

21st June 2026

Foghill,
Carrowmore-Lacken
Ballina,
Co. Mayo.

An Coimisiun Pleanála,
64 Marlborough Street,
Dublin 1, D01 V902

Case Reference: PAX16.324258

***Tirawley Windfarm Project, Strategic Infrastructure Development at
Ballymurphy, Ballynaleck, Barnhill Lower and Others***

Tirawley Wind Farm Observation

To whom it may concern.

***I wish to object to this application in the most forceful way because
the Lacken area is absolutely not suitable in any way for the proposed
development of this wind farm.***

1. There was no public consultation whatsoever by the applicant. They did not appoint any public liaison officer as they claimed, or any such officer completely failed to liaise with anyone in the area. The public open meeting was not held locally but 17 miles away outside Ballina. They put advertisements for the windfarm in the Mayo News which is a Westport and west Mayo newspaper. In relation to the public day advertisement, there is a discrepancy between the actual advertisement in the Western People (June 2023) and the advertisement reproduced in appendix 1.6 of the Community Engagement Report. The advertisement contained in appendix 1.6 contains a full list of all the townlands which are the subject matter of the proposed wind farm. However, the advertisement in the Western People merely refers to Lacken and Ballycastle. The application has failed to follow best practise and planning advice on meaningful local consultation and has disregarded procedural fairness. The proposed development is overwhelmingly opposed by the Lacken community. It has been and still is to this day impossible to contact Constant Energy. There is no telephone number or email address anywhere, their website is used solely by them to upload the planning documents. They do not have any trading address. They have a registered office in Limerick but that is merely the address of their auditors and accountants. For a company that has already obtained planning permission for two green hydrogen plants and has five more windfarms in the pipeline, this is most unusual.
2. Lacken is a significant destination on the Wild Atlantic Way and close to Downpatrick Head from where the Turbines will be clearly visible. Tourism is very important to the local economy and will be significantly negatively impacted by the proposed wind farm. Fáilte Ireland's Wild Mayo Destination project will be seriously compromised. The area around Downpatrick Head and the Lacken coastline possess stunning natural scenery and rare geological features which

has drawn recognition from visitors across the globe who are now coming in large numbers to view the stunning areas of high scenic value allied to its rich cultural heritage. The area has massive tourism potential and Failte Ireland now recognise that. The potential cumulative impact of turbines will be hugely detrimental to tourism, especially cultural tourism in the area. Its impact on the Wild Atlantic Way in north Mayo could potentially be catastrophic.

