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17th June 2026

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, Castlelacken Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

I wish to make a formal submission objecting to the proposed Tirawley Wind Farm development comprising 16 Vestas V117 wind turbines with a maximum tip height of 135 metres, associated electrical infrastructure, grid connection works and Battery Energy Storage System (BESS).

While I recognise the importance of renewable energy development in achieving national climate and energy objectives, I respectfully submit that the proposed development, as currently designed and assessed, raises significant concerns regarding compliance with the principles of proper planning and sustainable development. These concerns relate to development plan compliance, landscape and visual impact, biodiversity protection, project definition and environmental assessment, BESS safety considerations, and cumulative effects.

1. Material Contravention of the Mayo County Development Plan and Renewable Energy Strategy

I am concerned there are proposed turbines located outside Tier 1 and Tier 2 lands identified as suitable for wind energy development under the Mayo County Development Plan 2022–2028 and the Mayo Renewable Energy Strategy.

The Planning Statement acknowledges that a number of turbines fall outside the preferred wind energy areas designated by the Development Plan. These designations were established following strategic environmental assessment, landscape assessment and policy analysis and therefore represent the democratically adopted spatial framework for wind energy development within County Mayo.

The applicant relies heavily on broad references to national renewable energy policy and climate objectives to justify departures from the Development Plan. However, no sufficiently robust site-specific justification has been provided to explain why turbines must be located outside designated areas or why alternative layouts wholly within Tier 1 and Tier 2 lands were not adopted.

The Supreme Court judgement in Coolglass Wind Farm emphasised that planning authorities must meaningfully engage with climate obligations. However, it does not remove the statutory obligation to have regard to the Development Plan or permit departures without clear and compelling justification. National climate objectives cannot automatically override local planning policy, particularly where that policy has itself been formulated to facilitate renewable energy development in appropriate locations.

The application therefore raises serious questions as to whether the proposed layout represents a material contravention of the spatial strategy contained within the Mayo County Development Plan and Renewable Energy Strategy.

2. Significant Landscape and Visual Effects

The Landscape and Visual Impact Assessment confirms that the development extends across two landscape character units identified as having medium to high sensitivity.

The proposed turbines, each reaching 135 metres in height, would become dominant vertical structures across an extensive area of rural and coastal landscape. The visual effects are particularly concerning because:

- The site occupies elevated ridgelines that increase turbine visibility over wide distances.
- The development lies within landscapes identified as sensitive within the County Development Plan.
- Parts of the development are visible from coastal viewpoints and scenic routes.
- The proposal affects the setting of important heritage assets, including the protected Lacken Gazebo.
- The Montane Coastal Policy Area is identified as having high landscape sensitivity.

The applicant acknowledges moderate to substantial visual effects from several viewpoints. However, the proposed mitigation measures, including turbine selection and spacing, do not eliminate the fundamental impact arising from the scale, height and prominence of the turbines.

The visual effects would persist throughout the operational life of the project and would fundamentally alter the character of the receiving landscape. While the applicant argues that the impacts are acceptable in the context of renewable energy generation, insufficient weight appears to have been given to the protection of highly sensitive coastal and rural landscapes identified in the Development Plan.

Particular concern arises from the cumulative visual influence of turbines extending beyond designated wind energy lands, thereby increasing the perceived spread of industrial-scale infrastructure into areas not identified for such development.

Given the acknowledged landscape sensitivity and the scale of the proposal, the landscape and visual impacts are greater than suggested by the applicant and cannot be regarded as fully mitigated.

3. Biodiversity and Ornithological Concerns

The site is located within a region of recognised ecological importance and in proximity to the Killala Bay/Moy Estuary Special Protection Area (SPA) and Special Area of Conservation (SAC).

Although the applicant concludes that significant effects are unlikely, a number of concerns remain.

The Bird Collision Risk Assessment acknowledges potential adverse effects for certain species, including kestrel and hen harrier. These species are of recognised conservation concern and are particularly vulnerable to wind farm-related impacts.

The application relies significantly upon collision-risk modelling and references updated NatureScot guidance. However, modelling outputs remain dependent upon assumptions regarding bird behaviour and flight activity. Such assessments inherently contain uncertainty, particularly in relation to cumulative effects across wider landscapes.

Furthermore:

- The pre-application consultation record indicates no direct pre-application consultation with the National Parks and Wildlife Service regarding ornithological matters.
- The assessment relies partly upon comparisons with existing regional wind farms rather than solely on site-specific evidence.
- The cumulative assessment appears limited in its consideration of the wider expansion of renewable energy projects within north Mayo.
- The ecological sensitivity of the SPA and SAC requires a precautionary approach.

Given the proximity of internationally designated conservation sites and the acknowledged residual effects on certain bird species, there remains uncertainty regarding the full extent of cumulative ornithological impacts.

The precautionary principle should therefore be applied, and additional survey work and assessment should be required before any determination is made.

4. Noise and Shadow Flicker

I wish to make a submission regarding the assessment of my home, identified as H82 within the EIAR for the proposed wind energy development.

My dwelling is located approximately:

1.02KM from Turbine AT15

1.16KM from Turbine AT16

While my home is not the closest receptor assessed within the EIAR, I am concerned about the cumulative impact of multiple turbines surrounding my home and the resulting effect on residential amenity.

