

Objection to the Proposed Tirawley Wind Farm

**Submitted by Erin Finnerty,
Killerduff, Ballycastle, Co. Mayo,**

Planning Application Reference: 324258

I am writing to object to the proposed Tirawley Wind Farm development because I believe it would have a serious and lasting impact on the local area where I live.

Like many people living around Ballycastle and Lacken, I value the beautiful landscape, the local wildlife, the archaeological heritage and the peaceful rural character that makes this part of North Mayo such a special place. I am also very concerned about the possible effects that a development of this size could have on nearby rivers, protected habitats, local tourism, road safety and the wider environment.

Having read through the planning application and looked carefully at the accompanying reports and maps, I do not believe that all of the potential risks have been fully addressed. While a number of mitigation measures are proposed, I do not believe anyone can say with complete certainty that problems will not arise, particularly when the proposed development is located so close to internationally protected Natura 2000 sites and within a catchment that drains towards them.

I appreciate that renewable energy is important, but I also believe that the location of a development is just as important as the development itself. In my opinion, this is not an appropriate location for a wind farm of this scale because of the environmental sensitivity of the area and the potential impact on local communities, visitors and protected habitats.

The following sections explain the reasons why I believe planning permission should be refused.

Tourism, Shadow Flicker and Glare Hazard Assessment

Shadow Flicker and Glare

The photographs in this section were taken on 22 October 2025 from the Ballyknock and Doonfeeney area, looking east towards Carrowmore Hill where the proposed turbines would be located. Similar views are experienced from a number of locations further south towards Ballycastle village.

The purpose of these photographs is to show what local people and visitors already experience each morning when the sun rises behind Carrowmore Hill. They also help to illustrate why I am concerned that the addition of large rotating turbine blades in this location could create shadow flicker and glare for people using the R314, nearby homes and local tourism businesses.

Where the Photographs Were Taken

- The photographs were taken from the R314 overlooking the Doonfeeney area and the Stella Maris Shorehouse Hotel, along one of the most scenic stretches of the Wild Atlantic Way.
- They were taken between approximately 8:00 am and 9:00 am on a clear morning when the rising sun sits directly behind Carrowmore Hill.
- From these locations it is easy to see that the proposed turbine blades would rotate directly in front of the morning sun from the viewpoint of motorists, local residents, walkers and visitors travelling towards Ballycastle through Doonfeeney, Ballyknock, Muingelly and the surrounding area.

In my opinion, these photographs clearly show why there is potential for shadow flicker and glare to become a real issue for people who use this road every day and for visitors coming to enjoy this beautiful part of North Mayo.

Movement of the sun across the Carrowmore Hill ridge contour line clearly visible from image to image as time lapsed in the morning. **These images represent a significant threat to road users** from glint, glare and shadow flicker for tourists and locals on this busy road which links Ballycastle and the town of Belmullet in the west, both with frequently visited tourist attractions.

This also poses significant adverse long term permanent negative potential for shadow flicker to sensitive human receptors at these locations.

Images



Figure 1. View eastwards from Doonfeeney showing photomontage of the proposed turbines and blades as observed from the R314 looking towards the blades, turbines and windfarm over Carrowmore Hill.



Figure 2. Sunrise directly behind Carrowmore Hill on October 22nd 2025 as per Figure 1 above. At its current position, the sun has come from the lower left of image along the contour of the hill and in doing so has moved through the sightline, as seen in the photomontages above of the

turbine blades.



Figure 3. View including Stella Maris Shorehouse Hotel and coastline alignment. Movement of the sun across the Carrowmore Hill ridge contour line clearly visible from image to image as time lapsed in the morning.

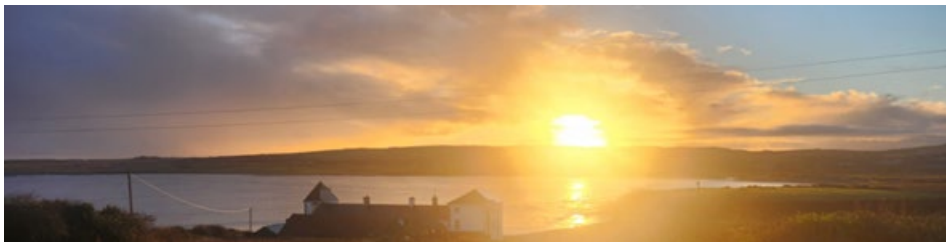


Figure 4. View including Stella Maris Shorehouse Hotel and coastline alignment. Movement of the sun across the Carrowmore Hill ridge contour line clearly visible from image to image as time lapsed in the morning.



