



Céide Coast Community Company Ltd,  
Eco Campus,  
Main Street,  
Ballycastle F26 W544  
Co. Mayo

23 June 2026

**To:** An Coimisiuin Pleanála

**Re:** An Coimisiuin Pleanála Planning Ref 324258 Tirawley Windfarm located within the townlands of Ballymurphy, Ballynaleck, Barnhill Lower, Barnhill Upper, Barroe, Billoos, Carn, Carrickanass, Carrowmore, Castlelackan Demesne, Castletown and others Co. Mayo.

**From:** Ceide Coast Community Company Eco Campus, Main St, Ballycastle, Co Mayo. F26 W544.

**Description:** The proposed development consists of up to 16 no. wind turbines (Tirawley Wind Farm), including a 110kV sub-station on site, an energy storage system in the form of a battery array located within container units and all associated infrastructure.

**To whom it concerns at An Coimisiuin Pleanála**

We **The Ceide Coast Community CLG** refer to the above planning application and wish to make the following observations in relation to the proposed development.

Regards,

Maura Fox  
**Company Secretary**

**On behalf of the Ceide Coast Community CLG**

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Registered in Ireland No: 616734  
Registered Charity No: CHY 22662  
Charities Regulatory No: 20205880

The Ceide Coast Community Coast (CCCC) was established approximately six years ago in response to the issues that are affecting the local area such as rural decline, depopulation, closure of schools (primary and post-primary) and post offices in the parish of Ballycastle/Belderrig and surrounding areas. In this instance, and to reverse such decline, the aims and objectives of the CCCC are to sustain and improve the tourist potential of the area and in doing so, via a knock-on affect, improve the economic factor, aesthetic appearance and sustainable well-being of the locality.

The CCCC was successful in 2021 in attracting the world-renowned Red Bull Cliff diving event to Downpatrick Head. The scenic views and historical significance of the site and surrounding area were a major factor in securing the event not alone for Ballycastle but the whole of County Mayo. Given the enormous success of the event and the viewership figures it brought to North Mayo from both National and International press (in the millions) the CCCC understand that Downpatrick Head will at some point host the event again in the future. This will have significant economic boosts for the both the North Mayo and County areas.

We wish to make a number of observations on the proposed Tirawley project and the affects it would or may have on our area, our home.

**The Ceide Coast Community CLG wish to make the following observations regarding the proposed Tirawley Windfarm:**

### **Community Engagement and Public Consultation**

**Deficiencies in Meaningful Community Consultation** - The Céide Coast Community Company CLG (CCCC) has significant concerns regarding the level and quality of community engagement undertaken in relation to the proposed Tirawley Wind Farm development.

The proposed development represents one of the largest infrastructure projects ever proposed within the wider Lacken, Ballycastle and North Mayo area and has the potential to give rise to significant and long-term effects on local communities, landscape character, tourism, recreation, environmental resources and quality of life. In such circumstances, meaningful and accessible consultation with those communities most directly affected should be regarded as a fundamental component of the development process.

It is our understanding that no dedicated consultation event was held within either Ballycastle or Lacken, the communities that are likely to experience many of the direct visual, environmental and social impacts associated with the proposed development.

Instead, consultation was undertaken at a venue located some distance from the affected communities and during normal working hours. Such arrangements limited the ability of local

residents, landowners, business owners, farmers, tourism operators, community organisations and other stakeholders to meaningfully participate in the consultation process.

The CCCC considers that effective consultation should extend beyond the provision of information and should facilitate genuine dialogue with local communities. Meaningful engagement involves listening to local concerns, understanding local knowledge, responding transparently to issues raised and providing opportunities for affected communities to influence project design and decision-making where appropriate.

The Ballycastle and Lacken areas contain communities with deep historical, cultural and environmental connections to the landscape within which the proposed development is situated. Local residents possess extensive knowledge regarding the area's hydrology, ecology, archaeology, tourism assets, recreational resources and community needs. This knowledge represents an important component of the planning process and should have been afforded appropriate consideration.

The apparent absence of direct engagement within the communities most affected by the proposal has contributed to a perception that local concerns have not been fully acknowledged or addressed. It has also resulted in a missed opportunity to build trust, improve understanding and identify locally specific issues that may not be readily apparent through desk-based assessments or formal environmental studies alone.

The CCCC respectfully submits that meaningful stakeholder engagement is an important principle of good planning practice and sustainable development. Given the scale of the proposed development and the significant concerns now being expressed throughout the wider Ballycastle and Lacken area, it is difficult to conclude that a sufficient level of meaningful community engagement has been achieved for the project.

Accordingly, the CCCC requests that An Coimisiún Pleanála give appropriate consideration to the extent and effectiveness of community consultation undertaken to date when assessing this application and determining whether the proposal has adequately addressed the concerns of the communities most directly affected by the development. In our opinion, this process has not been undertaken in an honest, meaningful manner.

### **Archaeology, Heritage and Landscape**

The Céide Coast Community CLG considers the wider Ballycastle, Belderrig and Lacken area to be one of the most important archaeological and cultural landscapes in Ireland and indeed Europe. The community has safeguarded, lived within and celebrated this landscape for generations and continues to promote its unique heritage through sustainable tourism, education and community initiatives.

At the heart of this landscape lies the internationally significant Céide Fields archaeological complex, interpreted through the Céide Fields Visitor Centre which attracts in excess of 30,000 visitors annually. The Céide Fields contain one of the oldest known enclosed field systems in the world, dating back approximately 6,000 years and predating the pyramids of Egypt. Beneath the blanket peat lie extensive Neolithic field systems, habitation sites, walls and associated archaeological features which provide an unparalleled insight into early farming communities and human settlement in Ireland.

The CCCC wishes to emphasise that the archaeological significance of the Céide Fields extends far beyond the immediate footprint of the Visitor Centre or the currently excavated areas. The wider uplands and hills visible throughout the Ballycastle, Belderrig and Lacken landscape form an integral component of the broader Céide Fields Neolithic Landscape. Archaeological evidence confirms that these ancient field systems extend across extensive areas of North Mayo and are intrinsically linked to the character, setting and significance of the wider landscape.

