

24th June 2026

Carrowmore-Lacken,
Ballina,
Co. Mayo.

An Coimisiuin Pleanála,
64 Marlborough Street.
Dulin 1.

Tirawley Wind Farm Ref 324258. Strategic Infrastructure Development

To Whom it may concern.

I wish to make a submission opposing the proposed wind farm development. I, along with many others, have serious concerns about the application's compliance with the Planning and Development Act 2000 (as amended), the Habitats Directive, the EIA Directive, the Water Framework Directive, and Ireland's constitutional and European rights obligations. In my view, the application is deficient and defective in several respects. It contains significant errors and omissions, relies on outdated surveys, reports and standards, and makes unsupported assumptions. Given these cumulative deficiencies, some of which are set out below, An Coimisiún Pleanála cannot lawfully conclude that the proposed development would not cause significant adverse environmental, archaeological, or human impacts. Any reasonable assessment of the application must conclude that the proposal materially conflicts with the Mayo County Development Plan, the revised Mayo Renewable Energy Strategy, Irish and EU environmental law, constitutional rights, and established planning precedent.

My main points of objection are as follows:

- a) **Scale.** The scale of this project is simply too large. The need for such a large number of turbines in an unspoilt area of outstanding natural beauty with a complex and fragile ecosystem, a rich archaeology and cultural history and a scenic, coastal landscape of great character and distinctiveness is highly questionable. This is especially so bearing in mind that the applicant has five other wind farms in the pipeline southwest of the Lacken site.
- b) **Impact on School.** I have serious concerns about locating three large turbines close to the Lacken Cross secondary school. There is a real risk that mechanical noise, infrasound and shadow flicker will have a negative impact on children's health and well-being. Furthermore, the prospect of thousands of heavy abnormally loaded vehicles passing near the vicinity of the school will be a potential breach of health and safety. The proposal could very well be in breach of the UN Convention on the Rights of the Child.

c) **Palmerstown Bridge**

There will be enormous construction disturbance in the area if the proposal is accepted. The narrow, substandard local roads leading up to the proposed windfarm site will be under huge strain and how local families will cope when meeting these trucks on narrow roads is a major cause of concern. Palmerstown Bridge is a protected structure built in 1777. It is an important component of the eighteenth-century civil engineering heritage of north Mayo. It has an elegant sweep of the arches and makes a substantial visual statement at the crossing over the Palmerstown River. It is an architectural gem which should not be put at risk or compromised by large numbers of heavy haulage trucks for which it does not have the loadbearing capacity. The beautiful setting of the bridge would be compromised by any land take for the road widening haulage. The applicant fails to appreciate the implications for the project on this wonderful setting which represents one of the gateways into the ancient Barony of Tirawley.

d) **Lacken Gazebo**

The Lacken Hill area is one of pristine natural beauty. The views from here are stunning. The historical feature of “the Lacken Gazebo” is presently the most visually dominant feature of the landscape. The proposal to have two large turbines located each side of the Gazebo is totally inappropriate. It would overshadow and dwarf the Gazebo and would irreversibly damage the perfect symmetrical balance to the hill which the Gazebo provides as it stands sentinel over Lacken Bay and the surrounding countryside. The developer in his application fails to bring attention to this unique and special setting and the deleterious implications of wind turbines on it.

e) **Ornithology**

The Lacken area is an extremely important area for ornithology. Kilcummin Head just across the bay from the windfarm site is a premier Irish bird watching location. It draws spectacular numbers of seabirds including rare, unusual birds, migrating skuas, petrels, red throated divers, puffin, arctic terns and auks. The site is famous for its massive autumn seabird passages and summer cliff nesting colonies. Lacken Strand and Bay is noted for large flocks of golden plover, brent geese, teal, lapwing, godwits egrets, whooper swans and heron. The area is one of the most important coastal sites in Ireland for wintering waterfowl. It supports species that have populations of national importance including a very substantial population of golden plover, 2.4% of the entire national total. The presence of large numbers of golden plover, red throated diver and bar-tailed godwits is of particular note as these species are listed in Annex 1 of the EU Birds Directive. The Lacken Saltmarsh, an area of special conservation, abounds with rare bird species including the curlew and hen harrier. At nighttime the bird sounds from the saltmarsh are unique and enchanting. The whole area adjacent to the proposed windfarm is a paradise for birdwatchers.

