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The Secretary
An Coimisiún Pleanála
64 Marlborough Street
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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

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Dear Sir/Madam,

I am writing as a resident of the area within proximity to the proposed Tirawley Wind Farm project, submitted by Constant Energy Limited, to formally lodge my objection to this Strategic Infrastructure Development application. This development poses significant and irreversible risks to the local environment, biodiversity and local residents. In particular the proposal threatens critical habitats for protected species such as the Hen Harrier, involves substantial habitat removal including over 4 km of hedgerow, and 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.

Failure to Engage with the Community

One of the most concerning aspects of this application has been the absence of meaningful engagement with the local community.

Despite the scale of the proposed development, which includes sixteen industrial-scale wind turbines, a large Battery Energy Storage System (BESS), a substantial electrical substation and extensive associated infrastructure, the developer failed to engage directly with many of the community organisations that form the backbone of life in the area.

I received no meaningful consultation from the developer regarding the impact this project could have on the community we serve. At no stage were we afforded an opportunity to participate in a genuine discussion regarding the future of the area or the likely consequences of the proposal.

Particularly concerning is the fact that the BESS and substation proposals were not adequately highlighted during the consultation process. These significant industrial elements carry impacts and risks separate from the turbines themselves and should have been clearly presented to the community from the outset.

The consultation process appears to have been designed primarily to satisfy procedural requirements rather than to genuinely listen to, understand and address local concerns.

Having reviewed the public information provided and engaged with neighbours; I wish to also raise the following concerns:

1. Residential and Property Impact

The proposed wind turbines are located uncomfortably close to existing homes. Despite the stated 540m buffer, the visual impact, noise pollution, and potential shadow flicker effects will significantly disrupt our residential amenity and quality of life. There is also a genuine concern about the likely devaluation of property prices due to proximity to large-scale industrial turbines.

(Reference: Appendix 1.6 Community Engagement Report, Pages 7-13)

2. Noise Impact Concerns

My home is identified as **receptor H75** in the EIAR.

My home is located approximately:

- **965 metres from turbine AT08 stated in Table 15.1**
- **1130 metres from turbine AT07 stated in Table 15.1**
- **AT07, AT08, AT09, AT10, AT11, AT13, AT14, AT15 and AT16 are all located within 2km of my home (9 turbines)**

I am concerned that the EIAR assessment does not adequately address the real-world residential impact of having nine large-scale turbines located approximately within a two kilometre of my home.

The proposed turbine AT08 is located only approximately **965 metres from my dwelling (H75)**. I consider this separation distance insufficient to protect residential amenity, particularly given the scale of modern turbines and the quiet rural environment in which my home is located.

The assessment relies heavily on predicted modelling. I request that An Coimisiún Pleanála carefully examine whether the modelling fully represents the actual conditions experienced at H75, including:

- night-time noise impacts when background noise levels are naturally low;
- periods with specific wind direction where turbines **AT07, AT08, AT09, AT10, AT11, AT13, AT14, AT15 and AT16** may all contribute simultaneously;
- amplitude modulation (“blade swish” or changing character of turbine noise);
- low-frequency noise impacts;
- the cumulative noise contribution from multiple turbines.

A predicted compliance with a numerical noise limit does not necessarily mean that there will be no significant loss of residential amenity. A change from the existing quiet rural soundscape to continuous operational turbine noise has the potential to materially affect my enjoyment of my home, garden and surrounding property.

I request that a more precautionary assessment be applied to H75 given its proximity to 9 turbines listed above.

	ING	ING	4 m/s	5 m/s	6 m/s	7 m/s	8 m/s	9+ m/s
House ID	Easting	Northing	dBA	dBA	dBA	dBA	dBA	dBA
H73	517910	837382	26.7	30.8	34.6	36.9	37.2	37.2
H74	516822	835130	28	32.1	35.9	38.2	38.5	38.5
H75	516865	836247	29.5	33.6	37.4	39.7	40	40
H76	515173	831629	26	30.1	33.9	36.2	36.5	36.5
H77	517945	837469	26.6	30.7	34.5	36.8	37.1	37.1
H78	516609	833595	26.3	30.4	34.2	36.5	36.8	36.8

