

Francesca Scott
Barnhill
Carowmore Lacken
Co. Mayo
F26

21st June 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re: Objection to the Proposed Tirawley Wind Farm Strategic Infrastructure Development
Objection Submission to An Coimisiún Pleanála

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

Case Number: PAX16.324258

Dear Sir/Madam,

I am writing 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.

Having reviewed the public information provided and engaged with the community consultation materials, I wish to raise the following concerns:

1. My home is identified as **receptor H30** in the EIAR.

My home is located approximately:

- **744 metres from turbine AT01 stated in Table 15.1**
- **832 metres from turbine AT05**
- **986 metres from turbine AT07**

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

1. Noise Impact Concerns

The proposed turbine AT is located only approximately **metres from my dwelling (H30)**. 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 my home , including:

- night-time noise impacts when background noise levels are naturally low;
- periods with specific wind direction where turbines AT01, AT05 and AT07 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 H30 given its proximity to AT01, AT07 and AT05 and the combined influence of three turbines.

	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
H17	515390	832068	29.5	33.6	37.4	39.7	40	40
H18	517622	837746	30.2	34.3	38.1	40.4	40.7	40.7
H19	517552	838096	30	34.1	37.9	40.2	40.5	40.5
H20	515559	834678	31.3	35.4	39.2	41.5	41.8	41.8
H21	516744	836946	32	36.1	39.9	42.2	42.5	42.5
H22	514721	837259	31.8	35.9	39.7	42	42.3	42.3
H23	515805	834702	31	35.1	38.9	41.2	41.5	41.5
H24	517581	838054	29.9	34	37.8	40.1	40.4	40.4
H25	515641	832856	31.1	35.2	39	41.3	41.6	41.6
H26	515947	834836	30.8	34.9	38.7	41	41.3	41.3
H27	517606	838071	29.5	33.6	37.4	39.7	40	40
H28	515886	834729	30.8	34.9	38.7	41	41.3	41.3
H29	517490	838353	28.8	32.9	36.7	39	39.3	39.3
H30	515462	834716	31.3	35.4	39.2	41.5	41.8	41.8

Shadow Flicker – Dwelling H30

The EIAR identifies my dwelling, **H30**, as being approximately 744 metres from turbine **AT01**. Table 15.3 of Chapter 15 predicts that H will experience:

- **16:56 hours minutes worst-case shadow flicker per year**
- **02:31 hours expected shadow flicker per year**
- **34 minutes maximum expected shadow flicker per day**

This exceeds the **2006 Wind Energy Development Guidelines recommendation of no more than 30 minutes per day by 4 minutes.**

I consider this significant because the applicant's own modelling confirms that my home is one of the receptors where the guideline threshold is exceeded. 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 an exceedance 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 H30 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 H30 is already predicted to exceed the 2006 daily guideline, I submit that the appropriate standard should be prevention rather than management.

Current House ID	Easting ITM	Northing ITM	Closest Turbine	Closest Distance to Turbine (m)
H23	515805	834702	AT01	687
H24	517581	838054	AT15	691
H25	515641	832856	AT02	715
H26	515947	834836	AT07	719
H27	517606	838071	AT15	720
H28	515886	834729	AT01	727
H29	517490	838353	AT15	742
H30	515462	834716	AT01	744

2. LANDSCAPE AND VISUAL IMPACT

Turbines' Effect on Scenic Beauty, Particularly in Areas of Natural Beauty or Cultural Heritage

- The proposed 16 turbines (Vestas V117, 135 m tip height) are located on a plateau of low rolling hills near Knockboha Summit, an area with coastal and upland landscape features (Volume I NTS pp. 40-43; Tirawley Planning Statement pp. 69-74).
- The site includes areas classified as Tier 1 and Tier 2 in the Mayo Renewable Energy Strategy (RES). Tier 1 is "Preferred" for wind farms, while Tier 2 is "Open for Consideration," reflecting sensitivity to visual and environmental impacts.
- Landscape and Visual Impact Assessment (LVIA) found that although turbines will be visible, the irregular, dispersed layout and existing forestry screening mitigate overbearing visual impacts. The visual effects on local communities range from "Substantial-moderate" to "Slight-imperceptible" with residual effects assessed as not significant (Volume I NTS pp. 42-43).
- The proposal acknowledges proximity to sensitive coastal landscapes including Ballycastle, Céide Coast, and Downpatrick Head (Mayo Preplanning Notes March 2026 p. 2-3), areas of high scenic and cultural significance. Mayo County Council expressed concerns about industrial-scale wind farms impacting these landscapes and visual amenity.
- Some turbines are sited outside designated RES areas, potentially affecting sensitive landscapes (Mayo Preplanning Notes March 2026 p. 2).

Cumulative Impacts with Existing Industrial Wind Turbine Sites

- The nearest operational wind farm is Killala Community Wind Farm, 5.2 km southeast (Tirawley Planning Statement p. 11).
- Cumulative visual impacts with existing and consented developments are assessed as low due to spatial separation and visual separation (Volume I NTS p. 43).
- Potential future cumulative scenarios including proposed wind farms (e.g., Glenora and Keerglen) indicate a high-medium magnitude of cumulative effect but turbines remain separated by at least 7.6 km, reducing direct visual saturation (Volume I NTS p. 43).