f) Hen Harrier

The hen harrier is present within the area which provides suitable autumn and winter foraging habitat. The applicant has not carried out any comprehensive winter roost survey across the windfarm site. As a result, in the absence of a full and proper assessment of winter roosting activity the impacts on this protected species have not been fully assessed. The site also supports other protected Annex 1 red, amber listed species such as the kestrel, peregrine, merlin and buzzard. The main risks to locally migratory birds are collision, displacement, construction disturbance and habitat loss. The proposed mitigation measures in the application are not robust or satisfactory. It over relies on post construction monitoring rather than preventive measures. This approach is unacceptable. The proposed windfarm will result in the permanent loss and fragmentation of habitats including the destruction of hedgerows, tree felling and loss of blanket bog. The precautionary principle must be adapted.

g) Tourism

Tourism is very important to the local economy and will be seriously negatively impacted by the proposed development. Lacken is a significant destination on the Wild Atlantic Way and close to the stunning Downpatrick Head. In recent years, tourism has increased exponentially year on year. It is beloved by cultural tourists. Failte Ireland are spending millions on the Wild Mayo Destination project including the Ceide Coastal trail which has the capacity to become the next “Cliffs of Moher” Many tourists claim that the north Mayo rugged and spectacular coastline has more to offer than the Cliffs of Moher. The cumulative impact of several windfarms in the Lacken and Ballycastle area could sound the death knell to tourism in north Mayo.

h) Archaeology

The wind farm site area on Lacken Hill forms part of the Ceide Fields neolithic complex stretching from the Ceide Fields interpretive Centre right over to the Ballinglen Hills and onto and including Lacken Hills as confirmed by archaeological studies of Gretta Byrne, Stuart Rathbone, Graeme Warren, Erika Guttman -Bond & others. This combined area contains some of the oldest field systems in the world and they are confirmed to be present and widespread all across the hills in this area from Lacken to Belderrig. This rare, world-renowned archaeology is unique to the entire Ceide Fields complex. The significance of the Ceide fields expands far beyond the excavated areas near the visitor centre and encompasses vast, intact prehistoric field systems, domestic structures and ritual sites preserved beneath extensive blanket bog across the area which remains unexcavated. It would constitute an act of sacrilege to our cultural history should a windfarm be permitted in the Lacken area where this archaeology exists. This neolithic landscape combined with the wonderful coast and cliff views provided the viewer with one of the best visitor experiences along the Wild Atlantic Way. If granted approval for a large windfarm on a revered neolithic landscape,

which abounds with national monuments, it would be totally out of character with the natural surroundings and would be highly injurious to the scenic amenity of the area. The cumulative impact on the elemental landscape of this proposal combined with the other permitted and proposed windfarms in the area is not sustainable and will have very negative long term adverse impact on the integrity, character of the cherished visual landscape in an area of outstanding natural beauty, with dramatic open Atlantic views and unique international heritage value. I would go as far as to state that we would become the laughingstock of Europe were we to allow an industrial sized windfarm in this pristine area. The Ceide Fields and Boglands of North Mayo were included on Irelands 2010 UNESCO Tentative list for more than a decade. The Mayo County Development Plan 2022-2028 has a clear objective “To protect the tentative World Heritage Site in Mayo on the UNESCO tentative List, The Ceide Fields, from inappropriate development and support its nomination to World Heritage status.” Six thousand years of natural and cultural heritage must not be sacrificed to the commercial interests of a corporate body which, by its own admission, has five other windfarms in the pipeline in Mayo.

i) **Lacken Saltmarsh**

As mentioned above the Lacken Saltmarsh is large protected coastal wetland beside Lacken Strand an area of special conservation and is very close to the proposed windfarm site. Excavation of soil and peat combined with the laying of thousands of tons of concrete will cause significant run off from this area could cause serious damage. The salt marsh is rated highly for its natural beauty, rare birdlife and rich ecology and biodiversity. It helps to maintain coastal habitats and protected plant species, listed on Annex 1/11 of the EU Habitats Directive; such as Atlantic Salt Meadows, Mediterranean Salt Meadows, Salicornia Mud, Marram Dunes and Fixed Dunes. The large number of channels and tidal pools render it a significant habitat for wading and migratory birds including species like Golden Plover, Dunlin, Wigeon, Snipe, Teal, Mallard Curlews, Herons and Lapwings. Up to 2200 Golden Plover have been seen in early winter roosting and feeding in the salt marsh site (less than 1km from the proposed windfarm). This area is a very important ornithological site providing many diverse habitats for foraging and roosting. The hen harrier roosts close to the marsh. These species are known to be very sensitive to disturbance from human activities. The construction of a windfarm 1km away would be hugely detrimental to all bird life here. The site Synopsis of Lacken salt marsh and Kilcummin Head SAC (Site code 00516) clearly point out the substantial ecological importance of this coastal site for the range, quality, floristic richness of its coastal habitats, in particular, the fixed dunes which are a priority habitat on Annex 1 of the EU Habitats Directive. The coastal shoreline around Lacken Bay abounds with skylarks, sand martins, oyster-catchers, kestrels, snipes and mallards.

