

Geraldine Lynn
Kilgobban
Killala
County Mayo
F26 EE61
lynng501@gmail.com
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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:

The proposed Tirawley Wind Farm comprises 16 Vestas V117 wind turbines with a maximum tip height of 135 metres, together with associated infrastructure including access roads, substations, forestry clearance, and grid connection works. While the development is presented as a contribution to Ireland's renewable energy objectives, a review of the Environmental Impact

Assessment Report (EIAR), Natura Impact Statement (NIS), Construction Environmental Management Plan (CEMP), Planning Statement, and Mayo County Council pre-planning observations identifies a number of significant concerns.

This analysis outlines the principal grounds upon which objections may reasonably be raised, focusing on landscape and visual impacts, environmental considerations, cultural heritage, community effects, infrastructure pressures, and peatland disturbance.

1. Visual and Landscape Impact

Scale and Siting of the Development

The proposed turbines would each reach a height of 135 metres to blade tip, making them highly prominent features within the surrounding landscape. The proposed layout is dispersed across a combination of Tier 1 (preferred), Tier 2 (open for consideration), and non-designated areas under the Mayo Wind Energy Strategy.

Mayo County Council has expressed particular concern regarding turbines located outside designated wind energy zones, noting that five turbines are proposed within non-designated areas. This raises questions regarding consistency with the County Development Plan and landscape protection policies.

Impact on Scenic Landscapes

The development site lies within an area of exceptional scenic quality and is visible from several designated Discovery Points along the Wild Atlantic Way, one of Ireland's most important tourism assets. The surrounding landscape includes nationally recognised attractions such as Downpatrick Head, the Céide Coast, and Ballycastle. It also includes many beautiful beaches such as the Back Strand in Kilcummin, Lacken Strand and Lacken Salt Marsh. Also Benwee Head, Creevagh Head, cliffs and commanding views of the Atlantic Ocean.

Landscape and Visual Impact

The proposed development would have profound visual consequences across the Lacken area and wider North Mayo coast. The negative visual impact of the proposed development is highlighted in this photo. The elevation of the area is not suitable for this development as it would be such an intrusive destructive feature on this historic landscape.



Although the Landscape and Visual Impact Assessment concludes that residual visual impacts are generally “not significant,” this conclusion may not reflect the experience of local residents, visitors, or tourism operators. Large-scale industrial infrastructure introduced into a largely rural and coastal landscape has the potential to alter landscape character permanently.

Potential Grounds for Objection

- Excessive turbine height and visual dominance within a sensitive coastal landscape.
- Siting of turbines outside preferred wind energy zones.
- Adverse effects on scenic viewpoints and tourism assets associated with the Wild Atlantic Way.
- Potential degradation of landscape character and visual amenity.

Tourism within the area is not dependent upon industrial development but rather upon the preservation of the natural landscape, coastal scenery, tranquility and cultural heritage that attract visitors from across Ireland and abroad.

Visitors come to experience:

- The Céide Fields cultural landscape.
- Downpatrick Head.
- The Wild Atlantic Way.
- The North Mayo coastal scenery.

- The Western Way and local walking routes.
- Local heritage sites and monuments.
- The area's dark skies and natural tranquillity.
- Historic locations associated with General Humbert's 1798 landing and campaign.

The introduction of sixteen turbines reaching approximately 135 metres in height, together with aviation lighting, a large BESS facility and a major substation, would industrialise a landscape that is currently marketed and valued precisely because it remains largely undeveloped.

The Environmental Impact Assessment acknowledges significant visual impacts from numerous viewpoints. These impacts will not be experienced solely by residents but also by visitors using scenic roads, walking routes and tourism facilities throughout the area.

The Protected Western Way National Waymarked Trail passes through the wider landscape and visitors using this route will experience the turbines at close range. The quality of this walking experience will be significantly diminished.

The cumulative effect of existing, permitted and proposed wind energy developments throughout North Mayo must also be considered. The gradual industrialisation of the Mayo landscape threatens the long-term viability of tourism across the wider region.

2. Environmental and Biodiversity Concerns

Habitat Loss and Ecological Disturbance

The development area contains agricultural grasslands, commercial forestry plantations, and areas of lowland blanket bog, which is listed as an Annex I habitat under the Habitats Directive. Approximately 31.86 hectares of forestry would require removal to facilitate construction.

While ecological assessments classify some habitats as being of local importance, the cumulative loss and fragmentation of habitat remains a significant concern.

Risks to European Protected Sites

The site is hydrologically connected to several Natura 2000 sites, including:

- Lacken Saltmarsh SAC
- Kilcummin Head SAC
- Killala Bay/Moy Estuary SAC
- Killala Bay/Moy Estuary SPA

The Natura Impact Statement acknowledges that, without mitigation measures, significant adverse effects on these designated sites cannot be excluded. Construction activities present risks associated with sediment release, nutrient enrichment, and hydrocarbon contamination.

Although mitigation measures are proposed, reliance on future management and compliance introduces uncertainty regarding long-term protection.

