

Antje Keller
Beltra,
Carrowmore Lacken, Ballina
County Mayo
F26 T9T0
kellerantje@yahoo.co.uk
20th of June 2026

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

**Objection to the Proposed Tirawley Wind Farm Strategic Infrastructure Development
Objection Submission to An Coimisiún Pleanála (case details 324258)**

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, Castlackleen Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

I am writing as a resident of the area within proximity to the proposed Tirawley Wind Farm project, submitted by Constant Energy Limited, to formally lodge my objection to 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 (significant adverse effect, over 25% of permanent duration, Ch. 6, pp. 76 & 114)., 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.

I fully and unequivocally support the transition to renewable energy and urgent action on climate change. However, as ACP will be aware, if transition is to deliver measurable environmental improvement, development must be carefully considered and appropriately evidenced. Hastily conceived projects, however well-intentioned, present serious risks to the

very environments they purport to protect. Any collateral damage inflicted to the unique habitats and the precious cultural heritage of this island may well be irreversible. For these reasons, and many others, such developments must be subject to an especial level of scrutiny.

Having reviewed the public information provided and engaged with the community consultation materials,

My objection and concerns are based on **fifteen principal grounds**. You will find details below, the relevant standards are summarised and referenced at the end of the document in table A.

Fifteen principal grounds

1. Unacceptable impacts on residential amenity, human health and private water supplies.
2. Unsuitable site selection and significant landscape and visual impacts.
3. Loss of protected habitats and inadequate ecological assessment.
4. Negative impacts on dark skies / nocturnal ecology.
5. Risks to migratory and protected bird species.
6. Inadequate assessment of impacts on hen harriers.
7. Significant risks to bats, pine martens and other protected mammals.
8. Serious traffic, road safety and infrastructure impacts.
9. Negative socio-economic impacts and insufficient community benefits.
10. Failure to assess impacts on horse riders.
11. Inadequate assessment of cumulative impacts.
12. Failure to undertake meaningful public consultation.
13. Failure to properly consider reasonable alternatives.
14. Inadequate assessment of archaeological and cultural heritage impacts.
15. Conflict with national, regional and local planning policy.

Details of the fifteen principal grounds of my objection in no particular order:

1. Residential and Property Impact / Impact on Human Population and Residential amenity:

Impact on Residential Amenity and Quality of Life

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.

Given that 100 houses are in close proximity to turbines it is totally inappropriate that planning permission can be granted on the basis of MITIGATION

The Environmental Impact Assessment Report for the proposed Tirawley Wind Farm fails to meet the legal, scientific, and procedural standards required under EU and Irish

planning law. The developer's continued reliance on the obsolete ETSU-R-97 methodology, the exclusion of WHO 2018 Environmental Noise Guidelines, and the superficial treatment of human health impacts all point to a flawed and incomplete assessment

Inadequate Assessment of Noise Impacts

It is quite clear from these admissions in chapter 12 that there are serious noise issues from at least 6 turbines from a number of wind directions, including the prevailing wind. When it is well recognized that the current noise limits are totally inadequate these noise admissions are concerning

Water Quality and Groundwater Protection

Water quality: my sole water supply is a well (spring) and if the development will get the go ahead potentially my ground water source could be contaminated by foundations, borrow pits and infrastructure such as roads, tracks and trenches as they can disrupt groundwater flow reducing the amount of water flowing to nearby watercourses or water supplies. Their construction also removes the protective layers of soil and subsoil making the groundwater below more vulnerable to pollution from leaks or spills from vehicles or equipment used to construct them. It also makes the groundwater vulnerable to leaks and spills from the turbines and other site infrastructure during operation. Additionally the battery storage facilities can pose a significant risk of pollution from fires and losses of contaminated firewater into the environment. (<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/wind-farms-and-their-effects-on-groundwater-guidance-for-planning-authorities-and-developers/?lang=en>)

Health and Wellbeing Considerations

Health and Wellbeing Considerations (EU guidance defines “human health” as encompassing physical, mental and social wellbeing) A number of potentially significant considerations in relation to health and well-being are overlooked or underestimated in this application.

The failure of the applicant to consider health and safety matters in relation to traffic. Also, the applicant also failed to follow H.S.E. West’s recommendation to undertake ‘early and meaningful’ consultation with the community to adequately address impacts (pg. 26, 29th March 2023 Appendix 1.3.)