The uplands visible from Downpatrick Head and throughout the Céide Coast are therefore not merely scenic viewpoints but form part of a living archaeological landscape of international importance. The visual relationship between the Atlantic coastline, the open peatland, the upland ridges and the preserved Neolithic field systems contributes significantly to the cultural heritage value, authenticity and sense of place associated with the area.

The CCCC considers that the introduction of large-scale industrial infrastructure, including turbines, crane hardstands, construction compounds, internal access roads and associated development, would adversely affect the setting, character and visual integrity of this internationally significant archaeological landscape. The proposed development would fundamentally alter views and landscape character that have remained largely unchanged for millennia and would detract from the experience and appreciation of one of Ireland's most important cultural heritage assets.

The preservation of the wider Céide Fields landscape should be regarded as a matter of national and international importance. The Ceide Coast therefore submits that particular weight should be attached to the protection of the archaeological setting, cultural significance and landscape integrity of the Céide Fields Neolithic Landscape when determining this application.

### **Effect on the Visual, Scenic Amenity and Tourism Value of the Area.**

The Céide Coast Community Company CLG (CCCC) considers that the proposed development would have a significant adverse impact on the visual amenity, landscape character, cultural heritage setting and tourism value of the wider North Mayo area.

Downpatrick Head, Ballycastle is recognised as one of the principal Signature Discovery Points along the Wild Atlantic Way and has become one of the most successful tourism attractions in North Mayo, attracting in excess of 60,000 visitors annually. The site is internationally renowned for its dramatic coastal scenery, geological significance and exceptional panoramic views. Standing at Downpatrick Head, visitors experience a unique 360-degree vista encompassing the Atlantic coastline, the Staggs of Broadhaven sea stack, the Slieve League Cliffs in County Donegal and the uplands of North Mayo. These views are not merely scenic; they form an essential component of the visitor experience and contribute significantly to the tourism economy of the region.

The CCCC considers that the introduction of multiple large-scale wind turbines, turbine foundations, crane hardstands, construction compounds, internal access roads and associated infrastructure into this landscape would fundamentally alter its character and setting. Turbines of the scale proposed would become dominant vertical features within an otherwise open and undeveloped landscape and would significantly detract from the visual appreciation of both the Céide Fields archaeological complex and the wider coastal environment. Such development is considered incompatible with the landscape qualities that underpin the area's tourism offering and international reputation.

The proposal is also considered to be fundamentally at odds with the objectives of the Wild Atlantic Way, which seeks to promote and celebrate Ireland's most scenic landscapes and visitor experiences. The success of Downpatrick Head as a Signature Discovery Point is based upon the area's sense of remoteness, natural beauty and cultural significance. The CCCC considers that the proposed development would severely undermine these qualities and diminish the visitor experience associated with this internationally recognised destination.

In addition to the impacts identified above, the CCCC is concerned that the proposed development would directly conflict with significant tourism investment and strategic tourism initiatives currently being progressed within North Mayo. Fáilte Ireland recently announced the Wild Mayo Destination Experience Development Plan (DEDP) which seeks to strengthen and enhance tourism experiences throughout County Mayo by investing in high-quality visitor attractions centred on landscape, heritage, culture and outdoor recreation.

The Céide Coast Community Company CLG has been actively advancing these objectives through the development of the Céide Coast Walk, a transformational tourism project extending approximately 15 kilometres between Downpatrick Head and Céide Fields. The project has received planning permission and is anticipated to attract investment in the order

of €10 million plus. A key feature of the project is the construction of a landmark 60-metre suspension bridge near Céide Fields which will provide a unique visitor experience of international quality and establish the route as one of Ireland's premier coastal walking destinations.

The CCCC firmly believes that the visitor experience of this area will be greatly enhanced once this project is delivered. The proposed wind farm would undermine the landscape setting upon which the success of this investment depends and would be contrary to the long-term vision of the community for sustainable tourism, heritage protection and landscape-led economic development within North Mayo.

Particular concern arises from the location of the proposed turbine construction areas, associated infrastructure and internal road network in close proximity to a local access road that forms part of the Western Way long-distance walking route. This nationally important recreational route provides a walking link extending from Oughterard, Co. Galway, through the west of Ireland to the Wild Nephin National Park Visitor Centre in Ballycroy and onwards through North Mayo. The route traverses Lecarrowntemple, Conaghra, Castlelacken, Lissadrone and neighbouring townlands that are either within or immediately adjacent to the proposed development area.

The landscape visible from this route is among the most spectacular within Co. Mayo and provides panoramic views of County Donegal, County Sligo, the Ox Mountains, Lough Conn, Nephin and the mountain ranges to the west of Nephin. These views form a key component of the recreational and tourism experience enjoyed by walkers, cyclists, visitors and local residents. The introduction of industrial-scale wind energy infrastructure into this landscape would significantly diminish these views and adversely affect the scenic amenity of the route.

The CCCC is also concerned that the construction phase of the project would negatively impact tourism through increased heavy goods vehicle traffic, road disturbance, visual intrusion and disruption to visitors using the local road network and walking routes. These impacts would occur in an area where tourism forms a significant component of the local economy and supports businesses, accommodation providers and recreational enterprises throughout North Mayo.

The CCCC is aware of a number of existing and proposed wind energy developments within the wider region. The cumulative and in-combination visual effects arising from multiple wind farm developments across the North Mayo uplands are of significant concern. While individual developments may be assessed in isolation, the combined effect of numerous large-scale turbine developments has the potential to erode the distinctive landscape character of the area and result in the gradual industrialisation of a landscape recognised for its natural beauty, archaeological significance and tourism value.