Several streams/water courses from the proposed site flow down to both the salt marsh and Lacken Strand potentially contaminating and polluting this area of unrivalled scenic beauty. It is likely that there will be water quality problems resulting from the construction of turbines in this area relating to the significant release of sediment hydrocarbons and other deleterious material to the aquatic environment.

j) Impact on mammals

The construction and development of this wind farm would have a negative effect on several 'red-listed' mammals in this fragile and vulnerable ecosystem. Significant risks to these mammals are underestimated by the applicant. The location proposed for the development is a delicate ecosystem that supports numerous 'red-listed' species, including deer, badger, bat, fox, hare, rabbit and pine marten. Some red-listed species in particular the pine marten, are dealt with in a desultory manner, whilst the impacts on others are minimised on the basis of limited data collection. Pine Martens are an important 'red-list species' resident in the proposed location. Locals and visitors often have sightings of this species, which was once in danger of extinction in Ireland and still critically endangered in the UK. The Pine Marten is a legally protected species under the Wildlife Acts 1976-2018 and the EU Habitats Directive. Regulation 51 of the Birds and Natural Habitats Regulations 2011 (S.I. 477 of 2011) specifically prohibits: deliberate disturbance of protected species, deterioration or destruction of breeding sites or resting places.

k) Impact on Bats

As set out in the EIAR, bats are also amongst the red-listed species found in the proposed location. Three bat species found present in the area are considered as the utmost conservation concern, namely: Lesser Horseshoe bat, Leisler's Bat and Nathusius Pipistrelle. The Lesser Horseshoe Bat is 'near threatened' in Europe. Despite the importance of the location for bats, the applicant's assessment was limited to "200m from works area, up to 6km for bat roost desk review" This is a flawed baseline that conflicts with current best practice. Most of the survey data is almost four years old and does not provide recent and representative data of bat activity at the proposed site as required for this planning application.

The applicant suggests a range of mitigation measures for bats, including turbine buffer zones, retention of treelines, lighting controls, and operational curtailment. These suggestions are not sufficient or robust enough to deal with the issue. The proposed 50m vegetation-free buffer between turbine blade tips and nearby trees represents the lower end of current guidance. The tendency of these species to navigate along treelines will likely be exacerbated by the extensive removal of mature hedgerow proposed in this application.

l) **Conclusion on Biodiversity Impacts**

The proposed development would result in permanent, irreversible, and non-mitigable damage to habitats and species of national and EU importance. The EIAR fails to provide a lawful basis for concluding that biodiversity impacts can be avoided or adequately mitigated. To grant permission would be contrary to:

- The Habitats and Birds Directives.
- The EIA Directive.
- National Biodiversity Policy and
- The Mayo County Development Plan

m) **Noise**

I believe that the proposed developments would give rise to serious, persistent and unacceptable impacts on local dwellings, including shadow flicker, mechanical noise nuisance, sleep disturbance risk, low-frequency infrasound and potential vibration related concerns. These impacts would arise in a settled, quiet, rural community, with numerous occupied dwellings located within close proximity of the proposed turbine locations. The EIAR is overly reliant on numerical compliance with outdated technical thresholds and fails to address the real world, lived experience of turbine noise and shadow flicker in a peaceful, tranquil, rural setting. The application does not provide a robust basis upon which ACP can be satisfied that residential amenity will be protected.

The proposed turbines will introduce an industrial noise source into an otherwise low background rural soundscape. The turbines will emit a combination of aerodynamic 'whoosh' and mechanical tonal components, which can carry over long distances and become especially intrusive at night when ambient noise levels are lowest. There are large numbers of family homes within 2km of the proposed turbines. It is well known that the 2006 Wind Energy Guidelines are hopelessly out of date and do not give adequate protection to people from the ill effects of noise and infrasound. In this regard I refer to a recent study by the University of Delft in the Netherlands and reported in the Dutch media. (21 June 2026). An in-depth internal investigation by the university has led to a crucial institutional recognition: prolonged exposure to low frequency noise causes severe health problems.' It is reported that the implications for the thousands of Dutch residents who live close to turbines are immense. "The discussion thus definitely shifts from the question of whether it makes people sick, to the question of when the government will take responsibility to protect its citizens." Another breaking issue in the media, The Times and Sunday Times of 21 June 2026 refers to the disturbing revelation of asbestos from China discovered in 1,000 wind turbines in the UK. ACP needs to satisfy itself regarding the potential health implications of both these issues for Irish people who are living close to turbines or potentially future individuals being similarly exposed.