Impact on Property Values

Additionally 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) Property values “the Galway paper “ (Gillespie and McHale, 2023, pp. 2-3). notes: “Of the 10 key studies in Europe, results consistently indicate significant negative reductions in house values within 2km of turbines” The Galway study itself - the only local, empirical study examined in the

application - notes that, for properties within a 1km radius, property values can fall by up to 14.7%.

2. Site Suitability and Landscape Impact

Unsuitability of the Proposed Site

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.

(Reference: Mayo County Council submission, EIAR Chapter 17 - Traffic and Transport, Pages 9-10; Planning Statement, Pages 69-71)

Conflict with Mayo County Development Plan

All of the statements in section 2.5.4 of Mayo County Development Plan speak unequivocally and consistently when they state as follows: - “The main concern for natural linear features such as coastlines and ridgelines is to avoid penetration by development that will interrupt and reduce the integrity of such elements”. Is it possible to think of a more inappropriate development than a wind farm by reference to this statement?

Impact on Ridgelines and Skyline

Break the Ridge and Sky line: The proposed turbines on the Lacken Hills will break both the Ridge and Skyline. The photomontages (although inadequate) clearly demonstrate the serious unforgivable impact on the ridge and skyline. The main concern for natural linear features such as coastlines and ridgelines is to avoid penetration by development that will interrupt and reduce the integrity of such elements.

Inadequate Visual Assessment and Photomontages

Development can have a disproportionate visual impact in such terrain, due to an inherent inability to be absorbed, physically or visually. Concerning the 2 previous statements, this proposal to site 135 M tall turbines on top of these hills breaks the Ridge and Sky Lines, reduces the integrity and has a disproportionate impact due to an inherent inability to be absorbed, physically or visually. The photomontages ‘Viewing Points’ are totally inadequate. The most appropriate VPS are on the Kilcummin side of Lacken parish in the following townlands: Carrowtrasna townland near the top of a laneway that goes to the strand, at the bottom of this lane as it enters the strand, Foghill where the Salt Marsh meets the strand. Cloonalaghan, Cloonboy, near to Mullagh Cross, at Cashel, Tooreen and Breastagh.

Quality of Photomontage Images

These locations have largely been omitted and display a naive attempt to avoid illustrating the real consequences. Many of the photomontage photos are inadequate and in many cases appear designed to deliberately capture scenes of briars, bushes, poles, walls and houses that obstruct the views of the turbines.

This planning application should be refused on the grounds of the inadequacy of the Viewing Points chosen and secondly the inadequacy and poor quality of the photomontage photos. It appears as if the proposers realise the unsuitability of this site for turbines and are trying to hide the fact with poor photographs and no photographs from appropriate locations

Example Local road at Knockboha Viewpoint Ref: VP8b image below. My house (eir code F26T9O) is behind the tree red marker turn into my drive way. Between my kitchen windows and the proposed turbines are no other houses nor large trees so the wireline model will be my new view including all the side effects of shadow flickering, noise and dark sky pollution .



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)

The EIAR and NIS submitted with this application fail to provide the robust and reliable evidence necessary for ACP to form reasoned conclusions regarding the potential environmental impacts of the proposed development (ss. 171A(b) & 172(1J)(b) Planning and Development Act 2000; Article 3(1) Directive 2014/52/EU). As is clear from *Commission v Ireland* (2019), C-261/18, an appropriate environmental assessment must be in place before consent can be given. The EIAR provided with this application does not provide the information necessary to enable ACP to make such an assessment. A NIS is required for the proposed development. The applicant has prepared this on the basis of identified hydrological connectivity (Cloonalaghan and Cloonaghmore Rivers) and potential significant effects on three European designated sites (Ch. 6, pp. 74-75):

- Lackan Saltmarsh and Kilcummin Head SAC (code 00516)
- Killala Bay/Moy Estuary SAC (code 000364)
- Killala Bay/Moy Estuary SPA (code 002041)

The proposed development would result in the loss of blanket bog (significant adverse effect of permanent duration, Ch. 6, pg. 114). Such destruction directly conflicts with the aims of Directives 92/43/EEC; 2009/147/EC and Ireland's National Peatland Strategy

Removal of 40.2 Ha of forestry will have negative consequence for bird life and CO₂ sequestration. Total project CO₂ losses are estimated at ~175,100 tCO₂

Risks to the fish and aquatic life in the Cloonaghmore-Palmerstown rivers are also identified.

