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23rd 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 have lived in Lackenhill for 38 years with my family. This is our family farm and five generations of my family have lived here, beginning with my Grandfather, my Mother was born and reared here, I was born in Lissadrone just a short distance away and moved to our family home when we got married. We have lived here for over 100 years in peace and tranquility.

This development has been shrouded in secrecy from day 1, the first thing we knew about this proposed development was the badly advertised Information Day in June 2023 held at the Ballina Manor Hotel, over 30km from the start of the development. There was zero information or consultation with neighbours, given the amount of local landowners involved, it is amazing how the developer kept it all quiet?

My home which has pyrite is situated in a precarious position close to a bend leading to the disused quarry where thousands of tonnes of peat will be shifted past my front door. I only hope my home will not crumble and deteriorate with this huge volume of traffic passing within a few feet of my front door.

Our home will be worthless and unbearable to live in, as will our way of life be destroyed.

Also we have turbary rights to our bog at Lissadrone where turbines are planned, how can turbines be placed on blanket bogs ruining them?

Impact on water that supplies our home

We are residents of Lacken and my household relies on a private well and spring-fed groundwater source for all drinking water, cooking and domestic use. Consequently, we have serious concerns regarding the potential impact of the proposed Tirawley Wind Farm development on both the quality and quantity of my water supply.

The proposed development involves extensive excavation works, turbine foundations, access roads, drainage infrastructure, forestry felling and associated construction activities across an area that is highly dependent on shallow groundwater systems. The Environmental Impact Assessment Report (EIAR) acknowledges that groundwater within the area commonly emerges as springs (Section 9.5.1.9), yet it does not appear to adequately assess the dependence of local households on these groundwater sources for their daily drinking water supplies.

Megalithic tombs

MA007-057----- : Megalithic tomb - court tomb : LECARROWNTemple

Description: See linked document with details from Ruaidhrí de Valera and Seán Ó Nualláin, Survey of the Megalithic Tombs of Ireland. Volume II. County Mayo. (Dublin: Stationery Office, 1964) Date of upload: 30 December 2011

MA007-058----- : Megalithic tomb - court tomb : LECARROWNTemple

Description: See linked document with details from Ruaidhrí de Valera and Seán Ó Nualláin, Survey of the Megalithic Tombs of Ireland. Volume II. County Mayo. (Dublin: Stationery Office, 1964) Date of upload: 30 December 2011

The above megalithic tombs are on the farm next to our home, given the close proximity of them to the road, how can they be protected as lorries thunder past drawing hundreds of loads of peat? We have them fenced off as part of protecting our heritage in the ACRES scheme. They have never been touched or disturbed so what effect with rock breaking and enormous vehicular traffic inflict on our priceless tombs?

Can ACP ensure their protection in light of this development?

1. Noise & Shadow Flicker – H11

Our home is identified as a “receptor” H11 in the EIAR. We would like it noted that we have an issue with the term “receptor” as it appears to detach the development from the fact that it is being proposed for an area that is home to so many people. The area is not a barren site, it's our home and our community.

Our home is located approximately:

- **624 metres from turbine AT16 stated in Table 15.1**
- **740 metres from turbine AT14**
- **920 metres from turbine AT10**
- **935 metres from turbine AT15**
- **AT09, AT12, AT13 and AT11 are located just over 1 km from my home**

We are concerned that the EIAR assessment does not adequately address the real-world residential impact of having two large-scale turbines located within approximately one kilometre of my home.

Noise Impact Concerns

The proposed turbine AT16 is located only approximately **624 metres from our home (H11)**. We consider this separation distance insufficient to protect residential amenity, particularly given the scale of modern turbines and the quiet rural environment in which my home is located.

The assessment relies heavily on predicted modelling. We request that An Coimisiún Pleanála carefully examine whether the modelling fully represents the actual conditions experienced at H11, including:

- night-time noise impacts when background noise levels are naturally low;
- periods with specific wind direction where turbines **AT09, AT10, AT11, AT12, AT13, AT14, AT15 and AT16** may all contribute simultaneously;
- amplitude modulation (“blade swish” or changing character of turbine noise);
- low-frequency noise impacts;
- the cumulative noise contribution from multiple turbines.

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

We request that a more precautionary assessment be applied to H11 given its proximity to AT16 and the combined influence of eight turbines.

Shadow Flicker

The EIAR identifies our home, H11, as being approximately 624 metres from turbine A. Table 15.3 of Chapter 15 predicts that H11 will experience:

- 101 hours 23 minutes worst-case shadow flicker per year
- 17 hours 06 minutes expected shadow flicker per year
- 41 minutes maximum expected shadow flicker per day

This exceeds the 2006 Wind Energy Development Guidelines recommendation of no more than 30 minutes per day by 11 minutes.

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

While the EIAR refers to mitigation measures in **Section 15.2.9.3**, including turbine control measures/shadow flicker control systems, we do not consider reliance on future mitigation alone to be sufficient justification for permitting a development that is predicted to create an exceedance of shadow flicker at my home.

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

- long-term reliability of control systems;

- monitoring and enforcement arrangements;
- responsibility if mitigation fails;
- whether shutdown will occur automatically or only after complaints;
- how compliance at H11 will be independently verified throughout the lifetime of the wind farm.

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

Given that H11 is already predicted to exceed the 2006 daily guideline, we submit that the appropriate standard should be prevention rather than management.