The most salient factors in relation to noise issues are as follows:

- Outdated threshold reliance: the EIAR relies on the outdated guideline framework rather than adopting the more protective health-based approach recommended internationally for wind turbine noise exposure.
- Character of noise matters: the human impact is driven not only by average decibel values, but by quality of noise, in particular low-frequency components and periodic amplitude modulation which can be especially disturbing at night and has been proven to have negative implications for health including psychological stress.
- Night-time intrusiveness in quiet rural areas such as a pulsing or monotonous wind turbine noise can deprive residents of their sleep, interfere with the ability to open windows, and degrade the quiet enjoyment of homes.
- Site sensitivity: in a valley type area as exists in Lacken, residents are reasonably concerned that sound propagation and vibration characteristics may differ from generic assumptions. The EIAR does not provide sufficient site-specific reassurance on this point.
- There is a considerable body of evidence from WHO guidance, HSE positions and expert submissions that the 2006 Wind Energy Guidelines may not adequately protect health.

n) **Landscape**

The Lacken Hills comprise a beautiful, natural, expansive coastal landscape. It is a deeply intimate landscape where the Atlantic feels close and ever present. It is a meeting place of sea, stone and sky. Weather beaten headlands jut into the Atlantic while steep, green rundale fields fall towards the shore. The landscape feels ancient, sacred shaped by generations of farmers and fishermen and those who have eked out a living along its shoreline for centuries. It comprises a landscape of exceptional archaeological, cultural and spiritual importance. The value of the area lies not just in its abundance of monuments but in its unique, unspoilt visual setting and the experience of immersion in an ancient landscape. That is what brings creative artists and painters to the area and to their residencies in Ballinglen Art Centre. Sixteen large turbines in such an area would permanently damage the exceptional visual amenity. Furthermore, the proposed windfarm site is close to three areas of special conservation and protection. The Mayo County Development Plan clearly states that the natural linear features such as coastlines and ridgelines is to avoid penetration that will interrupt and reduce the integrity of such elements. The proposed turbines on Lacken Hill will break the ridgelines and skylines which is anathema to good planning. The photomontages/ viewing points used by the applicant are total inadequate in that they give a misleading and inaccurate account of the reality of the situation. The most appropriate viewing points are to the east of the proposed windfarm site, in particular, the townlands of Carrowtrasna, Foghill, Cloonalaghan and Tooreen.

These locations have largely been omitted giving a distorted overall picture. The draft 2019 Wind Energy Guidelines emphasise the importance of assessing intervisibility and interrelationships between archaeological heritage within the wider landscape. In the case of Lacken, that intervisibility would be fundamentally compromised. For residents living close to the proposed turbines, the impact would be immediate, overbearing and completely dominant.

o) **Cultural Heritage**

In relation to cultural heritage, I have set out above the main issues relation to the Ceide Fields Complex archaeology. The other key cultural heritage issues are as follows:

- Industrialisation of a highly sensitive archaeological landscape.
- Severe visual and setting impacts on monuments and protected structures.
- Destruction of archaeological context.
- Incompatibility with the historic landscape character of north Mayo.
- Failure to adequately account for cumulative cultural impacts.
- Adverse impacts on intangible cultural heritage.
- Contradiction with stated heritage protection objectives within the Mayo County Development Plan 2022-2028.

p) **Public Health and Residential Rights Impacts of Industrial Wind Turbines Within 1km**

The proposed turbines, by virtue of their scale, height, and proximity to a densely populated rural area, would pose significant and foreseeable risks to the health, wellbeing and safety of adults and children living in the area. I draw attention to the legal rights guaranteed to every resident under the Irish Constitution, the European Convention on Human Rights, the EU Charter of Fundamental Rights, and the Aarhus Convention. These instruments impose clear obligations on planning authorities to protect human health, children's rights, and the integrity of the home environment. The State must protect citizens from foreseeable harm. Industrial turbines within 1km will generate:

- Persistent noise and vibration.
- Shadow flicker.
- Sleep disturbance and chronic stress.
- Documented physical and psychological health impacts.