Table 11.16: Predicted Noise Levels as LA90 at Varying Wind Speeds from the Proposed Development

Shadow Flicker – Dwelling H75

The EIAR identifies my dwelling, **H75**, as being approximately **879 metres from turbine AT07**. Table 15.3 of Chapter 15 predicts that H75 will experience:

- **63 hours 15 minutes worst-case shadow flicker per year**
- **10 hours 00 minutes expected shadow flicker per year**
- **29 minutes maximum expected shadow flicker per day**

The **2006 Wind Energy Development Guidelines** recommendation of no more than **30 minutes per day**.

I consider this significant because the applicant's own modelling confirms that my home is one of the receptors where the guideline threshold is just below the acceptable level. The issue is not a theoretical concern — the impact has already been identified within the EIAR.

While the EIAR refers to mitigation measures in **Section 15.2.9.3**, including turbine control measures/shadow flicker control systems, I do not consider reliance on future mitigation alone to be sufficient justification for permitting a development that is predicted to create just below an excess at my home.

The mitigation proposal effectively acknowledges that turbines have the potential to cause unacceptable shadow flicker impacts unless active intervention occurs. This raises concerns regarding:

- long-term reliability of control systems;
- monitoring and enforcement arrangements;
- responsibility if mitigation fails;
- whether shutdown will occur automatically or only after complaints;
- how compliance at H75 will be independently verified throughout the lifetime of the wind farm.

I further note that the **Draft Revised Wind Energy Development Guidelines (2019)** recognise that modern turbine technology can prevent shadow flicker and move towards a **zero shadow flicker approach at sensitive receptors**.

Given that H75 is already predicted to exceed the 2006 daily guideline, I submit that the appropriate standard should be prevention rather than management.

Impact on Community Cohesion and Social Wellbeing

In relation to a previous application to an Coimisiún Planála Case No. 239901, Planning Authority Reference P11/409. Planning permission was refused for 4 small turbines, hub height 45m, the following was the decision of ABP on 5 September 2012.

‘The proposed development is located on an elevated site 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 the height, scale and extent in an exposed location overlooking Killala Bay, the proposed development would have a disproportionate and obtrusive visual impact and the proposed development would, therefore, be contrary to policy P/EH-LC 1 of the Mayo County Development Plan 2008-2014, and be contrary to the proper planning and sustainable development of the area.’

The planning documentation largely focuses on technical assessments and engineering solutions while failing to adequately consider the effect that a development of this scale can have on a rural community.

Over recent years the proposed development has already created division, anxiety and uncertainty amongst neighbours. Families who have lived together in the area for generations now find themselves on opposing sides of a development that will permanently alter the landscape in which they live.

The introduction of industrial infrastructure throughout a rural parish risks undermining the strong community spirit that has long characterised the Lacken area. Community cohesion cannot be measured in decibels or visual impact assessments, yet it remains one of the most important assets any rural community possesses.

The loss of trust between neighbours, the stress associated with prolonged planning disputes, and the perception that local concerns are being ignored all have lasting social consequences that cannot be mitigated through planning conditions.

Risk of Depopulation and Decline of Rural Communities

Lacken and Kilcummin, like many rural communities throughout Ireland, face ongoing challenges in maintaining population levels, supporting local services and encouraging younger generations to remain in the area.

The future sustainability of our schools, sports clubs, community groups, local businesses and community facilities depends upon maintaining and growing the resident population.

We are concerned that the industrialisation of the local landscape will discourage families from settling in the area and may encourage existing residents to relocate elsewhere. The perception of the area as a peaceful, attractive and desirable place to live is one of its greatest strengths.

The introduction of a major industrial energy development throughout the parish risks damaging that reputation.

Many residents have already expressed concerns regarding noise, shadow flicker, visual impacts, construction activity, traffic disruption and the cumulative effect of increasing wind

energy infrastructure throughout North Mayo. These concerns are real and should not be dismissed simply because they are difficult to quantify.

If people choose not to move into the area, or if existing residents decide to leave, the consequences will extend far beyond individual households. Every family lost weakens local schools, community organisations, sports clubs, businesses and voluntary groups.

