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24/06/26

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**

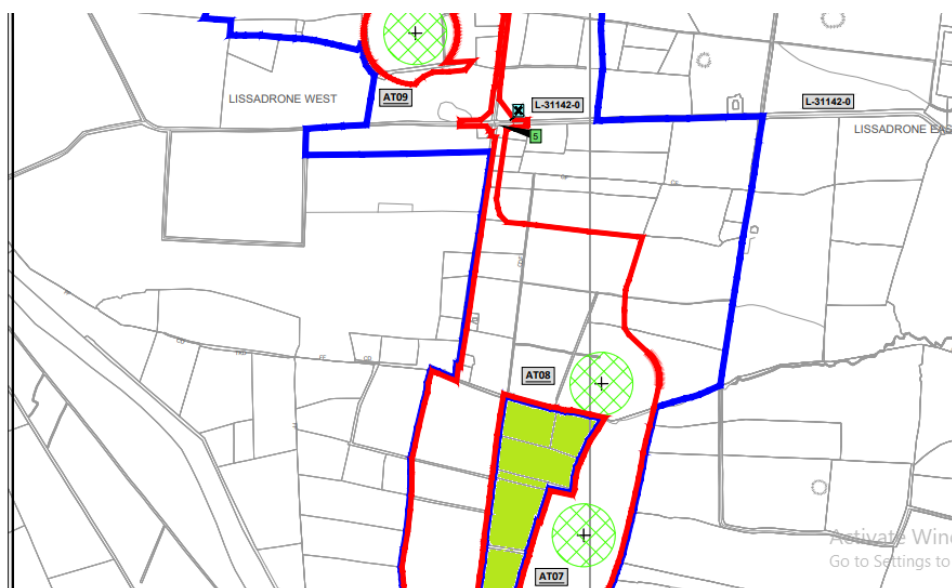
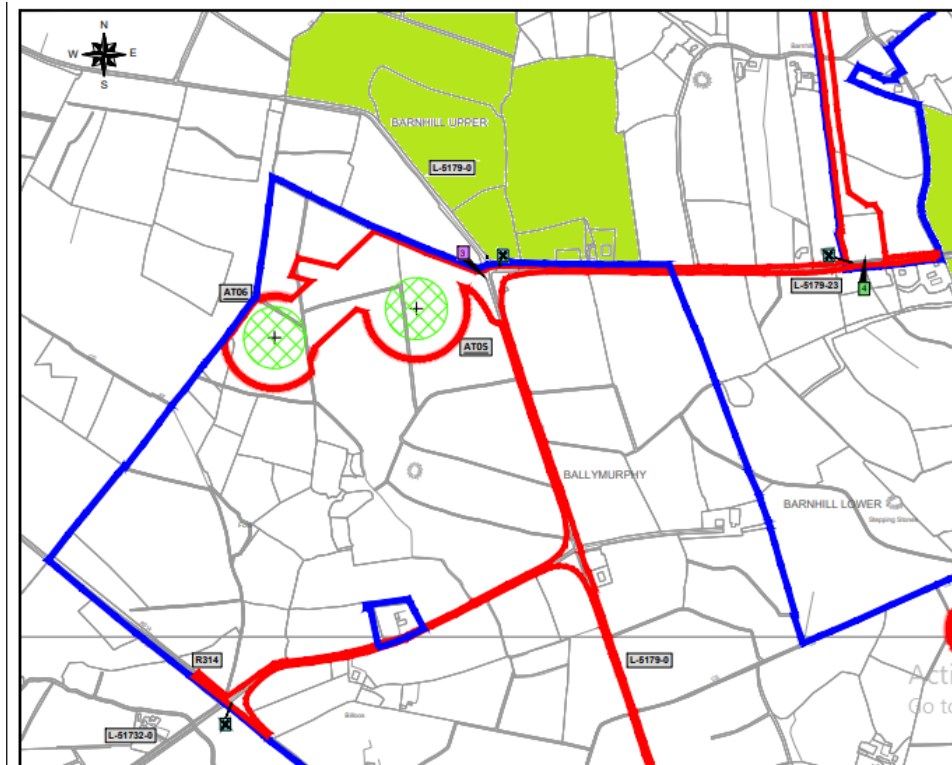
Re: Planning permission for the construction of Tirawley Windfarm consisting of 16 no. wind turbines, a permanent 110kV substation, 110kV underground cable and grid connection, and ancillary development in the townlands of Ballymurphy, Ballynaleck, Barnhill Lower & Upper, Barroe, Billoos, Carn, Carrickanass, Carrowmore, Castlelacken Demesne, and other townlands in County Mayo.

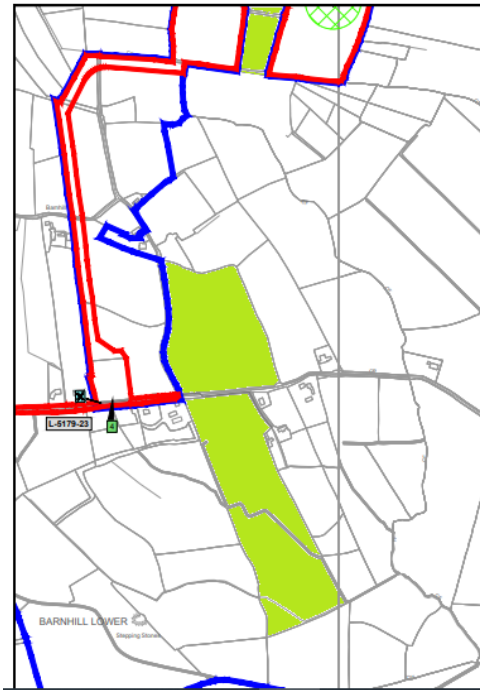
Case Number: PAX16.324258

Dear Sir/Madam,

I am writing to formally oppose the proposed Tirawley Windfarm development consisting of 16 wind turbines, a permanent 110kV substation, underground grid connection, and ancillary infrastructure in the townlands of Ballymurphy, Ballynaleck, Barnhill, and surrounding areas in County Mayo. This development will change our landscape and local community forever due to the nature of the construction and installations that are proposed. Among other significant impacts, the widening and closure of local roads and the inability of local families to get planning permission will decimate our community. Together with the hedgerow and habitat loss and the damage to local tourism and farming businesses there will not be one aspect of our community that will not be irreparably damaged.

Firstly, this project, should planning be granted, will have a detrimental impact on my family's business. I am 27 years old and came home after college to take over the family farm along with my brother. This project could put me out of business at the start of my career, at a time when generational renewal is a big focus in the plans for the next Common Agricultural Policy. Our family farm is right in the middle of the proposed windfarm and its construction and delivery routes as I have highlighted in green on the following maps taken from the planning application.