Tourism remains one of the most important sectors of the local economy and together with agriculture supports employment throughout Ballycastle, Lacken, Belderrig, Kilfian, Killala and surrounding areas. The tourism offering of the region is intrinsically linked to its landscape quality, heritage assets and sense of place. Any development that adversely affects these attributes has the potential to negatively impact visitor numbers, visitor experience and associated economic activity.

For these reasons, the CCCC considers that the proposed development would result in significant adverse effects on visual amenity, landscape character, cultural heritage setting, recreational amenity and tourism value and therefore should not be permitted.

### **The Western Way Trail**

The Western Way Walking trail from Oughterard in Co. Galway to Ballycastle, Co. Mayo and beyond to Bunnyconellan via Lacken Hill (directly through the centre of the proposed area for Tyrawley Wind Farm) was established in the 1980s and will be impacted negatively and for a long period of time during the construction of this project. The complete removal and fragmentation of this tourism and recreational resource from the local and regional area will result in a significant adverse effect on the local area from a tourism and outdoor recreational perspective. Once the turbine field has been established, the vistas will be utterly changed from that of a walk through a once natural and semi-natural peatland and woodland area to that of a large scale industrial wind energy facility. A large portion of the Western Way Walk would be taken up as a haul and access route for the construction of the proposed project.

### **The Shralogga Loop Walk**

A major section of the existing Shralogga Loop Walk from Ballycastle through Ballyglass, Ballyknock and returning to Ballycastle Village again will be negatively impacted by the development of this project from a visual perspective. The huge blades and turbines will be visible throughout the area and whilst renewable energy is a positive in some circumstances; the development of such imposing infrastructure as previously stated – an area of high scenic value – will be damaging to the potential for further Tourism in this unspoilt, natural and long established indigenous cultural area of Ireland.

### **Potential Impacts on Ornithology and Natura 2000 Qualifying Interest Species:**

The CCCC has significant concerns regarding the potential impacts of the proposed development on bird populations within the wider North Mayo area, including the Qualifying Interest (QI) species of the Killala Bay/Moy Estuary SPA (Site Code 004036).

The Killala Bay/Moy Estuary SPA is designated for a range of internationally important bird species and supports significant populations of wintering waterbirds, estuarine birds and migratory species. Many of these species rely upon habitats and ecological resources extending well beyond the designated site boundary and utilise a wider network of feeding, roosting, commuting and refuge habitats throughout the surrounding catchment.

The proposed development is located within a landscape that maintains hydrological connectivity with watercourses draining towards Killala Bay and the Moy Estuary. The Glebe and Conaghra river systems ultimately contribute to the ecological functioning of the downstream estuarine environment. The CCCC is concerned that construction-phase activities, including excavation works, road construction, peat disturbance, concrete works, drainage alteration and sediment mobilisation, could result in adverse effects on downstream water quality if not adequately controlled.

The ecological integrity of estuarine and coastal habitats is dependent upon the maintenance of appropriate water quality, sediment dynamics and nutrient balance. Any deterioration in these conditions has the potential to adversely affect aquatic invertebrate communities, fish populations and other prey resources upon which SPA bird species depend. Consequently, indirect impacts on the conservation interests of the SPA cannot be dismissed without robust scientific assessment.

The CCCC is also concerned about the potential for collision risk, displacement effects and habitat avoidance associated with large-scale turbine infrastructure. Numerous bird species utilise the coastal, agricultural and upland habitats of North Mayo for feeding, migration and movement between habitats. The introduction of multiple large-scale turbines into this landscape may alter established flight paths and increase the risk of disturbance or displacement of sensitive species.

Particular regard should be had to the cumulative and in-combination effects of this proposal when considered alongside existing and proposed wind energy developments within the wider region. While individual projects may not appear significant in isolation, the cumulative effect of multiple developments has the potential to increase habitat fragmentation, disturbance levels and collision risk across a much broader geographical area.

The CCCC notes that many avian Qualifying Interest species protected under the EU Birds Directive are already experiencing population declines at national and international levels. In light of the conservation importance of the Killala Bay/Moy Estuary SPA and the ecological sensitivity of the surrounding catchment, a precautionary approach should be adopted. It is

the opinion of the CCCC that the potential impacts of the proposed development on Natura 2000 conservation interests, particularly in relation to hydrological pathways, habitat connectivity, disturbance and cumulative effects, require the highest level of scrutiny before any consent is considered.

| Species                             | Scientific Name                     | SPA Qualifying Interest | BoCCI Status* |
|-------------------------------------|-------------------------------------|-------------------------|---------------|
| Greenland White-fronted Goose       | <i>Anser albifrons flavirostris</i> | Yes                     | Red           |
| Greylag Goose                       | <i>Anser anser</i>                  | Yes                     | Amber         |
| Bar-tailed Godwit                   | <i>Limosa lapponica</i>             | Yes                     | Red           |
| Golden Plover                       | <i>Pluvialis apricaria</i>          | Yes                     | Red           |
| Dunlin                              | <i>Calidris alpina</i>              | Yes                     | Amber         |
| Sanderling                          | <i>Calidris alba</i>                | Yes                     | Amber         |
| Ringed Plover                       | <i>Charadrius hiaticula</i>         | Yes                     | Amber         |
| Redshank                            | <i>Tringa totanus</i>               | Yes                     | Red           |
| Curlew                              | <i>Numenius arquata</i>             | Yes                     | Red           |
| Black-headed Gull                   | <i>Chroicocephalus ridibundus</i>   | Yes                     | Amber         |
| Goldeneye                           | <i>Bucephala clangula</i>           | Yes                     | Amber         |
| Lapwing                             | <i>Vanellus vanellus</i>            | Yes                     | Red           |
| Common Scoter                       | <i>Melanitta nigra</i>              | Yes                     | Red           |
| Wetland and Waterbirds (Assemblage) | Multiple Species                    | Yes                     | -             |

Table 1 Qualifying Interest Bird Species of Killala Bay/Moy Estuary SPA (Site Code 004036) showing 7 of the 13 QI's being Red listed. The remaining 6 are Amber.

