

Fo-Choill
Ceathru Mhor Leacan
Beal an Atha
Contae Mhaigh Eo.
F26 NIF6.

An Coimisiun Pleanála,
64 Marlborough Street
Dublin 1,
D01 V902

21 June 2026

Case Reference PAX16.324258 Applicant Constant Energy Limited.

**Tirawley Windfarm, Strategic Infrastructure Development at
Ballymurphy, Ballynaleck, Barnhill Lower, and others.**

To whom it may concern.

I set out below my submission in relation this Strategic Infrastructure Development application by Constant Energy Limited.

1. The proposed development is located on an elevated site (Lacken Hills) in a totally unspoilt and exposed upland location within a highly scenic vulnerable landscape extremely close to the majestic coastline adjoining Lacken Bay, Lacken Strand & Saltmarsh and Killala Bay and in close proximity to areas of special protection and conservation and areas rich in biodiversity and significant ornithology. By reason of the height, industrial scale and extent in such a sensitive and ecologically fragile area, the proposed development would have a highly disproportionate and obtrusive visual impact and, as a result, would be contrary to the proper planning and sustainable development of the area and would also be contrary to the provisions of the Mayo County Development Plan 2022-2028. Any objective reader of the application would, erroneously, be led to believe that the windfarm site is a remote area with little human activity apart from sporadic farming. It fails utterly to appreciate that there is a vibrant living community here of several hundred people who stand to be negatively impacted by a large windfarm as proposed. There are real potential health issues as a result of mechanical noise, infrasound and shadow flicker to the many residential dwelling close to the site. (Three Windfarms shut down in Wexford this year for noise pollution which is more and more being recognized as a serious effect of wind turbines). There are several hundred residential houses within 2km of the windfarm site who will most likely be affected. Almost all the houses are located to the east and northeast of the site and the prevailing south- west and westerly winds would exacerbate the noise and infrasound issue. A number of turbines are being proposed close to Lacken Cross Secondary School. The potential impact on students from noise, construction operations and shadow flicker is considerable and has not been addressed by the applicant. The

cumulative impact of potentially in excess of 100 wind turbines in the Lacken/Ballycastle area needs to be seriously considered in relation to an ancient, sacred landscape that until very recently was on the UNESCO World Heritage Sites tentative list. (The Ceide Fields and the Boglands of North and West Mayo)

2. There was no public consultation from the developer. There was no proper or adequate notice of the public meeting held back in June 2023. It was held sixteen miles away in Ballina and not in any of the many local centres in Lacken, Ballycastle or Killala. No subsequent meeting was held over the past three years even though the developer's plans have changed substantially since. No public liaison officer was appointed by the applicant as stated or if there was, there was no communication. The applicant ignored ACP's recommendations regarding the importance of transparency and good communication. This is totally in breach of the wind farm guidelines and the Aarhus Convention and constitutes a significant lapse in procedural fairness and basic democracy as the local population who stand to be greatly impacted had no say whatsoever, good or bad, in the whole process. The SID planning legislation was not enacted to totally deprive people of their natural rights. There has been no worthwhile information about Constant Energy Limited available anywhere. For some time, they have a web site about Tirawley wind farm but all it said was that a planning application was coming soon. There was no telephone number, email addresses or any contact information whatsoever to enable the public or concerned parties to contact them. They do not appear to have any trading address or place of business. This, despite them already obtaining planning permission for multi million euros green hydrogen facilities in Killala and Bellacorrick. The planning notice for the latest application was placed in the Mayo News on 28 April 2026. The Mayo News circulates mainly in the Westport and west Mayo area. The Western People is the local paper which circulates in Ballina and the North Mayo areas.
3. Lacken is unsuitable for industrial scale Windfarm because of its beautiful scenery, panoramic coastal views, golden strands and high sand dunes. The proposed site is bordered by a highly scenic, sensitive, coastal route from Castlelacken to Ballycastle via Downpatrick Head. This stunning coastline is entirely classed as a vulnerable area. The proposed development is located a mere 1.1km from the coastline at the closest point on prominent ridgelines and will be visible in all directions. From the Lacken Gazebo, there is a remarkable, magnificent vista, an arc of outstanding natural features stretching from the Donegal Mountains & Slieve League cliffs in the northwest around by Ben Bulbin & Knocknarea, and the Ox Mountains to the east and Mount Nephin and the Nephin Beg range to the south. This neolithic landscape including the surrounding hills running from Ceide to Lacken embraces spectacular sea views and provide the viewer with one of the premier visitor experiences along the Wild Atlantic Way. Any approval of large turbines on this priceless, neolithic landscape would be totally out of character with its natural surroundings and would have an extremely negative impact on the visual scenic amenity of the area. It was a distortion of common sense for Mayo County Council to ever designate this area as "open for consideration" to wind farms. They have now realized the folly of their decision and in November 2025, the executive of the council together with the almost unanimous decision of the