The bogland areas where it is proposed to locate these turbines has already been designated under GAEC 2 by the Department of Agriculture and planning permission is required in order to alter that status.

4. Impact on Dark Sky / nocturnal ecology

Wind mills mandatory flashing red or white aviation warning lights will have both negative impacts due to Ecological Disruption. Artificial light at night from these warning lights is known to disorient nocturnal wildlife and migrating birds as well as disrupt stargazing (e.g. Northern lights).

Mayo is home to Ireland's first International Dark Sky Park, showcasing some of the darkest, most pristine skies in the world. (<https://www.mayodarkskypark.ie/>) . Windfarm lighting negatively impacts dark sky. Lighting can dominate the horizon, with medium-intensity lights reaching standard stellar visibility limits up to 38 km away (www.sciencedirect.com) so negatively impact dark sky.
<https://www.nature.scot/doc/guidance-aviation-lighting-impact-assessment>

5. Impact on migrating birds such as whooping swans, Brent Geese, Cuckoo, oyster catchers, swallows, house martins and other birds

I am particularly concerned about cumulative effects of habitat loss, construction disturbance and operational displacement the proposed development on migrating birds as whooping swans, Brent Geese, Cuckoo, oyster catchers, swallows, and house martins all of which I can see and or hear flying over my house during peak times several times daily, or nesting nearby my home here in Beltra, Crrowmore Lacken, Castletown, Lacken or at Lacken strand or the larger development area of Tirawley development.

Migratory water birds (e.g., whooper swan, brent geese, curlew, golden plover) are present in the estuary system and fly locally — so occasional transits across the wind-farm footprint can occur (documented flocks/flight lines).

The main risks to migratory and locally-migrating birds are collision, displacement, avoidance, construction disturbance, and habitat loss. Collision risk modelling indicating kestrel, buzzard and lesser black-backed gull as species with higher predicted mortality and kestrel highlighted as the most significant predicted impact pre-mitigation.

Autumn/winter flocks of golden plover/curlew): these are the higher concern category for this site because they use the local bogs/fields and have recorded flight activity within the site.

While the EIAR proposes mitigation, it relies heavily on post-construction monitoring rather than preventive measures. Given the known sensitivity of species like Kestrel and peregrine to turbine proximity, this approach is unacceptable, particularly being cognizant of Ireland's current lack of performance in ornithological or environmental protection.

We have protective legislation but little supervision.

6. Impact on Hen Harrier Habitat

I am 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 that a winter hen harrier roost was recorded within the study area, yet no comprehensive winter roost survey appears to have been undertaken across the wind farm site itself. The applicant's roost surveys focused primarily on areas outside the development footprint, despite evidence that hen harriers utilise habitats within the proposed development area. In the absence of a robust assessment of winter roosting activity, 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.

I am 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, I 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.

7. Impact on Terrestrial Mammals

The construction and development of this windfarm would have a deleterious effect on several 'red-listed' mammals in this delicate ecosystem; significant risks are severely under-estimated.

The location proposed for the development is a delicate eco-system that supports numerous 'red-listed' species, including: badger, bat, deer, hare and pine marten (Marnell, Looney and Lawton, 2019). Some red-listed species, such as pine marten, are dealt with in a cursory manner, whilst the impacts on others are downplayed on the basis of limited data collection

Pine martens are an important 'red-list species' resident in the proposed location; the fact that none were recorded during the applicants' 'surveys' (Ch. 6, pg 57) speaks more to the poor quality of the surveying than the actual presence of the species. Locals and visitors often see this recovering species, once in danger of extinction in Ireland and still critically endangered in England and Wales. As well as numerous local sightings, the presence of recovering populations of pine marten in Mayo has been recognised in relevant national reports (see, for example, N.P.W.S., 2019). As a whole, the report fails to demonstrate that the proposal will not result in direct adverse impacts on pine martens in breach of regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011). I have seen several times pine martens on the loop walk near the quarry, Gazebo, Lacken hill, Castletown and near my house F26 T9T0 both while on horseback, driving or walking.