Figure 5. This and the following images were taken from Doonfeeney (across the bay from the proposed wind farm along with the village of Ballycastle amongst other locations) almost a

week later on October 28th, 2025 showing the same repeated movement of the sun over the mountain where the blades are proposed to be positioned.



Figure 6. This and the following images were taken from Doonfeeney (across the bay from the proposed wind farm along with the village of Ballycastle amongst other locations) almost a week later on October 28th, 2025 showing the same repeated movement of the sun over the mountain where the blades are proposed to be positioned.

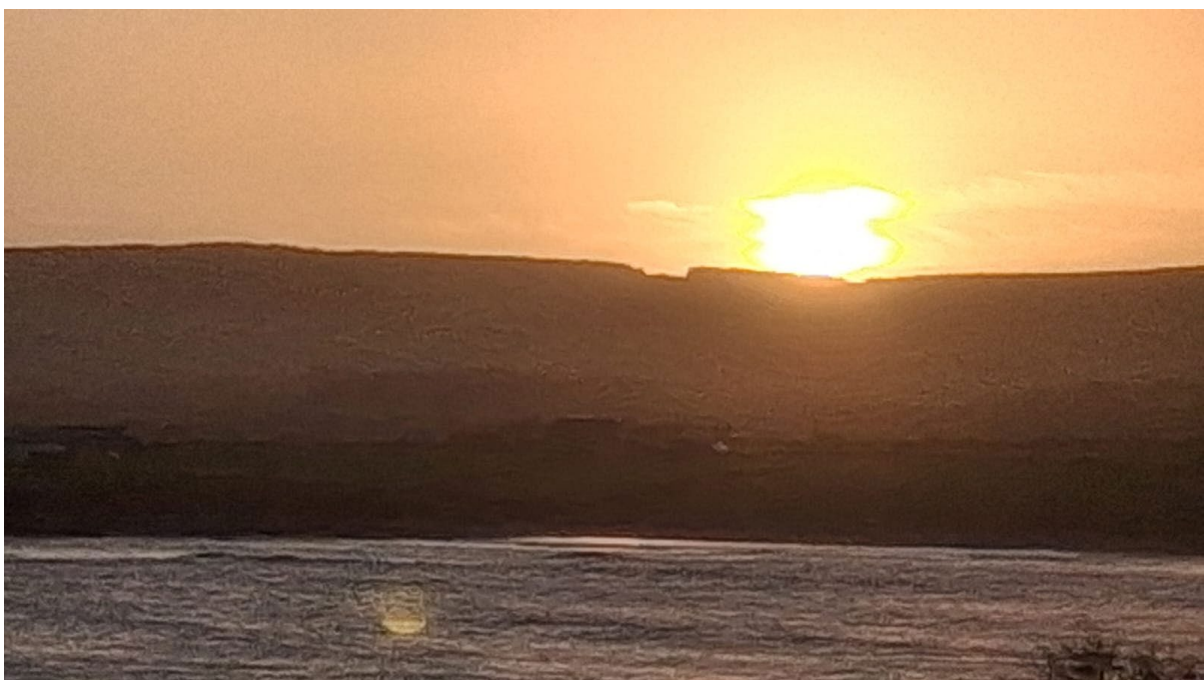


Figure 7. This and the following images were taken from Doonfeeney (across the bay from the proposed wind farm along with the village of Ballycastle amongst other locations) almost a

week later on October 28th, 2025 showing the same repeated movement of the sun over the mountain where the blades are proposed to be positioned.



Figure 8. The Stella Maris Hotel (very popular amongst tourists) sits across the bay from the windfarm and directly along the proposed Ceide Coastal Path supported by Mayo County Council and Fáilte Ireland. This image was taken from Doonfeeney (across the bay from the proposed wind farm along with the village of Ballycastle amongst other locations) almost a week later on October 28th, 2025 showing the same repeated movement of the sun over the mountain where the blades are proposed to be positioned.

Assessment of Potential Impacts - Road Safety

Road safety is an issue that genuinely worries me.

The R314 is the main road linking Ballycastle with the Céide Fields Visitor Centre, Downpatrick Head and many other attractions along the Wild Atlantic Way. It is used every day by local residents, commuters, tourists, cyclists and buses travelling through the area.

Anyone who regularly drives this road knows that, on clear mornings, the rising sun can already make visibility difficult for traffic travelling east towards Ballycastle. The photographs included in this submission show how the sun rises directly behind Carrowmore Hill from many locations along this route.