For a rural community already facing demographic challenges, this is a matter of serious concern.

Impact on Tourism and Community-Led Economic Development

Our area has been actively involved in supporting tourism initiatives, community events and projects aimed at promoting the area as a destination for visitors.

The local economy benefits significantly from visitors who come to experience the natural beauty, history and tranquillity of the North Mayo coast.

The area's appeal is built upon its unspoilt landscapes, spectacular coastal scenery, archaeological heritage, walking routes and strong sense of place.

Visitors come to experience:

- The wider Céide Fields cultural landscape.
- The Wild Atlantic Way.
- Downpatrick Head.
- Local walking and cycling routes.
- The area's dark skies and natural tranquillity.
- Historic sites associated with General Humbert and the rich history of North Mayo.
- The unique rural character of the Lacken and Kilcummin area.

The introduction of sixteen 135-metre turbines, aviation lighting, a BESS facility and a major electrical substation will fundamentally alter the visitor experience.

The gradual industrialisation of the North Mayo landscape risks undermining decades of investment by local communities, tourism organisations and businesses seeking to establish the region as a premium tourism destination.

Impact on Landscape Character

The landscape surrounding Lacken is one of the area's most valuable assets.

The visual presence of turbines of this scale will be experienced across a wide area and will permanently alter the character of the local environment.

The proposed development cannot be viewed in isolation. Existing wind farms, consented projects and further proposed developments throughout Mayo and neighbouring counties must be considered collectively.

The cumulative impact of repeated large-scale wind energy developments threatens to transform the wider landscape from a predominantly rural and scenic environment into an increasingly industrialised one.

Environmental and Ecological Concerns

I am concerned about the potential impacts on protected habitats, designated conservation sites, bird populations, bats, watercourses and biodiversity.

Particular concern exists regarding the hydrological connection between the development site and downstream protected environments including Lacken Saltmarsh and the Killala Bay/Moy Estuary designated sites.

The applicant's reliance on future mitigation and monitoring does not provide sufficient certainty that these sensitive environments can be adequately protected throughout the lifetime of the project.

We also remain concerned regarding the age of certain ecological survey data and whether the information relied upon accurately reflects current conditions.

The Lacken Gazebo is a Folly, which overlooks my home, it is one of the most unusual protected structures in Ireland which can be viewed from Sligo, Leitrim, Donegal and all over Mayo. It is formed from a double arch of rough stones. It is situated on the summit of Lacken Hill to the rear of Castle Lacken: seat of the Palmer family from the sixteenth century. This was constructed during the latter part of the eighteenth century by either Sir Roger or Sir John Palmer. This structure is located 300m from the nearest turbine AT16, how can this historical monument be protected in light of the planned development?

Traffic and Construction Impacts

The construction phase will place substantial pressure on local infrastructure and create disruption for residents, businesses and visitors.

Many local roads were never designed to accommodate the abnormal loads associated with a project of this scale.

The impact on local road networks, tourism routes, community facilities and daily life has not been adequately addressed.

The disruption associated with construction will extend over a prolonged period and will affect not only residents but also visitors and local enterprises.

Failure to Achieve Sustainable Rural Development

While I recognise the importance of renewable energy in addressing climate change, renewable energy development must be located in areas where it can be accommodated without causing unacceptable harm to communities and landscapes.

This proposal fails that test.

The development would impose significant burdens upon the local community while delivering limited long-term benefits to the area itself.

Rather than supporting sustainable rural development, we believe the proposal risks contributing to rural decline by damaging the very qualities that attract people to live, work, visit and invest in the area.

Conclusion

For all of the reasons outlined above, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed Tirawley Wind Farm development.

The proposal represents a significant threat to community cohesion, rural sustainability, tourism, landscape character and the future development of the Lacken and Kilcummin area.

The strength of rural Ireland lies in its communities. Developments of this scale should not be permitted where they risk weakening those communities, undermining community spirit and contributing to the gradual depopulation of areas that are already working hard to secure their future.

We respectfully request that permission be refused in the interests of proper planning and sustainable development.

Yours faithfully,

Fiona Brady