Bats are also amongst the red-listed species found in the proposed location (Marnell, Looney and Lawton, 2019). Three bat species found present in the area are considered as of the utmost conservation concern, namely: Lesser Horseshoe Bat, Leisler's Bat and, Nathusius' Pipistrelle. The Lesser Horseshoe Bat is 'near threatened' in Europe (ibid, pg 29.)

Despite the importance of the location for bats, the applicant's assessment was limited to "200 m from works area; Up to 6 km for bat roost desk review" (Ch. 6, pg. 8). This is a fatally flawed baseline that conflicts with current best practice. As noted in the 2025 C.I.E.E.M Bat Mitigation Guidelines:

"It is rarely acceptable for the consideration of impacts to be limited to the red line boundary..." (Reason and Wray, 2025, pg. 27)

the report also fails to properly recognise the cumulative effects of the development (e.g. the removal of 4km of hedgerow during construction, Ch. 6, pp. 76 & 114)) on bat populations. Most bats, including the near threatened lesser horseshoe bat found in the study area, "are known to be highly dependent on linear landscape elements such as hedgerows ... for commuting from their roost to foraging areas." (Lacœuilhé et al, 2018: 72).

The effects on other 'redlisted' mammals, such as badger, deer, rabbit, hare, hedgehog, otter and shrew are summarily dismissed in section 6.3.4. by the applicant as 'not significant' on what seems to be an assumption that they will 'go elsewhere' or they are not prevalent because limited survey efforts failed to reveal them. Anecdotal evidence and national reports all attest to the prevalence of these species at the proposed location (see, inter alia, N.P.W.S., 2020; Lysaght and Marnell (Eds), 2016). In relation to badgers, for example, a simple NBDC data search shows 46 records of badger for the G21 grid square and 39 records for the G22 grid square

As with the other redlisted mammals considered in this section, the proposed development is likely to have significant effects on populations both in the construction phase (destruction of key habitats and ecological corridors, as above) operation (Lopuki, 2017). This is especially the case in light of the cumulative effects of multiple developments in this area.

The applicants' conclusions regarding the effects on redlisted mammals dependent on the proposed location is premature and lacks rigorous evidence. There is a clear and obvious risk that the construction and development of the proposed windfarm will disturb and destroy the habitat of numerous species, in contravention of national and European regulations.

8. Traffic and Infrastructure Impact and issues

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)

- At the very earliest stages, Mayo County Council pointed out the unacceptable impacts that such a project would have on transport, traffic and safety in the location:

“The use of narrow county roads for the protracted length of proposed haul route will be problematic given their generally poor structural condition and restricted carriageway width.” (Tirawley-WF-Mayo -PrePlanning Notes, pp.2-3)

- There is significant underestimation of construction impacts on traffic. The applicant identifies that during the construction phase, there will be peak HGV traffic of up to 150 daily movements (Ch. 17, pg 50-51). This equates to one HGV every 3–4 minutes during working hours, which is substantial on these local rural roads. As identified by Mayo County Council at the 2023 pre-planning meeting:

“The traffic generated by the development (construction materials, labour-force, turbine deliveries etc) will cause serious disruption to local road users.” (Tirawley-WF-Mayo -PrePlanning Notes, pp. 2-3)

- Moreover, the application does not appear to contain any clear commitment to required pre/ post-construction condition surveys (TII CC-GSW-00700). Relatedly, no details are provided with regard to reinstatement inspection, responsibility, or funding arrangements. There are also cultural impacts on the protected structure of Palmerston Bridge, which were identified by Mayo County Council as of concern:

“Palmerstown Bridge is a Protected Structure in the County Development Plan. It an objective of the development plan to Protect those structures in the RPS together with the integrity of their character and setting. The setting of bridge is affected by the land-take for the road widening haulage.” (Tirawley-WF-Mayo -PrePlanning Notes, pp. 2-3)

9. Community and Socio-Economic Issues

While I 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)

10. Impact on horse owner, breeder and horse riders:

The applicant did not address the local horse riding community which uses daily the Lacken loop walks, western way and other local roads in the proposed area. The British horse society has published an advice guide on wind turbines and Horses: a guidance for planners and developers and can be found referenced in other Irish windfarms e.g.

