

Submission of Observations on the Proposed Tirawley Wind Farm Development and BESS by Constant Energy, Lacken, Co. Mayo PAX16.324258

To Whom It May Concern,

I wish to make the following observations regarding the proposed Tirawley Wind Farm development by Constant Energy in the townlands of Lacken, Co. Mayo.

I am concerned that the proposed development, comprising 19 industrial-scale wind turbines and associated infrastructure, will have significant impacts on the local environment, heritage, landscape, ecology and community. My observations are outlined below.

1. Lack of Community Consultation

I am concerned by the apparent lack of meaningful consultation with local residents and stakeholders regarding a development of this scale. The proposal represents a substantial industrialisation of a rural coastal landscape, yet many residents feel they have not been adequately informed or consulted throughout the project development process.

I am a resident of Ballycastle, Co. Mayo and when the initial pre-planning application was made, I was not aware of the initial 21 turbines that were planned, where 5 of them would have been visible from the back of my house, where the sun would be rising, where shadow flicker and noise would be a very obvious concern. I was only made aware of it when I went to the consultation day in the Ballina Manor Hotel on the 6th of June 2023.

On that matter, I feel it was not appropriate for the consultation day to take place in Ballina, where there are three community hubs or halls available within the vicinity of the proposed Tirawley Wind Farm development. The advertisement Constant Energy provided to An Coimisiún Pleanála that they claim appeared in the Western People was not the one that appeared (see photo attached at end of document). There was very little other advertisement of the consultation in any other media or even leaflets delivered to inform residents of the community that such was to happen.

Given the scale, visual prominence and long-term implications of the proposed wind farm, a more comprehensive and transparent engagement process with affected communities has not been undertaken prior to the submission of the application.

2. Impact on Lacken Salt Marsh and Bird Populations

The Lacken salt marsh is an important ecological habitat, which is a Special Area of Conservation (SAC) supporting a variety of bird species, including migratory and nesting birds. The construction and operation of 19 turbines, together with associated roads, excavation works, drainage alterations and increased human activity, have the potential to adversely affect these sensitive habitats.

Particular concern arises regarding:

- Disturbance of migratory bird's flight paths such as the Whooper Swan and Brent geese that are known to settle in the Salt Marsh during the winter and spring months.
- Potential collision risks associated with turbine blades.
- Disturbance of nesting and feeding grounds for the aforementioned birds and native species.
- Indirect impacts arising from construction noise, lighting and increased traffic.
- Potential hydrological changes affecting the ecological functioning of the salt marsh for native and migratory birds thus having a negative effect on the Special Area of Conservation.

I believe that the ecological assessment has not fully consider the cumulative and long-term effects of the development on bird populations and associated habitats.

Not only is the area of importance to birds and animals, but also it is a tourist attraction with two loop walks associated with the Salt Marsh and I have concerns the construction phase will have a negative impact on tourists trying to access these loop walks, as well as locals that use these walks and trails as part of their community.

3. Potential Risks to Water Quality and Hydrology

The proposed development is located within an area containing peatland, agricultural lands and sensitive water environments. Construction activities associated with turbine foundations, access roads, cable routes, substations and the BESS compound have the potential to alter drainage patterns and increase sedimentation and pollution risks. The applicant's own environmental documentation acknowledges the need for extensive surface water management measures during construction.

Any accidental release associated with the BESS, including contaminated firewater, chemical leakage or construction-related pollution, could have consequences for local streams running into the Lacken Salt Marsh, groundwater and private water supplies.

Given the reliance of many rural households on private wells and local groundwater resources, this reason alone, the wind farm development and associated BESS should not go ahead.

4. Archaeological and Cultural Heritage Sensitivity of the Céide Coastline

The proposed development is located within a landscape of exceptional archaeological significance. The wider Céide coastline is internationally recognised for its archaeological heritage and contains a rich concentration of prehistoric monuments, field systems and archaeological remains. These include the Lacken Gazebo, Lacken Castle and Lacken Court tomb. There are numerous ringforts and field systems still visible within the vicinity of the dispersed wind farm site.