The Killala Bay/Moy Estuary SPA supports a significant number of bird species that are recognised as being of elevated conservation concern at national level. Of the individual Qualifying Interest species for which the SPA is designated, the majority are classified as either Red-listed or Amber-listed Birds of Conservation Concern in Ireland (BoCCI). These

classifications reflect declining populations, restricted distributions and/or unfavourable conservation trends and highlight the ecological sensitivity of the SPA and the importance of maintaining the integrity of habitats and ecological processes upon which these species depend.

#### **Flooding and Water Quality Issues for Natura 2000 sites and Lacken Beach**

In relation to the proposed development at Tyrawley, it is the opinion of the CCCC that the removal of blanket bog from the Lacken Hill hydrological catchment area coupled with the fragmentation of the area to accommodate the placement of a multitude of turbines will result in the lack of water retention capacity at this location. This will lead to the rapid movement of river waters downstream with a significant adverse effect on human and flora and fauna receptors downstream in the watershed area. There will be increased pollution of the Lacken Saltmarsh and Kilcummin Head SAC, Killala Bay/Moy Estuary SPA and its waters with the increased potential for further eutrophication of the Glebe and Conaghra rivers, fishkills or worse still the death of the river catchment habitat and associated ecology.

#### **Increased Acidification and Sediment Loading of Rivers**

It cannot be guaranteed that there will not be water quality problems arising from the construction of the Tyrawley project as proposed relating to the release of sediment and hydrocarbons to the aquatic environment from the use and movement of machinery used in its wind farm construction and potential impacts from acidification as a result of forestry removal and pine needles entering the Glebe and Conaghra Rivers.

#### **Traffic Impact**

The impending construction of the Tyrawley Wind Farm project, particularly the installation of towering 135-metre high turbine structures, raises significant concerns regarding the probable disruption to the Ballycastle rural area caused by heavy commercial traffic. This observation stems from an understanding of the logistical challenges and potential impacts associated with transporting large components and equipment to the project site, as well as the broader implications for local infrastructure, environment, and community well-being.

Firstly, the transportation of components for the wind turbines, such as blades, towers, and nacelles, requires specialized heavy goods vehicles (HGVs) and oversized loads, which are often accompanied by escort vehicles for safety reasons. The influx of such large and heavy commercial traffic into the Lacken and Ballycastle rural areas pose several immediate

challenges, including increased congestion on local roads, potential damage to road surfaces and bridges, and heightened safety risks for motorists and pedestrians.

Moreover, the construction phase of the Tyrawley Wind Farm project is likely to necessitate a significant increase in vehicular movements, with HGVs traversing narrow rural roads and navigating challenging terrain to reach the designated construction sites. This influx of heavy commercial traffic not only disrupts the tranquillity and rural character of the area but also poses a potential threat to the safety of residents, particularly those living along or near the transportation routes.

Furthermore, the environmental impact of heavy commercial traffic cannot be overlooked, as diesel emissions from HGVs contribute to air pollution and greenhouse gas emissions, exacerbating climate change and compromising local air quality. The construction phase may also result in habitat disruption, soil erosion, and noise pollution, further degrading the natural environment and wildlife habitats in the Lacken and Ballycastle rural areas.

Additionally, the increased presence of heavy commercial traffic during the construction of the Tyrawley Wind Farm project has the potential to strain local infrastructure and services, including emergency response capabilities, healthcare facilities, and waste management systems. This strain may lead to delays in emergency response times, inadequate provision of services, and additional pressure on already stretched resources, diminishing the overall quality of life for residents.

In conclusion, the probable disruption to the Lacken and Ballycastle areas by heavy commercial traffic associated with the construction of the Tyrawley Wind Farm project, particularly the installation of 135-metre high turbine structures, underscores the need for careful planning, mitigation measures, and community engagement to address concerns and minimize negative impacts. Stakeholders must work collaboratively to ensure that the construction phase proceeds in a manner that prioritizes the safety, well-being, and environmental sustainability of the local community.

**What really are the long term benefits from the proposed Wind Farm for Ballycastle and the surrounding areas of North Mayo?**

Wind Farm construction is a specialised activity with select contractors travelling from project to project. The promise of a number of local jobs is greatly overstated. The operational phase of the 16 turbines will have a bare minimum, of again, specialised personnel involved in technical operation and occasional maintenance of the turbines and associated infrastructure. Therefore any statement regarding the economic benefit in the creation of employment is disingenuous. There are no visible positive benefits for the siting of this project in the Lacken and Ballycastle area other than a negative visual impact on the scenic beauty.

### **Conflict of Interest between Blanket Bog Restoration and the Development of Wind Energy Infrastructure on Blanket Bog**

The proposed Tyrawley wind energy development and the accompanying grid connection which will run through the village of Ballycastle will require the movement and operation of multiple sets of large-scale machinery across a wide area. Ground and surface material such as rocks, gravel and maintenance will need to be imported into the site in order to lay foundations for turbine bases and access routes in relation to the haulage of the turbines as described including large volumes of other materials. The imposition of such materials (not to mention the concern around biosecurity measures and management protocols) been placed upon the local environment is surely contradictory to the policies of national authorities and organisations such as the Department of the Environment, Climate and Communications, Bord na Mona, the Nature Trust and Coillte (who have been planting and harvesting large volumes of forestry in the area at will with no input back into the local community whatsoever).

### **Borrow Pits, Mineral Extraction and Regulatory Compliance**

The Céide Coast Community Company CLG (CCCC) notes that the proposed development includes the excavation and extraction of substantial quantities of rock, stone and other geological materials from within the development footprint for the construction of internal access roads, crane hardstands, turbine foundations, turning areas and associated infrastructure.

While these areas are described as borrow pits within the application documentation, the CCCC considers that the proposed activity exhibits many of the characteristics commonly associated with quarrying and mineral extraction operations. The extraction of significant quantities of geological material for engineering and construction purposes should therefore be subject to careful scrutiny by An Coimisiún Pleanála in the context of the relevant planning, environmental and extractive industry legislation.