<https://www.derryaddwindfarm.ie/>, Seskin Wind Farm Co. Carlow - EIAR EIAR Appendices - F - 2024.05.03 – 220246, <https://www.pleanala.ie/publicaccess/EIAR-NIS/322225/EIAR/322225%20-%20eiar%20chapter%205%20appendix%205-3%20advice%20on%20wind%20turbines%20and%20horses.pdf>

Wind turbines can negatively impact horse riders by triggering a flight response in horses due to sudden movements, casting shadows, and low-frequency noises. These hazards increase the risk of the horse bolting or bucking, endangering the rider's safety.

The key ways wind turbines impact equestrians include (www.yardownerhub.co.uk):
Visual Distractions: The sudden movement of rotating blades and moving shadows (flickering or strobe-like effects) can startle horses, particularly if they appear suddenly behind hedges or on sunny days. Audible Noise: Wind turbines generate varying levels of aerodynamic noise and low-frequency humming or rumbling. Because horses have more sensitive hearing than humans, distant noises that seem quiet to us can be quite loud and alarming to them. Safety and Route Displacement: Riders may be forced to avoid off-road trails near wind farms, which pushes them onto busier roads or requires traveling elsewhere, negatively affecting the equestrian community (e.g. AIRE approved riding school Iceford stables Ballina with their clients as well as AIRC horse riding members use the lacken loop walks on horseback which pass by the gazebo as well as parts of the western way regularly) and local rural businesses. (www.pleanala.ie). Unusual Testing Noises: The British Horse Society notes that annual mechanical testing of turbines can sometimes produce abrupt, unusually loud sounds that are particularly frightening to horses. <https://www.bhs.org.uk/media/lgwdbphr/wind-turbines-0525.pdf>

11. Cumulative Impact and Strategic Considerations

The project overlaps with areas where other developments are planned or existing, increasing cumulative environmental, visual, and infrastructural pressures. The scale and height of modern turbines, as noted by Mayo County Council, raise questions about the suitability of this site compared to previous assessments.

(Reference: Mayo County Council submission, EIAR Chapter 17, Pages 9-10)

12. There has been no meaningful public consultation. (Procedural Deficiency)

The only evidence of community consultation that is provided in the application relates to one 'Public Information Day' which, according to the current application, was held on the 6th June 2023 and involved 31 residents. Notably, the information on the PID in the application is inconsistent with that reported to An Bord Pleanála (ABP) at the 2nd pre-application meeting 14th August 2023 (Meeting ABP 315864-23; ACP-Pre-App-Meeting-Minutes). In this meeting, Constant Energy reported to ABP that community consultation was held on the 4th of June and involved 38 residents.

Whichever is the accurate record, the PID was deficient in multiple respects:

It was not held in the local community and was inaccessible to many. The PID was held in Ballina Manor Hotel 15-22 km away from the proposed site, thus excluding many, particularly older and more vulnerable members of the community, as well as people working during that day and time.

- The ‘public information day’ was poorly publicised (not all townlands impacted referenced)
- If 31 residents attended (pg. 9, Non-technical summary; pg. 37, Ch. 1 EIAR), the PID involved just 1% of those residents directly affected (2022 Electoral data suggests at least 2676 residents live within the proposed site area).
- With regard to the actual evidence of attendance provided in the ‘public consultation and feedback forms’ (Appendix-1.6: pp. 1 to 28); there are just 14. This represents just 0.5% of the affected community.

There is no evidence of any further efforts being made to increase engagement and awareness. During pre-application meetings, ABP representatives directly queried the decision to hold the PID at such a distant location (pg. 8, Meeting ABP 315864-23; ACP-Pre-App-Meeting-Minutes), yet no action appears to have been taken subsequently to address this concern. There are multiple venues within the directly affected area, such as Lacken Community Centre (F26K2V4), which would have been more accessible for the affected communities.

The paucity of public consultation not only disregards best practice Guidelines, but also advice provided to Constant Energy at the earliest stages of the project’s genesis. In March 2023, the Department of Public Health indicated to the applicant that: “consultation with the local population should be conducted” (pg. 32, Appendix 1.3. Scoping Opinion). The Environmental Health Service (H.S.E. West) further recommended: “Early and meaningful public consultation with the local community should be carried out ensuring all potentially significant impacts have been adequately addressed. All parties affected... must be fully informed...” (pg. 26, 29th March 2023 Appendix 1.3., see also Ch. 5 EIAR pg. 14-15)

Additionally I had sent multiple emails about exact location of proposed windmills relating to houses nearby to Jennings O’Donovan consulting engineers back in June 2023 and July 2023 and I did not get answers..