elected council members came out strongly against the application of Constant Energy for the Tirawley windfarm and stated that any windfarm in this area would constitute a material contravention of Mayo County Councils Renewable Energy Strategy. The councils new draft Strategic Renewable Energy Policy Document recently published excludes the Lacken area as being suitable for wind farms.

4. Lacken is a significant destination on the Wild Atlantic Way and close to Downpatrick Head from where the Turbines will be clearly visible. Tourism is very important to the local economy and will be significantly negatively impacted by the proposed wind farm. Failte Irelands Wild Mayo Destination project will be seriously compromised. The area around Downpatrick head and the Lacken coastline possess stunning natural scenery and rare geological features which has drawn recognition from visitors across the globe who are now coming in large numbers to view the stunning areas of high scenic value allied to its rich cultural heritage. The area has massive tourism potential and Failte Ireland now recognize that. The potential cumulative impact of turbines stretching from Geesala in the west across Oweninny&Sheskin , Keenagh, through Glenora, Keerglen , Clydagh, Carrowcullen & Annagh then arcing around Cooneal and Killala towards Lacken will be hugely detrimental to tourism, especially cultural tourism in the area. Its impact on the Wild Atlantic Way in North Mayo could potentially be catastrophic. We cannot have both a dense cluster of turbines and sustainable tourism. Both are not compatible. At present, Failte Ireland, Mayo County Council and the local Ceide Coast Committee are collaborating on major regional tourism initiatives, including advanced plans for the Ceide Coastal Path, a 15km world class trail linking the Ceide Fields and Downpatrick Head. The well-known Western Way long distance walking trail traverses the Lacken area, in close proximity to the windfarm site. There are several popular loop walks in Lacken, with the Rathlacken one running though the windfarm site
5. The landscape of the area, in particular, the Lacken Hills will be totally transformed for the worse if the proposal is accepted. The whole character, integrity and distinctiveness of the area will be compromised. The photomontages do not highlight, in any meaningful way, the view from the east of the site, in particular from the Foghill, Carrowtrasna and Kilcummin areas. There are fine panoramic vistas from these locations, which is a growing tourist location, which will be destroyed by large turbines. North Mayo Tourism use an iconic image taken from Kilcummin Back strand in their marketing of the area. The view from the image looks right across the strand to the wind farm site.
6. The Turbines will be clearly visible from the west Sligo area, from Easkey right up to Enniscrone and from the Moy Estuary Road to Ballina. They will also be visible from the North Coast Road which is classified as a Scenic Route and has designated scenic views. The Mayo County Development Plan objective is that developments should not impinge in any significant way on the character, integrity and distinctiveness of the area. This development will be bad for tourism in the whole area, not just North Mayo but West Sligo and Ballina and will impact on the integrity of the Wild Atlantic Way. The proposed site layout is in the form of dispersed turbines throughout the landscape

and does not conform to the layouts identified in the Wind Energy Guidelines. In the application documentation, there would appear to be no single site boundary. The redline site boundary seems to be a series of groups of turbines and single turbines linked along the public road. The public roads cannot form part of the site boundary.