The introduction of large-scale turbines into this landscape has the potential to adversely affect the setting, as well as disturbing the archaeological structures, the context and appreciation of

archaeological resources that derive much of their significance from their relationship with the surrounding landscape.

The visual and cultural impact of the development on this sensitive archaeological landscape has not been assessed with particular care and precaution.

4. Impact on Daily Commuting and Construction Traffic

The construction phase is likely to generate substantial volumes of heavy goods vehicle traffic, abnormal loads and construction-related movements on local and regional roads. Local roads in North Mayo are not designed for sustained heavy industrial traffic.

As a daily commuter travelling to and from Ballina, I am concerned about:

- Increased traffic congestion, especially at pinch points.
- Road delays and disruption.
- Potential road closures or temporary traffic management measures adding time to commuter journeys over a prolonged period.
- Safety risks associated with transporting turbine components and construction materials.
- The cumulative, disruptive impact of prolonged construction activity on residents and local businesses.
- The inability of the local roads to be able to cater for an industrial development of this size.

Not only are these concerns for local commuters, these concerns will be shared by the thousands of tourists that use these roads as part of the Wild Atlantic Way.

The BESS and electrical infrastructure add further construction requirements beyond the turbines themselves. The proposed grid connection route and associated infrastructure will further extend the geographic footprint of the development. A more detailed assessment of construction traffic impacts on regular road users has not been provided.

5. Inadequate Assessment of Palmerstown Bridge

I am concerned that insufficient consideration appears to have been given to the protected structure status of Palmerstown Bridge and the potential impacts arising from construction traffic associated with the development.

Heavy construction vehicles and abnormal loads may have implications for the structural integrity, setting and heritage value of this protected structure. The planning authority should note that a comprehensive assessment has not been undertaken to demonstrate that the bridge will not be adversely affected during either the construction or operational phases of the project.

6. Visual Impact on the Landscape

The proposed turbines are to be located on an elevated coastal site. Unlike developments situated within mountainous terrain, there are no significant landforms in this area capable of visually absorbing or screening turbines of the scale proposed.

As a result, the turbines are likely to become dominant features across a wide geographical area and significantly alter the character of the landscape.

The visual impact will be particularly pronounced because:

- The site occupies elevated ground.
- The surrounding landscape is relatively open.
- The coastal setting provides extensive viewing opportunities.
- The turbines will be visible over long distances and from numerous public viewpoints.

7. Inappropriate Industrialisation of a Sensitive Rural and Coastal Landscape

The proposed development consists of a large-scale wind energy project, associated electrical infrastructure, onsite substation, operations compound and a BESS facility within a landscape of exceptional scenic, cultural and tourism value. The area forms part of the wider North Mayo landscape associated with the Wild Atlantic Way, Céide Fields, Downpatrick Head and the unspoilt coastal character that attracts visitors to the region. Mayo County Council planners have previously expressed concerns that the location is not appropriate for industrial-scale renewable energy infrastructure and that the project would adversely affect the landscape character of the area.

The addition of a BESS facility, security fencing, electrical equipment, transformers and associated infrastructure further intensifies the industrial character of the development and increases the visual impact beyond that associated with the turbines alone. This is an inappropriate industrialisation of a rural, coastal area that does not belong in an agricultural area close to homes.

8. Impact on the Wild Atlantic Way

The proposed development raises significant concerns regarding its impact on the scenic quality of the Wild Atlantic Way.

The Wild Atlantic Way is one of Ireland's premier tourism routes and derives much of its appeal from its unspoilt coastal landscapes and panoramic views. The introduction of 19 large turbines into this coastal setting risks undermining the visual amenity and visitor experience associated with this internationally marketed tourism corridor. North Mayo's economy also benefits significantly from tourism linked to its natural landscapes, coastal scenery and archaeological heritage, all as part of the Wild Atlantic Way. The visual prominence of turbines, electrical infrastructure and the BESS facility risks undermining the area's attractiveness as a destination.

