

Gerry Healy
29 Seaview Place,
Ballycastle,
Co. Mayo
F26WD86
gerryh112@gmail.com

14th June 2026

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

Case reference: PAX16.324258

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, Castlackleen Demesne, and other townlands in County Mayo.

Dear Sir/Madam,

I am writing to formally object to the proposed Tirawley Wind Farm Strategic Infrastructure Development application submitted by Constant Energy Limited.

The proposed development, comprising 16 wind turbines, a permanent 110kV substation, underground cabling, grid connection infrastructure and ancillary works, would introduce substantial industrial-scale development into a sensitive rural area of north Mayo. I believe the application fails to adequately address a number of significant planning, environmental and community concerns and is therefore contrary to the principles of proper planning and sustainable development.

Introduction

I wish to make a formal objection to the proposed Tirawley Wind Farm development.

Having considered the Environmental Impact Assessment Report (EIAR), I believe that the proposed Tirawley Wind Farm represents a development of excessive scale within a sensitive rural and coastal landscape. The proposal would result in significant and long-lasting impacts on the landscape character, visual amenity, biodiversity, protected bird species, peatland environments, cultural heritage, tourism value and the overall identity of the Tirawley area.

The proposed development consists of 16 wind turbines with a blade tip height of 135 metres, together with extensive associated infrastructure including new access roads, turbine foundations and hardstands, spoil deposition areas, a 110 kV substation, a Battery Energy Storage System, extensive underground cabling and forestry clearance. The development is proposed to operate for approximately 35 years, representing a long-term transformation of the receiving landscape.

1. Scale and Industrialisation of the Rural Landscape

The proposed development is not simply a wind farm but a large-scale industrial energy complex within a traditionally rural landscape.

The combined effect of sixteen 135 metre turbines, almost 10 kilometres of new site roads, extensive excavation works, 17 permanent spoil deposition areas, a large electrical substation, battery storage infrastructure and associated engineering works would fundamentally alter the existing character of the area.

The landscape has evolved over generations through agriculture, traditional settlement patterns, historic field boundaries, hedgerows, forestry and areas of blanket bog. The introduction of a development of this magnitude would transform the perception of the area from a predominantly rural and natural landscape into one characterised by industrial energy infrastructure.

The planning authority should consider not only the impact of individual elements of the development, but the cumulative effect of all associated infrastructure and whether the landscape has the capacity to absorb a development of this scale without unacceptable harm to its character and identity.

2. Landscape and Visual Amenity Impact

The landscape and visual effects of this proposal represent one of the most significant concerns associated with the development.

The proposed turbines, reaching 135 metres to blade tip height, would become dominant man-made structures within the landscape. Due to their exceptional height, rotating blades and movement, they would inevitably draw the eye and become defining features across a wide area.

The visual impact is not limited to the turbine towers themselves. It includes the wider industrial infrastructure associated with the development including new access roads, widened entrances, hardstands, excavation works, spoil deposition areas, the substation, Battery Energy Storage System and the removal of existing forestry.

Particular concern must be given to the impact on residential amenity. Residents do not experience the landscape from a single viewpoint or a photomontage. They experience it every day, in changing weather, lighting and seasonal conditions. The presence of multiple 135 metre moving structures within the local landscape for at least 35 years would represent a profound and permanent change to the visual environment of those living nearby.

The proposed felling of approximately 31.86 hectares of existing forestry will further alter the visual character of the area. While replacement planting may be proposed elsewhere, it cannot replace the established landscape structure, screening and sense of enclosure currently provided by mature vegetation.

The question for the Planning Authority is not simply whether the turbines will be visible, but whether the Tirawley landscape can accommodate a development of this scale without unacceptable damage to its character, visual quality and sense of place.

3. Impact on Tourism, Heritage and the Wider Landscape

The proposed development must also be considered within the context of the wider North Mayo landscape, which is recognised nationally and internationally for its exceptional scenic, archaeological and tourism value.

The wider area includes internationally recognised attractions and tourism assets such as the Wild Atlantic Way, Downpatrick Head, the Céide Fields and the Kilcummin Loop Walk. These locations are valued because of their dramatic coastal scenery, expansive views, archaeological importance, tranquillity and strong connection to an unspoilt natural landscape.

The Wild Atlantic Way is a national tourism initiative founded on the protection and promotion of Ireland's unique coastal landscapes. The continued success of this tourism product depends on preserving the sense of wildness, remoteness and natural beauty that visitors travel to experience.

Downpatrick Head is one of the most iconic viewpoints on the Mayo coastline and is valued for its dramatic cliffs, panoramic Atlantic views and largely undeveloped horizon. Likewise, the Céide Fields represent one of the most important archaeological landscapes in the world, where the relationship between the ancient farming landscape, blanket bog and Atlantic setting forms a central element of its cultural significance.

The Kilcummin Loop Walk and surrounding walking routes are similarly dependent on the quality, tranquillity and scenic character of the landscape. Visitors and local users experience the landscape as a journey rather than through isolated viewpoints. Therefore, the impact of large-scale turbines cannot be assessed solely by whether they are visible from a single location but must consider the cumulative effect on the overall visitor experience and sense of place.

The introduction of sixteen 135 metre turbines into this wider landscape risks diminishing the qualities of wildness, remoteness and natural heritage that are central to North Mayo's tourism identity.

The Planning Authority must carefully consider the potential conflict between the national objective of renewable energy generation and the equally important objective of protecting Ireland's internationally marketed scenic landscapes and cultural heritage.