7. If approved, our youth and young families will not live in an area dominated by massive turbines. The social and economic fabric of the area will be injured to an alarming extent. Residential planning permission will, in all likelihood, be refused to local people if the wind farm goes ahead. Decisions to prioritize wind farms over residential developments in pristine, beautiful place like Lacken/ Ballycastle area is symptomatic of a skewed set of government priorities that ranks commercial profit above people. The policy is morally suspect when the large scale economic benefits of wind energy come at the expense of the health, well-being and livelihoods of local residents and in circumstances wherein several locals have either been denied planning on the grounds of “injurious to the scenic amenity of the area” or are put through endless bureaucratic obstacles to get planning. It is a matter of serious concern that in the application there is no proper consideration of alternative locations for the proposed development in Mayo or elsewhere. There are lots of other locations in Mayo, particularly to the east and south which are much less scenic, with little archaeological heritage and with less scope for landscape, environmental and habitat degradation. The applicant does not provide any proper, valid consideration of reasonable alternatives as required by Article 5 1 D of Directive 2014/52/EU and, therefore, does not provide sufficient evidence that the site in Lacken represents the least environmentally damaging or most appropriate alternative. This is a fatal flaw in the application. The sheer scale of the proposal and the magnitude of the associated changes have the potential to detract from local people’s sense of place and connection to the land.
8. Many local people have been refused planning permission in the area because of the importance of the visual amenity. Huge Wind Turbines will be much more damaging to the visual amenity. All citizens are not treated equally in the planning process. Any decision to grant planning permission for towering windfarms on prominent ridgelines in Lacken will not only discard the rights and needs of the local community but will clearly show an undemocratic prioritisation of large commercial interests over the health and well-being of local people, the preservation of rare cultural heritage and the natural beauty of the landscape and environmental and habitat protection.
9. The Ceide Fields system of stone walls, dwellings, tombs, etc extends into the Lacken area. Lacken is part of the wider field wall landscape of North Mayo that is linked to Ceide and shares the same pre-historic agriculture system. Archaeological studies conducted by Gretta Byrne have confirmed this. The May 2016 edition of the Journal of the North Atlantic contains a significant article on “Early Neolithic Agriculture in County Mayo. Geoarchaeology of The Ceide Fields, Belderrig & Rathlacken.” (Dr Erika Guttmann-Bond & Others). This offers further proof of the extension of the Ceide Fields complex into the wind farm site. An extract from this study states “Ceide Fields, Belderrig and Rathlacken are extensive early neolithic field systems in County Mayo. The Ceide Fields are thought to be the earliest field system in Europe and, as such, they

are listed as a potential world heritage site.” This academic study by leading archaeologists saw Belderrig and Rathlacken as being part of the Ceide Fields System. It concluded that these areas were used for both arable and pastoral farming in the early neolithic period. A further academic study was carried out by Dr Stuart Rathbone in 2009 entitled “Archaeological Excavations at Rathlacken (E580) Neolithic and Bronze Age Landscapes of North Mayo.” The study concluded that the Rathlacken site reveals complex Neolithic and Bronze Age interactions, crucial for understanding early agricultural communities. There was highly significant artefacts recovery including 1025 items with 873 of these assignable to specific locations across the site. The applicant fails to refer to any of these studies or journal articles in the cultural heritage section of the application.