If large turbine blades are added to this skyline, I believe there is a real possibility that rotating blades passing in front of the morning sun could create repeated shadow flicker and glare. In my opinion, this could become distracting for drivers and increase the risk of accidents, particularly during the busy tourist season when many visitors are unfamiliar with the road.

I am also concerned about the many homes located between Rynn, Ballyknock, Doonfeeney, Muingelly and Ballycastle that would experience these same morning lighting conditions. Residents should not have to live with regular shadow flicker where it can reasonably be avoided.

I understand that the Wind Energy Development Guidelines advise that shadow flicker should not create a hazard for road users or affect nearby homes. Having looked at the location of the proposed turbines and having photographed the sunrise from this area, I am not convinced that this issue has been fully addressed within the application.

Tourism

Another concern is the effect this proposed wind farm could have on tourism in North Mayo.

One of the things that makes this part of North Mayo so special is its outstanding scenery. People travel here from all over Ireland and abroad to experience places such as the Céide Fields, Downpatrick Head and the Wild Atlantic Way. These are some of Mayo's best-known visitor attractions and are enjoyed because they have remained largely unspoilt.

The recently approved 15 km Céide Coastal Path, supported by Mayo County Council and Fáilte Ireland, will further encourage people to visit Ballycastle and the surrounding area over the coming years. It represents a major investment in sustainable tourism and in the long-term future

of our local community. In my opinion, introducing large wind turbines onto the inland skyline would fundamentally change many of the views that people come here to enjoy.

The proposed turbines, construction compounds, new internal roads and extensive construction works would be located immediately beside a local road that forms part of the wider Western Greenway network. This popular route provides an important walking and cycling link through some of the most scenic parts of North Mayo and connects visitors travelling from areas such as Oughterard, through Wild Nephin National Park and onwards towards Ballycastle, Lacken, Lecarrowntemple, Conaghra, Castlelacken, Lissadrone and the surrounding countryside. The nearby Fáilte Ireland information boards actively encourage people to visit and experience this landscape.

This is an area that many local people are extremely proud of. The views from this road are among the finest in North Mayo, stretching across Donegal, Sligo, the Ox Mountains, Lough Conn, Nephin and the mountains further west. It is a peaceful landscape that people come to enjoy because of its natural beauty.

In my opinion, introducing a large wind farm into the middle of these views would permanently change the character of the area. Visitors walking or cycling through this landscape would no longer experience the same sense of openness and unspoilt scenery that currently exists. I believe this would reduce the attraction of the area for tourism and would be at odds with the ongoing efforts by Fáilte Ireland and Mayo County Council to promote North Mayo as a high-quality destination based on its scenery, heritage and outdoor recreation.



Figure 9. Proposed windfarm application site above would sit directly upon the Western Way tourist walk as described by Fáilte Ireland on their billboard at the Wild Nephin National Park, Ballycroy.