3. The area around Lacken and Downpatrick Head comprises an ecological, geological and archaeological gem on the Wild Atlantic Way. An industrial scale wind farm as proposed would cause irreparable damage to this environment and impact negatively on tourism. The area is rich in sensitive and vulnerable habitats in particular the Lacken Salt Marsh. Sediment and other discharges into the Salt Marsh from the construction of large-scale wind farms would suffocate the fragile ecosystem and undermine biodiversity and carbon storage capabilities. Hydrological changes are likely to affect the Saltmarsh ecosystem. The construction of access roads and windfarm infrastructure allied to the destruction of hedgerows and tree felling is likely to cause habitat fragmentation. In the construction phase activity, there will be surface water emissions to local streams flowing into the Saltmarsh with potentially contaminating materials such as cement based materials, lubricants, oils, diesel, petrol, hydrocarbons and silt. This will have a negative on the rare flora and fauna, invertebrates and coastal wildlife in the area. The habitats in the area are protected under Irish and European environmental legislation. Tourism depends on natural unspoiled landscapes and peaceful, pastoral ambience that defines its unique appeal. Industrial scale development will reduce the areas attractiveness as a heritage destination. The visual impact of very large turbines towering over the natural terrain would destroy the sense of place and wildness and impact negatively on tourism also.
4. Some places should not, at any cost, host large scale wind farm developments because the cost and damage to the landscape, the cultural heritage the ecology and aesthetics would simply be too great. Lacken is one of these areas. This area is an exceptional place of natural beauty and coastal landscape. It possesses a fragile sensitive vulnerable ecological and sixth generational cultural heritage and unspoiled scenic coastal landscape with golden beaches and large sand dunes. This landscape is a living, layered, terrain of geology, archaeology, culture, heritage and history. It has a unique sense of place, its unspoilt character, its six thousand years heritage between humans and environment is crucial to our understanding. The landscape of the area is not just beautiful, it is elemental comprising of wild bogland intertwining with pastoral hillsides, ancient stone, Atlantic changing weather and immense light. The Lacken Hills forms part of the world renowned Ceide Fields neolithic complex (over 6,000 years old). The Rathlacken and Lacken Hills area forms part of the wider field wall landscape of North Mayo that is linked to Ceide and shares the same pre-historic agriculture structure. There is credible evidence that the archaeologist Gretta Byrne discovered an integrated system of field walls under the surface in the Lacken area equal to that of original Ceide discovery. The approval of an industrial scale wind farm on this highly revered neolithic landscape would be totally out of character with its natural surroundings and would threaten the integrity of the highly scenic Lacken/ Ceide Coast, classified as a vulnerable area. It would undermine the whole concept of the Wild Atlantic Way and the work of those bodies who promote the stunning scenic vistas within county Mayo. Neolithic sites are protected as natural heritage assets which carry significant legal safeguards. The potential risk to the areas archaeological fabric is substantial. The scale of the construction work, including laying foundations with thousands of tons of concrete, the laying of several access roads, felling of trees and hedgerows would severely damage the buried archaeology. There is no evidence that the applicant sought the advice of Mayo County Council, the Heritage Council, UNESCO, etc as a reasonably prudent applicant would have done. The relationship between the sea & shorelines, strands, rivers, bogs, prehistoric monuments and rundale fields all form part of the cultural heritage of the area. Once

altered and damaged by large structures, those qualities will be impossible to restore. The turbines proposed at the northern end of the site are very close to a mapped area of the pre-historic Ceide fields system. It is inconceivable to a person, even with a cursory interest in our cultural heritage, that this priceless heritage could be jeopardized in a location that until recently was UNESCO protected. In the Cultural Heritage Section of the application, the applicant has failed to mention or refer in any way to important archaeological studies, reports and peer reviewed journal articles in relation to the Lacken/Ballycastle area. These include the following : Archaeological Excavations at Rathlackan Neolithic and Bronze Age Landscape of North Mayo, Dr Stuart Rathbone (Academia Archaeology) : Early Neolithic Agriculture in County Mayo : Geoarchaeology of the Ceide Fields , Belderrig and Rathlackan (Journal of the North Atlantic, May 2016): Dr Graeme Warren , The Prehistoric Archaeology of North Mayo : Excavations on Ceide Hill , Behy and Glenurla, (Seamus Caulfield , Gretta Byrne, Noel Dunne and Graeme Warren:. It is incredible that the applicant does not refer to these critical studies that explain the archaeological gem that is the Lacken area.

5. The cumulative impact of proposed and actual wind farms located within 20 km of the proposed site is extremely concerning. This is not sustainable and will have a further negative long-term impact on the character and distinctiveness of the visual landscape in an area of outstanding natural beauty and unique heritage value. The Lacken/Ballycastle area has been identified by Fáilte Ireland and Mayo County Council as a key tourism asset with ongoing development plans, including the Wild Mayo Destination experience, and the potential investment of up to 10,000,000 Euros over the coming years. The Ceide Coastal Trail, connecting Downpatrick Head with the Ceide Fields Visitor Centre, is a cornerstone of this development plan and has the potential to open up the area to large scale tourism. The proposed development threatens the visual integrity of Downpatrick Head, one of Ireland's most iconic coastal landmarks and which is a major draw for visitors, domestic and international offering a dramatic and immersive experience of the Atlantic coastline including raw unspoilt landscapes, dramatic sea cliffs and panoramic views. The cumulative impact of windfarms at Glenora, Keerglen , Clydagh, Killala and other areas will erode the authenticity of the Ceide Fields Complex which until recently was on the UNESCO World Heritage Tentative List. The applicant has failed to address these issues in any meaningful way.