10. Mayo County Council failed to retain the UNESCO status of the Ceide Fields and the Bogs of North and West Mayo on the UNESCO World Heritage Sites tentative list In 2019/2020. As a result, this opened the floodgates for large scale windfarm developments in North Mayo. The council has, however, recently re-confirmed that they are open to supporting and facilitating future applications to secure UNESCO World Heritage designations of the Ceide Fields and the Boglands of North and West Mayo. This would include the windfarm site area. It would be a tragedy of great proportions if part of the oldest, neolithic field system in the world is compromised by this proposed windfarm development. Up until a few short years ago, this area of Lacken formed part of the Ceide Fields Complex and the Bogs of North and West Mayo which were on the UNESCO World Heritage Sites Tentative List. The applicant disingenuously fails to mention this highly pertinent fact. Furthermore, it is incomprehensible that the developer fails to recognize or deliberately chose not to recognise the exceptional archaeological sensitivity and vulnerability of the landscape of the proposed wind farm site. The studies and reports provided in the application comprise of the most desultory and cursory review of the significant recorded monuments of this area. They fail, in any meaningful way to capture the uniqueness and cultural importance of the archaeology. They do not mention the potential significant unexplored, unrecorded, subsurface archaeology which could potentially be vast. The character and integrity of this area should be preserved as it has been by generations of people of the area for over 6,000 years. Our unique cultural heritage must not be squandered for a totally inappropriate development.
11. The Lacken salt marsh which is an area of special conservation (SAC) located just one kilometre from the proposed windfarm could be seriously compromised if run off of sediment, chemicals, oil/lubricants, concrete etc occurs. Excavation of huge amounts of soil and peat and potential run off from this could cause serious damage. The highly scenic Saltmarsh is a large protected coastal wetland located beside the 600-acre Lacken Strand and is rated highly for its natural beauty, rare birdlife and rich ecology and biodiversity. It helps to maintain coastal habitats and protected plant species, listed on Annex 1/11 of the EU Habitats Directive; such as Atlantic Salt Meadows., Mediterranean Salt Meadows, Salicornia Mud, Marram Dunes and Fixed Dunes. The

myriad number of channels and tidal pools render it a significant habitat for wading and migratory birds including species like Golden Plover, Dunlin, Wigeon, Snipe, Teal, Mallard Curlews, Herons and lapwings. UP to 2200 Golden Plover have been seen in early winter roosting and feeding on this Saltmarsh site (less than 1km from the proposed windfarm) This area is a very important ornithological site providing many diverse habitats for foraging and roosting. The hen harrier roosts close to the marsh. These species are known to be very sensitive to disturbance from human activities. The construction of a windfarm 1 km away would be hugely detrimental to all bird life here. I invite ACP to view the Site Synopsis of the Lackan Saltmarsh and Kilcummin Head SAC (Site Code 00516). This document clearly points out the substantial ecological importance of this coastal site for the range, quality, floristic richness of its coastal habitats, in particular the fixed dunes which are a priority habitat on Annex 1 of the EU Habitats Directive. The Saltmarsh is an ecological gem which must not be exposed to potential degradation. The coastal shoreline around Lacken Bay abounds with skylarks, sand martins, oyster-catchers, kestrels, snipes and mallards.

12. Several streams/water courses from the proposed site flow down to both the Salt Marsh and Lacken Strand potentially contaminating and polluting this area of unrivalled scenic beauty. It is likely that there will be water quality problems resulting from the construction of turbines in this area relating to the significant release of sediment, hydrocarbons and other deleterious material to the aquatic environment.
13. The area of Kilcummin Head is an area of special conservation and is famous for bird watching. Also, both Lacken Strand and the Salt Marsh abound with many rare species of birds, including, inter alia, the Hen Harrier, Curlew, Golden Plover, Red Shank, whooper swans and large quantities of Brent geese overwinter in the area. There is a real risk of many rare species of birds being slaughtered by wind turbines and disturbed by windfarm construction including the destruction of vast amounts of hedge rows and considerable felling of trees. In particular, the Hen Harrier breeding ground has been identified by the applicant. There are real risks that the construction and operation of the wind turbines together with destruction of hedgerows could put paid to the hen harrier in this area. The EIAR acknowledges that hen harriers are present within the study area and that the site provides suitable autumn and winter foraging habitat. The site contains a combination of blanket bog, scrub, wet grassland, semi-improved grassland and hedgerow networks, all of which are important habitats for foraging and roosting hen harriers.