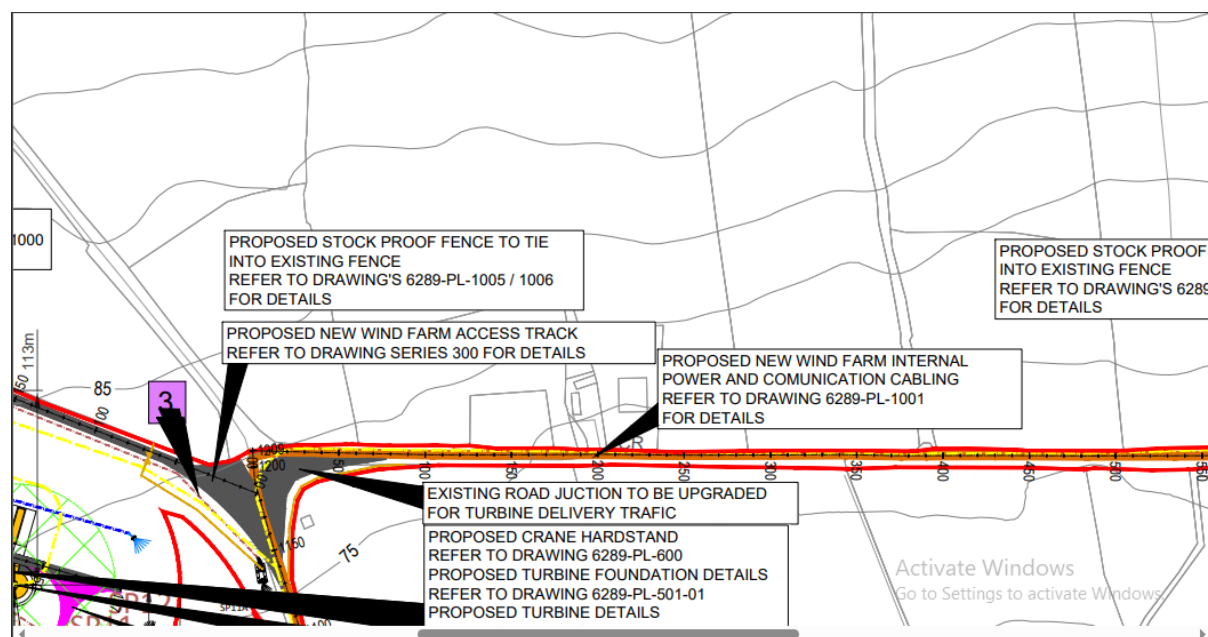


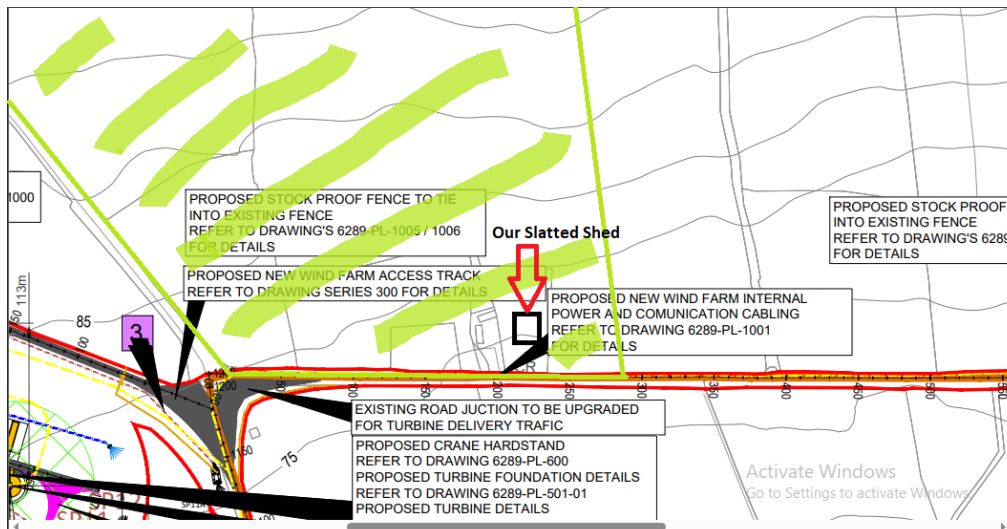
I live 1.5 miles away from our farm-yard so having clear road access is non-negotiable for me. I need to be able to get to and from my place of work (our farm) without delays for animal welfare reasons. For 4 months of the year, February – May, I have sheep lambing and cows calving. Animals need very close supervision at these times. If the local road from our house to the farm is blocked with heavy construction traffic or turbine deliveries it will lead to the deaths of my livestock if they get into difficulty birthing their young. If I need to call in the vet in an emergency and he cannot get through there could also be deaths, or at the very least animal welfare issues due to delays in treatment. Road widening that requires the moving of ESB poles and electricity being turned off will also cause serious problems in spring time when I'm trying to keep newborn animals warm under heat lamps and heat up milk for them. I love my animals and go to great lengths to keep them healthy and safe. The lambs and calves are also the produce of our family farm and what I make my living selling. I don't see why this project should get to go ahead at the expense of my viable business. The public roads are there for everyone to access their properties, not for one commercial entity to monopolise to the detriment of the local residents.

All the traffic required for deliveries for turbines AT07 – AT16 are intended to pass by our farm-yard. This causes more issues for the running of our farm in addition to the ones mentioned above. As you can see from the maps above, our farm is very fragmented. In the summer time our silage needs to be drawn along the local road to the yard for storage. With the enormous increase in traffic proposed for this narrow country road it will be extremely difficult, and in fact very dangerous, for our contractor's machinery to draw the silage in to our yard. It will be the same situation when I need to walk my cattle and sheep down the road to another field to give them fresh grass and when I bring my lambs to the yard weekly for weighing before sale. These roads are the only way we can access our land and I disagree with the entitled stance of the developer, who did not consult with us during the pre-planning

stage about the use of this narrow, public road. Farmers are not mentioned as effected receptors in the Chapter 17: Traffic & Transport document despite the fact the local roads are essential to the running of local farms. The little regard for local farms in this plan is clearly seen in the fact the farmers are only mentioned once in all the traffic related documents: *“The effects on residents and farmers who live close to these local public roads can be predicted to be very low but short-term in nature.”* This sentence is the only acknowledgment of farmers and yet it does not give a fair representation of the enormous upheaval road closures and construction traffic will cause to us. For example, in the areas of Barnhill, Billoos, Barroe, Ballymurphy and Carrickanass all connecting local roads are proposed to be widened and used for the grid connection, construction, and turbine delivery traffic. There will be no possible way to provide an alternative route and as a result no way for people to access their properties, including farms. You would imagine that this would have been addressed in the severance paragraph of Chapter 17, but it was not.

The lack of public consultation from the developer has been shocking. They have made no attempt to include the community in this project. I have only come to understand the full impact of this development by spending time going through the planning documents. In the site layout maps I discovered that extra ground for road widening is proposed to be taken from our boundary fence as shown in these maps:



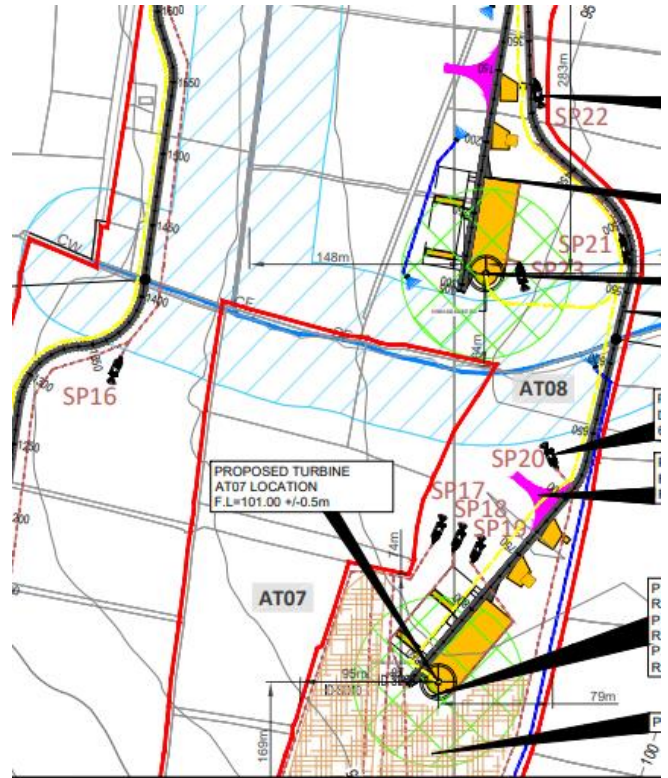
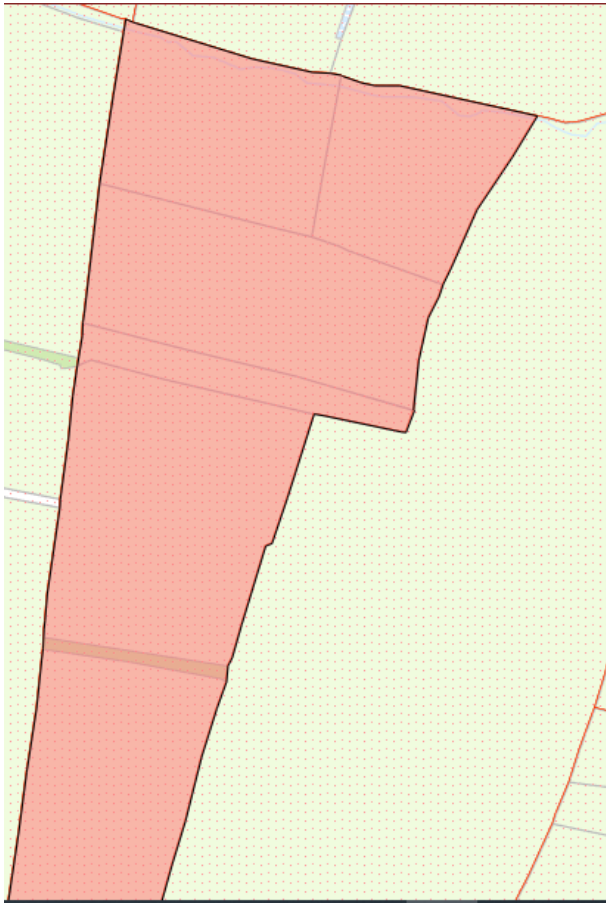


As in the maps I included earlier, the green shaded area is part of our farm. There is Japanese Knotweed outside the gate of our yard (pictured below) where road widening would be needed. Mayo County Council have been spraying it and monitoring it in recent years which has brought it under control. Before this it was at least nine foot high and resembled a hedge. Should this development go ahead this knotweed will get out of control again and will most certainly spread far beyond where it has been contained to at present.



