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6th 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 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, 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.

Having reviewed the public information provided and engaged with the community consultation materials, I wish to raise the following concerns:

1. Residential and Property Impact

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. 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)

2. Noise Impact Concerns

My home is identified as **receptor H33** in the EIAR.

My home is located approximately:

- **754 metres from turbine AT05 stated in Table 15.1**
- **765 metres from turbine AT01**
- **1026 metres from turbine AT06**

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

The proposed turbine AT15 is located only approximately **754 metres from my dwelling (H33)**. I 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. I request that An Coimisiún Pleanála carefully examine whether the modelling fully represents the actual conditions experienced at H33, including:

- night-time noise impacts when background noise levels are naturally low;
- periods with specific wind direction where turbines AT05, AT01 and AT06 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.

I request that a more precautionary assessment be applied to H33 given its proximity to AT05 and the combined influence of three turbines.

Shadow Flicker – Dwelling H33

The EIAR identifies my dwelling, **H33**, as being approximately **754 metres from turbine AT05**. Table 15.3 of Chapter 15 predicts that H24 will experience:

- **20 hours 15 minutes worst-case shadow flicker per year**
- **3 hours 2 minutes expected shadow flicker per year**
- **36 minutes maximum expected shadow flicker per day**

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

I consider this significant because the applicant's own modelling confirms that my 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, I do not consider reliance on future mitigation alone to be sufficient justification for permitting a development that is predicted to create an exceedance 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 H33 will be independently verified throughout the lifetime of the wind farm.

I 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 H33 is already predicted to exceed the 2006 daily guideline, I submit that the appropriate standard should be prevention rather than management.

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

Jennings O'Donovan & Partners Limited

Consulting Engineers

Sligo

Receptor ID	Specimen Turbine		
	Worst Case Shadow [h/year]	Expected Shadow [h/year]	Max. Expected Shadow [h/day]
H28	06:57	01:02	00:22
H29	58:39	06:24	00:38
H30	16:56	02:31	00:34
H31	03:38	00:32	00:17
H32	52:03	06:23	00:37
H33	20:15	03:02	00:36

Table 11.16: Predicted Noise Levels as LA90 at Varying Wind Speeds from the Proposed 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
H17	515390	832068	29.5	33.6	37.4	39.7	40	40
H18	517622	837746	30.2	34.3	38.1	40.4	40.7	40.7
H19	517552	838096	30	34.1	37.9	40.2	40.5	40.5
H20	515559	834678	31.3	35.4	39.2	41.5	41.8	41.8
H21	516744	836946	32	36.1	39.9	42.2	42.5	42.5
H22	514721	837259	31.8	35.9	39.7	42	42.3	42.3
H23	515805	834702	31	35.1	38.9	41.2	41.5	41.5
H24	517581	838054	29.9	34	37.8	40.1	40.4	40.4
H25	515641	832856	31.1	35.2	39	41.3	41.6	41.6
H26	515947	834836	30.8	34.9	38.7	41	41.3	41.3
H27	517606	838071	29.5	33.6	37.4	39.7	40	40
H28	515886	834729	30.8	34.9	38.7	41	41.3	41.3
H29	517490	838353	28.8	32.9	36.7	39	39.3	39.3
H30	515462	834716	31.3	35.4	39.2	41.5	41.8	41.8
H31	516107	834819	30.4	34.5	38.3	40.6	40.9	40.9
H32	517583	838226	28.9	33	36.8	39.1	39.4	39.4
H33	515398	834709	31.5	35.6	39.4	41.7	42	42

3. Site Suitability and Landscape Impact

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)

4. 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)

5. 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.

6. Traffic and Infrastructure Impact

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)

7. 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)

8. 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)

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,

Carmel and Frank Gallagher