The CCCC respectfully submits that An Coimisiún Pleanála should satisfy itself that all proposed borrow pit operations comply fully with the Planning and Development Regulations, the Environmental Impact Assessment legislative framework and all other applicable statutory requirements relating to the extraction of minerals and aggregate materials.

Particular regard should be given to the scale of the proposed extraction activities, the cumulative environmental effects associated with multiple borrow pit locations, the potential impacts on hydrology, groundwater, peat stability, landscape character, archaeology, biodiversity and water quality, together with the adequacy of environmental assessment undertaken in respect of these activities.

Particular concern arises where borrow pit excavation may intercept groundwater pathways, alter local drainage patterns or increase sediment mobilisation within catchments hydrologically connected to Lacken Saltmarsh and Kilcummin Head SAC and the Killala Bay/Moy Estuary SPA.

The CCCC further submits that no extraction of minerals, rock or aggregate should occur on-site unless it can be clearly demonstrated that all relevant planning, environmental assessment and regulatory requirements have been fully satisfied and that the activity does not give rise to significant adverse environmental effects.

### **Excavated Peat Management, Storage and Disposal**

The CCCC also has significant concerns regarding the proposed management, storage and ultimate disposal of excavated peat arising from the construction of the development.

The application indicates that substantial quantities of peat will be excavated during the construction phase and temporarily stockpiled on site before being deposited within excavated borrow pit areas and other engineered locations. Given the scale of peat excavation proposed, the CCCC considers that the handling, storage, recovery, reuse or disposal of excavated peat requires careful examination from both a planning and waste management perspective.

Blanket bog represents an important carbon store and carbon sequestration resource. The excavation, disturbance and long-term storage of peat has the potential to result in the release of stored carbon and greenhouse gases which should be fully quantified and assessed.

Peat is a highly sensitive environmental resource and its excavation, movement and deposition have the potential to give rise to a range of environmental impacts including sediment release, water quality deterioration, peat instability, greenhouse gas emissions and impacts on surrounding habitats and hydrological systems.

The CCCC respectfully requests that An Coimisiún Pleanála fully satisfy itself that all proposed peat management activities comply with the Waste Management Act, relevant waste management regulations, environmental protection legislation and any applicable guidance relating to peat excavation, storage, recovery and disposal.

In particular, it should be clearly demonstrated whether the proposed deposition of excavated peat within borrow pits or other locations constitutes a legitimate recovery activity or whether additional waste authorisations, permits, licences or regulatory approvals are required. The planning authority should also be satisfied that appropriate environmental safeguards, monitoring measures and contingency procedures are in place to prevent adverse impacts on groundwater, surface water, Natura 2000 sites, local communities and the wider receiving environment.

Given the ecological sensitivity of the receiving landscape, the hydrological connectivity of the area and the proximity of designated European sites, the CCCC considers that a precautionary approach should be adopted in relation to all excavated peat management proposals associated with the development.

### **Shadow Flicker, Glint, Glare, Road Safety and Tourism Amenity Assessment**

#### **Introduction and Context**

**Ceide Fields to Ballycastle Corridor (R314), Doonfeeney Area** - All photographs presented below were taken from the Ballyknock/Doonfeeney area west of Ballycastle, looking east towards Lacken Hill and the proposed turbine ridgeline. The photographs demonstrate the relationship between the rising sun, the Lacken Hill skyline and the visual corridor experienced by local residents, road users, tourism accommodation providers and visitors travelling along the R314 approach to Ballycastle.

The purpose of this section is to demonstrate that there is a credible potential for shadow flicker, glint and glare effects arising from the proposed turbines, particularly where rotating turbine blades would be positioned within or close to the sunrise viewing corridor. This concern is especially relevant to sensitive human receptors including local dwellings, the R314 regional road, the Stella Maris Shorehouse Hotel, Doonfeeney Glamping Site, Ballycastle village, the Céide Coastal Walk corridor and other tourism and recreational viewpoints within the receiving landscape.

The photographs do not seek to replace formal shadow flicker modelling. Rather, they provide site-specific visual evidence demonstrating a repeated geometric alignment between the rising sun and the ridgeline where the proposed turbines would be visible. This alignment gives rise to legitimate concerns with regard to human receptors, road safety and road users (vulnerable cyclists, walkers and vehicles).

#### **Site Setting and Viewing Conditions**

The observation area is located along the R314 regional road and surrounding lands within the Ballyknock, Doonfeeney, Muingelly and Ballycastle area. This road forms part of the wider tourism corridor linking Céide Fields, Ballycastle, Downpatrick Head and the wider North Mayo coastline.

Photographs were taken during the morning period under clear or partially clear conditions when the rising sun was positioned behind or close to the Lacken Hill ridgeline. The images demonstrate that the sun tracks across the same skyline where the proposed turbines would be visible from sensitive receptors located west of the proposed wind farm (as per the pictures).

This alignment is particularly relevant because turbine blades rotating across a low-angle sun position have the potential to create intermittent light modulation effects, including shadow flicker, glint and glare. Such effects may be experienced by residents, accommodation providers, visitors, walkers, cyclists and motorists using the R314 and associated local roads.

### **Photographic Evidence**

**Figure 1.**



**Figure 1.** View eastwards from Doonfeeney towards Lacken Hill showing the proposed turbine skyline in the same visual corridor as the R314 approach to Ballycastle.



**Figure 2.** Sunrise directly behind Lacken Hill in the morning as per Figure 1 above. At its current position, the sun has come from the lower left of image along the contour of the hill and in doing so has moved through the ridge sightline as seen in the photomontages above of the turbine blades (Figure 1).



**Figure 3.** This and the following images were taken from Doonfeeney (across the bay from the proposed wind farm along with the village of Ballycastle amongst other locations) showing the same repeated movement of the sun over the mountain where the blades are proposed to be positioned a week later than the previous images.



**Figure 4.** This and the following images were taken from Doonfeeney (across the bay from the proposed wind farm along with the village of Ballycastle amongst other locations) almost a week later showing the same repeated movement of the sun over the mountain where the blades are proposed to be positioned.



