on this protected species have been fully assessed.

The development will result in the permanent loss and fragmentation of habitats used by hen harriers, including substantial hedgerow removal, loss of blanket bog habitat, forestry felling and the construction of extensive site roads and infrastructure. While mitigation is proposed, there remains uncertainty as to whether replacement habitats can adequately replicate the ecological value of the habitats being lost, particularly in the short to medium term.

We are also concerned about the cumulative effects of habitat loss, construction disturbance and operational displacement. Research has shown that hen harriers may avoid otherwise suitable habitat in the vicinity of operational turbines, resulting in a reduction in available foraging area. The application does not appear to adequately assess or mitigate this displacement effect.

Given the conservation status of the species, the acknowledged presence of suitable habitat and recorded winter roosting activity within the study area, we do not believe sufficient scientific certainty has been provided to demonstrate that the proposed development will not adversely affect the hen harrier population using this landscape. The precautionary principle should therefore apply.

5. Traffic and Infrastructure Impact

The construction phase will bring significant disruption to the local road network due to the delivery of abnormal loads and turbine components. The existing roads will require widening and modifications that will impact local traffic flow and road safety. The scale of this impact has not been adequately mitigated in the proposal.

(Reference: EIAR Chapter 17 – Traffic and Transport, Pages 6–10; Appendix 1.6 Community Engagement Report, Pages 11–12)

6. Community and Socio-Economic Issues

While we acknowledge the need for renewable energy and some regional economic benefits, the socio-economic impact on sustainable family farms and local amenities is concerning. The proposal does not sufficiently address the community's needs or provide clear, direct benefits to local residents. The proposed community benefit package remains vague and unconvincing.

(Reference: Appendix 1.6 Community Engagement Report, Pages 7–14)

7. Cumulative and In-Combination Impacts

This application cannot properly be assessed in isolation. By the applicant's own account, there are in the region of 14 operational, consented or proposed wind farms within approximately 20 kilometres of this site, and the EIAR itself acknowledges this through its cumulative figures and appendices (for example Figure 2.5, Appendix 1.2 and Appendix 1.5). We are not satisfied that the in-combination effects of so many large-scale wind developments — on landscape and visual amenity, on the hen harrier and other protected species and their European sites, on peatland and hydrology, and on the local road network — have been assessed with the rigour that the Habitats Directive and proper planning require. Where reasonable scientific doubt remains as to in-combination effects on European sites, the precautionary principle requires that permission be refused.

That cumulative pressure is compounded by the fact that this turbine array is only one element of a wider energy cluster being advanced in north Mayo, including hydrogen and gas generation and associated large-user demand such as data centres. The combined landscape, grid-infrastructure, construction-traffic and peatland impacts of developing these projects in close proximity have not been adequately addressed. As Mayo County Council has noted, the scale and height of modern turbines raise serious questions about the suitability of this site, and the cumulative burden on this coastal landscape and community weighs firmly against the proposal.

(Reference: EIAR Figure 2.5 – Windfarms within approximately 20km of the Wind Farm Site; Appendix 1.2 Cumulative Windfarm Sites; Appendix 1.5 Other Major Developments within 10km; Planning Statement; Mayo County Council submission)

8. Battery Energy Storage System (BESS) and Fire Safety

The application includes a Battery Energy Storage System (BESS), comprising battery units and associated electrical infrastructure on the site. Lithium-based battery storage carries a recognised risk of thermal runaway and fire, which can be difficult to extinguish, may reignite, and can release toxic gases. We are concerned about this risk in a remote rural location served by narrow access roads, with limited water supply for firefighting and extended emergency-service response times. There is also a risk that firewater run-off from a battery fire could contaminate surrounding peatland, watercourses and sensitive habitats. While the EIAR includes a Fire Safety Assessment (Appendix 16.1) and addresses major accidents in Chapter 16, we do not consider reliance on the applicant's own assessment to be sufficient, absent independent verification and a clear, resourced emergency response

plan agreed with the local fire service, given the potential consequences of a failure at this location.