In another case, tucked away in the middle of Chapter 6, the EIAR Biodiversity Report, it states that a boundary hedge on our property will be “*curtailed*” to make a buffer zone for

AT08. The screenshot below on the left is from landdirect.ie and the right is from the site layout maps. They show the land that we own adjacent to the proposed locations of AT07 and AT08.

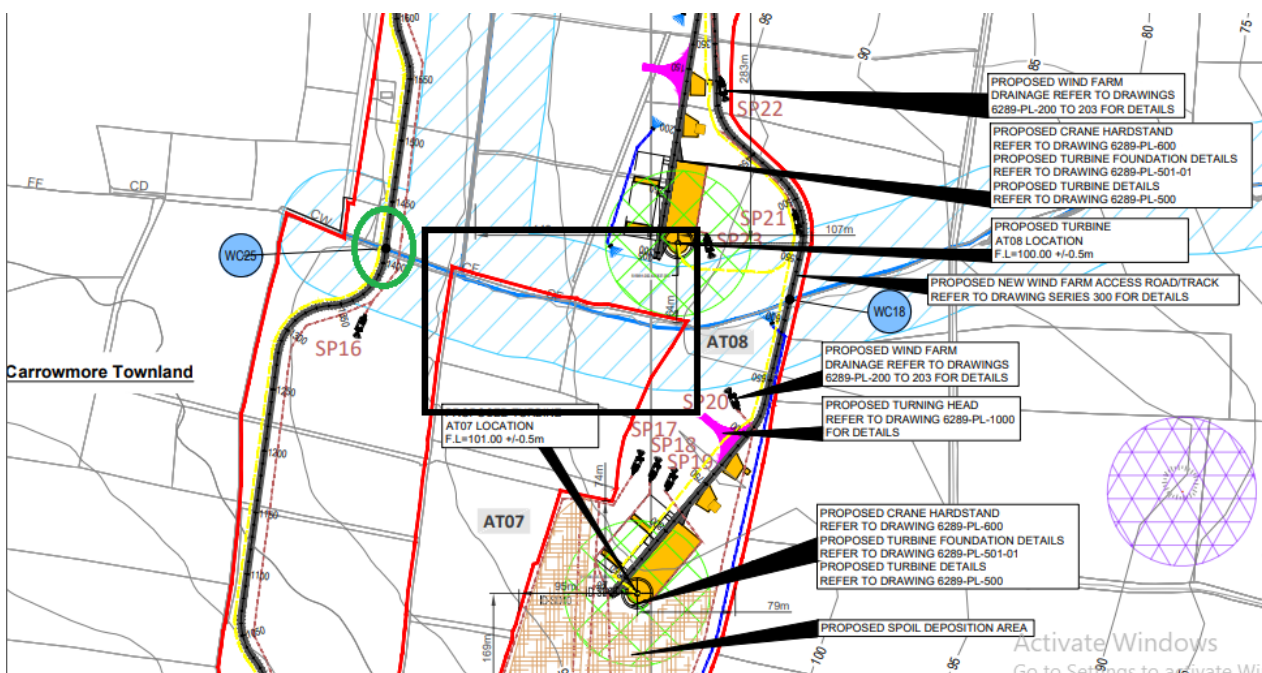


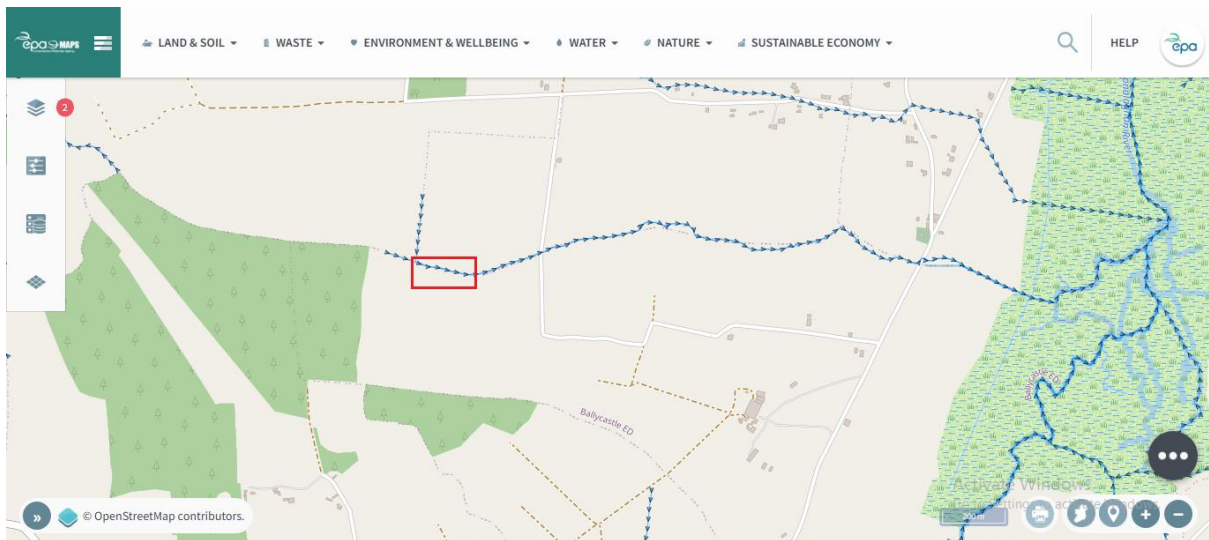
The Land Registry map clearly shows that we own both sides of the stream at the bottom of the field, up to the stone wall dividing fence at the property boundary. The hedge that the developers wish to “curtail” grows on the banks of this stream, entirely from our side of the stone wall. My family have not been asked for permission either to “curtail” our hedge or to take our boundary fences for road widening. This does not give me any confidence in the developer engaging with the community to solve any issues caused during construction. The proposed road widening outside our farm is likely to cause flooding because a stream runs the length of the verge of the L5179-23. There are numerous small bridges along this road, some of which are already damaged, without adding thousands of HGV journeys and industrial equipment to our roads. These small streams in their natural capacity can barely cope with the torrential rain in winter. If their flow is impeded or modified the road could flood.

I have numerous concerns about our field adjacent to the planned sites of AT07 and AT08. Firstly, we are in the Agri-Climate Rural Environment Scheme (ACRES). As part of this our land gets scored for biodiversity. If this mature, species-rich hedge is “curtailed” this will seriously affect our score and our payment under the scheme through no fault of our own. This hedge is also an excellent wildlife corridor because the alder, whins and whitethorn have made a good, thick canopy as you can see in this picture:

