

Name: Erika Bodnar

Address: Tooreen,
Carrowmore Lacken,
Ballina, Co. Mayo
F26 HY68

Date: 01/06/2026

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Subject matter of the submission: An Coimisiún Pleanála - Case reference: PAX16.324258

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, Castletown 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.

I live in this unique area where there are protected bird species such as cuckoos, lapwings multiple bat species, a saltmarsh SAC and it's positioned directly near a globally acclaimed heritage site dated back over to 5000 years (Céide Fields). To build 16 wind turbines and other industrial buildings on this natural built heritage environment would transform the ancient landscape forever. This would be similar to building industrial buildings near such ancient landscapes as Newgrange, Stonehenge or the Egyptian Pyramids.

This development poses significant and irreversible risks to the local environment, biodiversity, the local residents and its global and regional cultural heritage. In particular the proposal threatens critical habitats for protected species such as the Hen Harrier, Atlantic Puffin, Black-legged Kittiwake, European Storm-petrel, Leach's Storm-petrel, Leisler's bat and many other species.

The development involves substantial cutting (felling) over 4 km of hedgerow the habitat of protected bird species, it includes the loss of blanket bog and the landscape amenity that makes this area unique.

This development raises serious concerns regarding visual impact, traffic disruption, and inadequate community consultation. These issues, coupled with shortcomings in the Environmental Impact Assessment Report, justify a refusal of permission for this project.

I want to make observation's specifically relating to the following areas

1. Negative Impact on Residential Amenity

- Concerns about noise pollution affecting nearby homes.
The noise of the wind turbines which is a constant swishing sound could affect health and can create a life with sleep disturbance and constant background noise. The area that the developers are looking to industrialise is rural with no current industrialisation of the same degree. The extreme negative impact that the noise wind turbines raise is not in keeping with the area and cannot be absorbed by its landscape.

2. Visual Impact and Landscape Character

- The wind turbines will significantly alter the local landscape and visual amenity impacting the Visitors of the nearby Céide Field visitor centre, which is the most extensive Stone Age monument and the oldest known field system in the world, dating back 5,000 years, pre-dating the Egyptian Pyramids. The wider Céide fields complex covers the area from Belderrig to Ballinglen, Ballykinletragh, Keerglen, Ballycastle right across to Lacken and over to Moygownagh. Much of the Céide fields complex has yet to be properly investigated. The immense structures that wind turbines are (135m built on the Lacken Hills) would dominate the area and will change the nature of the area similar to an industrial district as opposed to potentially being listed on the UNESCO Heritage list.

3. Shadow Flicker Effects on Homes

- Potential for shadow flicker impacting residential properties. The Shadow Flicker will impact everyone in the development area. The flashing lights can cause health issues for sensitive adults and children and the constant exposure would impact the everyday life (sleeping disruption, disturbance of activities due to changing continuously between light and shadow in the area). The impacts of the shadow flicker has only been predicted up to 1.17km surrounding the turbines, I would question given the elevation of the turbines if this is not insufficient as it is highly possible the effects will be felt much further across the parish of Lacken.

4. Noise from Construction and Operational Phases

- Disturbance from construction noise and ongoing turbine operation noise. Prolonged exposure to transport noise in Europe was linked to an estimated 66,000 premature deaths, 50,000 new cases of cardiovascular diseases and 22,000 new cases of type 2 diabetes. Additionally, according to new research, noise could also potentially contribute to thousands of cases of depression and dementia. (European Environment Agency (EEA) report on noise pollution published on 23 June 2025) The construction of the immense objects (wind turbines and related buildings) will create transport noise for a prolonged time. When compared to other environmental health threats in Europe, transport noise ranks among the top three — just behind air pollution and temperature-related (climatic) factors. Furthermore, it has a greater health impact than better-known risks such as second-hand smoke or lead exposure. The Board is reminded that the area the turbines are proposed for is rural and extremely quite the introduction of this extensive industrialisation would be a complete destruction the tranquillity of the area.

5. Increased Traffic and Road Damage During Construction

- Heavy machinery will damage local roads and increase traffic hazards.
The local roads are very narrow and not adequate to construction traffic of this volume. When we are using the road, only one car is able to cross on many sections. We have only one bridge connecting the community to the shops and other amenities such as healthcare and governmental services. The eleven-arch Palmerstown Bridge

is dated back to 1700-1777, and it's widely accepted as part of the eighteenth-century engineering heritage. This valuable listed heritage asset would be seriously damaged by the approx. 100 x construction traffic of large trucks daily for the construction phase. If one truck is crossing the traffic will need to wait as only one vehicle is able to cross at the time. At the least, the trucks would make serious traffic obstruction being in the junction of the Belmullet/Ballycastle-Crossmolina-Killala Road.