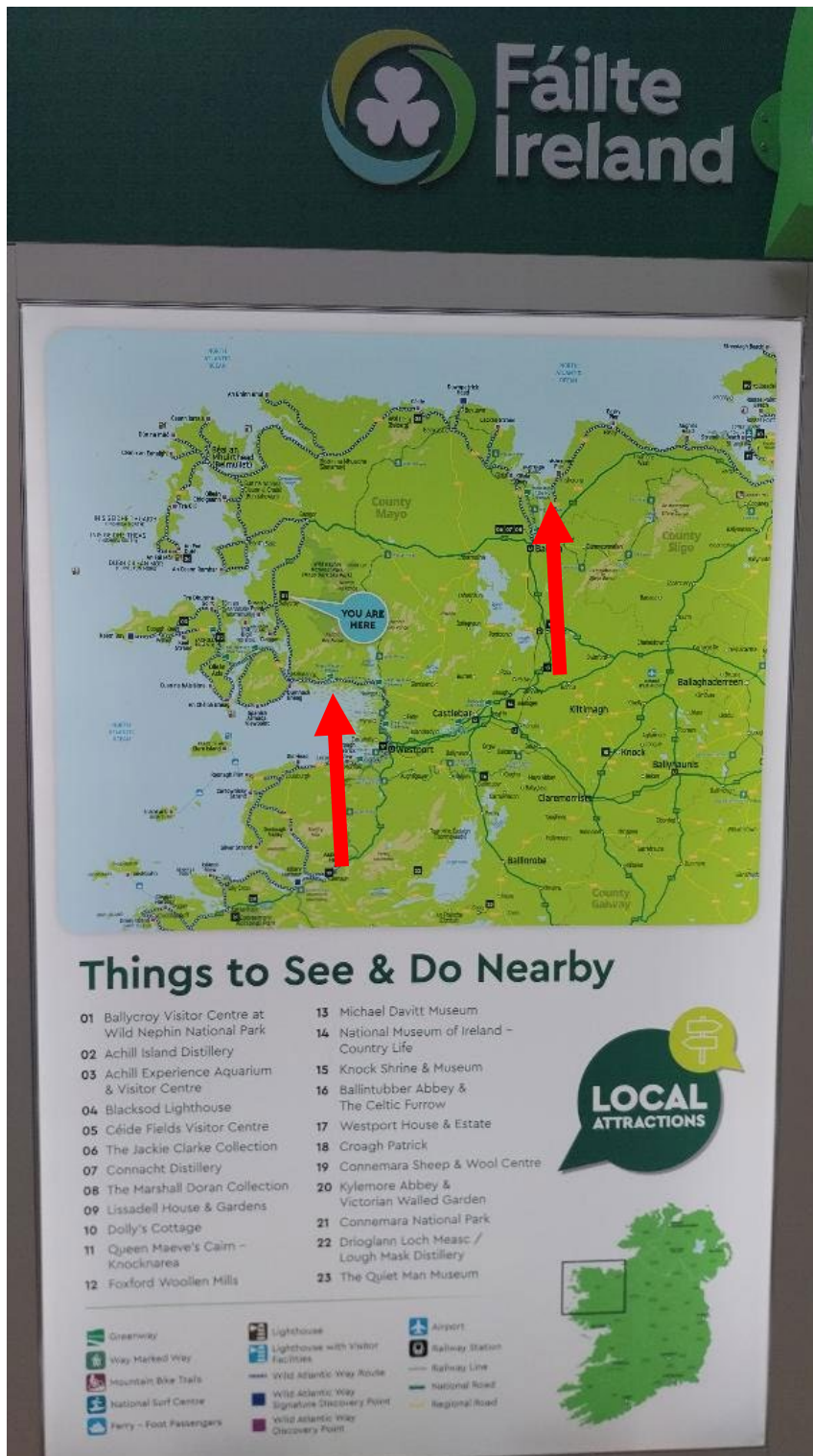


Figure 10. Proposed windfarm application site above directly upon the Western Way tourist walk as described by Fáilte Ireland on their billboard (image in picture taken in Ballycroy) at the Wild Nephin National Park, Ballycroy. Start and finish point shown with red arrows.

The turbines would become a dominant feature in the landscape and would be visible from many parts of the surrounding area, the impact of the movement of the turbine blades, creating shadow flicker, would detract from the experience of walkers, cyclists and visitors travelling through Ballycastle towards the Céide Fields and Downpatrick Head.

For these reasons, I believe the proposed wind farm is difficult to reconcile with the considerable work already being undertaken by Fáilte Ireland, Mayo County Council and local community groups to promote North Mayo as a destination based on its natural beauty, heritage and outdoor recreation.

Residential and Visitor Accommodation Impact

The Stella Maris Shorehouse Hotel and the Doonfeeney Glamping Site both enjoy open views towards Carrowmore Hill, where the proposed turbines would be located. These businesses attract visitors because of the peace, scenery and spectacular coastal landscape that surrounds them.

As the photographs included in this submission demonstrate, the rising morning sun already sits directly behind Carrowmore Hill. If the proposed turbines are built in this location, I believe guests staying at these accommodation providers could experience additional glare and shadow flicker during the early morning, together with the constant visual presence of large rotating turbine blades on the skyline.

People choose to stay in this area because of its natural beauty and peaceful surroundings. In my opinion, introducing a development of this scale into such an iconic landscape could reduce the overall visitor experience and make the area less attractive as a place to stay. This would not only affect individual businesses but could also have wider consequences for the local economy, which depends heavily on tourism and visitors throughout the year.

Local Archaeology

Another concern I have is the potential impact that this development could have on the area's archaeological heritage.

Having read through the planning application, I still find myself asking whether a sufficiently detailed archaeological assessment has been carried out for a landscape as historically important as this. The proposed wind farm is located in an area that is well known for its rich

archaeological heritage, including the nearby Rathlacken Court Tomb, which lies only a few hundred metres from parts of the proposed wind farm boundary.

