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Castletown
Carrowmore Lacken
County Mayo
F26 AF43
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 Wind Farm 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.

My home is identified as receptor H15 in the EIAR.

My dwelling is located approximately 647 metres from turbine AT15 as stated in Table 15.1, approximately 684 metres from turbine AT16 and approximately 1,676 metres from turbine AT14. 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.

Residential Amenity and Noise Impacts

The proposed turbine AT15 is located only approximately 647 metres from my dwelling (H15). 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 likely to be experienced at H15. In particular, consideration should be given to night-time noise impacts when background noise levels are naturally low, periods when wind direction may result in turbines AT15, AT16 and AT14 contributing simultaneously to noise levels at my home, amplitude modulation commonly referred to as “blade swish”, low-frequency noise impacts and the cumulative contribution from multiple turbines operating together.

A predicted compliance with a numerical noise limit does not necessarily mean that there will be no significant loss of residential amenity. The transition 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. The EIAR appears to focus primarily on compliance with noise criteria, whereas the lived experience of residents may differ considerably from modelled predictions.

Given the proximity of turbine AT15 and the combined influence of turbines AT15, AT16 and AT14, I believe that a more precautionary assessment should be applied to H15. The cumulative effect of multiple turbines operating within close proximity to a dwelling has the potential to create a greater impact than that reflected in an assessment of individual turbines alone.

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

	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
H1*	515110	837466	38.2	42.3	46.1	48.4	48.7	48.7
H2*	515526	833767	35.3	39.4	43.2	45.5	45.8	45.8
H3	516227	836339	34.4	38.5	42.3	44.6	44.9	44.9
H4	514628	834072	33.3	37.4	41.2	43.5	43.8	43.8
H5	516241	833804	30.4	34.5	38.3	40.6	40.9	40.9
H6	515489	833504	32.6	36.7	40.5	42.8	43.1	43.1
H7	517503	837983	31.2	35.3	39.1	41.4	41.7	41.7
H8*	515450	832962	33.3	37.4	41.2	43.5	43.8	43.8
H9	515080	831996	30.3	34.4	38.2	40.5	40.8	40.8
H10	515456	833467	32.6	36.7	40.5	42.8	43.1	43.1
H11	516561	837118	33.4	37.5	41.3	43.6	43.9	43.9
H12	515575	835060	31.8	35.9	39.7	42	42.3	42.3
H13	515019	834112	32.6	36.7	40.5	42.8	43.1	43.1
H14	517530	838028	30.6	34.7	38.5	40.8	41.1	41.1
H15	517553	837950	30.7	34.8	38.6	40.9	41.2	41.2

Shadow Flicker Impacts at H15

The EIAR identifies my dwelling, H15, as being approximately 647 metres from turbine AT15. Table 15.3 of Chapter 15 predicts that H15 will experience 61 hours and 26 minutes of worst-case shadow flicker per year, 9 hours and 5 minutes of expected shadow flicker per year and a maximum expected shadow flicker duration of 42 minutes per day.

This exceeds the recommendation contained within the 2006 Wind Energy Development Guidelines of no more than 30 minutes per day by 12 minutes. The applicant's own modelling therefore confirms that my home is one of the receptors where the guideline threshold is exceeded.

I consider this significant because the impact has already been identified within the EIAR and is not merely a theoretical possibility. The prediction of up to 42 minutes of shadow flicker in a single day represents a clear exceedance of recognised guidance and has the potential to adversely affect residential amenity and quality of life.

While the EIAR refers to mitigation measures in Section 15.2.9.3, including turbine control measures and 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 proposed mitigation measures effectively acknowledge that the turbines have the potential to create unacceptable shadow flicker impacts unless active intervention occurs. This raises concerns regarding the long-term reliability of control systems, the adequacy of monitoring and enforcement arrangements, responsibility in circumstances where mitigation measures fail, whether turbine shutdowns would occur automatically or only after complaints are made, and how compliance at H15 would be independently verified throughout the operational 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 H15 is already predicted to exceed the daily guideline threshold, I submit that prevention rather than management should be the appropriate standard in this case.