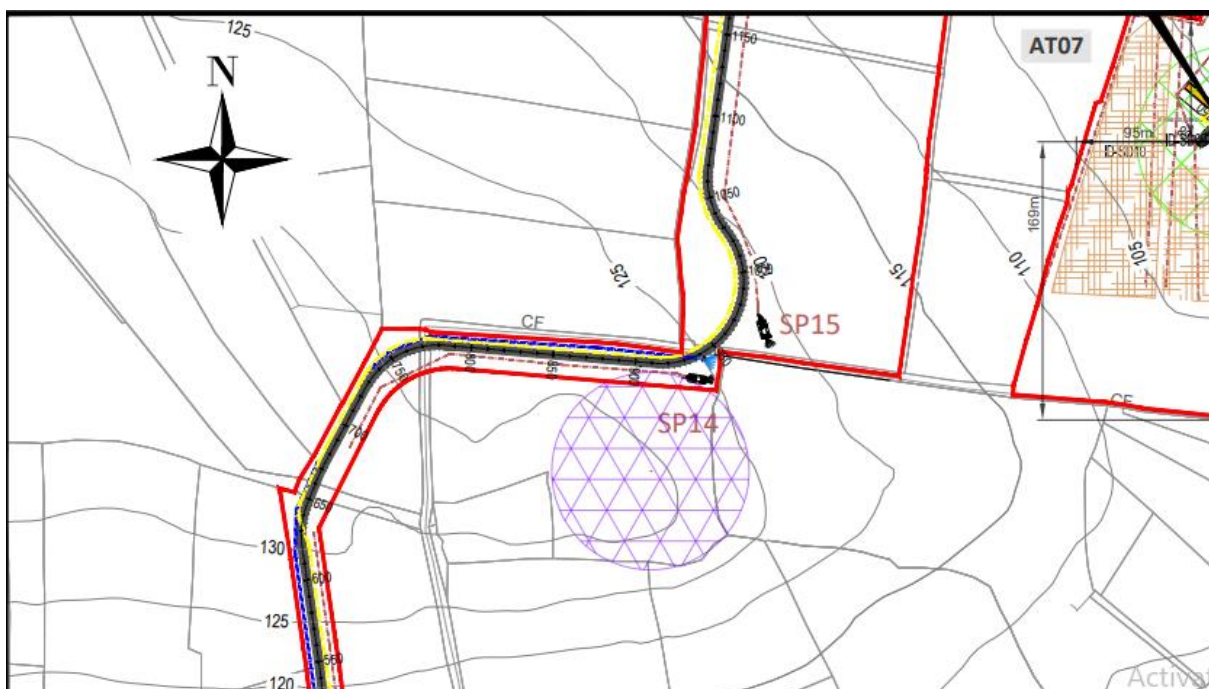


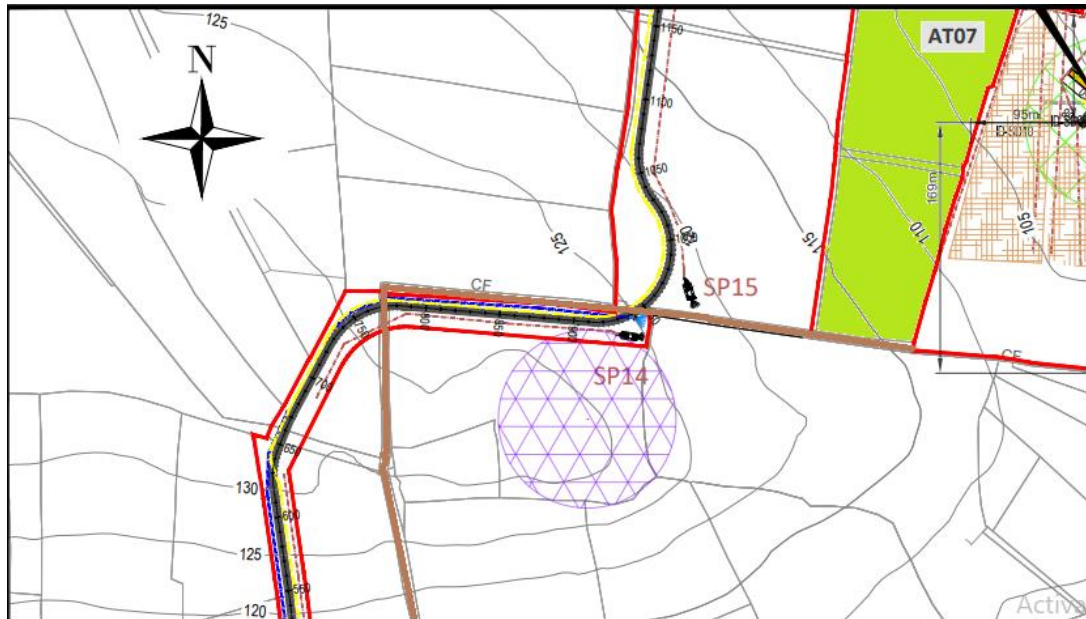
There is a stream inside this hedge which is the only water source for our animals to drink from when they are grazing this field. This field is away from all the rest of our farm and it is at the top of a hill so I cannot pump water out to it if this stream becomes contaminated during construction. Even if by some miracle the water is still clean enough for animals to drink, the blades of AT08 turning right beside it will terrify them. In the event of this development going ahead I won't be able to use this field and as a result will have to carry less livestock, impacting the viability of our farm. How is it fair to infringe on my rights to farm my land to accommodate a company with no connections to our community? This stream also flows into the Lacken Saltmarsh and Kilcummin Head SAC and pNHA. The following pictures shows where the developers intend to build an access road crossing the stream upstream of our field and the EPA water flow direction map showing the stream flowing into the Saltmarsh. This is extremely poor, wet, marshy ground which makes it very high risk for contamination during a project of this scale. As a farmer I do not spread chemical fertiliser on this land because of this. The risks the developer is proposing to take in our local habitats make me question their environmental values.





It is also planned to put two permanent spoil repository areas around AT07 and adjacent to our field. Our field slopes down towards both AT07 and AT08. Adding spoil repository areas approximately 1.5m high along most of our boundary fence along with turbine foundations affecting the natural drainage is going to back the water back into our land and make it even more waterlogged than it already naturally is. Finally, this field is accessed through a private road which is a cul de sac. The new site access road is proposed to cross this private road in two places as can be seen in the maps below, the second one with the boreen marked in brown. This, and the proposed construction traffic crossing this boreen is going to make access extremely difficult, if not impossible should construction go ahead. Poor quality road construction leaving the boreen uneven or with trenches and ruts will make our field inaccessible by tractor or on foot with my animals.





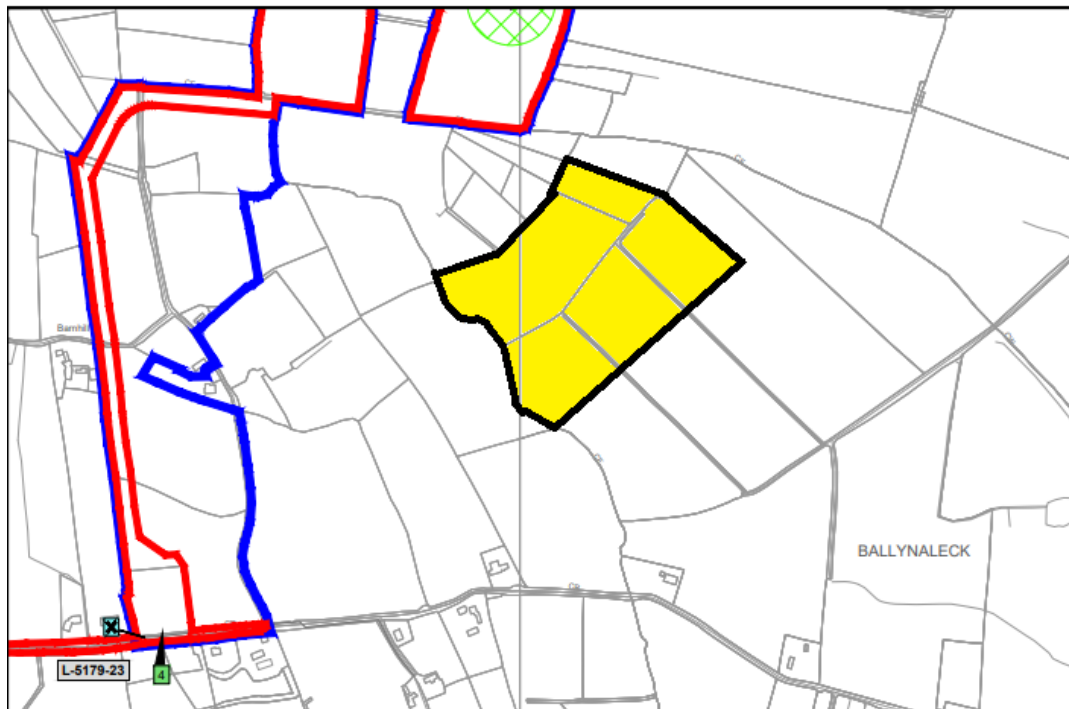
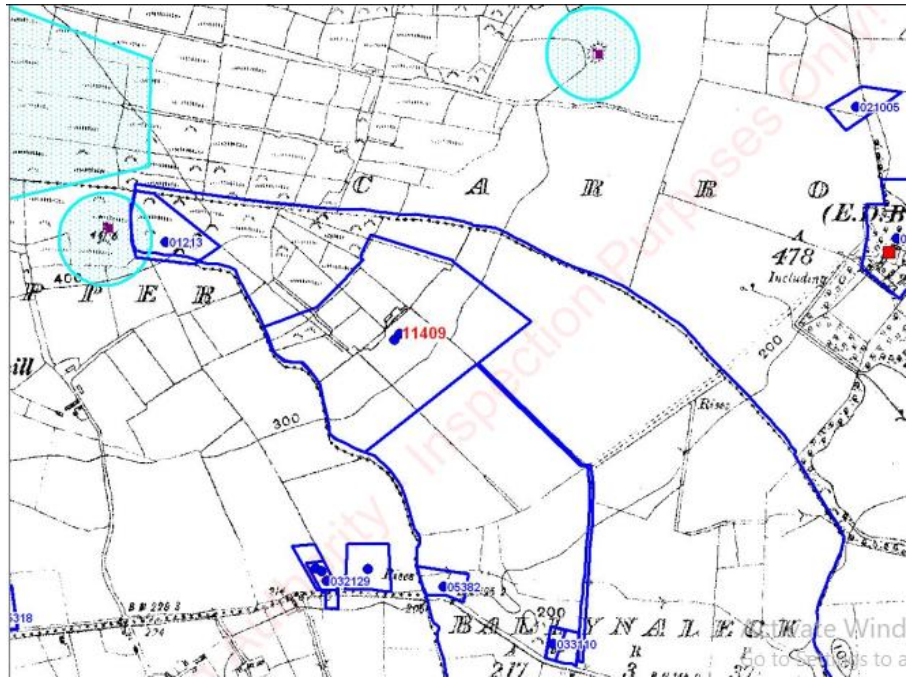
The area around the boreen pictured above is probably the most peaceful place in the whole parish. This land has never been developed and, as a result, despite it being farmland it is effectively a nature reserve. To grant planning in this area will be to replace peace and quiet and birdsong with HGVs and industrial construction noise pollution. Safe habitats that are away from human interference will be destroyed forever. This peaceful environment is hugely important for my brother, who has autism. He needs to be able to walk out in the peace and quiet to think things through and work out things that are bothering him. If this windfarm goes ahead his routine of going for walks and working on our family farm, which is extremely important for him, will be destroyed.

