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

**Re: Objection to the Proposed Tirawley Wind Farm Strategic Infrastructure
Development Objection Submission 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, Castlелacken Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

I wish to lodge a strong objection to the proposed Tirawley Wind Farm development by Constant Energy. Having carefully reviewed the application documentation, Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), supporting technical reports and consultation material, I am deeply concerned that this proposal represents an inappropriate industrial-scale development in a highly sensitive rural, cultural, environmental and tourism landscape.

This submission is made on the basis that the proposed development would cause significant and unacceptable impacts on the landscape character of North Mayo, the local community, residential amenity, biodiversity, archaeology, tourism, water resources, cultural heritage and

public infrastructure. The proposal would fundamentally alter the character of the Lacken and Kilcummin area and would result in lasting consequences for generations to come.

INTRODUCTION

Lacken and Kilcummin are not merely locations identified on a map for renewable energy development. They are living rural communities steeped in history, culture and heritage. The area forms part of the wider Céide Fields landscape, one of Ireland's most significant archaeological landscapes and a location of immense international importance. It is also a key component of the Wild Atlantic Way experience and the tourism economy of North Mayo.

The community has spent decades building and promoting the area as a tourism destination, preserving its natural beauty and cultural identity while supporting local businesses, farms and community organisations. This proposal threatens to industrialise that landscape with sixteen turbines of up to 135 metres in height, a large Battery Energy Storage System, a substantial electrical substation and associated infrastructure spread across a vast geographical area.

The overwhelming level of community concern regarding this development demonstrates that it does not enjoy a social licence to operate. The lack of meaningful engagement with residents, community groups and local organisations throughout the development process has further undermined confidence in the application.

COMMUNITY IMPACT AND LACK OF SOCIAL ACCEPTANCE

The applicant has failed to demonstrate meaningful engagement with the communities most affected by the development. Numerous residents only became aware of the true scale of the proposal after planning documents were published.

Community consultation records themselves acknowledge concerns regarding noise, visual intrusion, impacts on homes, farming operations and property values. Residents described the development as being in the wrong location and expressed concerns regarding the scattered nature of the project across the landscape.

The development would fundamentally alter the character of the area and risks creating long-term division within the community. It would place industrial infrastructure in close proximity to homes, farms, schools and community facilities.

There is also a genuine concern regarding rural depopulation. The attractiveness of rural communities such as Lacken and Kilcummin depends upon the quality of the environment, landscape, tranquillity and sense of place. The industrialisation of the area through large-scale energy infrastructure risks discouraging families from remaining in or relocating to the community. Such an outcome would be entirely contrary to national and regional objectives aimed at sustaining vibrant rural communities.

NOISE, SHADOW FLICKER AND RESIDENTIAL AMENITY

The proposal would expose hundreds of residents to the impacts of turbine noise and shadow flicker over a 35-year operational period.

There remain significant concerns regarding the methodology used in the applicant's noise assessments, including receptor selection, baseline monitoring locations and assumptions regarding operational conditions. The assessment appears to rely upon compliance with outdated Irish guidance rather than reflecting the growing body of international evidence regarding the health and wellbeing impacts associated with turbine noise.

Particular concern exists regarding amplitude modulation, low-frequency noise and repetitive aerodynamic noise characteristics. These effects may be especially significant during night-time periods when background noise levels are lower.

The proposed development also raises serious concerns regarding shadow flicker. The methodology used by the applicant relies upon substantial reductions for cloud cover and sunshine duration which may underestimate actual impacts experienced by residents. There remain instances identified within the applicant's own modelling where compliance is highly dependent upon mitigation measures that may not always be effective.

The exclusion of certain sensitive receptors from shadow flicker assessment, including educational facilities, raises further concerns regarding the completeness of the analysis.

HEALTH AND WELLBEING

The potential impacts upon vulnerable individuals require far greater consideration than has been provided within the application.

Research has identified concerns regarding the effects of turbine noise and visual disturbance on individuals suffering from migraines, sleep disruption, sensory sensitivities and other health conditions. Sleep disturbance in particular is recognised by the World Health

Organisation as a significant public health issue. The long-term implications of introducing industrial-scale noise sources into a previously quiet rural environment have not been adequately addressed.

LANDSCAPE, VISUAL IMPACT AND TOURISM

One of the most significant shortcomings of the application is the apparent underestimation of landscape and visual impacts.

Mayo County Council itself expressed concerns regarding the visual sensitivity of the location and the impact on the unique coastal landscape and Wild Atlantic Way experience.

The proposal would introduce sixteen turbines up to 135 metres in height into one of the most distinctive coastal landscapes in Ireland. These structures would be visible across extensive areas of North Mayo, including from tourist routes, scenic viewpoints, archaeological sites, coastal amenities and residential properties.