4. Impact on Birds and Protected Species Including Hen Harrier

The EIAR confirms that extensive ornithological surveys were required over a number of years, including vantage point surveys, breeding bird surveys, winter bird surveys, collision risk modelling and dedicated winter Hen Harrier roost surveys.

The requirement for specific Hen Harrier surveys demonstrates that this protected species was identified as a receptor requiring particular assessment.

The Hen Harrier is listed under Annex I of the European Birds Directive and is recognised as a species sensitive to disturbance, habitat alteration and the introduction of large structures within its foraging and flight areas.

The concerns are not limited to direct collision risk. Wind farm developments may also result in displacement effects, whereby birds avoid otherwise suitable feeding or hunting habitats due to the presence of turbines and associated activity. Such habitat loss through avoidance can have long-term implications for a species whose conservation status remains vulnerable.

The surrounding landscape also contains important ecological resources, including the Killala Bay/Moy Estuary Special Protection Area (SPA) and the Killala Bay/Moy Estuary Special Area of Conservation (SAC), which include the inner areas of Killala Bay, including Rathfran Bay. The wider coastal landscape also includes the Lacken Saltmarsh and Kilcummin Head SAC, which protects an important complex of coastal habitats in the Lacken Bay and Kilcummin Head area. These designated European sites are recognised for their importance to protected habitats and bird species, including internationally significant wintering waterbird populations. The proximity of the proposed development to this sensitive ecological network requires a precautionary approach, particularly in relation to potential cumulative effects on protected bird populations and the wider ecological integrity of the area.

Given the proposed 35-year operational lifespan of the development, a precautionary approach should be applied where uncertainty remains regarding the long-term effects on Hen Harrier populations and other sensitive bird species.

5. Peat, Soil Stability and Water Environment

The EIAR identifies peat as a significant consideration requiring detailed assessment. The construction of turbine foundations, access roads, drainage systems and other engineering works within peat-influenced landscapes creates an inherent risk of peat disturbance, erosion and sediment release.

Although mitigation measures are proposed, these measures rely on effective implementation and ongoing management over the construction period. Any failure of these measures could have irreversible consequences for peatland habitats, soils and downstream water quality.

Given the sensitivity of peatland environments and the long-term environmental consequences that can arise from peat instability, the precautionary principle should be applied.

6. Cumulative Impact and Landscape Capacity

The Planning Authority must consider the cumulative burden that this proposal would place upon the Lacken, surrounding townlands and wider North Mayo landscape.

The key planning question is not simply whether individual impacts can be reduced through mitigation. It must also be considered whether a landscape of significant environmental, scenic, cultural and tourism value has the capacity to accommodate a large-scale industrial energy development of this magnitude.

The cumulative impact of turbines, roads, spoil areas, electrical infrastructure, forestry removal and associated works would represent a substantial and long-term change to the character of the area.

8. Impact on Family Farm, Future Generations and Potential Residential Development

My family owns and actively farms land in close proximity to the proposed Tirawley Wind Farm. In particular, our family lands are located approximately **669 metres from proposed Turbine T09 and approximately 700 metres from proposed Turbine T08**. This is not a distant or abstract concern; the proposed development would directly affect land that has long formed part of our family's farming activity and connection to the local area.

As a member of a farming family with strong roots in this community, I hope that in the future I may have the opportunity to build a family home on our lands and continue living and contributing to the local rural community.

The proposed development raises a serious concern regarding the potential sterilisation of the future residential potential of our family lands. While no planning application for a dwelling may currently exist, it is reasonable that future generations of local farming families should have the opportunity to establish homes on family lands where this would otherwise be considered acceptable under rural housing policies. Rural communities such as Lacken and the wider North Mayo area depend on younger generations being able to remain

within their communities, continue farming traditions and establish homes on family lands. It would be a matter of serious concern if a private commercial development, operating for a period of 35 years, were to significantly restrict those opportunities.

The proximity of proposed Turbines T08 and T09, at approximately 700 metres and 669 metres respectively from our family lands, may significantly prejudice the ability to obtain planning permission for a future dwelling due to concerns relating to residential amenity, visual dominance, noise, shadow flicker and the overall quality of the living environment. A future planning authority may consider the existence of these turbines as a significant constraint on residential development, thereby effectively reducing the reasonable future use of our lands.

This concern is particularly significant given that the proposed operational lifespan of the wind farm is 35 years. A decision to grant permission would not only affect my family today, but could have consequences for future generations by restricting their ability to live on, farm, and maintain a connection with their own land.

The Planning Authority should carefully consider whether it is appropriate that a private commercial energy development could have the effect of sterilising the future development potential of neighbouring family lands and limiting the ability of local families to remain within their own community.

Conclusion

The proposed Tirawley Wind Farm is a development of exceptional scale within a sensitive rural and coastal landscape. The combination of sixteen 135 metre turbines, extensive associated infrastructure, forestry clearance and a 35-year operational life would result in a significant industrialisation of Lacken and surrounding townlands and wider North Mayo landscape.

There remain serious concerns regarding the effects of the proposal on landscape character, residential visual amenity, tourism, the Wild Atlantic Way experience, the setting of Downpatrick Head and the Céide Fields, local walking routes including the Kilcummin Loop Walk, biodiversity, Hen Harrier and other protected species, peatland environments and the wider ecological network.

For these reasons, I respectfully request that the Planning Authority refuses permission for the proposed Tirawley Wind Farm.

Thank you for taking the time to consider these observations

Gerry Healy