Should this windfarm get planning permission it will put neighbouring farmers' cattle at serious risk of contracting bovine tuberculosis (bTB). There was a serious outbreak of bTB in the area surrounding the southern section of the proposed windfarm in 2024-2025 and in the wider area, including Barnhill. There is a risk that land involved in the development was part of or in close proximity to these outbreaks. Digging up this land for construction work will disturb wildlife, including badgers, known carriers of TB, who have their setts in ditches and fences. Deer can also spread TB and the 31.86ha forestry felling planned will cause major disturbances to them. The unprecedented nature of the outbreak in the area has led to investigations by the Department of Agriculture (DAFM) into badgers in the area. In May 2026 my father was contacted by a contractor employed by DAFM for permission to set badger traps on our land and test any caught for TB. It is highly irresponsible on the part of the developers to propose industrial scale construction work in an area where DAFM has recognised an issue with bTB and is currently investigating the source and trying to rectify the problem. There was an extra €85 million allocated in the last budget to cover the cost of the rising bTB outbreaks. This project will hinder DAFM bTB eradication efforts and lead to the waste of this extra tax-payer money.

My reading of the biodiversity and CEMP sections of the EIAR leaves me wondering whether any monitoring of deer or badger by the developers ever actually took place. Deer are only briefly mentioned: *“Construction activity would be expected to cause larger mammals such as deer to remain in cover whilst the works are on-going.”* It would be difficult for a herd of deer to remain in cover when large areas of their forestry territory is going to be felled. Badgers are only mentioned as being seen killed on the road outside of the proposed windfarm area. In fact, the developers seem to admit to going into this blind as to the badger population in the area because they say a pre-construction survey is required because their surveys were completed more than 36 months ago. However, under the Pre-Construction Badger Survey heading in the CEMP badgers aren't mentioned because the whole section has been copied and pasted from the otter section. This is not responsible project planning. I have seen adult badgers and their mature young on the L5179-23 beside the proposed new road leading to AT07 onward while driving at night during February – April 2026 for lambing and calving. I have also seen a herd of 7 fallow deer in this same area. Both deer and badger footprints are regularly to be seen in the Barnhill area. If any surveys were completed properly it is not hard to spot these animals.

In the study *“Is there an association between road building and bovine tuberculosis herd risk? A three time-point study in Ireland, 2011–2019”* by Barroso et. al., 2021, there is a clear link shown between badger disturbance during construction, in this instance the M17/18 in Galway, and an increase in bTB in the surrounding area. bTB cases rose during construction, were elevated post construction and were considerably worse within 1km of the construction works. *“Badgers and Bovine Tuberculosis in Ireland”* by Robert O'Connor and Eoin O'Malley, 1989, contains a case study from Ballymooney Co. Offaly where just one badger with TB caused a severe outbreak in three previously clear herds. The seriousness of bTB should lead to great caution during construction projects around cattle herds. The developer has given no thought to the prospect of bTB in the area and what this could do to the livelihoods of farmers. Why should an indigenous industry like agriculture suffer for this project?

There is a precedent for refusing planning permission for windfarms in Lacken. In November 2011 Mayo County Council refused permission for four turbines (file no. 11409) right beside the proposed sites of AT07 and AT08. In September 2012 An Bord Pleanála upheld this refusal after an appeal. I am including the following maps to show the close proximity of these sites:



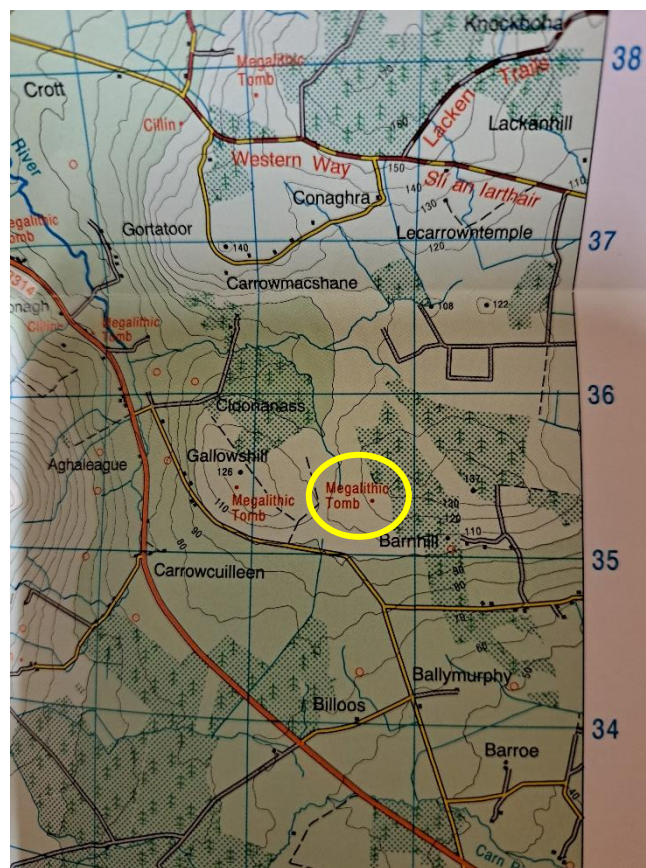
The refused application was planned to go on this yellow site which is at a lower elevation than AT07 and AT08. These turbines would have had a hub height of 45m in comparison to the Tirawley windfarm's intended 76.5m hub height. They were also going to occupy a small, contained site in comparison to Tirawley windfarm's sprawling, scattered site with no true boundaries. In spite of all this the 2011 application was refused on the grounds of scenery. The inspector's report (PL16.239901) from An Bord Pleanála stated the following as the reason for recommending refusal: *"The proposed wind farm development is located on a site in an elevated and unspoilt exposed upland location in a rural scenic landscape in close proximity to the coastline adjoining Killala Bay. It is considered that, by reason of its height, scale and extent in an exposed location overlooking Killala Bay, the proposed development would have a disproportionate and obtrusive visual impact."* The scenery of Lacken has not changed in the last fourteen years. The same landscape that Mayo County Council and An Bord Pleanála protected from unsuitable developments then needs the same protection now. If not, the beauty of Lacken will be lost beneath an industrial wasteland. I am including a photograph below of a view of Lacken Strand from our field looking down towards the proposed locations of AT07 and AT08 to show the *"elevated and unspoilt exposed upland location"* and *"rural scenic landscape"* that this development will affect. These two turbines, and AT15 and AT16 beside the Gazebo, will destroy this beautiful scenery should this development go ahead.



In a submission by Inland Fisheries Ireland (IFI) regarding the 2011 proposal, they mention concerns about suspended solids, concrete run-off and tree felling affecting a tributary of the Cloonalaghan River, which is a salmonid watercourse. The Tirawley windfarm will affect numerous tributaries of the Cloonalaghan River so the issues that IFI had in 2011 will be multiplied exponentially if planning is granted this time.

I am also worried about the effects this development will have on our archaeological heritage should planning be granted. Our family is fortunate to have a megalithic tomb on our land. It is a privilege to be able to look after this piece of our local history for the next generation. There are numerous historical monuments all over Lacken which suggests that there are many more under the surface that we don't know about yet. All this digging out for roads and turbines during construction will destroy unknown sites without us getting the chance to study and learn about them. MA014-030, a listed monument, is beside where a new site access road is to be built. This field was supposed to be planted for forestry in the early 2000s but only a small section was allowed to be planted at the bottom of the field away from the monument. With this being the case, a site access road going right alongside this monument should most certainly not be allowed. So many archaeological monuments have already been planted over with forestry in the last forty years but at least they might be recoverable with some care during clearfelling. It would be like a repeat of Wood Quay to allow all of this history to be irreparably destroyed by construction works.