Nor is there any contact details on the <https://tirawleywindfarm.com/> website for any queries or questions.

Concerns, comments raised on consultation day forms did not get answered! No alternative consultation day was provided, nor did the initial consultation mention any energy storage system in the form of a battery array located within container units (BESS), 2 no. temporary construction compounds and a permanent Operations Building, security fencing and lighting, 1 no. spoil deposition area/habitat enhancement area, 1 no. on-site office, Erection of 1 no. meteorological mast with a height of 80m and a 4m lightning pole on top. Should there not have been a consultation meeting about the actual application? Not of a draft proposal which looks fundamental different now?

No Community Liaison Officer (CLO) for the project had been appointed or other contact details for the community appears to have been appointed. Zero project leaflet of the proposed project and no contact details appeared to have been shared with any resident by the applicant.

13. Failure to Consider Alternatives

The prospect of alternative locations is summarily dismissed by the applicant on pg. 15 of Chapter 3:

as outlined only one potential viable area....other wind farm sites include 5 no. potential wind farms located between c. 11.7 km and c. 43 km southwest of the Proposed Development. No other viable sites were found during the assessment and all five sites are being developed by the Developer.”

European Commission (2017) guidance on the application of Art. 5 clearly states:

“...it is very important that the identification and consideration of Alternatives should not be treated as a mere formality.” (pg. 52)

The application in front of ACP has cleared treated alternatives as a ‘mere formality’ and, as established under ground 12 (no meaningful public consultation) has not engaged in any consultation on alternatives.

Particularly strong reasoning would be needed to support development in this specific location; it is not present.

The application does not provide a robust consideration of reasonable alternatives as required by Article 5(1)(d) of Directive 2014/52/EU and, as such, does not provide sufficient evidence to allow ACP to be reasonably satisfied that the chosen site represents the least environmentally damaging or most appropriate alternative.

14. Impact on Heritage and Archaeology

The location proposed for the development is proximate to the internationally significant Céide Fields complex—whose Neolithic field systems and dwellings extend invisibly beneath blanket bog for several kilometres: it is highly probable that undiscovered prehistoric material exists within the turbine and cabling footprint. No geophysical survey, test trenching or archaeological monitoring strategy has been undertaken or is proposed to address this risk. This is particularly concerning given the paucity of previous archaeological work in the area recognised in the report (Ch. 14, pp. 32-33).

As is apparent from the documentation Mayo County Council raised the impact on Céide in the 2023 (18th August) pre-planning meeting (Tirawley-WF-Mayo -PrePlanning Notes), as a key reason why such development could not be supported:

“The turbines will be visible of the turbines to/from the Céide Fields which is on tentative UNESCO Tentative World Heritage Site. The development plan seeks to protect the Céide

Fields from inappropriate development. The full extent of the Céide Fields archaeology site is unknown and may reach as far as the windfarm site.” (MCC, 2023, pg.2)

In such a context, the methodology adopted (desk review/ walkover) is wholly inadequate and cannot be rationally justified or viewed as sufficient evidence from which to make an assessment.

Ch. 14 purports to justify the flawed approach taken by stating: “there are no relevant guidelines in relation to specific methodological approaches to Cultural Heritage field surveys for wind farm developments.” (pg. 11, Ch, 14). This is poor justification when there is a wealth of appropriate guidance available regarding analogous developments and the archaeological and cultural significance of peatland areas. As the Heritage Council Guidance (2024, pg.3.), provides:

“Peatlands are exceptional environments for the preservation of unique and invariably fragile archaeological remains.”

To allow industrial-scale construction and development at this location without any proper archaeological assessment would risk destroying artefacts of global significance. As such, the current application contravenes multiple planning requirements which require the full identification, protection and assessment of archaeological and architectural heritage and their settings (see, inter alia, Directive 2014/52/EU, Planning and Development Regulations 2001, National Planning Framework, Mayo County Development Plan).

