

21st June 2026

Stratton Way
Adamstown,
Lucan,
Co. Dublin.

An Coimisiun Pleanála
Marlborough Street
Dublin 1
Case Reference PAX16.324258
Tirawley Windfarm

To whom it may concern,

This submission sets out my firm and outright objection to the planning application for the development of wind turbines in the Lacken/Ballycastle region in North Mayo. Please see below my concerns and reservations about this proposal.

North Mayo Landscape

North Mayo is an area of unparalleled scenic beauty, boasting renowned landmarks and historical sites such as Céide Fields, Downpatrick Head, Kilcummin Pier, and Lacken Strand. It is home to rich and diverse habitats that support wildlife species including the Corncrake and Hen Harriers, as well as rare flora found within the Lacken Saltmarsh, an area of special conservation.

Each year, tens of thousands of visitors travel along the Wild Atlantic Way to experience and admire the area's unspoilt landscapes, dramatic coastline, and unique natural heritage. However, this only begins to capture the depth of Lacken's historical, cultural, and environmental significance.

The proposed wind turbine development would be located in close proximity to important heritage features, including the Lacken Gazebo and the nearby Rathlackan court tomb not to mention countless ringforts, holy wells and court tombs as demonstrated by red dots in the picture below. The issue is not simply one of proximity. At a height of 135 metres, these turbines would dominate the surrounding landscape, dwarfing these historic landmarks and fundamentally altering the character of the area.



Source: Historic Environment Viewer

Rathlacken Court Tomb (54°17'26.7"N, 9°16'52.0"W) is a nationally significant prehistoric monument that has survived for approximately 5,300 years. Older than Stonehenge, this site holds significant historical weight. The proposed wind energy development would place turbines in the immediate vicinity of this archaeological site and in turn engulfing the court tomb raising serious concerns about the preservation of its setting, integrity, and cultural significance. These sites need to be preserved and protected, we need respect our previous generations and not sacrifice the preservation of these sites at the alter of multinational profit.

Court tombs are among Ireland's most important prehistoric monuments, providing a direct connection to the communities who lived on this landscape thousands of years ago. Their value extends beyond the physical stones themselves, the surrounding landscape forms an integral part of their historical and cultural context. It would be cultural assassination to endanger such a sacred site and putting it at danger of being irreparably scarred.

Any development that risks damaging, diminishing, or visually overwhelming such a monument should not be allowed to proceed. Once the character and setting of such a prehistoric site is altered, that loss cannot easily be reversed. The preservation of archaeological heritage is not only a responsibility to the present generation but also an obligation to future generations who deserve the opportunity to experience and study these monuments in their original context. Economic interests should not outweigh the long-term stewardship of monuments that have endured for more than five millennia.

The scale and visual impact of the proposed structures would undermine the scenic beauty, heritage value, and sense of place that make Lacken such a treasured destination for residents and visitors alike. Rather than complementing the landscape, the development would impose an industrial presence on a unique and historically significant environment, causing lasting visual and cultural harm.

No Public Consultation

The developer has made no meaningful effort to consult with local residents, which demonstrates a significant disregard for the concerns of the communities most directly affected by this proposal.

The only public meeting held in relation to the project took place in Ballina, approximately 15 miles from the affected areas of Lacken, Killala, and Ballycastle. This location created a logistical barrier for many local residents and, in my view, is inconsistent with the principles of effective public participation set out in the relevant wind energy development guidelines and the Aarhus Convention.

Furthermore, the meeting did not provide an adequate opportunity for a genuine democratic process whereby local residents could meaningfully voice their concerns about the proposal. As a result, the local community has had little or no input into a project that may have a significant impact on the area.

I have also been unable to obtain sufficient information regarding Constant Energy Limited. No contact details appear to be readily available online, preventing me from seeking clarification on important aspects of the proposal. In particular, in relation to the first application to ACP, there was a discrepancy between the planning notice and the planning application documentation regarding the number of turbines proposed, with references made to both 16 and 18 turbines. In the new application there is mention of different turbine numbers. In some instances, it is 18 turbines, others 21 and 31. In addition the applicant has misidentified St Patricks college Lacken cross, St. Patricks church and the community centre as being residential dwellings. There are also discrepancies between the coordinates on the site

layout map as compared to the coordinates in table 2.3 of chapter two. In one section of the report the application has identified the wrong area of the site location (on the map provided in figure 4.2), this is the location of Stella Maris northwest of Ballycastle. The consultation letters issued to the prescribed bodies do not identify the proposed Battery Energy Storage System as part of the development. It would appear that no consultation letter was sent to the NPWS, a critical stakeholder.

These inconsistencies raise concerns regarding the accuracy and reliability of the application. If basic due diligence cannot correct fundamental errors of this nature and scale, it is reasonable to question whether other aspects of the application may also contain errors, omissions, or inaccuracies that warrant closer scrutiny.

Deterioration of the local community

Lacken and Ballycastle have experienced decades of depopulation and brain drain as young people were forced to leave in search of employment and opportunities elsewhere. However, this trend is now beginning to reverse. The growth of remote working has enabled many people to return to the area to raise their families and enjoy the peace, tranquillity, and natural beauty that these communities have to offer.

If this wind farm development is approved, many of these aspirations may never be realised. Few people would choose to live in the shadow of industrial-scale turbines dominating the landscape. It seems ethically questionable to prioritise corporate profit over the wishes and wellbeing of local residents in an area that has already faced significant economic and social challenges.