I note from the application that a winter hen harrier roost was recorded within the study area. However, it appears that no comprehensive winter roost survey has been undertaken across the wind farm site itself. The applicant's roost survey focused mainly on areas outside the site development area. That is totally unsatisfactory. In the absence of a full and proper assessment and analysis of winter roosting activity, a reasonably objective view is that the impacts on this protected species have not been fully assessed, assimilated and considered by the applicant and this is a fatal flaw in the application.

The development will, in all likelihood, result in the permanent loss and fragmentation of habitats used by hen harriers and other species including considerable hedgerow removal, loss of blanket bog habitat, forestry felling and the construction of extensive site access roads and infrastructure. The mitigation measures proposed are not robust and, therefore, there is much uncertainty as to whether replacement habitats can adequately replicate the ecological value of the habitats being lost.

I am also seriously concerned about the cumulative effects of habitat loss, construction disturbance and operational displacement. Recent research has shown that hen harriers may avoid otherwise suitable habitat in the vicinity of operational turbines, resulting in a reduction in available foraging areas. The application does not appear to adequately assess or mitigate this displacement effect. Taking into account, the strong conservation status of the species, the acknowledged presence of a suitable habitat and recorded winter roosting activity within the area, under observation, a reasonably objective appraisal of the situation can only conclude that sufficient scientific clarity, certainty and assurance has not been provided to prove that the proposed development will not seriously and adversely affect the hen harrier population using this landscape.

14. The Lissadrone, Castlelacken and Rathlacken areas contain significant archaeological features such as Court Tombs, Stone Circles, Ringforts, Chalybeate Springs and Holy Wells. These could be compromised by the proposed development. There are at least 85 recorded archaeological sites located within 1km of the windfarm site. This is one of the heaviest and most dense concentrations of sites in such a small area in the country. Many artefacts of rare antiquity have been found in the Lissarone area and are part of the Nation Museum display. The area is an archaeological treasure trove with immense cultural heritage. In their seminal work on Archaeology, DeValera and O Nuallain described the supreme cultural heritage of this Lacken area northwest of Killala and its archaeological magnificence. Many archaeologists believe that this area is one of the premier areas of archaeological merit in Ireland. The applicant has completely failed to refer to these issues in their cultural heritage section of the application
15. The initial planning notices in October 2025 stated 16 Wind Turbines but all the reports in the planning application referred to 18 Wind Turbines. This was entirely confusing. The application also included a BESS which was not discussed with ACP in the consultation process. This was totally unprofessional and demonstrated a total disregard of the planning process. It demonstrates also a lack of care, attention and due diligence on the part of the applicant. This is a significant worry in a proposed development that could impact so significantly on peoples' lives and on the environment. Probity, good governance and high standards. are critical for a proposed project of this nature.
16. Part of the proposed site contains lands that are restricted by the Department of Agriculture under GAEC 2. These restrictions for farmers include no digging new

drains, no deepening of existing drains and not ploughing more than 12 inches. Therefore, if such restrictions exist for ordinary landowners for modest farming activities, in what circumstances can a windfarm developer dig out huge foundations for multi-wind turbines?

I have considerable concern regarding the huge volume of traffic, in particular the proposed thousands of heavy load bearing trucks passing by Lacken Cross School, Palmerstown Bridge and Killala town during the construction phase. The levels of traffic ensuing from the proposed development, including a huge amount of construction materials, will cause serious disturbance to local road users along long, narrow country roads which are already in very poor structural condition. It will also seriously impact on local farming practises.