15. Failure to Comply with Requisite Planning Frameworks

Tirawley Development would conflict with a number of additional key objectives in National and Regional Planning Frameworks,

Proposed development at this location, situated on the Wild Atlantic Way (WAW), would be in conflict with several aims and objectives identified in the National Planning Framework (2025). The framework notes the importance of maximising “the quality and integrity of the visitor experience and the added benefit in economic terms, especially for rural and local communities” as a key priority for this region (pg. 37, N.P.F.). Specifically, windfarm development at this location conflicts with National Policy Objectives 23 and 34, namely:

“Protect and promote the sense of place and culture and the quality, character and distinctiveness of the Irish rural landscape including island communities that make Ireland’s rural areas authentic and attractive as places to live, work and visit.” (Objective 23 N.P.F. pg. 64)

“Continue to facilitate tourism development and in particular the Strategy for the Future Development of National and Regional Greenways, and a Blueways and Peatways Strategy, which prioritises...projects on the basis of their environmental sustainability: achieving maximum impact...while ensuring their development is compliant with the National Biodiversity Action Plan...” (Objective 34 N.P.F. pg. 74)

The proposed development will negatively impact on multiple walkways and cycle ways: Lackan Trail (<https://mayotrails.com/trail/lackan-green-loop/>) <https://www.alltrails.com/trail/ireland/county-mayo/lackan-trails-blue-loop> ; Rathlackan Court Tomb Trail, <https://www.mayo-ireland.ie/en/things-to-do/outdoor-activities/walking/rathlackan-court-tomb-trails-lacken.html> , The Western Way <https://thewesternway.ie/ballycastle-to-ballina/> , Kilcummin Loop Walk (3) <https://www.mayo.ie/getmedia/3a4b27ee-bfac-4857-b7d4-0493cd6bbd77/Kilcummin-Loop-walks-map.pdf> ; If permitted, the windfarm would be visible from a signature discovery point of the Wild Atlantic Way (WAW), the EuroVelo 1 – Atlantic Coast Route follows Ireland’s rugged Atlantic coastline and passes through the planned development area (<https://en.eurovelo.com/ev1>)

The Gazebo adorns its ridge line and the installation of turbines will irreparably damage this vista. Two of the local walks pass immediately by the Gazebo

A development of the type proposed at this location would also be in contravention of regional planning frameworks and identified priorities. As the applicant themselves identifies, Mayo County Council do not support this development at this location (MCC 2023 Pre-Planning Notes, pg. 3).

Tourism is also a significant strategic priority identified in the County Development Plan; tourism is one of the most important elements of the economic health of the region:

“Mayo aims to be a premier tourism destination, leveraging its natural beauty, cultural heritage, and strategic location on the Wild Atlantic Way.” (2002, Vol. 1. p.54-55, 97)

This particular proposal is incompatible with the County Development Plan strategic priorities regarding tourism. The applicant’s prediction of the likely effect on tourism (slight negative, Ch. 5., pp. 57-58, 64) significantly underestimates the detrimental impact the proposed development would have in this location. It is an assessment that has been made on the basis of partial data, of limited relevance, without a true understanding of the particular local context. The omitted attractions include, but are not limited to, the Lackan Loop walking trails (recently improved); Rathlackan Court tomb, Castlelackan Gazebo; and, Castle Lackan Demesne

Conclusion:

On the fifteen grounds detailed above, I respectfully urge An Coimisiún Pleanála to refuse permission for the Tirawley Wind Farm development in the interests of proper planning and sustainable development. The location and scale of this project would result in significant and irreversible harm to the environment, and have significant negative impacts on residential amenity, local landscape, ecology, infrastructure, and the community.. The applicant has repeatedly failed to demonstrate compliance with relevant planning regulations and best practice recommendations. Approval of such a substandard proposal would substantially damage public confidence in the planning system and due process.

Thank you for considering this submission.