The Ceide Coastal Community Company was successful in 2021 in attracting the world-renowned Red Bull Cliff diving event to Downpatrick Head. The scenic views and historical significance of the site and surrounding area were a major factor in securing the event not alone for Ballycastle but the whole of County Mayo. Given the enormous success of the event and the viewership figures it brought to north Mayo from both national and international press (in the millions) the CCCC understand that Downpatrick Head will at some point host the event again in the future. This will have significant economic boosts for both north Mayo and county areas. Tourists, especially cultural tourists will not be interested in visiting an area with a dense cluster of wind turbines. Successful tourism and windfarms are not compatible in an area like this.

6. In 2012, both Mayo County Council and An Bord Pleanála refused planning permission to a local farmer, for four relatively small wind turbines in the middle of the proposed wind farm site area of the Constant Energy application. (ABP reference number P1 16.239901). The decision of ABP was as follows:

“The proposed development is located on an elevated site in an unspoilt and exposed upland location within a rural scenic landscape in close proximity to the coastline adjoining Killala Bay. It is considered that, by reason of its height, scale and extent in an exposed area

overlooking Killala Bay, the proposed development would have a disproportionate and obtrusive visual impact and the proposed development and would, therefore, be contrary to the Mayo County Development Plan, and be contrary to the proper planning and sustainable development of the area.”

The height, scale and extent of the current application by Constant Energy is far, far greater than that of the 2012 application. ACP must take into account its own precedent decisions. Furthermore, it is vitally important that ACP views the proposed development from the vantage point of Carrowtrasna Village, and the Kilcummin Back strand, both to the east of the proposed windfarm. The view from these locations is stunning and will demonstrate clearly to the observer the totally negative impact of the proposed wind turbines from these vantage points.

7. Brendan Munnelly, the senior executive planner with Mayo County Council on 8 June 2026, at the council's monthly meeting, outlined the council's objections to the proposed windfarm and stated, “granting the application will be a material contravention of the county development plan”. A submission from the Tourism, Recreation and Amenity section of the council raised concerns regarding the potential negative impact of the proposal on the Wild Atlantic Way. They stated that the introduction of industrial scale infrastructure in this area would diminish the long-term value of the destination and threaten the visual integrity of Downpatrick Head, one of Ireland's most iconic landscapes. Only three of the proposed turbines are located in an area designated for large windfarm developments, five located in undesignated open countryside and eight in areas designated “open for consideration “. Mayo County Council have pointed out the areas exceptional visual, archaeological environmental and residential sensitivity. The windfarm site and surrounding area forms part of an extensive and unique cultural landscape containing dense clusters of archaeological sites, historic settlement features and evidence of neolithic and early medieval activity. The cumulative impact of 16 large turbines here, 22 more in Glenora, 9 in Keerglen, 6 in Killala and potentially 22 in Clydagh and 14 in Cooneal would fundamentally alter the setting of an ancient historic landscape with six thousand years of natural and cultural heritage. The applicant has minimized these issues.
8. The coastal region around Lacken and the western side of Killala Bay is very significant archaeologically. In fact, the area is rated as one of the richest archaeological landscapes in the west of Ireland. In their seminal work on Irish Archaeology, DeValera and O Nuallain highlighted this area for its sheer abundance of monuments, especially court tombs. With national recorded monuments (and several unrecorded) and evidence of human activity stretching from the neolithic period up to the post medieval period, it includes:
 - a. Early Christian sites.
 - b. Prehistoric megalithic tombs and court cairns.
 - c. Ogham Stones and other inscribed monuments.
 - d. A landscape of continuous human habitation and ritual use from the Neolithic period through medieval times.
 - e. A large and unprecedented concentration of court tombs court wedges, standing stones, enclosures, ringforts, lisheens, cills, holy wells, early church foundations and cross slabs.