In relation to archaeology, representatives of the developer approached our family about putting a turbine on our land, which we turned down. We were shown a map of the proposed site which was beside the megalithic tomb (MA014-011002) on our land. We pointed out this to the representative of the developer, but they told us that their maps did not show any historical monuments on our land, even though we told them that it is a recorded monument. They told us that it was a suitable site for a turbine as long as their maps showed no record of a monument. This conversation gave me reason to doubt the accuracy of the information they have provided in this application. Along with being a recorded monument, our megalithic tomb was surveyed and included in a report called Survey of the Megalithic Tombs of Ireland Volume II County Mayo by Ruaidhrí de Valéra and Seán Ó Nualláin, published in 1964. It is also marked on a basic OS map that anyone can buy in a newsagent (circled below).



I am also concerned about Palmerstown Bridge which is on the Record of Protected Structures of Mayo County Council. Despite the fact that this is an important historical structure and the main route for local residents into Ballina, the Palmerstown Bridge Structural Assessment Report in the EIAR is very poor. The inspection was done in January 2023, although it was only a visual one. Apparently this was due to unsafe conditions but this was more than three years ago. There has been plenty of time to prepare for and conduct a full survey. Palmerstown Bridge has been damaged several times by car accidents in the intervening years, as recently as early spring 2026. This shows that the report supplied for this planning application is inaccurate and out of date. The author of the report even recommends that a *“close inspection of the underside of the structure is undertaken when water levels are lower”* but this never happened. To conclude at the end of the report that the bridge is in *“good structural condition”* and capable of carrying the loads associated with the proposed Tirawley windfarm is nonsense considering the report is only a visual assessment. It also notes in several places in the report that the walls are covered in vegetation so how could even the visual assessment be completed? Another issue with the report is that it refers to appendix 1 and 2 for an explanation of rating systems but both of these appendices are blank. I have read in the plan that it is intended to drill under Palmerstown Bridge for the grid connection cable. This is an enormous risk to take with a protected structure, especially off the back of an incomplete structural survey. No responsible developer could operate like this.

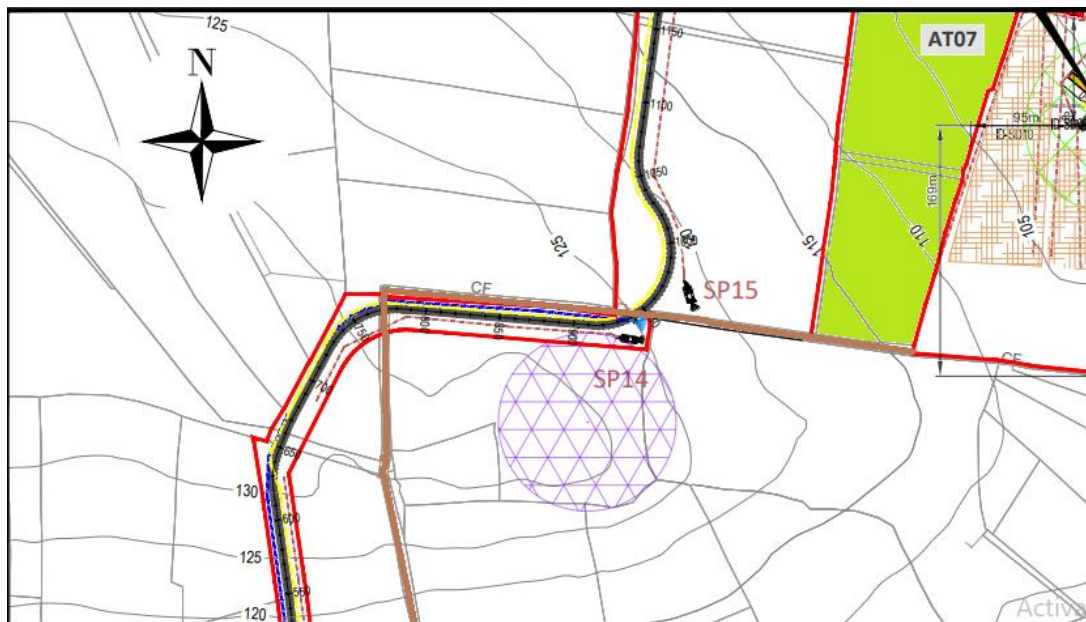
Another old bridge in the area of the proposed windfarm is Barroe Bridge. This small humpback bridge joins the local road at Ballymurphy to the R314. Although this bridge is not on any proposed routes it is a shorter route from the R314 to the turbines north of AT02, AT03 and AT04. If the approved construction delivery routes were not enforced this bridge could be used as a short cut and severely damaged. It is not listed as a protected structure but Barroe Bridge is a valued local historical structure that everyone in the area knows and it would be a disgrace to damage it by forcing it to carry such heavy loads and traffic levels that have never been seen in Lacken.

The parish of Lacken has a wealth of wildlife and habitats that this development will change forever if it goes ahead. This was not acknowledged in the Biodiversity Report. As a farmer I am outside every day and see these animals regularly. Our land in Barnhill has an abundance of snipe, a red listed bird. I see them in wet areas of the fields when I am out checking my animals. I see them almost every day in winter. One sighting I recorded was at 16:03 on 23/10/25, although I have never been able to get a picture of them because I don't see them until they have been startled out of the long grass and fly off, calling. In the Ornithology Report in reference to snipe it says: *“Snipe was not considered in the NatureScot (2022) review of disturbance distances in birds. However, Pearce-Higgins et al. (2012) identified snipe as one of the species showing a reduction (53%) in densities on wind farms during construction. Critically, the authors also found that snipe population densities did not recover after the construction period, with habitat within 400 m of turbines being used less than expected.”* The proposed Tirawley windfarm site covers such a wide area that this will drive snipe out of hundreds of acres of their habitat. To even consider constructing an industrial

development in the habitat of a red listed bird, where it is flourishing, is to make a mockery of its protected status.

In the SID Application Form when asked “*Does the application relate to work within or close to a European Site or a Natural Heritage Area?*” the developer ticked no despite the fact that all the streams and rivers in the proposed windfarm site flow into the Saltmarsh which is part of the Lackan Saltmarsh and Kilcummin Head SAC and the Killala Bay/Moy Estuary SPA. This gives the impression that the developer hasn’t researched the local habitats fully.

As I have mentioned earlier in relation to bovine TB, there are deer and badgers in the area surrounding the location of the proposed new access road linking the L5179-23 out across the hill to AT07 and AT08. I have seen badger latrines and pawprints and deer hoofprints and carcasses on the private access road that the new access road will be crossing, close to AT07 and AT08 (brown road marked in the following screenshot).



These badgers and deer are not just going to stay still in the areas that I have seen them. Their habitat is in the area of the proposed Tirawley windfarm and the developers cannot say, as they have in the Biodiversity Report about badgers for example, that there are no badgers to be seen within 100m of the proposed turbines sites. Animals do not abide by human boundaries.

The Common Frog is also present in the Barnhill and Carrowmore area, especially around AT07 and AT08. The wet land surrounding these turbines and the isolation of this land makes it an excellent, undisturbed habitat for frogs, especially at spawning time. In our neighbouring field, on 21st May 2026, I saw three young frogs, just out of the froglet stage, in the space of fifteen minutes while I was checking my sheep. If they are in our field they are also in the surrounding fields, and I can only imagine how many more there are when I saw three in such a short space of time. Constructing turbines, and especially the spoil repositories SD09 and SD10 around AT07, will decimate a large area of the common frogs’ habitat. All of

the proposed Tirawley windfarm is an excellent frog habitat and like all the other species they will suffer enormously by losing such a large area of ground should this go ahead.

I have seen a group of bats flying through our shed at night this May (2026). The cuckoo comes yearly to breed in this area. This May I heard it in Billoos. Other years it can be heard in Barnhill, Carrowmore and Lissadrone. I have seen it fly across Barnhill to Billoos, likely starting from Lissadrone. In winter and spring brent geese fly over the proposed Tirawley windfarm site. There are kestrel and sparrowhawks in Barnhill Lower and pheasants in Barnhill Upper. There are also stoats and pine martens in all the forestry in the area and foxes and hares are to be seen regularly in the grassland and occasionally on the roads. All of these animals form the local ecosystem and rely on each other as part of the food chain. This windfarm will destroy their habitats and disrupt this ecosystem.