Table 15.3: Summary of Potential Shadow Flicker Listing for All Properties

Receptor ID	Specimen Turbine		
	Worst Case Shadow [h/year]	Expected Shadow [h/year]	Max. Expected Shadow [h/day]
H1*	109:11	16:33	00:59
H2*	55:32	06:48	00:34
H3	110:08	15:30	00:54
H4	04:42	00:43	00:18
H5	85:01	15:12	00:52
H6	57:21	06:45	00:41
H7	70:29	10:03	00:45
H8	142:45	22:34	00:48
H9	00:00	00:00	00:00
H10	64:39	07:42	00:44
H11	101:23	17:06	00:41
H12	08:08	01:04	00:25
H13	41:26	06:41	00:37
H14	63:38	08:42	00:43
H15	61:26	09:05	00:42

Cumulative Impact on Residential Amenity

I am concerned that the EIAR considers individual impacts separately without adequately assessing the cumulative effect of multiple turbines on a single dwelling.

For H15, the combined effects of the visual presence of multiple turbines, operational noise from AT15, AT16 and AT14, shadow flicker impacts, aviation lighting where applicable and the overall change to the existing rural landscape character have the potential to create a significantly greater impact than is reflected by the assessment of each issue in isolation.

The cumulative burden on residents living in close proximity to several turbines should be carefully considered, particularly where a dwelling has already been identified as experiencing a predicted shadow flicker exceedance and where multiple turbines are located within relatively short distances of the residence.

Local Infrastructure and Road Network Concerns

I am also concerned about the potential impacts of the proposed development on local infrastructure during both the construction and operational phases.

A project of this scale will require the transport of abnormal loads, heavy goods vehicles, construction machinery, concrete deliveries and excavation equipment over an extended period. This has the potential to place significant pressure on local roads and associated infrastructure. There is a risk of deterioration of road surfaces, damage to verges, drainage systems and bridges, increased traffic hazards on narrow rural roads and disruption to local residents, agricultural activity and emergency access routes.

There are also potential road safety implications for pedestrians, cyclists and school transport services. I request that An Coimisiún Pleanála carefully examine whether the EIAR has fully assessed the extent of these impacts and whether adequate and enforceable measures are proposed to repair, maintain and restore any roads or public infrastructure affected by construction activities.

Clear commitments should be secured regarding the monitoring, maintenance and reinstatement of infrastructure throughout the construction phase and following completion of the works.

Habitats, Biodiversity and Environmental Protection

I am concerned about the potential impacts of the development on local habitats, biodiversity and ecological connectivity.

The development area and surrounding landscape support a range of habitats that may be affected by turbine construction, excavation works, road construction, drainage alterations and increased disturbance from traffic and construction activity. Habitat fragmentation and changes

to local environmental conditions can have long-term consequences for wildlife and ecosystem function.

Particular attention should be given to the potential effects on peatland habitats and associated hydrology where relevant, impacts on bird populations through disturbance and collision risk, impacts on bat species and their commuting and foraging routes, and any effects on protected habitats and species. The cumulative ecological impact of the proposal should also be assessed in combination with existing and permitted developments within the wider area.

I respectfully request that An Coimisiún Pleanála satisfy itself that all ecological surveys are current, seasonally appropriate and sufficiently robust to identify potential impacts throughout the lifetime of the project. Where uncertainty remains regarding environmental effects, the precautionary principle should be applied.

Conclusion

Given the proximity of turbines AT15, AT16 and AT14 to my home, the predicted exceedance of shadow flicker guidelines at H15, the concerns regarding cumulative noise impacts, residential amenity, local infrastructure, habitat protection and biodiversity impacts, I respectfully request that An Coimisiún Pleanála give careful consideration to the adequacy of the EIAR and whether the proposed mitigation measures are sufficient to protect residents and the local environment.

In particular, I request that the Board adopt a precautionary approach when assessing impacts on H15 and ensure that any decision prioritises the protection of residential amenity, public infrastructure, environmental integrity and the long-term quality of life of those living in close proximity to the proposed turbines.

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,

Gerry & Irene Murphy