The wider Céide Fields landscape is internationally recognised for its archaeological importance, yet it is also well accepted that not every archaeological feature has been discovered or recorded. Many important remains still lie beneath the ground and may only become apparent when major excavation works take place.

The construction of turbine foundations, new access roads, drainage works and underground cabling will involve extensive excavation over a large area. Once archaeological remains are disturbed or destroyed, they are lost forever and cannot be replaced.

For these reasons, I believe An Coimisiún Pleanála should be completely satisfied that the archaeological implications of this proposal have been thoroughly investigated before any permission is granted. Given the importance of the surrounding landscape, I believe a precautionary approach is fully justified.

See <https://www.archaeology.ie/archaeological-survey-ireland/historic-environment-viewer-application>

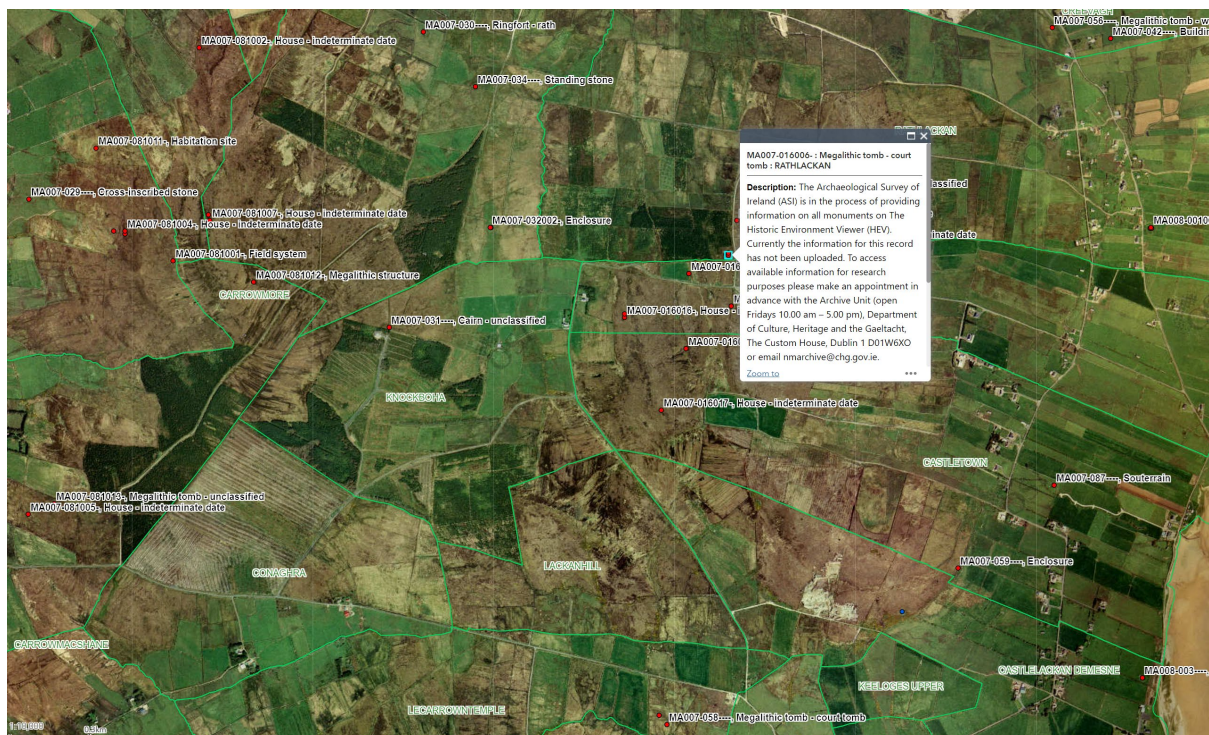


Figure 11. It is often the case that some archaeology, naturally as its under the ground, is yet to be discovered, especially in an area such as this that has multiples of known recorded sites.

Birds

Another concern I have relates to the bird species that rely on the Killala Bay/Moy Estuary SPA and the surrounding coastal habitats.

Many of the bird species for which this Special Protection Area was designated are already under pressure and depend on clean rivers, estuaries and coastal habitats for feeding, resting and overwintering. Having looked at the maps in the application, it appears that the Glebe and Conaghra river systems flow directly towards these protected areas only a short distance downstream from the proposed wind farm.

If increased amounts of silt, sediment or other pollutants were to enter these rivers during either the construction or operational phases of the development, I believe there is a risk that the quality of these important feeding habitats could be affected. Any deterioration in water quality has the potential to reduce the availability of food for birds and disturb the delicate balance of these protected ecosystems.