If the bridge will be damaged by the large construction trucks, the local community won't be able to do even grocery shopping, go to work or take their children to Killala or Ballina schools, visiting their families or visiting their GP or go to the bank or any government office. If someone gets seriously unwell it will be a serious delay or inability to get help from health services. This very likely scenario would mean that the whole community of Carrowmore Lacken area will be isolated, and potentially this could create a catastrophic situation.

The Palmerstown Bridge which links the community with health services, essential services is the lifeline of the community, the damage and the heavy traffic will limit or completely stop the daily journeys of the community to work, to school, to shops, to GP, to bank and to get any essential services.

A full survey of Palmerstown Bridge was not done by the applicant due to restrictions caused by water levels. The visual inspection conducted on 10th January 2023 noted that close inspection of the arches, abutments, and piers was not possible on the day of inspection because fast flowing and deep water made access unsafe. It was recommended that a close inspection of the underside of the structure should be undertaken when water levels are lower (Appendix 17.2 Palmerstown Bridge Report.pdf, pages 7, 10-11). Despite the initial survey being carried out over 3 years ago the applicant has not attempted to carry out a full and proper survey prior to submitting this application. It is incumbent upon the board to ensure that proper structural survey is carried out before any recommendation with regards this project is made. The bridge is vital to the people in the area as outlined above.

6. **Insufficient Community Consultation and Information**

- Public consultation was inadequate or poorly advertised, limiting community input. I didn't get any information from the company (brochure or meeting invitation). There was no information event in Lacken community centre which could inform the community of the windfarm project. I heard later that there was an event in Ballina, poorly advertised and more than 20 km away from the area of the development.

7. **Impact on Local Wildlife and Biodiversity**

- Potential harm to protected species and habitats, including European Sites nearby. The development poses significant and irreversible risks to the local environment, biodiversity. In particular the proposal threatens critical habitats for protected species such as the Hen Harrier, Atlantic Puffin, **Black-legged Kittiwake**, European Storm-petrel, Leach's Storm-petrel, Leisler's bat and other bat species.

All bats recorded in surveys are protected under the EU Habitats directive. The **Leisler's Bat** is one of the most frequently killed at wind farms, Ireland is considered a stronghold for Leisler's bat. The presence of one of Europe's most wind turbine sensitive species, within a site classified as high risk creates a material risk of mortality contrary to the EU Habitats Directive.

The North Mayo Coastline (see maps attached) is included in the list of IBAs (Important Bird and Biodiversity Area) published by BirdWatch Ireland. These IBAs are based on the best available data and standardised international criteria that is recognised by the European Court of Justice. It is a basic requirement of EU law to protect these sites.

The IBA triggering seabird species of the North Mayo Coastline is the Black-legged Kittiwake which is Red Listed and globally vulnerable. Studies show kittiwakes are susceptible to blade strikes of wind turbines, particularly when flying in high winds which alter their flight heights.

The development is also in the proximity of the 000516 Lackan Saltmarsh and Kilcummin Head SAC, where the Qualifying interests are already Unfavourable – Inadequate, Unfavourable – Bad. (Conservation status of Annex I sand dune habitats at Lackan).

8. Inadequate Archaeological and Heritage Assessment

- Concerns over impacts on local archaeological sites and protected structures such as Palmerstown Bridge and Lacken Gazebo.

The listed heritage assets will be directly impacted by the construction and the operational phase (Gazebo). The Heritage Trails: Lackan Green Loop and Lackan Blue Loop are listed as historic site trails, these trails will be most likely closed to public and the construction can cause serious damage to them. The Rathlacken Court Tomb is one of the finest megalithic court tombs in Mayo and it has been built before 5,300 years ago and goes to confirm the extent of the Céide field complex. No structural engineering survey was carried out on the Gazebo despite AT16 only being approx. 304m away. Again it is incumbent upon the board to ensure that historic heritage assets are protected from such industrial development as the one proposed.

There is a risk that the area with monuments, showing it was inhabited for thousands of years, could be transformed to an industrialised environment.

9. Risk to Human Health and Wellbeing

- Potential adverse health effects due to noise, shadow flicker, and other disturbances. The French courts have awarded over 100,000 Euro damages for the health problems of a couple which incurred from six turbines sited 700 m from their dwelling. They had headaches, insomnia, heart irregularities, tinnitus, and depression.
Causes Cited: Unusually loud noise ("like a washing machine continually turning") and flashing white lights. **Distance:** The six turbines were located 700 meters from their home. **Compensation Breakdown:** The damages covered both physical health issues and the loss of value to their property.