Prehistoric megalithic monuments in the area with some adjacent or close to the proposed windfarm site include.

Rathlacken Court Cairn

This is a very well-preserved court cairn set within field walls dating from the neolithic period. (very close to the wind farm site). It is significant not simply as a tomb but as a window into a complete neolithic landscape. Its preservation, associated settlement remains, ancient field systems and evidence

of reuse make it one of the most informative prehistoric sites in Mayo. The applicant has failed to appreciate and document its significance or the risks to it and its surrounding neolithic settlement area by the proposed development.

Breastagh Ogham Stone

This is an Ogham inscribed standing stone. It is one of the most important early medieval monuments in Mayo because it bridges two different periods of Irish pre-history and history: the Bronze Age and the dawn of written Irish. The stone provides rare direct evidence connecting archaeology with named historical families. Its significance is that it combines an ancient standing stone with one of Irelands earliest written inscriptions, commemorating members of a powerful Mayo dynasty, Ui Fiachrach.

Rathfran Wedge Tomb

Built circa 2500 to 2000 BC, it is archaeologically very important because it represents a later phase of Irelands megalithic tradition, dating from the transition from the neolithic to the Early Bronze Age. It reflects changing burial practises, beliefs and social organization and possible solar alignments.

Carbad More Court Tomb

This is a rare double court tomb dated to the early neolithic period, 4000 - 3500 BC. The unusual design of the tomb provides evidence for more complex ceremonial and burial practise than those seen in standard court tombs. It reflects the emergence of settled communities capable of organizing large scale construction projects.

There are several early Christian and medieval ecclesiastical sites in the Lacken area.

Kilogeary Church (close to the windfarm site)

Is one of the oldest ecclesiastical sites in the Lacken area and marks the original religious centre of the parish of Lacken, It preserves religious tradition stretching back many centuries.

Old Lacken Church and Graveyard on Lacken Hill

This is a very old historically important ecclesiastical site, occupying a prominent position overlooking Lacken Bay (and very close to the windfarm site) The graveyard contains burials dating back to the 1700s and is adjacent to the old Glebe House. The new Lacken Cemetery is just metres downhill from here.

Other early Christian and medieval ecclesiastical sites include St Cuimins Church and Graveyard (700AD) and Holy Well at Kilcummin, Rathfran Dominican Friary (1274), the Druids Chair at Mullagh na Croise, Leac Balbeni Standing Stone (Bronze Age) at Foghill and St Patricks Holy Well at Foghill. Most academic scholars now report that the Foghill /Fo-Choill area (Wood of Foclut) is the area where St Patrick spent his youth. The area is a sacred landscape and is just over 2km from the windfarm site.

The Lacken area is remarkably rich in ecclesiastical heritage and provides a valuable record of the development of early Christianity from the druidical pagan times right through the medieval and post medieval periods. The area is especially valuable because it preserves the interaction between prehistoric sacred landscapes, early Christian foundations, ancient abbeys, medieval parish churches, holy wells and cilins/ graveyards. It is incredible that the applicant ignores such a significant heritage.

9. The Lacken salt marsh which is in an area of special conservation (SAC) located just one kilometre from the proposed windfarm could be seriously compromised as regards its ecology and biodiversity if run-off of sediment, chemicals, concrete etc. occurs. Excavation of large amounts of soil and peat allied to the felling of large amounts of trees will result in run-off from the windfarm site and this could cause serious harm. The highly scenic salt marsh is a