**Figure 5.** This and the following images were taken from Doonfeeney (across the bay from the proposed wind farm along with the village of Ballycastle amongst other locations) almost a week later showing the same repeated movement of the sun over the mountain where the blades are proposed to be positioned.

## **Assessment of Potential Impacts**

**Summary of imagery** - Movement of the sun across the Lacken Hill ridgeline is clearly visible from image to image as time lapses throughout the morning period. This repeated alignment demonstrates the potential for significant adverse, long-term and permanent shadow flicker, glint and glare effects at sensitive human receptor locations throughout the wider Ballycastle, Doonfeeney, Ballyknock and surrounding areas.

These images also highlight the potential for adverse impacts on road users arising from shadow flicker, glint and glare effects along this important transport corridor linking Ballycastle and Belmullet, both of which contain significant tourism attractions and visitor destinations. The interaction of rotating turbine blades with low-angle sunlight may contribute to visual distraction and reduced driver comfort during morning periods when the sun rises directly behind the proposed turbine ridgeline.

The potential effects are not confined solely to local residents and road users. Visitor numbers within the area are expected to increase significantly from approximately 60,000 now to approximately 200,000 (annually) in the following years following the delivery of the approved Céide Coast Walk project, a major tourism initiative supported by Mayo County Council and Fáilte Ireland. The proposed 15 km coastal walking route linking Downpatrick Head and Céide Fields is anticipated to attract substantial numbers of walkers and outdoor recreation users annually. Many of these visitors will travel through or experience views from locations where the proposed turbines, associated shadow flicker and glint/glare effects may be visible. Consequently, the potential impacts of the development extend beyond residential amenity and road safety considerations and may adversely affect the visitor experience, scenic enjoyment and tourism value of one of North Mayo's most important emerging tourism destinations.

### **Road Safety**

The R314 serves as the principal regional road connecting Ballycastle, Céide Fields, Downpatrick Head, Lacken and the wider North Mayo area. It is utilised extensively by local residents, commercial traffic, agricultural vehicles, tourism operators, cyclists and visitors travelling between some of the most significant tourism destinations along the Wild Atlantic Way.

The photographic evidence presented within this assessment demonstrates that the rising sun occupies the same visual corridor as the proposed turbine ridgeline during morning periods. Under

existing conditions, motorists travelling eastwards already experience periods of direct solar glare, particularly during autumn and winter months when the sun remains low on the horizon.

The introduction of multiple large-scale turbines and rotating blades into this visual corridor has the potential to create intermittent shadow flicker, glint and glare effects capable of increasing driver distraction and visual discomfort. The repetitive interruption of sunlight by rotating blades may draw driver attention away from the road environment and create rapidly changing visual conditions during periods when concentration and visibility are already affected by low-angle sunlight.

The concern is particularly relevant given the strategic tourism importance of the route. Annual visitor numbers are anticipated to increase significantly in the coming years (60,000 to 200,000) following the delivery of the approved Céide Coast Walk project and the implementation of wider tourism initiatives associated with the Wild Atlantic Way and the Wild Mayo Destination Experience Development Plan (Failte Ireland, 2026). Consequently, greater numbers of unfamiliar road users, cyclists, walkers and visitors are expected to utilise the local road network.

The Ceide Coast Community considers that there is significant potential for shadow flicker, glint and glare effects to affect motorists, cyclists and pedestrians throughout the wider Ballycastle area. Particular concern arises along the R314 approach to Ballycastle from Muingelly, where road users travel for approximately 1.6 km directly towards the rising sun before entering the shelter of the Ballinglen Bridge area. The proposed turbines would be positioned within this existing sunrise corridor and may introduce additional visual disturbance through rotating blade movement, shadow flicker and reflected light. Similar concerns arise along local roads within the Doonfeeney and Ballyknock areas and at publicly accessible viewpoints where prolonged views towards the proposed turbine ridgeline are available. Given the strategic tourism and recreational importance of these routes, the potential implications for road safety and public amenity are of great concern for our group.

The Ceide Coast Community considers that a significant basis for concern remains regarding the potential impact of the proposed development on road safety and public amenity.

### **Tourism and Scenic Amenity**

The CCCC considers that the proposed development would have a significant adverse impact on the tourism value, visitor experience and scenic amenity of the wider North Mayo area. The landscape within and surrounding the proposed development site is one of the area's most valuable tourism

assets and forms a fundamental component of the visitor experience associated with the Wild Atlantic Way, the Céide Fields, Downpatrick Head and the wider Céide Coast.

The proposed turbines would be visible across a substantial portion of the receiving landscape and would introduce large-scale industrial infrastructure into an area renowned for its natural beauty, cultural heritage and sense of remoteness. The Ceide Coast Community considers that the visual prominence of the turbines, associated crane hardstands, access roads, construction compounds and ancillary infrastructure would fundamentally alter the character of the landscape and adversely affect views currently enjoyed by residents and visitors.

Particular concern arises in relation to the Wild Atlantic Way Signature Discovery Point at Downpatrick Head, which attracts in excess of 60,000 visitors annually. One of the defining characteristics of this location is the uninterrupted panoramic vista extending across the Atlantic coastline and inland across the uplands of North Mayo. The proposed turbines would become a prominent feature within this landscape setting and would detract from the natural and undeveloped character that underpins the attraction's success.

The Ceide Coast Community has been actively progressing the Céide Coast Walk, an approved 15 km coastal tourism route linking Downpatrick Head and Céide Fields. This transformational project, supported by Mayo County Council and Fáilte Ireland (<https://www.failteireland.ie/Utility/News-Library/New-5-year-tourism-development-plan-for-North-Mayo.aspx>) and anticipated to attract investment in the order of €10 million, will significantly increase visitor numbers to the area and further establish North Mayo as a premier tourism destination. A key feature of the project is the proposed 60-metre suspension bridge near Céide Fields which is intended to provide a visitor experience of national and international significance.