(Reference: EIAR Chapter 16 – Major Accidents & Natural Disasters; Appendix 16.1 – Fire Safety Assessment and Advice Report)

Finally I wish to adopt and support the detailed submission made by the Lacken Ballycastle Community Landscape Protection Group including the report by Con Sheehan in relation to the proposed Tirawley Wind Farm development (PAX16.324258). In particular, I endorse the concerns raised regarding negative visual impact, cumulative wind farm development across North Mayo, impacts on the Céide Fields cultural landscape, effects on tourism and recreation, biodiversity impacts, inadequacies in community consultation, and 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.

We make this submission as residents with direct, first-hand experience of this planning process, having participated in the 2012 case referred to above. We raise these concerns not in opposition to renewable energy in principle, but from a genuine and informed commitment to protecting this environment and to securing proper planning and sustainable development.

In conclusion, we respectfully submit that the proposed Tirawley Wind Farm project is not appropriate for this location due to the significant negative impacts on residential amenity, local landscape, ecology, infrastructure, and the community. We urge An Coimisiún Pleanála to refuse permission for this development in the interests of proper planning and sustainable development.

Thank you for considering our submission.

Yours faithfully,

Aideen Kane
John Breen




ATTACHMENTS X 3

Table 15.1: Properties within the Shadow Flicker Study Area

Jennings O'Donovan & Partners Limited

Consulting Engineers

Sligo

	ING	ING	4 m/s	5 m/s	6 m/s	7 m/s	8 m/s	9+ m/s
House ID	Easting	Northing	dBA	dBA	dBA	dBA	dBA	dBA
H45	515873	833236	29.7	33.8	37.6	39.9	40.2	40.2
H46	516625	836322	31.2	35.3	39.1	41.4	41.7	41.7
H47	517758	837737	28.4	32.5	36.3	38.6	38.9	38.9
H48	516764	835557	29.8	33.9	37.7	40	40.3	40.3

Table 15.3: Summary of Potential Shadow Flicker Listing for All Properties

Current House ID	Easting ITM	Northing ITM	Closest Turbine	Closest Distance to Turbine (m)
H23	515805	834702	AT01	687
H24	517581	838054	AT15	691
H25	515641	832856	AT02	715
H26	515947	834836	AT07	719
H27	517606	838071	AT15	720
H28	515886	834729	AT01	727
H29	517490	838353	AT15	742
H30	515462	834716	AT01	744
H31	516107	834819	AT07	751
H32	517583	838226	AT15	753
H33	515398	834709	AT05	753
H34	517725	837501	AT16	758
H35	517434	838443	AT15	762
H36	517697	837346	AT16	764
H37	514129	833845	AT06	769
H38	517741	837449	AT16	781
H39	517762	837602	AT16	790
H40	517663	838130	AT15	791
H41	517766	837561	AT16	794
H42	517762	837501	AT16	795
H43	517767	837579	AT16	795
H44	517742	837383	AT16	796
H45	515873	833236	AT01	798
H46	516625	836322	AT08	798
H47	517758	837737	AT16	800
H48	516764	835557	AT07	806

Table 11.16: Predicted Noise Levels as LA90 at Varying Wind Speeds from the Proposed Development

Jennings O'Donovan & Partners Limited

Consulting Engineers

Sligo

Receptor ID	Specimen Turbine		
	Worst Case Shadow [h/year]	Expected Shadow [h/year]	Max. Expected Shadow [h/day]
H28	06:57	01:02	00:22
H29	58:39	06:24	00:38
H30	16:56	02:31	00:34
H31	03:38	00:32	00:17
H32	52:03	06:23	00:37
H33	20:15	03:02	00:36
H34	64:07	11:34	00:36
H35	53:07	05:34	00:38
H36	50:22	09:09	00:37
H37	22:02	02:24	00:27
H38	60:03	10:45	00:36
H39	44:14	08:14	00:34
H40	40:10	05:21	00:35
H41	46:55	08:52	00:34
H42	58:45	10:41	00:35
H43	44:59	08:28	00:35
H44	52:31	09:25	00:36
H45	33:48	04:37	00:28
H46	99:27	14:20	00:37
H47	38:48	06:26	00:34
H48	48:17	08:57	00:35