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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 am a local resident who built a home in Lissadrone in 1999. I moved to the UK in 1989 for work when emigration from Ireland was at its peak. I met my wife there and we moved home to Lissadrone in August 2005 for peace and tranquility to rear our young family who attended the local schools, and they had a wonderful upbringing beside the sea.

This proposed Tirawley Wind Farm was advertised in the Western People and stated “the proposed Tirawley wind farm development within the barony of Tirawley incorporating the townlands of Lacken and Ballycastle, Co. Mayo. This was the first I heard of this development. There was no consultation from the Developer with locals, no engagement, no leaflets, no liaison officer, just a shroud of secrecy until the advert appeared. Given that local landowners were all involved, it was the best kept secret of all times. It is a disgraceful and disrespectful way to treat us and our community.

I wish to formally express my observation that the applicant did not properly or comprehensively inform the communities that will be impacted by this development and therefore ACP should refuse this development based on the observation that the applicant has not adhered to the guidelines for community engagement.

Impact of walking cattle and sheep from Lissadrone to Lackenhill and vice versa

The movement of cattle on the public road between Lissadrone and Lackenhill is an established agricultural practice that appears likely to come under increased pressure if the proposed Tirawley Wind Farm is constructed. The proposal comprises 16 turbines, a substation, battery storage facilities, underground grid connections, access roads and associated construction works across the Lacken/Ballycastle area.

Our local roads are very narrow, used by me and other farmers moving cattle and sheep between small holdings. Livestock movements occur at walking pace on very narrow roads.

My farmland is located

- **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**

What effect will the turbines have on my cattle and sheep?

Construction Phase

The greatest potential impact on cattle and sheep movements will be ongoing and a danger to both me, my animals and increased heavy machinery on local roads.

The planning application includes turbine delivery routes, underground cabling works and major construction activity associated with turbine foundations, substations and battery storage infrastructure. Has the applicant done an assessment on farm animal movements on local country roads?

This would result in:

- Significant increases in heavy goods vehicle (HGV) traffic.
- Abnormal loads carrying turbine components.
- Temporary road widening works.
- Traffic management systems and road closures.
- Reduced opportunities for farmers to safely move livestock.

For cattle being walked between my lands, interactions with frequent HGV movements present too many risks.

Animal Stress

Bearing in mind cattle and sheep are sensitive to noise, vibration and large moving vehicles. Increased construction traffic will make animals more difficult to control.

Greater risk of animals breaking from the herd and entering adjoining lands or roads.

Farmer and Animal Safety

Livestock movements often require farmers to walk cattle, sheep and horses on narrow roads. Increased construction traffic would expose us to a substantially higher level of risk.

From a farming perspective, the development will:

- Industrialise a traditionally agricultural landscape.
- Increase traffic and disturbance.
- Complicate livestock management.
- Interfere with cattle movements between fragmented holdings.
- Create stress during construction.
- Reduce operational efficiency and farm profitability.

Lissadrone–Lackenhill Area

Walking my cattle on local roads, using private water supplies, they will be grazing near proposed turbine locations, and I rely on quiet handling conditions for breeding and calving, the most credible concerns are:

1. Construction traffic and disturbance.
2. Interference with cattle movement routes.
3. Water supply and drainage impacts.
4. Loss of grazing efficiency.
5. Micro climate causing loss of temperature resulting in lower grass yields and forage for my cattle.
6. Increased management and labour costs.

Impact on Existing Farming Schemes, Environmental Investments and Rural Sustainability

A significant concern is the lack of consideration given to the extensive work already undertaken by local farmers under the Common Agricultural Policy (CAP), including CRISS, ANC and ACRES measures.

Local farmers have spent years adapting their farming practices to comply with increasingly demanding environmental and agricultural requirements. These measures include maintaining hedgerows, protecting habitats, managing watercourses, preserving biodiversity, adhering to Good Agricultural and Environmental Condition (GAEC) standards, maintaining stocking requirements, and implementing nature-friendly farming practices.

The ANC scheme specifically recognises that farms in this area operate under natural disadvantages including poorer soils, climatic challenges, difficult terrain and shorter growing seasons. These limitations are already acknowledged by the State through support payments

designed to sustain farming activity in marginal areas. The introduction of a large-scale industrial energy development into such a landscape raises questions regarding compatibility with the objectives of supporting sustainable rural farming communities.

Many local farmers are also participating in ACRES and have invested substantial time, labour and financial resources in improving habitats, enhancing biodiversity, protecting water quality, restoring hedgerows and stone walls, and managing land for environmental benefit. These efforts are intended to improve ecological resilience and environmental quality across the landscape.