The success of the Céide Coastal Walk is intrinsically linked to the preservation of the area's landscape quality, scenic views and sense of place. Walkers using the route will experience extensive views across the wider North Mayo landscape, including direct views towards the proposed turbine locations. The Ceide Coast Community considers that the introduction of large-scale wind energy infrastructure into this setting would diminish the quality of the visitor experience and undermine significant public and community investment currently being directed towards sustainable tourism development.

The proposed development also has the potential to adversely affect users of the Western Way long-distance walking route, which traverses the wider area and forms part of an important recreational corridor linking Wild Nephin National Park, North Mayo and the western seaboard. The route is

actively promoted as a scenic walking experience and derives much of its value from the quality of the surrounding landscape and the extensive views available throughout the area.

In addition to visual impacts, the Ceide Coast Community is concerned that shadow flicker, glint and glare effects may adversely affect visitors, walkers, cyclists and tourism accommodation providers, including locations such as the Stella Maris Shorehouse Hotel and Doonfeeney Glamping Site. These facilities depend heavily on the area's scenic character and visitor appeal and may experience adverse effects arising from the introduction of large-scale turbine infrastructure within key view corridors.

The Ceide Coast Community further notes that Fáilte Ireland's Wild Mayo Destination Experience Development Plan (<https://www.failteireland.ie/Utility/News-Library/New-5-year-tourism-development-plan-for-North-Mayo.aspx>) seeks to strengthen and enhance tourism experiences throughout County Mayo through investment in landscape-led tourism, outdoor recreation and heritage-based attractions. ***The proposed development is considered inconsistent with these objectives and risks undermining substantial public and community financial investment currently being directed towards the sustainable development of tourism within North Mayo.***

When considered individually and cumulatively with existing and proposed wind energy developments throughout the wider region, the Ceide Coast Community considers that the proposed development would result in a significant adverse effect on landscape character, tourism amenity, visitor experience and the long-term tourism potential of the Céide Coast and wider North Mayo area.

### **Residential and Visitor Accommodation Impact**

The Ceide Coast Community considers that the proposed development has the potential to adversely affect both residential amenity and visitor accommodation facilities located within the wider Ballycastle, Doonfeeney, Muingelly and Lacken areas.

A significant number of permanent residences, holiday homes and tourism accommodation providers are situated within the receiving landscape and currently benefit from extensive views towards the proposed turbine ridgeline. The area's attractiveness as both a place to live and a tourism destination is intrinsically linked to its scenic character, open landscapes, tranquillity and unobstructed views of the surrounding countryside and coastline.

Particular concern arises in relation to accommodation providers located within the visual influence of the proposed development, including the Stella Maris Shorehouse Hotel, Doonfeeney Glamping Site and other tourism enterprises operating throughout the wider area. These businesses derive

substantial value from their unique setting and from the quality of the surrounding landscape experienced by visitors.

The photographic evidence presented within this assessment demonstrates the alignment between the rising sun and the proposed turbine ridgeline. The CCCC is concerned that shadow flicker, glint and glare effects associated with rotating turbine blades may adversely affect residential receptors and visitor accommodation locations, particularly during morning periods when the sun occupies a low position on the horizon.

The potential impacts extend beyond visual effects alone. Visitor accommodation providers rely heavily upon the area's reputation for scenic quality, tranquillity and connection with nature. The introduction of large-scale turbines, rotating blades, aviation lighting and associated infrastructure into key view corridors has the potential to alter the character of the visitor experience and diminish the sense of place that currently distinguishes the area from other tourism destinations.

The concern is particularly relevant given the significant public and community investment currently being directed towards tourism development within North Mayo, including the Wild Atlantic Way, the Wild Mayo Destination Experience Development Plan and the approved Céide Coast Walk project. These initiatives seek to attract increasing numbers of visitors to the area and are founded upon the protection and promotion of the area's natural landscapes, cultural heritage and visitor experience.

The CCCC therefore considers that the potential effects of the proposed development on residential amenity and visitor accommodation require careful assessment, particularly in relation to shadow flicker, glint, glare, visual amenity and cumulative landscape effects. In the absence of detailed evidence demonstrating that such impacts can be avoided or adequately mitigated, a reasonable basis for concern remains regarding the long-term effects of the development on residential quality of life, visitor experience and tourism-related economic activity within the area.

## **Policy and Regulatory Context**

| <b>Policy Source</b>                                                                   | <b>Relevant Objective / Requirement</b>                                                                                                                                                                                                                                                                                       |
|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Wind Energy Development Guidelines (2006)</b>                                       | Avoid shadow flicker on roads and dwellings.                                                                                                                                                                                                                                                                                  |
| <b>Draft Revised Guidelines (2019)</b>                                                 | Mandatory mitigation (automatic shut-off) if >30 hours / year or 30 minutes / day.                                                                                                                                                                                                                                            |
| <b>Mayo County Development Plan</b>                                                    | Protect the <b>Ceide Coast Landscape Character Area</b> (Exceptional Value & High Sensitivity).                                                                                                                                                                                                                               |
| <b>Mayo County Development Plan – 3.7 (a) Area Designated as Highly Scenic Vistas</b>  | R314 Ceide Fields looking towards the Atlantic Ocean. The R414 links Ceide to Downpatrick Head. The <b>Ceide Coastal Path which has been given Part 8 Planning recently links both locations</b> also and underlines the importance of this wider area also from a scenic perspective of High Value.                          |
| <b>Fáilte Ireland – Wild Atlantic Way Operational Programme (2018–2023)</b>            | Preserve unspoilt coastal scenery and visitor safety.                                                                                                                                                                                                                                                                         |
| <b>Fáilte Ireland – Visitor Experience Development Plan for North Mayo (2021–2026)</b> | Maintain uninterrupted coastal views and experiential quality.<br><br><b>‘Greenways and Trails’ - The Ceide Coastal Trail</b> – Strengths to leverage and Opportunities<br><br><i>“The development of the Céide Coast experience will raise the profile of North Mayo considerably in international and national markets”</i> |
| <b>Tourism Development Strategy (2023–2030)</b>                                        | Ensure infrastructure near tourism assets protects visual integrity.                                                                                                                                                                                                                                                          |

**Table 2** Collectively, the policy objectives outlined above highlight the strategic importance of protecting the visual amenity, landscape character, tourism assets and visitor experience of the Céide Coast and North Mayo, all of which may be adversely affected by the proposed development.