Added Cumulative Impacts if All Current Industrial Sites are Approved (Encircling Cree Valley)

- No explicit mention of the Cree Valley or a "ring of steel" encircling it is found in the documents.
- However, the NIS and EIAR note that there are 14 operational, consented, or proposed wind farms within 20 km, but most are hydrologically or visually separated (Volume VI NIS pp. 51-52; Tirawley Planning Statement p. 11).
- The cumulative assessment concludes that the proposal will not contribute to significant adverse effects when considered in combination with other wind energy projects due to catchment separation and spatial distribution (Volume VI NIS p. 51).

- Inference: While the documents address cumulative impacts broadly, no detailed assessment specifically on Cree Valley encirclement is presented; thus, concerns about a "ring of steel" are not directly addressed.

3. IMPACT ON WILDLIFE AND ENVIRONMENT

Threats to Protected Species (Birds of Prey, Bats, Local Wildlife)

- Detailed ecological surveys were conducted, including for bats and birds (Volume I NTS pp. 25-31; Volume VI NIS pp. 26-34).
- European sites within 15 km (SACs and SPAs) were assessed, with hydrological connectivity to Lackan Saltmarsh and Kilcummin Head SAC and Killala Bay/Moy Estuary SAC and SPA (Volume VI NIS pp. 27-33).
- Potential impacts on birds, including hen harrier and buzzard, are assessed as slight adverse effects operationally, expected to reduce with habituation and mitigation (Volume I NTS p. 30-31).
- Biodiversity Enhancement Management Plan (BEMP) proposed to mitigate habitat loss, notably for blanket bog (loss of 0.68 ha at turbine AT13), and hedgerow/tree loss offset by planting (Volume VI Appendix 1 CEMP pp. 18-23; Volume I NTS p. 26).
- Ornithological monitoring is planned pre-construction, construction, and operation (Volume I NTS p. 31).
- Overall, no significant residual adverse effects on biodiversity or protected species are predicted when mitigation is fully implemented (Volume I NTS pp. 25-31; Volume VI NIS p. 34).

Damage to Habitats such as Peatlands

- The site includes areas of degraded cutover peat and a small area of shallow blanket bog (7.65 ha), rated locally important but disturbed (Volume I NTS p. 26).
- Peat slide risk assessment rates peat stability hazard as negligible to low with mitigation (Volume VI Appendix 1 CEMP pp. 31-32).
- Peat loss at AT13 is unavoidable but offset via BEMP with preservation and enhancement of nearby bog at a quarry site (Volume VI Appendix 1 CEMP pp. 18-23).
- The EIAR and CEMP include spoil and peat management plans to minimize erosion, sediment release, and landscape effects (Volume VI Appendix 1 CEMP pp. 4-5).

Contamination of Rivers, Streams, and Private Water Supplies

- Hydrological and hydrogeological assessments confirm the catchment drains to the Cloonalaghan River and Lackan Bay system (Volume I NTS p. 34; Volume VI NIS p. 30).
- Potential contamination risks during construction from suspended solids, cementitious materials, hydrocarbons are acknowledged but mitigated through best practice environmental management, buffer zones (≥ 50 m from streams), and silt fences (Volume VI Appendix 1 CEMP pp. 17-23).

- No significant residual effects on surface water quality or aquatic ecology are predicted (Volume I NTS p. 34; Volume VI Appendix 1 CEMP pp. 14-23).
- Private water supplies are not specifically mentioned, but protection measures for water quality imply control measures apply broadly.

4. IMPACT ON RESIDENTS AND COMMUNITIES

Noise Pollution, Shadow Flicker, Visual Intrusion

- Noise assessments indicate predicted noise levels at nearest receptors are well below thresholds for health effects (Volume I NTS p. 40).
- Curtailment strategies (e.g., turbine AT06 operated in Sound Optimized Mode at night) are proposed to comply with guidelines and mitigate noise (Volume I NTS p. 40).
- Shadow flicker analysis shows potential for 108 out of 119 receptors within the 10 rotor diameter study area, but a blade shadow control system is proposed to eliminate significant effects (Volume I NTS p. 44).
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Disruption from Construction Traffic

- Construction traffic is estimated at 11,022 HGV loads over 21 months, with mitigation measures to manage traffic impacts (Volume I NTS p. 53).
- Effects are assessed as negative. I am very concerned about the construction track through what is currently a green field adjacent to my home. I object strongly to it. The construction will cause significant disruption over many months.

Aviation Lighting and Dark Sky Status

- Turbines over 150 m require aviation lighting; lights will be installed per IAA and ICAO standards (Volume I NTS p. 50).
- No significant impact on air navigation predicted; lighting schemes will comply with safety regulations (Volume I NTS p. 50).
- No mention of Dark Sky Status or impacts on star gazing in the documents;

5. ECONOMIC IMPACTS

Negative Effects on Tourism Due to Industrialised Landscape

- Tourism effects are assessed as slight negative, short term during construction and operational phases (Volume I NTS p. 25).