Yours sincerely,
Antje Keller

Table Overview: Fifteen Principal Grounds for Objection

	Ground	Key Points	Relevant Standards
1	<i>Residential and Property Impact / Impact on Human Population and Residential Amenity</i>	<i>Failure to identify and consider impacts on human health</i> <i>Failure to properly consider effect on residential amenity</i>	<i>Cave et al./ IAEA (2020)</i> <i>Directive 2014/52/EU</i> <i>Environmental Protection Agency (2015) Guidelines.</i>
2	<i>Site Suitability and Landscape Impact</i>	<i>visual intrusion on the unique coastal and rural landscape is unacceptable and contrary to the policies</i>	<i>Mayo County Council submission, EIAR Chapter 17 - Traffic and Transport, Pages 9-10; Planning Statement, Pages 69-71</i>
3-7	<i>3 Environmental and Ecological Concerns</i> <i>4 Impact on Dark Sky/ nocturnal ecology</i> <i>5 Impact on migrating birds such as whooping swans, Brent Geese, Cuckoo, oyster catchers, swallows, and house martins</i> <i>6 Impact on Hen Harrier Habitat</i> <i>7 Impact on Terrestrial mammals</i>	<i>Failure to consider all relevant European sites</i> <i>Material weaknesses in NIS</i> <i>Failure to demonstrate the absence of adverse effects on European site integrity</i> <i>Failure to properly consider other impacts on habitats, flora and fauna</i>	<i>Birds and Natural Habitats Regulations 2011 (S.I. 477 of 2011)</i> <i>Commission v Ireland (2019), C-261/18</i> <i>Directive 2014/52/EU</i> <i>Directive 2009/147/EC</i> <i>Directive 2000/60/EC</i> <i>Directive 1992/43/EEC</i> <i>European Commission 2021, C 437/01</i> <i>European Commission, 2018, 2001(Guidance).</i> <i>Kelly v ABP [2014] IEHC 400)</i> <i>Mayo County Development Plan</i> <i>National Peatland Strategy</i> <i>National Planning Framework,</i> <i>NPWS, 2009 (Guidance);</i> <i>Planning and Development Act 2000</i> <i>Planning and Development Regulations 2001</i> <i>Sweetman v. ABP (C-258/11 & C-301/22)</i> <i>Wildlife (Amendment) 2000, s. 40)</i>
8	<i>Traffic and Infrastructure Impact Issues</i>	<i>Failure to appropriately assess adverse impacts on traffic and transport (including safety concerns)</i>	<i>DMURS (2025)</i> <i>Directive 2014/52/EU</i>

			<i>Planning and Development Regulations (R.104)</i> <i>Transport Infrastructure Ireland (2022) (Guidance)</i> <i>TII CC-GSW-00700</i>
9	<i>Community and Socio-Economic Issues</i>	<i>proposal does not sufficiently address the community's needs or provide clear, direct benefits to local residents</i>	<i>Appendix 1.6 Community Engagement Report, Pages 7-14</i>
10	<i>Impact Horse owner, breeder and horse riders</i>	<i>Failure to assess adverse impacts on horse riders (including safety concerns) as recommended by BHS advice guide on wind turbines and Horses: a guidance for planners and developers</i>	https://www.pleanala.ie/publicaccess/EIAR-NIS/322225/EIAR/322225%20-%20eiar%20chapter%205%20appendix%205-3%20advice%20on%20wind%20turbines%20and%20horses.pdf https://www.bhs.org.uk/media/lgwdbphr/wind-turbines-0525.pdf
11	<i>Cumulative Impact and Strategic Considerations</i>	<i>Question: suitability of this site</i>	<i>Mayo County Council submission, EIAR Chapter 17, Pages 9-10</i>
12	<i>There has been no meaningful public consultation/ Procedural Deficiency</i>	<i>Failure to consult</i> <i>No community Liaison Officer</i>	<i>National Wind Energy Development Guidance (2016;19)</i>
13	<i>Failure to Consider Alternatives</i>	<i>Failure to fully consider suitable alternative locations</i>	<i>Article 5(1), Directive 2014/52/EU</i> <i>European Commission (2017) Guidance</i> <i>Mayo County Development Plan (2022)</i> <i>Mayo Renewable Energy Strategy (2020)</i>
14	<i>Impact on Heritage and Archaeology</i>	<i>Failure to appropriately consider unique archaeology/ heritage</i>	<i>Directive 2014/52/EU</i> <i>Planning and Development Regulations 2001</i> <i>National Planning Framework, Mayo County Development Plan</i> <i>Heritage Council Guidance (2024)</i>
15	<i>Failure to Comply with Planning Frameworks</i>	<i>Conflict with National Planning Framework Objectives (23 & 34)</i> <i>Conflict with Mayo County Development Plan</i> <i>Failure to acknowledge significant adverse impact on tourism</i>	<i>Mayo County Development Plan (2022)</i> <i>Mayo Tourism Strategy (2020)</i> <i>National Planning Framework (2025)</i> <i>Planning and Development Act (2000)</i>