17. Palmerstown Bridge is a protected and vulnerable structure, over two hundred years old and not suited for a voluminous amount of heavy traffic. The setting of the bridge will be seriously affected by any land-take for the road widening haulage and will be seriously impacted by the sheer magnitude of heavy materials being carried over it. Mayo County Council have a stated objective in the Development Plan of protecting this structure in the RPS together with the integrity of its character and setting. Millions of euros have recently been spent on upgrades to Killala Town in terms of infrastructure, roads, footpaths, etc. Much damage could be caused by huge amounts of heavy transportation. The proposed development raises major concerns regarding the major disruption to the Lacken, and surrounding areas caused by heavy load bearing commercial traffic and the transportation of large equipment, materials and components. I do not believe that the local infrastructure is robust enough to cater for such loads and will lead to potential damage to bridges, roads, walls, buildings etc and will pose a serious risk of health and safety to local residents, especially those residing along narrow rural roads. The sheer amount of traffic generated by the development, including construction materials, labour force, turbine deliveries will cause serious disruption to all road users in the area. There are real concerns about the safety aspects of the BESS and how, in the event of a fire, the area could be contained and the safety of nearby residents assured. The proposed BESS is in close proximity to a number of dwelling houses.
18. The application, if successful, will be hugely detrimental to the area and the people living therein. There are circa 300 homes within a 2km radius of the proposed wind farm site, with many homes existing less than 700 meters from the proposed turbines. Many families are potentially facing adverse health issues caused by large wind turbines, resulting from mechanical noise, infrastructure and shadow flicker. Practically all of the homes are located either to the east or northeast of the proposed development. As the prevailing winds in the area are mainly from the southwest, west and, the turbines will be located in the worst possible area vis-à-vis the prevailing winds.
19. It is my contention that the Lacken area is totally unsuitable for a wind farm development of this magnitude. To quote the Failte Ireland website: "Lacken Strand is special. With its miles of beautiful, vast, expansive, golden shorelines and some of

the best unspoilt beaches, its scenic beauty is simply unrivalled.” The artist Cora Murphy has stated as follows: “the back strand at Lacken in north Mayo is one of the most breath-taking places I have ever been. Its wide and long and surrounded by high dunes. In the early part of the year a gentle breeze blows directly across the beach creating gentle gusts of sand – it feels other worldly and a bit magical – as if for a few moments you are suspended between two worlds, neither holding on or letting go.” The Lacken Gazebo stands sentinel over Lacken and Killala Bay. It overlooks the sea and land for many miles in all directions with magnificent views over the surrounding landscape and provides the perfect symmetrical balance on Lacken Hill. The proposed development has two wind turbines located on both sides of the Gazebo both south and north and several more in the nearby Lissarone area. These potentially could destroy the entire fabric, character and integrity of the entire Lacken Hill, Castlelacken and Lissadrone. area. The turbines proposed for this location, in particular, are absolutely in the wrong area and it is widely acknowledged now that it would be amount to environmental sacrilege to permit turbines here.

20. The Lacken area has a unique, historic, spiritual appeal and is the finest ancient, sacred landscape of North Mayo and possibly of the entire west of Ireland. The weight of present-day academic scholarship points to the Wood of Foclut (present day Foghill) as being the place where St Patrick spent his formative years. Foclut is the only Irish placename that St Patrick mentions himself. This is marked by St Patrick's Well, which is just 2.5km from the windfarm site. Lacken contains much evidence of very early Christianity. The ancient, venerable and highly scenic Parish of Kilcummin is the birthplace of the early Saint Cuimin. The ecclesiastical sites such as the Old Lacken Church on Lacken Hill, (adjacent to windfarm site) the Kilogeary church and the Kilcummin church date back several centuries. One of the most dramatic and remembered events in Irish History, the French army landing under General Humbert, took place at Kilcummin, Lacken in August 1798. No other rural districts in Ireland can claim to have been the landing place of a foreign army that temporarily overturned English rule, with the establishment of the Republic of Connacht. The presence of a large number of standing stones, court tombs, ogham stones, wedge tombs stone, circles, ringforts, fulacht fia, druids chair, lisheens, holy wells, etc indicates that the area was occupied and culturally important for millennia before Christianity arrived. The Lacken area has a long maritime and defensive role on the Atlantic Coast. Its piers, harbours, strands and coastguard infrastructure point to generations of fishing, trade wartime surveillance, etc.
21. In 2012, both Mayo County Council and An Bord Pleanála refused planning permission to a local farmer for four small wind turbines with a hub height of 45m right in the middle of the current proposed wind farm site area of the applicant. The reference number of this application was Pl 16.239901. The decision of ABP was as follows: “The proposed development is located on an elevated sight in an unspoilt and exposed upland location within 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 area overlooking Killala Bay, the proposed development would have a disproportionate and obtrusive visual impact and the proposed development would , therefore, be contrary to the Mayo County Development Plan, and be contrary to the

