

To: An Commisiun Pleanala,

Re; Observations on Tirawley Windfarm.

PAX16.324258

From: Kevin Loftus, Keerglen, Ballycastle,
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I would like to make the following submission in relation to Tirawley Windfarm:

I wish to adopt and support the detailed submission made by the Lacken BallycastleCommunity Landscape Protection Group in relation to the proposed Tirawley Windfarm (PAX16.324258). In particular I endorse the concerns raised regarding cumulative wind farm development across North Mayo, impacts on the Ceide Fields cultural landscape, effects on tourism and recreation, biodiversity impacts, inadequacies in community consultation, and the assessment of the Battery Energy Storage System. While I do not want to repeat those detailed arguments in full, I request that they be considered as forming part of this submission:

1) Deficiencies in the Application

This is the second application lodged to ACP for this development .The first one was declared invalid due to confusion arising from the consultants reports as to the number of turbines (16 Or 18) planned for the project. The planning application was correctly declared invalid as it could not be established definitively how many turbines were proposed. Regarding the positioning of the turbines in this current application there are substantial differences in the turbine location co -ordinates in Table 2.3 of the EIAR versus those in the site lay our map. On the ground the difference is well in excess of 200 metres. I am bringing this to the attention of the inspector and ACP as this application should e refused accordingly as the information contained in the application is inaccurate and due consideration or analysis of the application cannot be carried out.

- This planning applications fails to identify the local secondary school St Patricks College which is located within the parish, Lacken parish church and "The Failte Rooms" (local meeting rooms for the Lacken Community) all of which are in very close proximity to the development with the secondary school only a short distance from a number of turbines. Instead they are identified as residential houses in the planning application. In failing to properly identify St Patricks College the developer and its agents are failing to provide proper detailed analysis in respect of the school itself and potential negative effects on children attending. There should be detailed reports provided by the Dept Of Education, the HSE in relation to Health and Safety, the effects of shadow flicker and low frequency noise in relation to the proximity to the school and potential health issues for students. I include with this submission details of a recently published study into low frequency sound and the serious health implications for people living near windfarms. The extensive research was carried out by Delft Technology University in Holland and it lays bare the serious health risks posed to local communities by the low frequency sound which wind turbines omit.

Community Engagement.:

Ireland has signed up and is in agreement with the Aarhus convention which requires community and public participation in the preparation of broader environmental plans.

-Regarding the Lacken/Ballycastle area no proper consultation was undertaken by the local authority within the community when designating areas across North Mayo "open for consideration" in respect of industrialisation projects such as wind energy. Had there been such consultation there is no doubt Mayo County Council would have

been reminded much earlier of its responsibilities to protect the unique heritage which it is tasked with preserving across the hills of North Mayo, ie Ceide Fields complex. Mayo County Councillors and planners have since agreed to formally oppose this windfarm development on the grounds of visual amenity, presence of sensitive archaeology and cumulative over development of windfarm projects in the North Mayo area particularly Ballycastle, Kilfian, Killala and Lacken.

-With regard to this specific project there was no local community engagement. Apart from an event in Ballina 20km nothing further took place in the local Lacken or Ballycastle community centres which are focal points for both communities and would have facilitated a large gathering of people. No house calls were carried out by the developer or no information leaflets were provided.

- Tourism.

Lacken and Ballycastle provide major tourist attractions along the wild Atlantic way with Downpatrick head being a signature point. The recent Bord Failte launch of The Wild Mayo Destination and Experience Development Plan (WDEP) which is a 5 year strategy for developing tourism in North Mayo. Central to this strategy is the development of the Ceide Coastal walk which is a 13km coastal walk from Downpatrick Hd to the interpretative centre at the Ceide Fields. The walk has at all times a full-view of the nearby Lacken hills which also overlook Downpatrick head which attracts 50k visitors per year many of whom enjoy the adjacent amenity which Lacken strand provides. The iconic Strand itself is overlooked by the Neolithic landscape where it is proposed to build this project. It is a landscape that contains the under peat wall systems synonymous with the world renowned Ceide Fields.

-The extent of construction traffic required for this project would have a negative figure on visitor numbers to Downpatrick Head and the Ceide Fields interpretative centre which would have an adverse effect on tourism revenue for the local economy.

-This proposed project is at variance with landscape related policies and objectives as set out in Mayo Co Development plans which aim to "Protect, enhance and contribute to the physical, visual and scenic character of County Mayo and to preserve its unique landscape character including along scenic routes and in Mayo's Coastal areas and lakeshores". The landscape of the Ceide fields complex of Ballycastle and Lacken itself which is the site of the proposed development can only be described as the highest quality which forms an integral part of the Wild Atlantic Way, WDEP 5 yr strategy for tourism in North Mayo and the Ceide Fields complex which is world renowned. This landscape cannot "absorb" a proposal of this nature. Therefore, this project should be refused on those grounds.