10. Inadequate Consideration of Cumulative Effects

- The impact combined with other developments in the area is not fully assessed. There are a series of windfarms in the neighbouring area, and the cumulative effects were not entirely considered. The application includes a table listing 221 WTG (page 109, Table 6.12) near the Tirawley Windfarm. This means more than two hundred of wind turbines would be towering in the 20-22 km vicinity of this area. The application has only a few page of analysis, on cumulative effects.
- The cumulative effects on the economy, the larger community of the affected area, the natural habitats and the protected species are not considered in the application. These are not listed in cumulative effects.

11. Impact on Tourism and Local Amenities

- The development may deter tourists and affect recreational areas, walking, cycling, horse-riding and car routes. This would reduce the overall income of tourism businesses in Mayo. A significant number of rural families rely on tourism to make a living, any reduction in this solely for advantage of wind energy companies is simply not fair and proper planning. National policy should not actively inhibit people from making a living, this industrialisation of our area will negatively impact tourism in the area.
The area is part of the Wild Atlantic Way. In year 2024, 809,000 Domestic Tourists visited Mayo, 75% were returning tourists.
55% of the domestic tourists engaged in Walking activities, 49% of them toured around Mayo by car. The negative effect of the development of wind turbines can include to closure of walking trails, impossibility of access to the natural and built heritage sites. The change of the landscape and the loss of natural and built heritage which can deter tourist from the area, preventing the larger area from tourism income.

12. Lack of Transparency on Grid Connection and Infrastructure

- Details of the grid connection and associated infrastructure are unclear, raising concerns about additional environmental impacts. The local community won't receive less expensive electricity or free electricity. There is no clarity on the grid connection and infrastructure.

13. Concerns Regarding Fire Safety of Battery Energy Storage System (BESS)

- Potential fire risks associated with the battery storage units.
Thermal runaway can cause fire and explosion of the BESS system. In case of emergency there are no local fire brigade, there is a fire brigade in Ballina.
Emergency services aren't in the area; in case of injuries or toxic gas exposure the local community has the closest A&E in Castlebar (49, 2 km) or Sligo (52.7 km).

14. Increased Electromagnetic Interference

- Possible interference with telecommunications and other local infrastructure.
The internet connection is vital in such remote areas as Lackan, Co. Mayo.
Rotating turbine blades can obstruct, reflect, or diffract line-of-sight microwave links and mobile network signals. This can disrupt remote working which can deter families from the area, as the remote work has to have a good internet coverage. Local, remotely working people could lose their work.

15. Lack of Meaningful Community Benefit or Dividend

- The community has to face natural habitat loss, negative impact on local biodiversity, negative impact on the global heritage, risk to human health, loss of natural habitat, negative impact on local economy and tourism. The landscape negatively impacted. The everyday life will be impacted with daily hours in traffic or potentially losing the accessibility to work and essential services.

Other negative effects: Noise effects, shadow flicker and construction noise. Possible cut-off from essential services, losing roads.

The benefit offered is a relatively limited community fund where the affected community has no control over the spend. This does not address the negative effects.

Based on all the above I believe that it is incumbent on the board to refuse this application based on the concerns as outlined.