As someone who values the wildlife in this area, I find it difficult to understand why such a large development is being proposed within a catchment that drains towards internationally important bird habitats. Once these habitats are damaged, it may take many years for them to recover, if recovery is possible at all.

For these reasons, I believe the potential impacts on the bird populations associated with the Killala Bay/Moy Estuary SPA should be given very careful consideration before any decision is made on this application.

Hydrological impact

A big concern I have about this proposed wind farm is its location within a catchment that drains towards two nearby European protected nature sites – Lacken Saltmarsh and Kilcummin Head SAC and the Killala Bay/Moy Estuary SPA.

Having looked through the application and the accompanying maps, it appears that a large part of the proposed wind farm is located on land where streams naturally flow downhill towards these protected areas. This immediately raises concerns for me because the construction of turbine foundations, access roads, drainage works and other infrastructure will involve disturbing very large amounts of soil and peat.

During heavy rainfall, I am worried that silt, sediment and other pollutants could be washed into these streams and carried directly towards the protected habitats downstream. The application itself also refers to herbicide use in parts of the site and, when this is considered together with the amount of excavation proposed, I believe there is a real possibility of cumulative impacts on these sensitive areas.

The maps also show that the western side of the proposed wind farm is approximately 150 metres higher than the surrounding coastline. To me, this means that rainfall will naturally travel downhill towards the SAC and SPA through the existing stream network. Because of this steep slope, I believe there is a greater risk that silt and other material could be carried much more quickly into nearby rivers during periods of heavy rain.

I am particularly concerned about the Glebe River system (EPA Code 33G09), which already drains existing forestry before flowing towards these protected sites. If additional runoff from the proposed wind farm also enters this catchment, it seems inevitable that the river will have to carry even greater amounts of sediment during both the construction and operational phases of the development. I believe this could place further pressure on habitats and wildlife that are already sensitive.

The protected habitats within Lacken Saltmarsh and Kilcummin Head SAC have developed naturally over hundreds, if not thousands, of years. They depend on very specific environmental conditions to survive. If construction materials, fine sediment, concrete residues or other contaminants were to enter these waters, I believe there is a genuine risk that these habitats could gradually deteriorate.

I am especially concerned about the sand dune systems at Lacken. Marram Grass plays a vital role in holding these dunes together and protecting the coastline from erosion. If the quality of the water or natural sediment reaching these habitats changes over time, there is a risk that the dunes themselves could become less stable. Losing these natural coastal defences would not only affect wildlife but would also damage one of the most attractive parts of the North Mayo coastline that so many people come to visit.

Another concern is the possibility of accidental fuel, oil or hydraulic leaks from construction machinery. While every effort may be made to prevent spills, accidents can happen on projects of this scale. Given the direct drainage connections between the proposed wind farm and these protected sites, I believe this risk deserves very careful consideration.

For these reasons, I am not convinced that it has been shown beyond doubt that the proposed development can proceed without affecting these important European sites. Once damage occurs to habitats of this importance, it may take many years to recover, if recovery is possible at all. I therefore believe that a precautionary approach should be taken when considering this application.