### **Private Domestic Drinking Water Wells and Potential Long-Term Groundwater Impacts**

The proposed Tirawley Wind Farm development is located within a rural landscape where a significant number of households rely on private groundwater wells as their sole source of potable drinking water. The protection of these supplies is therefore of critical importance to the health, wellbeing and long-term sustainability of the local community.

Unlike public water supplies, private domestic wells often have limited treatment and monitoring systems in place, making them particularly vulnerable to changes in groundwater quality and quantity. Many local residents depend on shallow or moderately deep groundwater abstractions that are directly influenced by local geological and hydrogeological conditions.

The proposed wind farm would require extensive ground disturbance activities including turbine foundation excavations, access track construction, cable trenching, temporary construction compounds, drainage works and associated earthworks. Such activities have the potential to alter natural groundwater pathways, disrupt local hydrogeological regimes and create pathways for contaminant migration through fractured bedrock and overburden deposits.

Potential impacts on private drinking water wells include:

- Reduction in groundwater yield due to alteration of subsurface flow pathways or interception of groundwater-bearing strata;
- Increased turbidity and sediment loading arising from excavation and construction activities;
- Contamination from fuels, oils, lubricants, concrete washout, drilling fluids or other construction-related materials;
- Changes in groundwater chemistry resulting from disturbance of geological formations and natural groundwater flow systems;
- Temporary or permanent impairment of well functionality requiring costly remedial measures or replacement water supplies.

Of particular concern is the potential cumulative effect of multiple turbine foundations and associated infrastructure across the wider development footprint. While individual impacts may appear limited in isolation, the combined effect of extensive excavation, drainage modification and long-term infrastructure presence may alter groundwater behaviour at a catchment scale.

For many rural households, private wells represent a substantial personal investment and often provide the only available source of drinking water. Any deterioration in water quality or reduction in supply reliability could have significant financial, practical and public health consequences for affected residents.

Given the dependence of nearby households on groundwater-derived drinking water supplies, a comprehensive hydrogeological assessment should be undertaken to identify all potentially affected wells, establish baseline water quality and yield conditions, assess groundwater connectivity and determine the potential zone of influence associated with construction and operational activities.

In accordance with the precautionary principle, planning permission should not be granted unless it can be conclusively demonstrated that the proposed development will not adversely affect the quality, quantity or long-term sustainability of private domestic drinking water wells serving local residents.

### **Conclusions and Recommendations**

The photographic evidence presented within this assessment demonstrates a clear and repeated alignment between the rising sun and the proposed turbine ridgeline at Lacken Hill. This alignment is visible from a range of locations within the Ballycastle, Doonfeeney, Ballyknock and Muingelly areas and gives rise to legitimate concerns regarding the potential for shadow flicker, glint and glare effects.

The Ceide Coast Community considers that the potential impacts extend beyond individual residential properties and have the capacity to affect motorists, cyclists, pedestrians, tourism accommodation providers, recreational users and visitors to the wider North Mayo area. Particular concern arises in relation to the R314 regional road, where road users already experience prolonged periods of direct low-angle sunlight and where the proposed turbines would occupy the same visual corridor.

The proposed development is located within a landscape of exceptional scenic, archaeological and tourism value. The area contains the internationally significant Céide Fields Neolithic Landscape, the Wild Atlantic Way Signature Discovery Point at Downpatrick Head, the Western Way walking route and the ***Failte Ireland and Mayo County Council approved Céide Coastal Walk project, which has received planning permission and is anticipated to attract investment in the order of €10 million.*** These assets collectively form one of the most important tourism and heritage destinations in the west of Ireland.

The Ceide Coast Community considers that the proposed development has the potential to adversely affect the scenic quality, visitor experience, landscape character and tourism value upon which these initiatives depend. Furthermore, concerns remain regarding the cumulative effects of the proposal when considered alongside existing and proposed wind energy developments throughout the wider North Mayo region.

The policy review undertaken (Table 2) demonstrates that the protection of landscape character, visual amenity, tourism assets, visitor experience and public safety is a recurring objective of national, regional and local planning policy. The Ceide Coast Community is not satisfied that the information presented to date adequately demonstrates that shadow flicker, glint and glare effects can be avoided or effectively mitigated at all sensitive receptors.

Additional concerns remain regarding the scale of proposed borrow pit excavation activities, the management and disposal of excavated peat and the potential implications of these activities for hydrology, groundwater protection, waste management compliance and designated ecological receptors.

Accordingly, the CCCC respectfully requests that An Coimisiún Pleanála give substantial weight to the concerns outlined within this submission and adopt a precautionary approach in the assessment of the proposed development. In the absence of detailed and independently verifiable evidence demonstrating that significant adverse effects on road safety, residential amenity, tourism assets, visitor experience and landscape character can be avoided, the CCCC submits that planning permission should not be granted.

**For reasons herein as described, the proposed location for the Tirawley Windfarm is not hydrologically or ecologically acceptable or sustainable for the granting of planning permission with a number of clear and direct threats to the local water integrity from a chemical (TPH's and other contaminants) and sediment (siltation from construction works) perspective with potential for direct, significant, long-term adverse impacts to both Lacken Saltmarsh and Kilcummin Head SAC (000516) and Killala Bay/Moy Estuary SPA (004036), Qualifying Interest flora and fauna of these Natura 2000 sites and even more worrying, human receptors.**

**The Céide Coast Community Company CLG respectfully submits that planning permission for the proposed Tirawley Wind Farm should be refused.**