significant protected coastal wetland located beside Lacken Strand and is widely known for its natural beauty, for a & fauna, rare birdlife, rich ecology and biodiversity. It helps to maintain coastal habitats and protected plant species, listed on Annex 1/11 of the EU Habitats Directive; such as Atlantic Salt Meadows, Mediterranean Salt Meadows, Salicornia Mud, Marram Dunes and Fixed Dunes. The large number of channels and tidal pools in the Marsh render it a significant habitat for wading and migratory birds including species like Golden Plover, Dunlin, Wigeon, Snipe, Teal, Mallard Curlews, Heron and Lapwings. Up to two thousand two hundred Golden Plover have been seen in early winter roosting and feeding on the salt marsh site (less than 1km from the proposed windfarm). This area is a very important ornithological site providing many diverse habitats for foraging and roosting. The hen harrier roosts close to the marsh. This is known to be very sensitive to disturbance from human activities. The construction of a wind farm adjacent to the Saltmarsh would be hugely detrimental to bird life here. The Site Synopsis of the Lacken Saltmarsh and Kilcummin Head SAC (site code 00516) clearly point out the substantial ecological importance of this coastal site for the range, quality, floristic richness of its coastal habitats, in particular, the fixed dunes which are priority habitat on Annex 1 of the EU Habitats Directive. The coastal shoreline around Lacken Bay abounds with golden plover, skylarks, sand martins, oyster-catchers, kestrels, snipes and mallards.

10. Several streams/water courses from the proposed windfarm site flow down to both the Saltmarsh and Lacken strand potentially contaminating and polluting this area of unrivalled scenic beauty. It is likely that there will be water quality problems resulting from the construction of turbines in this area relating to the significant release of sediments, hydrocarbons and other deleterious material to the aquatic environment.
11. The area of Kilcummin Head is an area of special conservation and is famous for bird watching. Also, both Lacken Strand and the saltmarsh abound with many rare species of birds, such as, the hen harrier, curlew, golden plover, red shank, whooper swans and large quantities of brent geese overwinter in the area. There is a real risk of many rare species of birds being slaughtered by wind turbines and disturbed by wind farm construction including the destruction of vast amounts of hedgerows and considerable felling of trees. In particular, hen harrier breeding ground has been identified by the applicant. There are real risks that the construction and operation of the wind turbines together with destruction of hedgerows could put paid to the hen harrier in this area. The EIAR acknowledges that hen harriers are present within the study area and that the site provides suitable autumn and winter foraging habitat. The site contains a combination of blanket bog, scrub, wet grassland, semi-improved grassland and hedgerow networks, all of which are important habitats for foraging and roosting hen harriers.
12. There is no evidence that the applicant realistically sought to consider alternative locations for the proposed development but merely stated in Chapter 3 of the application that the developer wishes to undertake multiple developments southwest of the Lacken location. Support for renewable energy does not required support for every proposed location; it may be that the other five sites the developer wishes to develop to the southwest are more suitable. Any areas with lower ecological, archaeological, cultural, landscape and scenic sensitivity may be more suitable.
13. The area around Lacken and Ballycastle has proved inspirational for creative artists, painters, writers and poets. Jack B Yeats famous painting “A Fair Day” was based on a fair day in Ballycastle. William Butler Yeats play Caitlin Ni Houlihan was based outside Killala (presumably Kilcummin) and deals with the impact of the 1798 arrival of the French under General Humbert in Lacken. Thomas Flanagan’s critically approved historical novel, “The Year of the French” was based in Lacken. Seamus Heaney has written poems about the area including

the well-known “Belderrig “. Douglas Hydes well known short story “Crom Dubh” was bases in the Lacken area. Well known artists including Donald Teskey, Martin Gale and Hughie O Donoghue have painted aspects of the Lacken landscape. These painters had residences at the Ballinglen Arts Foundation, which is well known community of artists based in Ballycastle. It is a centre of artistic excellence of international standing. It beggars belief that the applicant fails to mention this vitally important aspect of the culture of the area and the negative impacts a windfarm would have on those prized aspects of our cultural heritage.

There are compelling reasons why this proposed windfarm development is totally unsuited to the Lacken area and is contrary to proper planning and sustainable development of the area. Any person who loves their country, any environmentalist who values and respects the natural environment, any person who cherishes our ancient sacred landscape and our beautiful coastal scenery and six thousand years of cultural heritage will not be vehemently opposed to this development. I call upon An Coimisiuin Pleanala to do the right and proper thing and refuse this application

Yours faithfully,

JV Kelly.