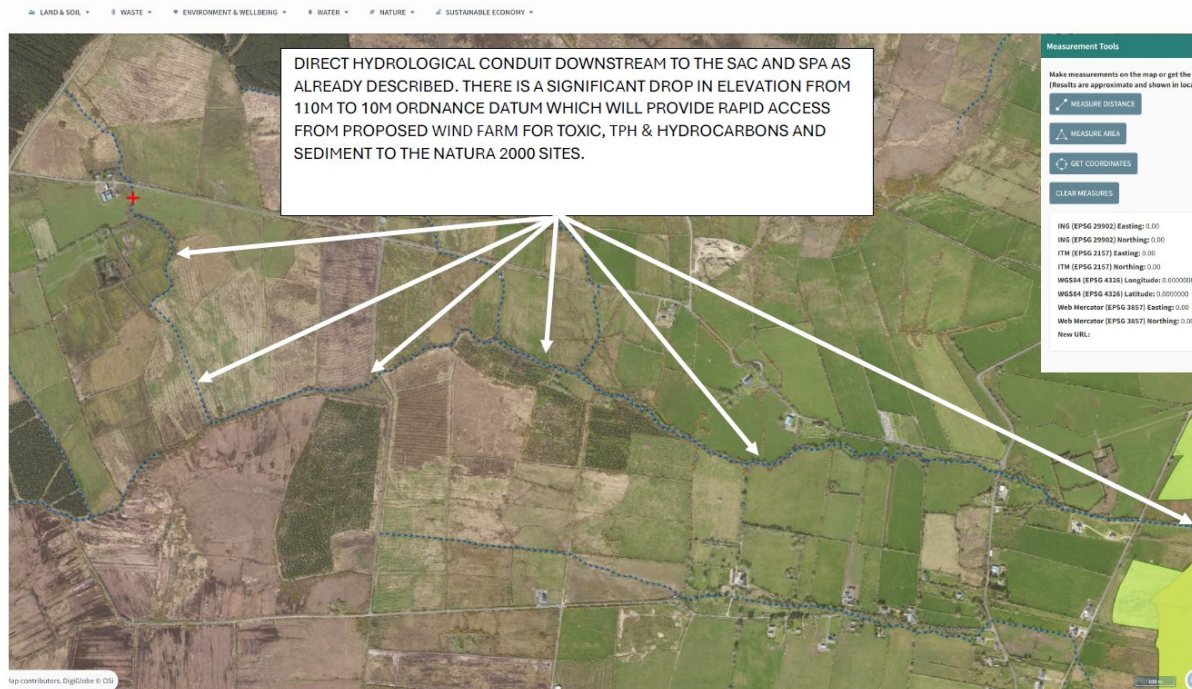


Figure 12. Conaghra River with direct hydrological connectivity to the SAC and SPA to the east (epa.ie)

The application also identifies the Conaghra River (EPA Code 33C54), shown by the white arrow on Figure 4, as another watercourse that drains part of the surrounding area. This river has already received runoff from forestry for many years and, if the wind farm goes ahead, it appears that it will also receive additional runoff from the proposed turbine bases, access roads, drainage works and other construction activities.

To me, this raises concerns that the river could end up carrying even greater amounts of silt and sediment than it already does. If that happens, I believe there is a real possibility that these materials could eventually be carried downstream into the Killala Bay/Moy Estuary SPA and the Lacken Saltmarsh and Kilcummin Head SAC, placing further pressure on habitats and wildlife that these sites were designated to protect.

Another point that stands out from the application is the difference in height between the proposed wind farm and the protected coastal sites below. The land falls by approximately 150

metres from the higher parts of the development down towards the SAC and SPA over a relatively short distance. In my opinion, this steep gradient increases the likelihood that heavy rainfall could carry silt, sediment and, in the event of an accidental spill, fuel or other contaminants from construction machinery downhill through the existing stream network.

For these reasons, I remain concerned that the natural drainage pathways linking the proposed development with these protected sites have not been given sufficient weight. Once material enters these streams it will naturally continue downstream, and I am not convinced that the potential risks to these important habitats can be fully ruled out.



Figure 13. Elevation maps showing the steep incline from the western section of the proposed wind farm towards the 2 Natura 2000 sites (from well over 110m OD minimum to 10m OD at the SAC and SPA (GSI.IE maps))

The proposed wind farm is located within a catchment that drains towards the Lacken Saltmarsh and Kilcummin Head SAC and the Killala Bay/Moy Estuary SPA, both of which are located only a short distance from parts of the proposed development. Having looked at the site maps and the changes in ground levels shown in the application, I am concerned that there is a natural downhill pathway by which silt, sediment and, in the event of an accidental spill, fuel or other contaminants could be carried towards these protected areas.

The western side of the proposed development sits approximately 150 metres above the coastline over a relatively short distance. To me, this suggests that during periods of heavy rainfall, water will naturally flow quite quickly downhill through the existing drainage network. With the amount of excavation proposed for turbine foundations, access roads, drainage

channels and cable trenches, I believe there is a genuine risk that disturbed soil and other materials could be washed into nearby streams.

The protected habitats within Lacken Saltmarsh and Kilcummin Head SAC, together with the bird populations that rely on the Killala Bay/Moy Estuary SPA, depend on clean water and stable environmental conditions. Even relatively small increases in silt or accidental pollution could have consequences for habitats and wildlife that have developed naturally over a very long period of time.

I have read the Hydrology and Hydrogeology Report and appreciate that a range of mitigation measures has been proposed. However, I am not convinced that standard construction measures alone can fully deal with the challenges presented by this particular site. This is not a flat development site or an industrial estate. It is a steep, exposed upland landscape where rainfall naturally flows towards internationally protected habitats.