The turbines will be visible from:

- The R314 route between Ballina and Killala.
- Lacken.
- Ballycastle.
- Areas along the Céide Coast.
- Enniscrone.
- Easkey.

Given the extent of visibility, I believe the visual impact assessment did not comprehensively address the cumulative effects on landscape character, scenic views and tourism-related amenities and was not adequately carried out by the developer.

8. Cumulative Impact of the Battery Energy Storage System

The BESS should not be viewed as a minor ancillary element of the project. It represents a substantial industrial installation in its own right and introduces additional environmental and public safety considerations. The compound of this nature would also have a negative impact on the Lacken Salt Marsh, the local wildlife and their habitats and disrupt the darkness of the area that many Dark Sky tourists use to view the milky way, Aurora Borealis, meteor showers and star gaze.

The proposed BESS would require battery containers, transformers, switchgear, security infrastructure and access arrangements, creating a permanent industrial compound within a rural landscape. This industrial compound does not fit into the landscape or can be absorbed into the landscape. The cumulative impact of the wind farm, BESS, substation and grid connection infrastructure must be fully considered rather than assessing each element in isolation.

9. Fire Safety and Emergency Response Concerns

Battery storage facilities are increasingly recognised as carrying a risk of thermal runaway and battery fires. Although such events may be infrequent, they can be difficult to extinguish and may result in the release of toxic gases and contaminated firefighting runoff.

Given the rural location of the site, concerns arise regarding:

- The capacity of local emergency services to respond to a significant battery fire.
- Potential risks to nearby residents, agricultural lands and livestock.
- The management of contaminated firefighting water.
- Long-duration fire incidents and their environmental consequences.

The applicant has not demonstrated beyond doubt that all fire risks have been adequately mitigated and that local emergency services have been fully consulted regarding response capability.

10. Discrepancy Between Table 2.3 and Site Layout Mapping

I have identified what appears to be a discrepancy between the turbine coordinates presented in Table 2.3 of the application documentation and the locations illustrated on the Site Layout Map.

As turbine positioning is a critical element of the assessment process, particularly in relation to environmental impacts, visual assessment, residential amenity and ecological considerations, this discrepancy should be clarified by the applicant. The planning authority should seek confirmation that all submitted drawings, coordinates and supporting documentation are fully consistent and accurate before any determination is made. If one or the other is incorrect, especially the table, then all reports are inaccurate and therefore should be rejected. It is difficult to consider observations in full as we can not know for sure which is the most accurate, the site layout map or the table.

11. Final comment.

In addition to my submission, I wish to adopt and support the detailed submission made by the Lacken Ballycastle Community Landscape Group in relation to the proposed Tirawley Wind Farm development (PAX16.324258). In particular, I endorse the concerns raised regarding cumulative wind farm developments across the North Mayo region, 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.

Conclusion

While I acknowledge the importance of renewable energy development, I believe the proposed Tirawley Wind Farm raises significant concerns regarding community consultation, ecological impacts, archaeological heritage, protected structures, traffic disruption, landscape character, impact on tourism and visual amenity. It is an inappropriate development in a coastal rural community, where many people reside, have businesses and tourists come to see in their thousands.

I respectfully request that the planning authority give full consideration to the issues raised above.

Yours faithfully,

Breege Walsh

5 Muingreevagh,

Ballycastle,

Co. Mayo

23.06.2026

Public Information Event



Constant Energy Ltd are hosting a public information event to inform the local community of the proposed Tirawley wind farm development within the barony of Tirawley incorporating the townlands of Lacken and Ballycastle, Co. Mayo. The proposed wind farm is being promoted by Constant Energy, an Irish owned renewable energy company. The wind farm will be developed in conjunction with local landowners.

Date: Tuesday June 6th, 2023

Time: 2pm to 7pm

Location: Ballina Manor Hotel, Ballina, Co Mayo.

website: www.Tirawleywindfarm.com

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