Badger Pawprints



Deer Hoofprints



Common Frog

As well as destroying habitats around the turbine sites, the access roads and turbine delivery routes will have to be widened and as a result many miles of hedgerows will be destroyed. These hedges are more than nice to look at. They are wildlife corridors joining habitats together, so not only will the local wildlife have their habitats destroyed by this proposed windfarm, but also their cover for travelling throughout the area. The mitigation won't help these species either because according to the Biodiversity Report the replanted hedgerows will be around AT01, AT06, AT14 and the substation. This is not even attempting to mimic a wildlife corridor. Animals will not want to colonise the area under noisy, industrial structures nor should they have to suffer the downgrade that these mitigation hedgerows will be compared to the quality of the habitats they have now. If a farmer wished to remove a hedgerow over 500m they would only be allowed to do so after being granted approval following an Environmental Impact Assessment and only for road safety issues, farmyard expansion or entrance widening. They would then have to replant twice the length of the removed hedge with the same type of hedge again. Planting around three turbines and a substation isn't replacing with a like-for-like hedge. The Biodiversity Report states: *"The significance of the loss of hedgerows along the TDR is rated as an Adverse Significant Effect of Medium-term Duration at a Local level of importance. In the long-term (>15 years), this effect is likely to become Neutral."* The negative effects are being minimised to a ridiculous degree. In the fifteen years they say it will take the effects on hedgerows to become neutral how many species in Lacken will have declined through habitat destruction? It does not make sense that uncut pollinator strips are being used by County Councils to increase pollinator habitats along roadsides and in towns but our hedgerows and natural pollinator habitats are in danger of being destroyed.

The extreme level of forestry felling will also have implications on the local environment and wildlife. 31.86ha of forestry all being felled in a short space of time in the one area will displace and kill a lot of wildlife such as deer and pine martens. Ordinarily when forestry is felled it has to be replanted and so the habitat and wildlife cover is at least replaced. Nine turbines and their surrounding landscaping are not the equivalent habitat of replanted forestry in terms of habitat quality. All of this forestry felled together will also add to the proposed enormous increase in HGV traffic on our local roads. Another serious environmental impact of this forestry felling will be caused by the use of urea to treat the tree stumps left after felling. All of the streams in the area of the proposed windfarm drain into the Saltmarsh which is an SAC. Using urea on wet ground in these conifer plantations runs the very likely risk of urea runoff getting into the forestry drainage channels, then into local streams and on into the Saltmarsh. A farmer spreading chemical fertiliser, such as urea, has to keep 2 metres away from all watercourses, including drains. The same rules should apply to urea no matter what it is used for.

Another environmental concern I have with this development is amount of peat that will be disturbed and destroyed. 14 of the 16 proposed turbines sites are on peat soil, per EPA soil maps. The AT13 site is 7.65ha of actively growing bog according to the Biodiversity Report due to it containing 30% - 60% Sphagnum moss. As well as being valuable habitats, particularly AT13, these soils are carbon sinks. According to the Irish Peatland Conservation

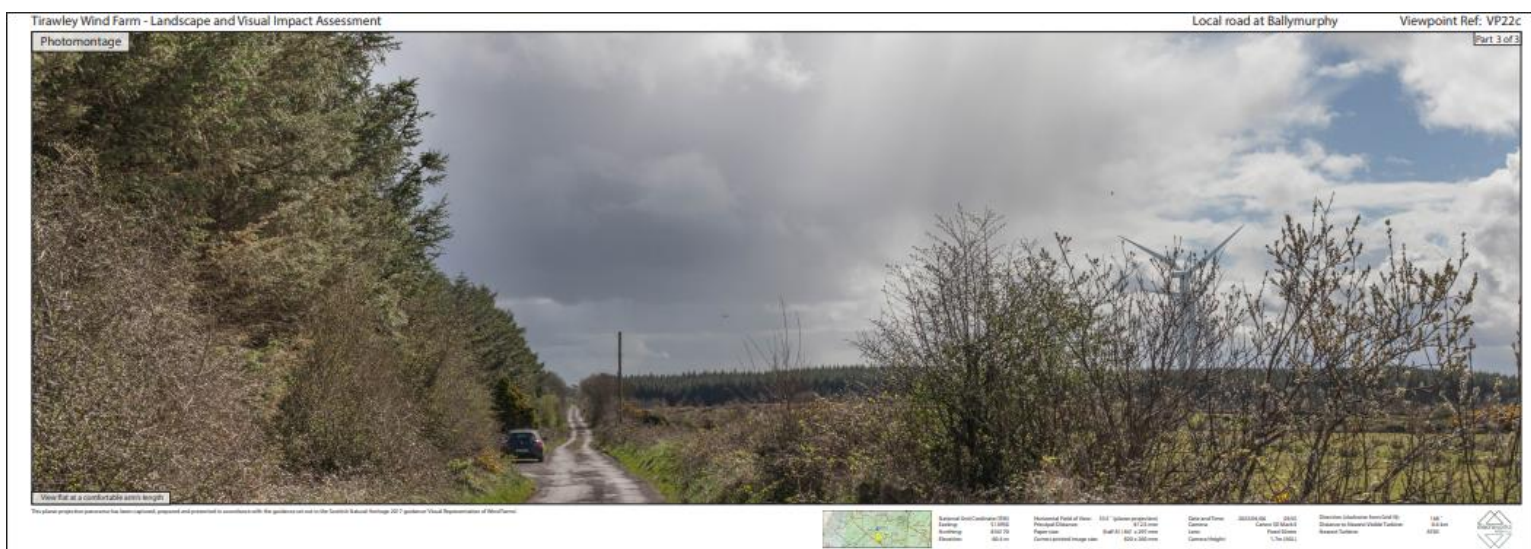
Council (IPCC) website, Irish peatlands store 53% of all soil carbon stored on the entire island even though they make up just 16% of the total land area. Constructing turbines on these soils will not only remove peat at the individual turbine locations. Access roads and cable trenches will lead to more peat removal and construction machinery manoeuvring around the site will damage the remaining peat soil. The natural ability of peat to store carbon should make it off limits to such invasive construction work. 97,369m³, or 62%, of the soil removed during this development will be peat soil. Digging up this soil will release huge amounts of carbon at a time when we are trying to store carbon and reduce carbon emissions. 13 of these 14 turbine sites are proposed for either forestry or agricultural land and so are currently subject to Department of Agriculture Good Agricultural and Environmental Condition 2 (GAEC 2) regulations. These regulations impose four restrictions on land that has majority peat soil. These are: drains can only be maintained but not lengthened or deepened, reseeding grassland can only be done once in four years, ploughing can not be any deeper than 30cm and new drainage requires planning permission. If the Tirawley windfarm is granted planning permission, this land that has peat soil that is currently protected under GAEC 2 will be allowed to be dug down to a much greater depth than ploughing or drainage work ever would have gone. It seems strange to restrict land while it is used by a farmer to protect the environment but then not to enforce these same restrictions on a developer on the same land once they are in control of it.

I have read in the Biodiversity Enhancement and Management Plan (BEMP), that to mitigate against the peat being lost to the development a new man-made habitat will be manufactured in the abandoned quarry at AT16. A man-made habitat will never be as good as the original, naturally occurring one. In fact, it will take a lot of regular maintenance if a new habitat is to be established there. Without maintenance the proposed trees and wildflowers in the spoil repository areas will just turn into rough grassland full of rushes. I am also worried about a wildflower seed mix being planted in this area. If this seed is not packaged to a high standard, incorrect seeds such as weeds or invasive species seed could be included in the mix. Should this happen weed seeds could spread beyond the quarry and colonise other local habitats. There are instances of this recorded as happening on tillage farms in this country due to poor quality control of seed mixes. In Teagasc Oak Park in Carlow a field margin was planted with grass and wildflowers in Autumn 2020. When it started to grow, blackgrass, an invasive weed resistant to herbicides, was found. This invasive weed can produce up to 6,000 seeds per plant. It does not make sense to risk a scenario like this occurring in Lacken just to produce a man-made habitat when we have excellent habitats, including these peat soils and bogland, already here. We should be preserving these natural carbon sinks instead of building windfarms on them.