While the report lists numerous drainage measures, settlement systems and erosion controls, I believe it is reasonable to ask how all of these measures would continue to perform during prolonged periods of heavy rainfall or under unforeseen site conditions. In my opinion, simply listing a wide range of mitigation measures does not automatically remove the possibility of problems occurring, particularly in such a sensitive landscape.

For these reasons, I remain concerned that the potential impacts on the nearby Natura 2000 sites have not been fully ruled out. Given the proximity of these protected areas, the steep topography and the scale of the proposed construction works, I believe a precautionary approach should be taken. Unless it can be clearly demonstrated that the development will not adversely affect these internationally important sites, I respectfully believe that planning permission should not be granted.

Local Drinking Water Supplies

One final concern I would like An Coimisiún Pleanála to consider is the potential impact on local drinking water supplies.

Many families throughout Ballycastle, Lacken and the surrounding area rely on either private wells or the local public water supply. Clean, safe drinking water is something most of us take for granted, but it has taken years of investment to improve the reliability of the local scheme.

Only recently, Uisce Éireann and Mayo County Council completed a major upgrade of the Ballycastle Water Supply Scheme by connecting it to the Ballina Regional Water Supply Scheme. This was an important investment for the area and successfully removed Ballycastle from the EPA's Remedial Action List. It now provides a safe and reliable drinking water supply to hundreds of homes and businesses.

Because of this, I find it difficult to understand why such extensive excavation works are now proposed within the same wider catchment. The construction of turbine foundations, access roads, drainage systems and underground cables will involve major disturbance of the ground over a large area. While measures are proposed to reduce environmental impacts, I remain concerned that accidental pollution or changes to groundwater movement could affect both private wells and the wider public water supply.

I also note that the proposed development lies within a catchment that drains towards two European protected sites. If water quality were to deteriorate, the consequences would not only affect local communities but could also extend to these internationally important habitats.

In my opinion, the precautionary principle should apply. Unless it can be clearly demonstrated that the proposed development poses no risk to local drinking water supplies or the surrounding environment, I believe permission should not be granted.

Lack of Consultation

One thing that has disappointed me throughout this process is the lack of meaningful engagement with the people who will be most affected by this proposed wind farm.

As far as I am aware, the developers have never taken the time to come to either Lacken or Ballycastle to meet local residents, answer questions or listen to the concerns of the people who live here. For a project of this size, I believe that was a missed opportunity.

Instead, the main public consultation event was held at a hotel approximately thirty minutes away from the communities that will experience the greatest impacts. It was also held during normal working hours, making it difficult for many people with work, family or farming commitments to attend.

In my opinion, if a development is likely to change the landscape and affect local communities for decades to come, then the people living in those communities should be given every

reasonable opportunity to meet the developers face to face and discuss the proposal in their own area.

I do not believe that simply holding a consultation event away from the affected communities was enough. I feel that local people deserved a genuine opportunity to ask questions, express concerns and have meaningful discussions before such a significant planning application was submitted.

The number of observations now being made by local residents shows just how strongly people feel about this proposal. I cannot help but wonder whether some of these concerns could have been better understood, or perhaps even addressed, if the developers had engaged directly with the communities of Lacken and Ballycastle from the very beginning.

For that reason, I believe the level of public consultation carried out should be taken into account when considering this application.

Having carefully read the planning application and considered all of the information available, I remain genuinely concerned about the suitability of this location for a wind farm of the scale proposed.

My concerns relate not only to the potential effects on local people and the surrounding landscape, but also to the possible impacts on nearby European protected sites, local watercourses, drinking water supplies, tourism, archaeology, wildlife and road safety. Looking at all of these issues together, I do not believe it has been clearly demonstrated that this development can proceed without creating unacceptable risks for the local environment and community.

Final Conclusion

I appreciate that Ireland needs to increase the amount of renewable energy it produces, and I fully support the move towards cleaner sources of electricity. However, I also believe that renewable energy projects must be located in places where they can be developed without causing unacceptable impacts on local communities, our natural environment and our shared heritage.

Having carefully read the planning application and considered the information provided, I remain concerned about the potential effects this proposal could have on the landscape, tourism, archaeology, road safety, local drinking water supplies and the nearby European protected sites.

Taken individually, each of these issues deserves careful consideration. When viewed together, I believe they present a compelling reason why this proposed development is not suited to this particular location.

For all of the reasons outlined throughout this submission, I respectfully request that An Coimisiún Pleanála refuses planning permission for the proposed Tirawley Wind Farm.

Thank you for taking the time to consider my observations.