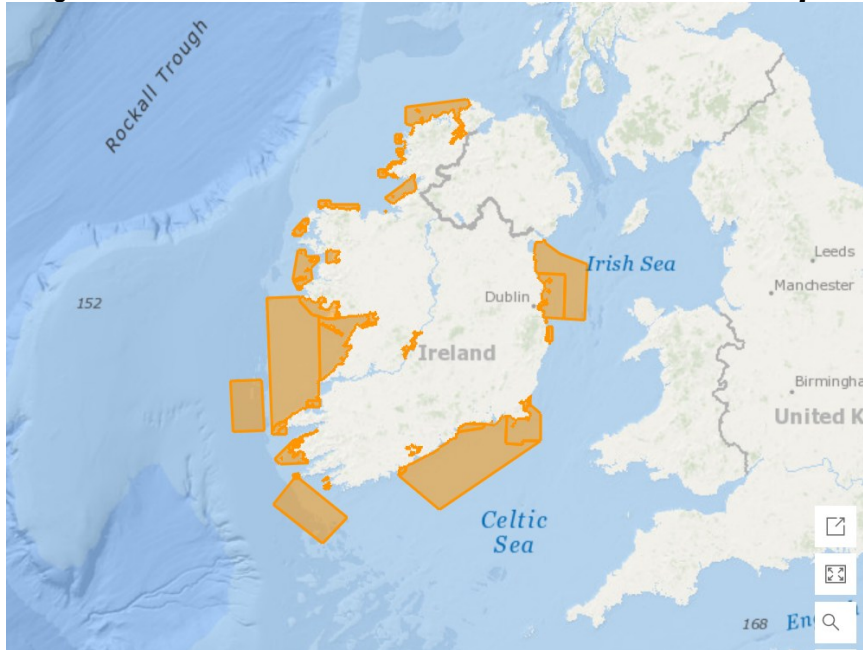
Yours sincerely

Erika Bodnar

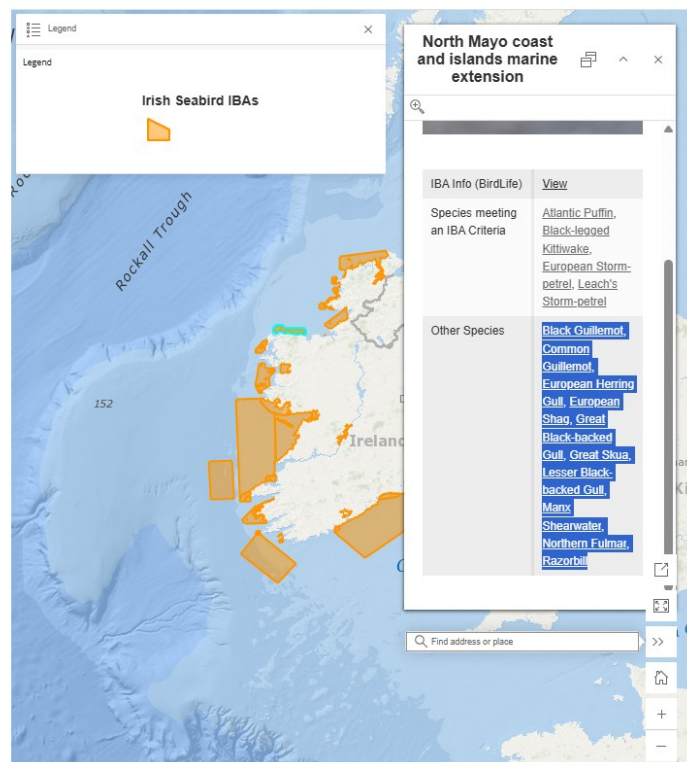
References:

- *2006-Wind-Energy-Development-1.pdf* (pp. 22, 25, 60, 97-98)
- *draft-revised-wind-energy-development-guidelines-december-2019* (pp. 2, 33, 60, 144-156)
- *ABP-315864-23 - 1st Meeting Record* (pp. 4, 7, 9)
- *ACP Direction Report* (pp. 1, 5, 10)
- *Pre Planning Inspectors Report* (pp. 13, 18, 24)
- *Appendix 1.6 - Public Consultation Responses* (multiple pages)
- *Appendix 2.1. CEMP – Emergency Response Plan* (p.20)
- *Appendix 17.2 Palmerstown Bridge Report.pdf*, pages 7, 10-11
- *EIAR Chapter 14 - Cultural Heritage*, pages 38-39
- <https://birdwatchireland.ie/ibas-for-seabirds-in-ireland/>
- <https://datazone.birdlife.org/site/factsheet/49411-north-mayo-coast-and-islands-marine-extension>
- <https://www.eea.europa.eu/en/newsroom/news/europeans-exposed-to-harmful-noise-pollution-levels>
- <https://www.buildingsofireland.ie/buildings-search/building/31301417/palmerstown-bridge-doonamona-co-mayo>
- <https://www.buildingsofireland.ie/buildings-search/building/31300708/castlelackan-castlelackan-demesne-co-mayo>
- <https://www.alltrails.com/ireland/county-mayo/lackan/historic-site>

- https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/Research/Key%20Tourism%20Facts%20and%20Figures%202024/FI_Key-Tourism-Facts-2024_Mayo.pdf?ext=.pdf
- <https://birdwatchireland.ie/app/uploads/2026/01/SPA-Designation-and-IBAs-ECJ-Rulings.pdf>
- <https://birdwatchireland.ie/app/uploads/2026/04/Detail-on-IBAs-to-be-designated.pdf>
- [https://www.npws.ie/sites/default/files/publications/pdf/Lackan%20Saltmarsh%20and%20Kilcummin%20Head%20SAC%20\(000516\)%20Conservation%20objectives%20supporting%20document%20%E2%80%93%20Coastal%20habitats%20\[Version%201\].pdf](https://www.npws.ie/sites/default/files/publications/pdf/Lackan%20Saltmarsh%20and%20Kilcummin%20Head%20SAC%20(000516)%20Conservation%20objectives%20supporting%20document%20%E2%80%93%20Coastal%20habitats%20[Version%201].pdf)