As I have quoted earlier from the IPCC, the fact that peat stores 53% of carbon on the island of Ireland and yet only accounts for 16% of the land area should make us think twice before concentrating windfarm development, here in Lacken and nationally, on peat soil and boglands. Once these boglands are destroyed it is extremely difficult for them to be recovered. In the Construction Environmental Management Plan (CEMP) there is a plan to “*encourage the rapid re-vegetation*” of the damaged blanket bog around AT13. The

developer says they intend to cut the turves of peat, store them in a single layer, water them during dry weather and then put the turves back around AT13 after construction. According to the IPCC website this will not preserve peat. It says *“Once peat is exposed to air by drainage, it begins to break down. Oxygen in the air makes it possible for bacteria to digest the peat. Carbon is released during decomposition. Drying of the peat and decomposition changes it structurally, making it difficult to re-wet and therefore unsuitable for re colonisation with Sphagnum mosses.”* When sphagnum moss can no longer grow on a bog the bog cannot continue to grow either and carbon sequestration will be severely impacted. The man-made habitat in the quarry will not sequester carbon at the same rate as the actively growing bog at AT13. It is madness to destroy this habitat especially given the poor results for blanket bog in the Status of EU Protected Habitats and Species in Ireland Report 2025. This report states that *“Both active and non-active 7130 (blanket bog habitat no.) habitats qualify as Annex I habitat”* and that *“The Overall Status is assessed as Bad and deteriorating, as in the last two monitoring reports.”*

The photomontage booklets in the planning documents are an extremely poor representation of the proposed Tirawley windfarm. The photographer seems to have been more interested in photographing hedges than in creating realistic viewpoints for people to assess. I could include all four booklets to back up this point, but here is just one example from my locality, VP22c:



The turbines are hardly noticeable through the conveniently placed hedge on the right, but people do not live their day to day lives looking at wind turbines through hedges. These viewpoints are not what people are going to see from their homes or in my family's case, from our workplace, our farm. Hedges are not going to stop shadow flicker or noise pollution from disrupting our lives.

Noise and shadow flicker are of serious concern to myself and my family because not only do we live in the area of the proposed windfarm, but we also work here too. Our whole lives will be changed forever if this development goes ahead. Our house is H125 in the planning application. We would be approximately 1.25km from the nearest turbine which is AT01 and 1.4km from AT07. AT07 – AT11 are proposed to be on a hill overlooking our house which would exacerbate the effects of noise and shadow flicker. For this reason I find it strange that our house is not included in the shadow flicker analysis. We are only just outside the study area and the fact that these turbines are intended to go on extremely elevated sites should warrant an increased study area.

Our yard is approximately 350m from the proposed site of AT05 and 625m from AT06. As I have said before, the rest of our land is scattered throughout the proposed windfarm resulting in AT07 and AT08 being next door to one field and AT01 being approximately 250m from another field. This means we will experience noise, infrasound and shadow flicker irritation while we are working. For four months during the spring time we spend at least 12 hours/day in the yard and up to 18 hours/day at extremely busy times. During the summer we also spend 10-12 hours/day in the fields when we are mowing grass. This means we will be spending huge amounts of time working within 300-400m of turbines, and in the case of one field, just yards away from AT07 and AT08. Turbines are not supposed to be this close to houses but our workplace will be if permission is granted. The health implications of being constantly in close proximity to turbines have not been studied enough but the reports of cardiovascular problems and effects on sleep are worrying. Shadow flicker, noise and infrasound will affect anyone living close to turbines but they will be especially irritating to my brother who has autism and sensory problems.

Our cattle and sheep will also suffer the effects of these turbines. AT01, AT07 and AT08 are so close to our fields that the animals will be frightened by the blades turning. The animals will also be affected by the noise from the turbines. Cattle housed for the winter will be approximately 350m from AT05. They cannot leave the shed to get away from the noise and infrasound. It will be the same for them out in the field if they are surrounded by turbines. There is little or no research on the effects of turbines, specifically infrasound, on farm animals. The full side effects of turbines should be investigated before planning permission is granted for any more windfarms. Erring on the side of caution in cases where there is a lack of solid scientific data is responsible planning.

There is a study on the effects of turbines on badgers in Great Britain which gives some indication as to how animals are affected by windfarms. *Wind Turbines Cause Chronic Stress In Badgers (Meles Meles) In Great Britain* by Roseanna C. N. Agnew, Valerie J. Smith, and Robert C. Fowkes, 2016, found that badgers living in setts less than 1km from turbines had cortisol levels 264% higher than badgers living in control setts greater than 10km from wind turbines. This study also found that there was no difference in the mean cortisol levels of badgers living near windfarms that became operational in 2009 and badgers living near windfarms that became operational in 2012, showing that over time the badgers did not grow accustomed to the turbines. The discussion of this study states: “Because the major factor distinguishing the badgers from the two categories of sampling sites was the presence of wind

turbines, it is reasonable to suggest that the increased cortisol levels in the hair is the result of disturbance from these installations, with vibration, noise, and especially infrasound, the most likely reasons.” It also states that one of the effects of high cortisol levels is suppressed immunity. This is of particular importance to farmers because badgers are carriers of bovine TB and, as I have mentioned already, there has been a serious outbreak of bTB in the area of the proposed windfarm recently.

The BESS would be approximately 500m from our nearest field and 1.26km from our yard. It would be approximately 1.25km from our house. Should the BESS ever go on fire the prevailing southerly winds will blow the smoke towards our house and farm. In the event of this how will we, or any other neighbouring farmers, look after our animals? There would be no way for anyone to evacuate their animals. This would be a serious animal welfare issue that we as farmers have no control over and cannot remedy. Injuries or loss of animals in the event of a fire at the BESS would also destroy our livelihoods through no fault of the local farmers. I haven’t found any consideration or mitigation for this serious issue in the planning documents.

If the developer had engaged with our community they would have been aware of the issues raised in this submission. They only held one public consultation meeting on 6th June 2023. There has been plenty of time for them to hold another one, especially considering that the number of turbines has changed since 2023 and people would find it easier to see this in a public information event than trawling through the planning application online by themselves. The meeting they did hold was very badly organised. It was not widely advertised. I did not even know there had been a public consultation meeting until I read the Pre-Application Community Consultation Report in this planning application. I also do not understand why it was held in Ballina and not in the Lacken Enterprise Centre. I don’t think saying Ballina is a “*centre of employment*” or “*daily destination*” for locals is a justifiable reason for using the Ballina Manor Hotel. If it was held in Lacken or even Killala it was on local residents’ way home after work. The time, from 14:00 – 19:00 on a weekday, was also difficult for working people to get to, especially if they were commuting long distances. For these reasons I take issue with the statement from the Pre-Application Community Consultation Report: “*the Applicant has taken a proactive approach and considers community consultation to be an important element of the Proposed Development.*” This is the exact opposite of my experience. Even the Site Notice was not well publicised. For both the 2025 and 2026 applications the Site Notice was placed in the Mayo News even though the Western People is the most widely read paper in the locality of the proposed development. The developer has made it very difficult for people to be informed about the proposed Tirawley windfarm.

From reading the Scoping Opinion (Appendix 1.3) it is clear that many organisations were consulted with in a better manner than our community was. There is a stark contrast in particular between the way Three and Vodafone were consulted and the way our community, many of whom are local business owners, were consulted. Both phone companies were given the chance to voice the problems that particular turbines would cause to their signals and the developer worked with them to rectify the situations, even going so far as to slightly move

turbine locations. As residents of Lacken our community deserves the same courtesy. Our homes and properties will be severely devalued should the Tirawley windfarm be constructed. I would be unable to get planning to build a house on our family farm. Allowing the Tirawley windfarm to go ahead will effectively kill our community because no young family will be able to come home and build a house and because a precedent will have been created for outside investors and companies to come in and buy local family farmland that these young families will be forced to leave.

My family's livelihood, which is entirely built on selling livestock, will be decimated if the proposed Tirawley windfarm goes ahead. Mayo County Council, in pre-application meetings with the developer in both 2023 and 2026, have said that they are "*not in favour of the proposed development at this location*". At the June 2026 meeting of Mayo County Council, the councillors also agreed to support the council's recommendation to refuse planning permission for the Tirawley windfarm on grounds including impacts to tourism, scenery and damage to Palmerstown Bridge. I would urge An Coimisiún Pleanála to do likewise and preserve our community.

I also wish to adopt and support the detailed submission made by the Lacken Ballycastle Landscape Protection Group in relation to the proposed Tirawley windfarm development (PAX16.324258). In particular, I endorse the concerns raised regarding cumulative wind farm development across North Mayo, impacts on the Céide Fields cultural landscape, effects on tourism and recreation, biodiversity impacts, inadequacies in community consultation and the assessment of the Battery Energy Storage System. While I do not repeat those detailed arguments in full, I request that they be considered as forming part of this submission.

In conclusion, I respectfully submit that the proposed Tirawley Wind Farm development is not appropriate for this location due to the many serious negative impacts on our local community, our scenic landscape, nature and local habitats, archaeology and local history, and the local road network, particularly bridges. I urge An Coimisiún Pleanála to refuse permission for this development in the interests of proper planning and sustainable development.

Yours sincerely,

Edel Boyd

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