-Battery Energy Storage System.

Lacken hill and surrounding areas contains significant amount of afforestation and peatland. BESS systems like the one proposed in this application are fire hazards. The inspector when considering this part of the application should consider:

-Has the local authority the capacity to deal with such a fire and the toxic chemicals that would be discharged in the event of a fire and any attempts to deal with such a catastrophe.

-Has the local authority the capacity to deal with turbine fire at heights similar to the proposed turbines in this development. The inspector should consider potential damage from a turbine fire to heather, afforestation, bio-diversity and wildlife.

- Discharge from the BESS has the potential to follow the intricate natural drainage systems which exist in the area and ultimately lead to the "salt marsh" which is a designated SAC area. This discharge would have far greater consequences in the event of a fire. Schools in Claregalway had to remain closed for days (Source Irish Independent 31/01/2025) in Jan 25 following a lithium battery fire at a nearby industrial unit. Fire fighters were seriously injured in this incident and still remain off work calling into question once again the capability of local authority fire crews to deal with such events. This is something ACP should give serious consideration to. St Patricks college is located in close proximity to this proposed storage system but instead is assessed in the developers application as a residential dwelling. The health & safety concerns of having such a facility in close proximity to a secondary school attended by a large number of pupils is not addressed in any report included in this application.

Peatland;

Much of this development is situated in peatland.

Co Mayo has only 33% of its original peatland habitats remaining preserved and intact in their original state. (Peatlands & Climate Change Action Plan 2030, O Connell 2021). ACP should give due consideration to the preservation of remaining peatlands within the county. This proposed development would further reduce the amount of preserved peatlands in the county, adversely affect remaining bio-diversity, carbon storage and wild life associated with boglands. The proposed works would result in site drainage which would adversely impact the natural state and bio-diversity of the peatlands. Therefore this proposal should not go ahead.

Cumulative effect:

ACP should give due consideration to the cumulative effect of the many windfarms that are in operation, in the planning process or waiting to commence construction in North Mayo. Local County Councillors and council planners now object to this windfarm going ahead on that basis alone. Communities have already been negatively impacted by the burden of having windfarms in their vicinity. Issues such as shadow flicker, noise disturbance and sleep deprivation have all been experienced and reported in communities where projects have been sited. The guidelines for windfarm projects in Ireland are based on outdated guidelines from 2006 when wind turbines were only 90/100metres high at most. Once again I reference the Delft Technology University report recently published which details the serious health effects for citizens living near windfarms. This is particularly relevant when considering the cumulative effect of windfarm projects in North Mayo including this application.

-Also ACP should consider the cumulative effect on migrating birds from the extensive windfarms in operation or proposed for North Mayo. Due to its geographical location this part of North Mayo is on a major flight path for large flocks of migrating birds often to Iceland and Greenland. Oweninny is the largest windfarm in Ireland situated at Bellacorrick, Bangor-Erris. There is also Sheskin and approval has been given for Glenora near Ballycastle. The existence of so many turbines across such a broad area is creating a significant barrier.

Archaeology, Culture and Heritage: The proposed site of this development is an area which forms part of the Ceide Fields complex itself which stretches across the hillsides of North Mayo from Ceide Interpretative Centre all the way to Lacken/Hil/Rathlacken, Ballinglen Hills and as far as Blanemore in Moygownagh. The unique field systems are preserved underneath the boglands forming a truly unique

neolithic landscape. The various reports associated with this proposed development fail to make reference or take into consideration the presence of the under peat field systems and the fact it is part of the Ceide fields complex.

The Mayo County Development Plan 2022-2028 states as follows:

BEO1. "To protect the archaeological heritage and sites identified in the record of Monuments and Places, National Monuments in the ownership or guardianship of the state in addition to National Monuments that are the subject of Preservation Orders and to safeguard the integrity of the archaeological sites in their setting".

BEO 2 of the County Development plan reads "

"To protect the tentative World Heritage Site in Mayo on the UNESCO Tentative List , the Ceide Fields, from inappropriate development and support its nomination to World Heritage Status"

It has been clearly established from studies carried out by expert archaeologists that the under peat field systems exist at Rathlacken/Lacken Hill. Any industrial development in or around this unique site is contra to the Mayo Development Plan as outlined above. Mayo County Council, heritage Council of Ireland and now ACP must act to protect this unique and world renowned archaeology that has been preserved underneath the peatlands for 6000 years. The Ceide Fields complex is older than the pyramids of Egypt and this entire area should have a designation that would ensure it remains protected going forward and not subject to commercial speculation on a scale we are seeing with this windfarm proposal and others. ACP should liaise with archaeologists from the Ceide fields interpretative centre to confirm the true extent of the Ceide Fields complex.