Allowing such impacts would breach the community's right to bodily integrity.

Protection of the Family

The Constitution recognises the family as a uniquely protected institution. A home overshadowed and disturbed by turbines cannot provide:

- Safety
- Stability
- Health
- Peace and privacy

This is especially damaging to children, who are significantly more vulnerable to noise-induced sleep disruption, anxiety and developmental impacts.

Property Rights

Families have a constitutional right to the peaceful use and enjoyment of their homes. Industrial turbines at proximity would:

- Severely diminish residential amenity
- Impair daily living.
- Impact property value and usability.

Breach of the European Convention on Human Rights (ECHR)

Article 8 – Right to respect for private life, family life and the home.

European case law confirms that environmental hazards such as noise, vibration, and visual intrusion can breach Article 8 when they meaningfully disrupt life in the home. Turbines within 1km create:

- Continuous environmental disturbance.
- Threats to physical and mental health.
- A significant reduction in quality of life.

Article 2 & 3 – Health and Human Dignity

Long-term exposure to significant environmental stressors, especially when affecting children, engages the State's obligations to prevent foreseeable harm to life and wellbeing.

EU Charter of Fundamental Rights

Article 7 – Respect for Private and Family Life

This Charter protection prohibits environmental interference that makes a home unhealthy or unliveable.

Article 24 – Rights of the Child

Children's best interests must be a primary consideration in planning decisions. Potential impacts on children include:

- Sleep disruption.

- Concentration and learning difficulties.
- Stress and anxiety.

Locating industrial machinery beside homes clearly fails to meet this standard.

Article 37 – Environmental Protection

EU law requires a high level of environmental and human protection. Placing turbines in a densely populated area contradicts this principle.

The Aarhus Convention Strengthens the Community's Position

Ireland is a party to the Aarhus Convention, which grants communities enforceable rights in environmental matters. These rights must be upheld by planning authorities.

Article 1 – The Right to Live in an Environment Adequate to Health and Wellbeing

This is the Convention's guiding principle. Industrial turbines within 1km breach this right by exposing residents, especially children, to unacceptable environmental stressors.

Article 4 – Right to Access Environmental Information

Communities have the right to:

- Full transparency
- Accurate data
- Independent assessments
- Access to modelling files and validation evidence.

When developers provide incomplete, unvalidated, or opaque assessments (including noise, shadow flicker, and software modelling), it violates the spirit and intent of Aarhus.

q) Final Observations. The application documentation contains many glaring errors, startling omissions and inconsistencies. In addition, to those pointed out above there are others such as. **1.** Describing the Lacken Cross School, St Patricks Church and the Failte Rooms Community Centre as “dwellings”. **2.** Failure to mention the BESS in the letter to the prescribed bodies. **3.** Discrepancies between the coordinates on the site lay out map and those in other sections of the application. **4.** Misidentifying the wind farm site with a location 5 miles away. **5.** Referring to the number of turbines throughout the report as 18, 21 and 31 when the correct number is 16.

In relation to the Consent Letters from Landowners, many of these are unsigned or undated and there is a significant issue regarding a letter of consent from Mayo Renewable Power Limited. This company is in “Official Liquidation” but signed by

another individual, not the Official Liquidator, the latter whom is the only person who is legally authorized to act on behalf of the company and sign letters on its behalf. In the previous application to ACP last year, the applicant made a cardinal error in applying for 16 turbines but in every single part of the application document referred to 18 turbines. The application also included proposals for a BESS despite this never having been discussed with ACP at the pre-consultation meetings. As a result, the application was rightly declared “incomplete “.

These issues point to a general level of unprofessionalism and amateurishness which are unbecoming for an application of this magnitude which must meet the highest standards and raises questions about the ability of the applicant to implement and deliver the proposed development. ACP needs to be satisfied about the background, experience and established track record of the applicant in delivering large scale projects of this nature. It needs to look at the group structure of the applicant company to ascertain if any other entities are involved as owners or promoters and establish the experience and track record of any such parties.

On the basis of all of the grounds set out in this submission, I respectfully request ACP to refuse planning permission for this proposed wind farm as it would not constitute proper planning and development. The proposed development is fundamentally flawed in terms of siting, scale and impact and would give rise to significant adverse effects on residential amenity, human health, landscape and visual amenity, priceless cultural heritage, biodiversity and water resources.

Yours faithfully,

Anne Jacob.