Operational Noise

I note that my home H82 has been included within the operational noise assessment as a residential receptor.

This demonstrates that the applicant recognises that operational turbine noise has the potential to affect my home.

I am concerned that the assessment relies primarily on predicted modelling and does not fully reflect the long-term experience of residents living in a quiet rural environment.

Particular consideration should be given to:

- cumulative noise from multiple turbines operating simultaneously;
- night-time impacts when background noise levels are lowest;
- changing wind directions and atmospheric conditions;
- amplitude modulation and fluctuating turbine noise characteristics;
- the overall change from the existing rural sound environment.

While compliance with numerical limits may be predicted, such compliance does not necessarily ensure protection of residential amenity.

Shadow Flicker

Where turbine control and shutdown systems are proposed under Section 15.2.9.3 of the EIAR, these measures should be available to protect all potentially affected dwellings and not only those included within the detailed modelling area.

The Draft Revised Wind Energy Development Guidelines (2019) indicate that modern turbine technology can prevent shadow flicker impacts and support a zero-shadow-flicker

approach at sensitive residential receptors.

Cumulative Residential Amenity Impact

My principal concern relates to the cumulative effect of two turbines located between approximately 1.02KM and 1.16KM from my home.

The combined impact of:

turbine noise;

visual presence;

continuous blade movement;

aviation lighting where applicable;

and the industrialisation of the surrounding rural landscape,

should be considered together rather than in isolation.

The assessment of residential amenity should take account not only of compliance with individual technical standards but also of the overall effect on those living permanently within the area.

5. Lack of Clarity and Consistency in the Project Description

The environmental assessment documentation contains inconsistencies regarding key elements of the proposed development.

The Planning Statement and associated environmental documentation refer at various points to differing turbine numbers and alternative grid connection options. While the final proposal consists of 16 turbines, assessments appear to have considered layouts involving 18 or 19 turbines during the design evolution process.

This creates uncertainty regarding:

- Which environmental effects were assessed for the final scheme.
- Whether all assessments correspond precisely with the final layout.
- Whether consultees and members of the public were provided with a fully consistent project description.

The applicant simultaneously states that no design flexibility is sought while also presenting assessments of alternative layouts and infrastructure arrangements.

Environmental Impact Assessment legislation requires a clear and precise project description to allow meaningful public participation and informed decision-making. Any ambiguity regarding the assessed development undermines confidence in the conclusions reached within the EIAR.

Given the scale of the proposal and the sensitivity of the receiving environment, absolute clarity regarding the development being assessed is essential.

6. Battery Energy Storage System (BESS) Safety Concerns

The proposed Battery Energy Storage System forms a significant component of the development but appears to have received comparatively limited attention within the planning documentation.

The pre-application consultation record indicates that the Health and Safety Authority did not specifically address the BESS component during consultations. Instead, the applicant was advised to engage with the local Fire Officer.

This approach appears inadequate given the growing international recognition of fire, thermal runaway and emergency response risks associated with utility-scale battery storage facilities.

The planning application does not appear to include:

- A detailed fire safety strategy.
- A comprehensive emergency response plan.
- Assessment of thermal runaway scenarios.
- Detailed analysis of potential impacts on nearby receptors.
- Clearly defined procedures for coordination with emergency services.

Given the strategic scale of the proposed BESS and the increasing scrutiny applied to such developments internationally, these matters should be comprehensively addressed before consent is considered.

The absence of detailed safety documentation represents a significant deficiency in the application.

7. Inadequate Assessment of Cumulative Impacts

The cumulative impact assessment appears to focus primarily upon existing and consented developments.

However, the renewable energy sector within County Mayo and the wider northwest region continues to expand rapidly. A realistic cumulative assessment should consider not only existing projects but also the likelihood of additional developments being pursued in adjoining areas.

The proposal has the potential to contribute to the progressive industrialisation of the wider landscape through the combined effects of:

- Existing wind farms.
- Consented wind farms.
- Emerging renewable energy projects.

- Grid infrastructure.
- Battery storage facilities.

The cumulative landscape, visual, ecological and community impacts arising from this broader pattern of development do not appear to have been fully explored.

Consequently, the cumulative assessment may underestimate the true long-term effects of the proposal.

8. Community Engagement and Public Participation

The applicant states that community consultation was undertaken through door-to-door engagement and a Public Information Day which was held 30km from the proposed area and was very badly advertised. No one called to my door nor did I receive any information from the company.

Particular concern arises regarding lack of engagement with Constant Energy:

- The siting of turbines outside preferred wind energy areas.
- The scale and operation of the Battery Energy Storage System.
- Long-term cumulative impacts.
- Landscape and visual effects on sensitive coastal environments.

I wish to adopt and support the detailed submission made by the Lacken Ballycastle Community Landscape Protection Group in relation to the proposed Tirawley Wind Farm development (PAX16.324258). In particular, I endorse the concerns raised regarding 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.

Meaningful public participation requires not only consultation opportunities but also clear and comprehensive disclosure of all material aspects of the proposal.

For these reasons, I respectfully request that An Bord Pleanála refuse permission for the proposed development or, at a minimum, require substantial further information and reassessment before any decision is made.

Yours faithfully

Ann Forde