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Palmerstown Bridge, DOONAMONA, MAYO



[View on map](#)

Survey Data

Reg No	31301417
Rating	Regional
Categories of Special Interest	Architectural, Scientific, Technical
Original Use	Bridge
In Use As	Bridge
Date	1700 - 1777
Coordinates	117268, 331445
Date Recorded	31/01/2011
Date Updated	--/--



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Castlelackan, CASTLELACKAN DEMESNE, MAYO



[View on map](#)

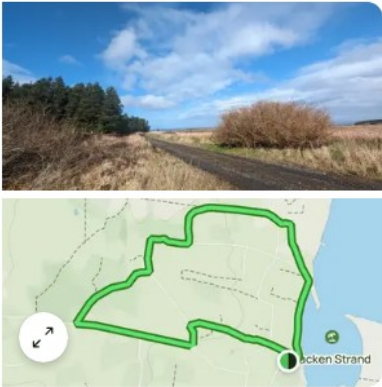
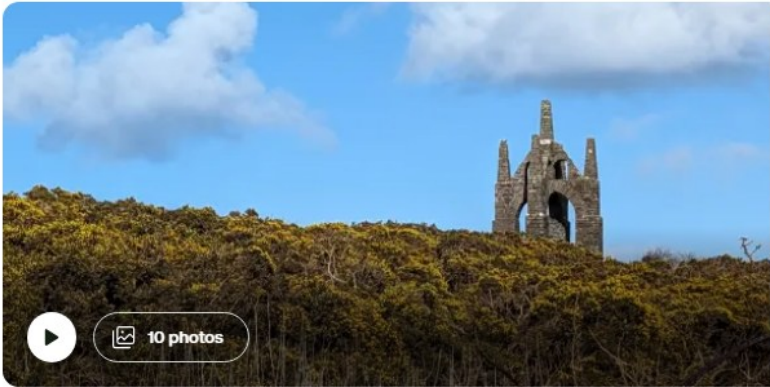
Survey Data

Reg No	31300708
Rating	Regional
Categories of Special Interest	Architectural
Original Use	Folly
In Use As	Folly
Date	1790 - 1795
Coordinates	117249, 337416
Date Recorded	31/01/2011

Lackan Trails - Blue Loop

★ 4.9 (10 reviews) · Moderate · Lackan, County Mayo, Ireland

Overview Conditions Reviews Nearby



10.8 km 220 m 2.5–3 hr Loop

The Lackan Trails Blue Loop is an absolute gem of a route that sets off from the car park at Lackan Church, guiding you along the sweeping shores of Lackan Bay. As you follow the blue markers across a varied landscape of rolling farmland, quiet country roads, and atmospheric bogland, you'll be treated to magnificent, expansive views over the Mayo coastline and across the water toward Sligo and Donegal.

Along the way, you'll climb to the route's highest point at Conaghra for breathtaking coastal vistas, and pass a peculiar stone 'Gazebo' built in 1794. It is a wonderful, moderate outdoor adventure that perfectly captures the wild, untamed beauty of North Mayo. [less](#)

Top sights

- Lacken Strand Beach >
- Rathlacken Court Cairn Ruins >

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Search for emergency departments, injury units and GP out-of-hours services in Ireland

Search by place

Enter a name or address and select an option from the list

Rathlackan, Carrowmore Lacken, County Mayo, Ireland

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Filters applied (1)

Service

- ☐ Early pregnancy assessment units
- ☒ Emergency departments
- ☐ GP out of hours
- ☐ Injury units
- ☐ Maternity emergency units

Age

All ages ▼

Opening hours

- ☐ Open now

[Clear filters](#)

Showing 1 to 10 of 29 results

Sorted by distance from "Rathlackan, Carrowmore Lacken, County Mayo, Ireland". Distance is measured in a straight line.

49.2km away

Emergency department

[Mayo University Hospital Emergency Department](#)

● Open now

This emergency department is for all ages

[When to go to the emergency department](#)

52.7km away

Emergency department

[Sligo University Hospital Emergency Department](#)

● Open now

This emergency department is for all ages

[When to go to the emergency department](#)

113.9km away

Emergency department

[University Hospital Galway Emergency Department](#)

● Open now

This emergency department is for all ages