proper planning and sustainable development of the area.” If four small wind turbines were deemed to have a disproportionate and obtrusive visual impact in 2012, how much greater will 16 significantly larger turbines have in the exact same area now. Pure logic points to a massive, colossal difference. The height, scale and extent of the current application is multiple times that of the 2012 application. Nothing has changed since 2012. The landscape is still in its unspoilt, pristine, natural state. The same Wind Energy Guidelines of 2006 are still in place. Mayo County Council have the same objectives in its County Development Plan to protect these scenic coastal landscapes as it did then. ACP cannot ignore its own precedent decisions.

In conclusion, I wish to state that I have demonstrated in this submission that there are many a sufficient and compelling reasons for the refusal of this application by ACP. I will summarize my conclusions about the proposed application as follows:

- A. A major and unacceptable intrusion into the rich archaeological heritage of the area and the potential despoilation and degradation of the Ceide Fields complex which extends into the Lacken area. The application would represent the nail in the coffin of Mayo County Councils plan to restore the area to the UNESCO World Heritage Site Tentative List.
- B. The visual impact on the amenity of the area would be massive and the fabric, character and distinctiveness of the Carrowmore-Lacken Hills would be irreversibly compromised and significantly harmed as the windfarm would be excessively domineering. The scale of the windfarm would turn an unspoilt, vulnerable, scenic, coastal elevated area into an industrial landscape that would be environmentally devastating.
- C. The proposed windfarm would result in unacceptable cumulative, adverse ornithological impacts, for the hen harrier in particular but also for the huge volume of wintering, migratory birds.
- D. Impact negatively on the surface and ground water hydrology, and result in contaminated run off into the Lacken Saltmarsh and strand. It would put designated areas of special protection and conservation at serious risk of pollution and degradation.
- E. The application has shown complete disregard for the living community, human activity, houses and farmsteads and totally ignores the real impact of the proposal on them.
- F. The total unsuitability of the area's existing, extremely narrow and defective road network to facilitate access for abnormal loads. The impact on Palmerstown Bridge and traffic safety throughout.
- G. The detrimental impact on tourism in the region, the lifeblood of the rural economy. The negative impact on Downpatrick Head, the Ceide Fields Visitor Centre and the Wild Mayo Destination Experience.
- H. The precedent set by ABP in relation to the local farmers application in 2012 which was a very small application by comparison to the present one.
- I. The total opposition to the application by Mayo County Council and its elected representatives. The draft Renewable Energy Strategy Document 2026 confirms the Lacken area's unsuitability for wind turbines.

- J. The complete failure of the applicant, at any time, to communicate in any meaningful way with the local people.
- K. The cumulative impact of the potential very large number of windfarm applications in the Lacken, Ballycastle, Killala area.

The proposed windfarm represents a highly inappropriate and excessive industrialisation of the pristine, natural, scenic coastal landscape of the Lacken area. I have demonstrated in this submission that the development would give rise to significant adverse and negative impacts which would be highly injurious to the area and which have not been satisfactorily addressed by the applicant. I urge ACP to refuse permission in the interests of proper planning, environmental, archaeological and landscape protection and the sustainable development of the area.

Yours faithfully,

Eibhlin Ni Fhaolain Ceallaigh