The Environmental Impact Assessment should fully examine whether construction activities, heavy traffic, excavation works, turbine operation, battery storage infrastructure and associated development could undermine the environmental gains achieved through these schemes. The cumulative impact on habitats, wildlife corridors, pollinator networks and protected environmental features requires detailed assessment.

If access roads, cabling routes or ancillary infrastructure intersect traditional livestock movement routes, farmers may face longer travel distances or more complicated herd management arrangements.

On my lands there are protected Megalithic tombs:

1. 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?

Cumulative Effects

A key planning consideration is cumulative impact.

Local community groups and councillors have expressed concerns regarding the scale of industrial infrastructure proposed for the area and the potential precedent it could create for further development.

From an agricultural perspective, cumulative effects could include:

- Additional traffic from future energy developments.
- Increased pressure on traditional farming practices.
- Gradual reduction in the practicality of moving livestock on public roads.
- Growing conflict between agricultural and industrial transport uses.

Planning and Environmental Assessment Considerations

A robust assessment should specifically examine:

- Frequency of existing cattle movements on the Lissadrone–Lackenhill route.
- Seasonal movement patterns.
- Predicted construction traffic volumes and timings.
- Interaction between livestock movements and abnormal-load deliveries.
- Availability of alternative livestock routes.
- Potential need for temporary livestock crossing management during construction.

Without such analysis, the impact on farming operations could be underestimated.

Residential Amenity & Tourism

The proposed development will fundamentally alter the peaceful rural character of the area. Residents have chosen to live in this location because of its natural environment, scenic landscape, and quiet surroundings. The presence of large industrial-scale turbines will have a significant visual impact and will be a constant feature on the horizon, affecting the enjoyment of homes and properties in the area.

The development represents an industrialisation of a rural landscape and will adversely affect the quality of life of local residents.

Cycling is increasingly popular in Ireland and a great way to explore the country. Two EuroVelo routes run through Ireland:

- **EuroVelo 1 – Atlantic Coast Route** travels 2,500 km along Ireland’s rugged south and west coasts. It brings cyclists to many of Ireland’s most scenic locations along the famous Wild Atlantic Way while using quieter roads than some of the busier sections of this route.
- **EuroVelo 2 – Capitals Route** is a flat 230 km route across the centre of Ireland, following canal paths and former railways, allowing cyclists to experience the peacefulness of inland rural Ireland.

- EuroVelo offers – is a remarkable network of 17 long-distance cycling routes that connect 40 countries across Europe. As of 2023, over 56,000 kilometers of routes are in operation.

We have not been given sufficient information to know the full extent and gravity of road closures. These are roads that we use every day, that we have to use to get from A to B.

The residents of Lacken can not be displaced to accommodate this development without proper assessment and engagement.

Ireland also offers many greenways (20–130 km) suitable for all abilities, plus signposted road routes and dedicated mountain bike trails. With Ireland's extensive cycle and walking routes a comprehensive assessment needs to be conducted during peak season.

I am concerned about the cumulative impact the Tirawley wind farm will have on tourism in not only the Lacken Area but also in Ballycastle. Recently the Glenora wind farm has been approved by An Coimisiún Pleanála for 22 turbines. The coast road from Lacken to Ballycastle is an extremely important part of the Wild Atlantic Way and is an extremely important economic asset to the area. The cumulative effect of Tirawley, Glenora, Keerglen and potentially Clydagh will have on tourism in the area cannot be ignored. The communities involved have worked extremely hard over the years to promote the areas, and the recently launched Failte Ireland and Mayo County Council tourism plan for the area is a significant boost for the area. This cumulative wind energy development that is planned for the north west coast of Mayo is eroding the future that our communities can have. The Lacken Ballycastle coastline is impressively historic with the Céide fields complex and down Patrick head, the future that residents could have will become negligible if ACP do not consider fully the cumulative impact of all projects in the area. I do not believe that the applicant has fully considered all the cumulative effects. 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 our local walking routes.
- 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.

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?

Carrowmore Lacken is not a site between Lacken and Ballycastle

We are concerned that the applicant does not appreciate that the Lacken area is not a “site” between Killala and Ballycastle. It is our community with over 600 people living in the area. The applicant does not give any consideration to the community for which it is proposing such a development. The complete industrialisation of our beautiful, historic area simply does not fit. The lack of consideration is evident by the total inadequate attempt at community engagement by holding one information day that was for a completely different site layout and as far as we are aware did not even include details of the BESS and Substation. The exclusion of this significant detail for the information day in our opinion constitutes that there was NO community engagement. The developer never came to our door to give information on the proposed development and we support the Lacken Ballycastle Community Landscape Protection Group in their submission relating to this and all other points.

Mayo County Council has described the location 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.