Potential Grounds for Objection

- Risk of pollution entering hydrologically connected SACs and SPAs.
- Loss of habitat resulting from extensive forestry clearance.
- Potential impacts on protected species and ecological networks.
- Uncertainty regarding the effectiveness of proposed mitigation measures.
- Cumulative impacts on biodiversity and ecosystem functioning.

3. Cultural Heritage and Archaeological Impact

Heritage Context

The wider area contains numerous archaeological and architectural heritage assets, including the Lacken Gazebo, Rathfran Abbey, Breastagh Ogham Stone, St. Patrick's Well, St. Cumín's Well, Rathlacken Court Tomb and Palmerstown Bridge all of which contribute significantly to local cultural identity and historic landscape character.

The project proposes archaeological monitoring, protective fencing, and preservation-by-record where necessary. However, such measures primarily address physical disturbance rather than impacts on setting and visual context.

Concerns Regarding Heritage Setting

Large turbines visible within the setting of heritage assets may diminish their historic character and significance. Construction traffic and heavy machinery also introduce risks to nearby historic structures and archaeological features.

Potential Grounds for Objection

- Adverse visual impacts on protected heritage assets.
- Alteration of historic landscape character.
- Risk of accidental damage during construction activities.
- Insufficient consideration of cumulative effects on heritage settings.

4. Community and Social Impact

Residential Amenity

The project documentation identifies approximately 266 dwellings within a two-kilometre radius of the proposed turbines. While minimum separation distances are generally maintained, the concentration of turbines in close proximity to residential areas has generated concern regarding quality of life and residential amenity.

Noise and shadow flicker assessments conclude that impacts can be managed through operational controls and curtailment measures. Nevertheless, concerns frequently persist where communities are required to rely upon post-construction mitigation.

Community and Local Authority Concerns

Mayo County Council has stated that it does not support the development in its proposed location due to landscape sensitivity, tourism impacts, and cumulative visual effects.

The council emphasised the area's exceptional scenic, cultural, archaeological, and tourism value and questioned the suitability of locating a large-scale industrial wind energy project within such a setting.

Potential Grounds for Objection

- Significant visual intrusion affecting residential amenity.
- Concerns regarding noise and shadow flicker.
- Potential negative impacts on tourism-dependent communities.
- Loss of local landscape character and cultural identity.
- Explicit concerns raised by Mayo County Council.

5. Traffic and Infrastructure Impact

Construction Traffic

The development requires substantial transportation infrastructure works, including:

- Upgrading nine existing site entrances.
- Construction of five new entrances.
- Significant road modifications to accommodate abnormal loads.
- Delivery of oversized turbine components along rural roads.

Mayo County Council has highlighted concerns regarding traffic management and the transportation of exceptional loads.

Community Implications

Construction traffic may cause disruption to residents, local businesses, and agricultural activities. Increased heavy vehicle movements also create concerns regarding road safety and long-term damage to local infrastructure.

Potential Grounds for Objection

- Increased traffic congestion and construction-related disruption.
- Road safety concerns associated with oversized loads.
- Potential damage to local road networks.
- Insufficient assurance regarding infrastructure restoration and maintenance.

6. Peatland and Geological Considerations

Peat Disturbance

Although peat depths across the site are generally shallow and the assessed risk of peat instability is low, construction activities involving excavation, drainage, and road construction inevitably increase the potential for localised peat disturbance.

Even limited peat movement can have significant consequences where downstream habitats are affected.

Carbon Balance Concerns

Peatlands function as important carbon stores. Disturbance and excavation can release stored carbon into the atmosphere, reducing some of the climate benefits associated with renewable energy generation.

Potential Grounds for Objection

- Risk of localised peat instability and sediment release.
- Potential impacts on downstream habitats and watercourses.
- Release of stored carbon from disturbed peat soils.
- Long-term impacts on peatland ecosystem functions.

The principal concerns arising from the proposed Tirawley Wind Farm include:

1. Significant visual and landscape impacts arising from turbine scale, dispersed layout, and siting outside preferred wind energy zones.
2. Potential adverse ecological effects on protected European sites through hydrological pathways and habitat disturbance.
3. Impacts on cultural heritage assets and historic landscape character.
4. Effects on residential amenity, tourism, and community identity.
5. Construction traffic impacts and pressure on local infrastructure.

6. Risks associated with peat disturbance, carbon release, and geological stability.

Conclusion

While the developer has proposed extensive mitigation measures and argues that the project complies with relevant planning and environmental policies, substantial concerns remain regarding the appropriateness of the development's scale and location.

The concerns identified extend beyond technical compliance and relate to the long-term protection of landscape character, biodiversity, cultural heritage, tourism assets, and community wellbeing. Significantly, Mayo County Council has itself expressed opposition to the proposal, citing landscape sensitivity, tourism impacts, and cumulative visual effects.

In light of these factors, there are credible and substantive grounds upon which local residents, community organisations, environmental groups, and other stakeholders may lodge formal objections to the proposed Tirawley Wind Farm.

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,

Geraldine Lynn