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

Development

	ING	ING	4 m/s	5 m/s	6 m/s	7 m/s	8 m/s	9+ m/s
House ID	Easting	Northing	dBA	dBA	dBA	dBA	dBA	dBA
H1*	515110	837466	38.2	42.3	46.1	48.4	48.7	48.7
H2*	515526	833767	35.3	39.4	43.2	45.5	45.8	45.8
H3	516227	836339	34.4	38.5	42.3	44.6	44.9	44.9
H4	514628	834072	33.3	37.4	41.2	43.5	43.8	43.8
H5	516241	833804	30.4	34.5	38.3	40.6	40.9	40.9
H6	515489	833504	32.6	36.7	40.5	42.8	43.1	43.1
H7	517503	837983	31.2	35.3	39.1	41.4	41.7	41.7
H8*	515450	832962	33.3	37.4	41.2	43.5	43.8	43.8
H9	515080	831996	30.3	34.4	38.2	40.5	40.8	40.8
H10	515456	833467	32.6	36.7	40.5	42.8	43.1	43.1
H11	516561	837118	33.4	37.5	41.3	43.6	43.9	43.9

The proposed development represents a direct threat to the tourism economy upon which many businesses and community initiatives depend.

The North Mayo coast is recognised nationally and internationally for its unspoilt scenery, archaeological significance and unique visitor experience. The area forms an important part of

the Wild Atlantic Way and contains some of the most significant heritage and landscape resources in Ireland.

Tourism within the area is not dependent upon industrial development but rather upon the preservation of the natural landscape, coastal scenery, tranquility and cultural heritage that attract visitors from across Ireland and abroad.

Visitors come to experience:

- The Céide Fields cultural landscape.
- Downpatrick Head.
- The Wild Atlantic Way.
- The North Mayo coastal scenery.
- The Western Way and local walking routes, the Blue, Green & Red loops (the blue and green loops are situated under the turbines and are on the proposed TDR).
- Local heritage sites and monuments - The Lacken Gazebo.
- The area's dark skies and natural tranquillity.
- Historic locations associated with General Humbert's 1798 landing and campaign.

The introduction of sixteen turbines reaching approximately 135 metres in height, together with aviation lighting, a large BESS facility and a major substation, would industrialise a landscape that is currently marketed and valued precisely because it remains largely undeveloped.

The Environmental Impact Assessment acknowledges significant visual impacts from numerous viewpoints. These impacts will not be experienced solely by residents but also by visitors using scenic roads, walking routes and tourism facilities throughout the area.

The Protected Western Way National Waymarked Trail passes through the wider landscape and visitors using this route will experience the turbines at close range. The quality of this walking experience will be significantly diminished.

The cumulative effect of existing, permitted and proposed wind energy developments throughout North Mayo must also be considered. The gradual industrialisation of the Mayo landscape threatens the long-term viability of tourism across the wider region.

The Lacken Gazebo is a Folly, one of the most unusual protected structures in Ireland which can be viewed from Sligo, Leitrim, Donegal and all over Mayo. It is formed from a double arch of rough stones. It is situated on the summit of Lacken Hill to the rear of Castle Lacken: seat of the Palmer family from the sixteenth century. This was constructed during the latter part of the eighteenth century by either Sir Roger or Sir John Palmer. This structure is located 300m from the nearest turbine AT16, how can this historical monument be protected in light of the planned development?

The Tirawley Wind Farm proposal faces significant challenges regarding compliance with local renewable energy zoning policies, potential adverse effects on sensitive natural and cultural heritage environments, impacts on landscape and visual amenity, and local infrastructure. The

presence of turbines outside designated areas, proximity to protected landscapes and structures, and community opposition grounded in environmental and visual concerns present strong grounds for refusal of planning permission.

Table 15.1 Properties within the Shadow Flicker Study Area

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

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Receptor ID	Specimen Turbine		
	Worst Case Shadow [h/year]	Expected Shadow [h/year]	Max. Expected Shadow [h/day]
H1*	109:11	16:33	00:59
H2*	55:32	06:48	00:34
H3	110:08	15:30	00:54
H4	04:42	00:43	00:18
H5	85:01	15:12	00:52
H6	57:21	06:45	00:41
H7	70:29	10:03	00:45
H8	142:45	22:34	00:48
H9	00:00	00:00	00:00
H10	64:39	07:42	00:44
H11	101:23	17:06	00:41

Impact on Local Residential Amenity and Future Homebuilding

The turbines proposed outside designated preferred areas appear to be at odds with local planning guidance and landscape sensitivity considerations. In addition, the fixed design approach and reliance on very large turbine models reduce flexibility to respond to future planning requirements, technological developments, and community concerns.

If this development were to be approved, I would not get planning permission to build a house leading to the depopulation and fragmentation of our rural landscape and the survival of our communities.

Community Engagement and Social Acceptability

I note that concerns have been raised locally regarding the suitability of this location for a development of this scale. As a local resident with five generations of my family living on the same site with long-standing family ties to the area and a future interest in living and building

here, I do not believe that community concerns relating to visual impact, environmental risk, and disruption have been adequately addressed.

For these reasons, I respectfully request that the proposed development be carefully reconsidered, taking full account of its potential impacts on local residents, the landscape, the environment, and the long-term sustainability of the area.

The proposal must engage more comprehensively with local stakeholders, including those intending to establish homes and livelihoods in the vicinity, to ensure that the development does not undermine community cohesion or quality of life.

The Tirawley Wind Farm proposal raises significant concerns relating to residential amenity, landscape and visual impact, ecological integrity, infrastructure capacity, and compliance with local planning frameworks. I urge the planning authority to critically assess these issues and require substantial redesign or relocation of the project to ensure a sustainable balance between energy needs and community, environmental, and landscape protection.

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.

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

Thank you for considering my submission.

Yours faithfully,

Breege Jackson