Noise and Shadow Flicker

I am concerned about the potential effects of turbine noise and shadow flicker on my home and my animals. Continuous turbine operation will generate noise and low-frequency noise, particularly with prevailing westerly winds, which is our normal wind direction.

Shadow flicker caused by rotating turbine blades will impact our homes, farms and living spaces. A comprehensive and independent assessment should be carried out due to the cluster of turbines and the cumulative effect on all of us.

Roads, Traffic and Construction Impacts

The construction phase will require the use of heavy machinery, including large excavators and construction vehicles. There are concerns regarding the suitability of local roads for such traffic.

The movement of heavy vehicles and equipment could damage local roads, verges, drainage systems, and other infrastructure that are already limited in capacity. Residents should not be left to bear the consequences of road deterioration caused by the development.

Property Values and Marketability

There is concern that the proximity of industrial wind turbines may negatively affect the attractiveness and marketability of nearby residential properties. Homeowners who have invested significantly in their properties should not be placed at a disadvantage due to a development over which they have no control.

Protection of Wells and Water Sources

Many farms and homes in the area rely on private wells and local water sources. There are serious concerns regarding the potential impact of excavation, blasting, road construction, and foundation works on groundwater flows and water quality.

Particular attention must be given to protecting water supplies used for livestock, including cattle, as any disruption or contamination could have serious consequences for farm operations and animal welfare.

A detailed hydrogeological assessment should be undertaken, and long-term monitoring should be required to ensure that private water supplies remain protected throughout construction and operation.

Quarry Operations and Effects on Local Structures

There is concern that the project will require significant quantities of stone and aggregate from local quarries. The continuous use of large excavators, including 50-tonne machines operating daily, together with increased quarrying activity, may generate vibration and disturbance over an extended period.

Residents are concerned that vibration from quarry operations and associated works could damage local structures and amenities, including the Lacken Gazebo, which is an important local landmark and community asset. Independent assessments should be carried out to establish whether such risks exist and what protective measures would be implemented.

Lack of Meaningful Community Consultation

A major concern is the absence of direct, meaningful consultation with affected residents. There has been no comprehensive house-to-house engagement with those who will be most impacted by the proposed development.

Residents should have been given the opportunity to discuss concerns, ask questions, and receive clear information before the project advanced to the planning stage. Genuine community engagement is essential for a development of this scale.

Concerns Regarding Local Microclimate Effects

There are also concerns regarding potential changes to local microclimatic conditions arising from turbines of this scale.

The surrounding area is heavily dependent on grass-based agriculture and livestock farming. Farmers rely on local knowledge of wind exposure, shelter, moisture retention, frost occurrence and grazing conditions developed over generations. Large turbines alter airflow patterns and create areas of turbulence that may influence local environmental conditions in their immediate vicinity.

While the extent of such effects may be disputed, there remains uncertainty regarding potential impacts on grass growth, soil moisture, livestock shelter, frost behaviour and sensitive habitats. Given that local farmers are required to meet strict environmental and agricultural performance standards under CAP schemes, any potential alteration of local environmental conditions should be assessed comprehensively before permission is granted.

Lissadrone Bog and Cultural Heritage Concerns

The development should also consider the historical and traditional rights associated with boglands in the area, including concerns relating to Lissadrone Bog and long-established local usage patterns.

Boglands form an important part of the environmental, cultural and historical heritage of rural communities. They provide wildlife habitat, carbon storage, water regulation functions and, in many cases, are associated with traditional turbary rights that have existed for generations.

Any development that has the potential to affect hydrology, access arrangements, drainage patterns or the long-term condition of nearby bogland areas should be subject to detailed assessment. The cumulative impact on peatland systems, traditional land uses and local heritage assets should be fully considered before any planning decision is made.

Failure to Recognise Existing Community Investment

Local residents and farmers have already made substantial contributions to environmental protection through participation in State-supported schemes and through stewardship of the landscape. It is difficult to reconcile these efforts with a proposal that would introduce significant industrial infrastructure into the same environment.

The planning authority should carefully consider whether the proposed development is consistent with the objectives of protecting rural communities, supporting sustainable farming systems, maintaining biodiversity gains achieved through ACRES, and preserving the environmental character of the area for future generations.

Given the concerns outlined above regarding residential amenity, noise, shadow flicker, road impacts, property values, protection of water sources, impacts on ACRES-supported habitats, potential effects from quarry activity, and the lack of meaningful consultation with local residents, I respectfully request that the planning authority refuse permission for this development unless these issues can be fully addressed through independent assessment and robust mitigation measures.

The rights, wellbeing, and livelihoods of existing residents and farming families must be given full consideration before any decision is made.

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.

I respectfully ask an Bórd Pleanála to refuse this application and stop the big developers making peoples lives a misery.

Yours faithfully
Brian Jackson