The area is intrinsically linked to the wider Céide Fields landscape and tourism offering. Visitors are attracted by the unspoilt nature of the coastline, the archaeological significance of the landscape and the sense of remoteness and tranquillity that characterises North Mayo.

The applicant's conclusion that no significant visual effects would arise is fundamentally at odds with both community experience and the concerns expressed by the local authority.

CUMULATIVE IMPACTS

The cumulative impacts of wind energy development in County Mayo have not been adequately addressed.

The landscape is already affected by existing wind farms and associated infrastructure. Additional operational, consented and proposed developments continue to place increasing pressure upon the visual and environmental carrying capacity of the region.

The introduction of the Tirawley Wind Farm would contribute significantly to the ongoing industrialisation of the Mayo landscape and would further erode the distinctive character that underpins tourism, recreation and community identity.

ARCHAEOLOGY, CULTURAL HERITAGE AND THE CÉIDE FIELDS LANDSCAPE

The proposed development is located within a landscape of exceptional archaeological significance.

The wider area contains an extraordinary concentration of recorded monuments, archaeological sites, field systems, court tombs, ecclesiastical sites and cultural heritage features. The landscape is closely associated with the broader Céide Fields complex, which remains one of the most significant prehistoric landscapes in Europe.

The applicant acknowledges the presence of sensitive archaeological resources and cultural heritage sites within the area. Concerns have also been raised regarding impacts upon the setting of protected structures and archaeological landscapes.

The scale of excavation, road construction, turbine foundations and associated infrastructure raises significant concerns regarding direct and indirect impacts upon known and as yet unidentified archaeological resources.

TRAFFIC, TRANSPORT AND PALMERSTOWN BRIDGE

The traffic implications of this development are profound.

The haul routes proposed rely heavily upon narrow rural roads that are already constrained in width and condition. The applicant acknowledges that construction traffic will result in significant disruption, while Mayo County Council has described the scale of impact and management challenges as significant and requiring high-level consideration.

Particular concern arises regarding Palmerstown Bridge, a protected structure and important heritage asset. The bridge is narrow, one-way and inherently vulnerable to increased traffic loads and associated construction activities. Only a limited number of structural assessments have been undertaken. There is insufficient detail regarding ongoing monitoring during and after construction to ensure that cumulative damage does not occur.

The proposed mitigation measures do not adequately address these concerns. While traffic management plans and road repair bonds are proposed, these measures are reactive rather than preventative and do not compensate for disruption to residents, damage risks to infrastructure or impacts upon heritage assets.

WATER QUALITY, HYDROLOGY AND ECOLOGY

The proposed development raises serious concerns regarding water quality and hydrological impacts.

The area contains numerous watercourses that ultimately drain into environmentally sensitive habitats including the Lacken Salt Marsh and associated protected areas. Forestry clearance,

extensive excavation works, road construction and turbine foundations all have the potential to alter drainage patterns and increase sedimentation risks.

Many local residents rely upon private wells and shallow groundwater sources for drinking water. The potential for impacts upon groundwater flows, water quality and spring-fed supplies has not been adequately assessed.

The proposed use of chemicals associated with forestry management and stump treatment further increases concern regarding downstream impacts on protected habitats and water-dependent ecosystems.

BIRDS, BATS AND PROTECTED SPECIES

The development is proposed within a landscape that supports internationally important bird populations and protected habitats.

Concerns remain regarding the adequacy and currency of ecological surveys, particularly in relation to birds and bats. The area's proximity to designated SPA and SAC sites, combined with the acknowledged use of surrounding habitats by protected species, demands a precautionary approach.

Given the sensitivity of the receiving environment, any uncertainty regarding ecological impacts should be resolved in favour of environmental protection.

BATTERY ENERGY STORAGE SYSTEM (BESS)

The inclusion of a large-scale Battery Energy Storage System introduces an additional layer of industrialisation and risk.

The BESS represents a substantial industrial facility with potential implications relating to fire safety, emergency response, noise generation and visual impact. The long-term consequences of locating such infrastructure within a rural community have not been adequately addressed.

The combination of turbines, substation infrastructure and BESS creates a cumulative industrial footprint that is entirely inconsistent with the character of the receiving environment.

CONCLUSION

The Tirawley Wind Farm proposal represents an inappropriate and excessive industrial development in one of Ireland's most sensitive rural and cultural landscapes.

The application fails to adequately address the substantial concerns relating to community impacts, noise, shadow flicker, traffic, cultural heritage, tourism, ecology, water quality, public safety and cumulative effects. The proposal would fundamentally alter the character of the Lacken and Kilcummin area while placing unacceptable burdens on local residents and future generations.

The environmental, social and cultural costs of this development significantly outweigh any claimed benefits. The precautionary principle must apply where uncertainty exists regarding impacts on protected habitats, water resources, archaeological landscapes and residential amenity.

For all of the reasons outlined above, I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed Tirawley Wind Farm development.

Yours faithfully,

Angela Kelly