There is also a glaring inconsistency in the planning process. Many local residents have previously been denied planning permission for homes or extensions on the grounds that they would negatively affect the scenic amenity of the area. Yet now, structures standing approximately three times the height of the Statue of Liberty are being proposed on an elevated and highly visible site. This appears both unjust and unreasonable.

Michael Mac Ruairí an Irish nationalist and renowned storyteller who participated in the 1916 rising who worked relentlessly throughout his life to promote Irish heritage and language hailed from Lacken. Patrick Pearse, a student of Michael Mac Ruairí, would surely have objected to the treatment of rural Irish communities for the benefit of profit-maximising corporations. The deep connection that local people have with the land, their heritage, and their sense of place risks being irreparably damaged.

Families living in Lacken and Ballycastle, as well as students attending St. Patrick's Secondary School, would be subjected to the impacts of infrasound, shadow flicker, and significant visual intrusion. The cumulative effect of these impacts would fundamentally alter the character of the area and diminish the quality of life enjoyed by residents and future generations.

Potential for UNESCO Status

Céide Fields is a remarkable prehistoric archaeological landscape located on the north coast of County Mayo. Dating back almost 6,000 years, it contains some of the world's oldest known stone-walled field systems, together with ancient dwellings and tombs preserved beneath blanket bog. The site provides a unique insight into the lives of Ireland's earliest farming communities and is widely recognised as one of the most important Neolithic landscapes in Europe.

The landscape demonstrates continuous human activity in this region over many millennia and is now at risk of damage or destruction as a result of the proposed development. Research undertaken by Gretta Byrne has documented that the stone-walled field systems associated with Céide Fields extend into the Lacken area. This evidence highlights the wider archaeological significance of the landscape and reinforces the need for its protection.

Céide Fields represents a quintessential example of a prehistoric farming community and, in recognition of its outstanding universal value, has previously been included on Ireland's UNESCO World Heritage Tentative List. Securing UNESCO World Heritage status would undoubtedly enhance the prestige of the area and further establish its importance on the global stage. Despite this, the wind farm applicant fails to adequately acknowledge or assess the historical and archaeological significance of the wider landscape within the application. This omission alone raises serious concerns and provides a compelling reason why the proposed development should not proceed.

In addition to its prehistoric importance, the area is associated with several significant historical events. General Humbert's landing at Kilcummin during the 1798 Rebellion played a pivotal role in Irish history. The area is also linked to St. Patrick through Foghill, Wood of Focult, which is the only location specifically referenced in his writings and now is the site of a venerable well in his name. These historical associations further demonstrate that Lacken and Ballycastle are areas deeply rooted in Ireland's cultural heritage.

Taken together, the archaeological, historical, and cultural significance of this landscape is exceptional. Any development that has the potential to adversely impact these heritage assets should be subject to the highest level of scrutiny. The importance of preserving this unique landscape for future generations must be given substantial weight in any planning decision.

Other Issues

Mr Iain Douglas is a consultant to the applicant. He attended the pre-consultation meetings with both ACP and Mayo County Council on behalf of the applicant. He is a former senior planner with Mayo County Council. I understand that he was involved in the Mayo Renewable Energy Strategy 2011 to 2020 which included the designation of lands suitable or open to consideration for windfarms. It was reported in the media in December 2010 that he gave a presentation on the renewable energy strategy to the elected members of Mayo County Council.

There are issues concerning the letters of consent from landowners. Some of them are unsigned and undated. In relation to the letter from Mayo Renewable Power Limited, I note that this company, according to the company registration office is in official liquidation under the auspices of the Irish high court. The only person who can sign a letter for or on behalf of this company is the official liquidator who is named as Michael McAteer of Grant Thornton. However, the letter is in fact signed by a Mr. Ben Hubbard.

According to the company's registration office Constant Energy Limited is 100% owned by Amber Mint Limited and the latter company is 100% owned by Shawdale Holdings Limited. The directors of this company are Barry Comer and Luke Comer Junior. This company would appear to be related to the Comer Group, an international property development entity. There is no evidence that they have established a track record in implementation and delivery of large-scale energy projects. Constant Energy first applied for planning for a green hydrogen facility in Ballycorrick in 2009. However, no construction work has been undertaken to date.

The proposed development would result in the loss of large amounts of hedgerows and blanket bogs. This is in direct conflict with priorities of the EU habitats directive. The construction and operation of the windfarm would have a very negative effect on several mammals such as pine martins, deer and bats. Three bat species in the wind farm site are of considerable conservation concern. These include the Lesser Horseshow Bat, Nathusius Pipistrelle and Leisler's Bat. The applicants assessment in relation to bats was flawed in that it was limited to "200m from works area; Up to 6km for bat roost desk review".

Ultimately, I vehemently oppose the construction of these wind turbines and I believe it is imperative that the development does not go ahead. The natural beauty of the region will be irreversibly damaged, historical sites will be ruined and local residents will be forced to live in the shadow of unwanted and hideous towering structures that pose health risks. The future potential of Lacken and Ballycastle hinges on this decision and I hope that the correct course of action is taken and this development is stopped. This application represents a David and Goliath situation, the interests of a small rural community up against multinational corporate developers. There is a major power imbalance weighted in favour of the latter. Real issues of democracy are at stake.

"The rule of majority does not mean that it should suppress the opinion of even an individual if it is sound. The opinion of an individual should have greater weight than the opinion of many, if that opinion is sound on merits" - Mahatma Gandhi

Jack Kelly