- Mayo County Council and others express concern about negative visual impacts on tourism-sensitive areas such as Ballycastle and the Wild Atlantic Way (Mayo Preplanning Notes March 2026 p. 2-3).
- The LVIA notes that turbines are mostly seen away from key coastal views and do not dominate scenic vistas (Volume I NTS p. 42-43).

6. PLANNING POLICY VIOLATIONS

Compliance with Local Development Plans, Regional Spatial Strategies, National Frameworks

- The proposal is consistent with National Planning Framework 2025, Regional Spatial and Economic Strategy, and Mayo County Development Plan 2022-2028 (Volume I NTS p. 22-23; Tirawley Planning Statement pp. 27-40, 55-64).
- The site lies within Tier 1, Tier 2, and unclassified areas of the Mayo RES; while some turbines are outside preferred zones, the EIAR argues the layout respects proper planning and sustainable development principles (Tirawley Planning Statement pp. 56-61).
- Mayo County Council has expressed opposition due to visual sensitivity and landscape concerns (Mayo Preplanning Notes March 2026 p. 3).
- The proposal meets criteria for Strategic Infrastructure Development under Planning and Development Act 2000 (Tirawley Planning Statement p. 7).
- No explicit reference to compliance or non-compliance with the Electricity Act 1989 is found in provided documents; inference is that standard grid connection and Generation License requirements apply.

7. CULTURAL AND ARCHAEOLOGICAL CONCERNS

- Several high-value archaeological sites are near the project, including cairns, a folly ("Lacken Gazebo"), wedge tombs, and protected monuments (Volume I NTS pp. 44-46; Tirawley Planning Statement pp. 43-46).
- Indirect moderate to significant negative effects on the setting of some heritage sites are predicted, reversible upon decommissioning (Volume I NTS p. 45).
- Archaeological monitoring and licensed testing are proposed during construction, with contingency for preservation or excavation (Volume I NTS p. 46; ABP meeting record p. 4-5).
- A vernacular structure will be removed (Volume VI Appendix 1 CEMP p. 65).

8. Planning Refusals – Impact on Residential Development

The proposed wind farm has the potential to significantly affect existing and future residential development within the area. Wind farms are subject to separation distances and operational constraints relating to noise, shadow flicker, and visual impact. As a result, the development of a large-scale wind farm in close proximity to residential lands may restrict the ability of landowners to obtain planning permission for future housing on their properties.

In addition, the visual presence of multiple turbines would have a substantial impact on the character and amenity of the surrounding area. The introduction of large-scale industrial structures into a predominantly rural landscape would alter established views and reduce the residential attractiveness of the locality.

The proposal may also create concerns regarding potential ecological impacts and the cumulative effect of wind energy development in the area. These factors should be carefully assessed before any permission is granted.

For these reasons, I submit that the proposed wind farm could adversely affect the planning potential, residential amenity, and rural character of the area, and these impacts should be given significant weight in the planning authority's assessment of the application.

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10. OTHER INFRASTRUCTURE IMPACTS

Telecommunications Interference

- Consultations identified one turbine (AT13) potentially impacting a microwave link of 'Three' operator; mitigation and engagement ongoing (Volume I NTS pp. 45-46).
- Effects on telecommunications during construction are temporary slight negatives; operational phase effects are moderate but mitigated to not significant (Volume I NTS p. 46).

- Compliance with EMC Directive 2014/30/EU will prevent interference (Volume I NTS p. 46).

The Tirawley Wind Farm proposal involves a detailed and comprehensive environmental and planning assessment with mitigation strategies for landscape, biodiversity, cultural heritage, and infrastructure impacts. Key concerns:

- Visual impacts in sensitive coastal landscapes and the cumulative effect with other wind farms, particularly as raised by Mayo County Council.
- Loss of some bog habitat and potential peat stability risks, managed via mitigation plans.
- Moderate indirect impacts on cultural heritage settings with reversible effects.
- Potential telecommunications interference localized to one turbine.
- Lack of direct assessment on impacts to Dark Sky status.
- Mayo County Council opposes the development due to landscape and visual sensitivity concerns.
- Positive economic impacts and community benefit plans are included but could benefit from more detailed disclosure. I fail to see the benefit to the local people, landowners, farmers, etc. and should this go ahead there will be significant disruption to their lives both short term during construction and long term (noise, shadow flicker, environmental concerns, etc).

Cumulative Impact and Strategic Considerations

The project overlaps with areas where other developments are planned or existing, increasing cumulative environmental, visual, and infrastructural pressures.

The scale and height of modern turbines, as noted by Mayo County Council, raise questions about the suitability of this site compared to previous assessments.

(Reference: Mayo County Council submission, EIAR Chapter 17, Pages 9-10)

In conclusion, I respectfully submit that the proposed Tirawley Wind Farm project is not appropriate for this location due to the significant negative impacts on residential amenity, local landscape, ecology, infrastructure, and the community. I urge An Coimisiún Pleanála to refuse permission for this development in the interests of proper planning and sustainable development.

Thank you for considering my submission.

Yours faithfully,
Francesca Scott