-The Lacken/Ballycastle Landscape Protection Group have also made observations on the archaeology& heritage in their submission to this application and I fully agree and support their submission.

-Lacken and surrounding areas contains many unique monuments dating from 6000 years ago (ceide fields) right down through the bronze age and more recent times.

Signed: Kevin Loftus

Date;22/06/202

Kevin Loftus

Appendix One:

Scientific breakthrough in Delft exposes danger of low-frequency noise

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Recognition of health damage by TU Delft provides new legal and social precedent for those living near wind turbines and heat pumps.

Although the research focused on a university ventilation system, the implications for the hundreds of thousands of Dutch people who live around wind farms and industrial heat pumps are immense.

An in-depth internal investigation by Delft University of Technology has led to a crucial institutional recognition: long-term exposure to low-frequency noise causes serious health problems.

Although the research focused on a university ventilation system, the implications for the hundreds of thousands of Dutch people who live around wind farms and industrial heat pumps are immense.

The discussion thus shifts definitively from the question of *whether* it makes people sick, to the question of *when* the government takes its responsibility to protect citizens.

The Delft Case: From Denial to Scientific Evidence

Since May 2025, six employees of the Faculty of Applied Sciences (AS) at TU Delft have been struggling with a complex syndrome of serious health problems, including acute shortness of breath, heart disease, hypertension (high blood pressure), nausea and disorientation.

Remarkably, these symptoms were very similar to an earlier wave of unexplained sick leave in 2016, shortly after the initial completion of the faculty building.

In contrast to regular social practice, in which such complaints are often marginalized, the university board decided to form a multidisciplinary research team in June 2025.

This team, consisting of internal specialists and external noise experts, carried out systematic measurements for almost a year.

The results, which were recently published via the university journalistic platform *Delta*, left nothing to be desired in terms of clarity: the complaints were directly caused by a recent expansion of the central ventilation system, which generated invisible but penetrating low-frequency vibrations.

"Levels of low-frequency noise were measured in the building to such an extent that the usual audibility and nuisance standards were significantly exceeded. This has convincingly demonstrated that long-term exposure leads to serious somatic complaints." — **Spokesperson for the TU Delft Research Team**

The physiology of the invisible hum

Low-frequency noise (LFG) is located in the frequency range between roughly 20 and 125 Hertz. Although this sound is hardly perceptible to the human ear, the physical sound waves possess an enormous mechanical energy that penetrates deep into structures and the human body.

Clinical physicist and audiologist Jan de Laat, affiliated with the Leiden University Medical Center (LUMC), explains that the human body does not register LFG primarily through the eardrum, but through the mechanical organ of balance in the inner ear.

With chronic exposure, this organ becomes chronically disoriented. The body is in a constant state of apparent movement, leading to symptoms such as vertigo (dizziness), migraines, intestinal complaints and progressive hearing loss.

What's more, the constant vibrations trigger the limbic system — the cerebral structure responsible for emotion and stress regulation — allowing patients to develop deep anxiety and panic disorders.

For the employees in Delft, the recognition came too late; They have now been reported sick for a long time, transferred or have been forced to leave the institution.

The social paradox: Wind turbines and heat pumps

The thoroughness with which TU Delft investigated and acknowledged the source of the complaints is in stark contrast to the current government policy outside the walls of the academy.

According to official data from the RIVM report *'Perception of the living environment: nuisance and sleep disturbance'*, which was published in September 2025, the scale of this problem among the Dutch population is now enormous:

- **Tens of thousands of adults** experience serious and chronic noise nuisance from wind turbines near residential areas.

- **More than 200,000 households** are now seriously affected by the dominant, low-frequency hum of heat pumps.

Instead of a systematic source analysis as in Delft, citizens systematically encounter a wall of scepticism at bodies such as the GGD and the regional Environmental Services.

Complaints are often diagnosed as 'psychosomatic' or dismissed with the statement that the nuisance is 'between the ears'.

Tested in practice: The story of a local resident

For residents living near large-scale wind energy projects, the Delft case is the definitive validation of their daily reality. Renata van Heuven, who lives more than three kilometres away from the recently commissioned Goyerbrug Wind Farm in Houten, tells [the Andere Krant](#) that she recognises the medical spectrum of TU Delft employees in detail. Since the activation of four gigantic turbines (tip height 230 meters) in January of this year, her health has been ruthlessly interrupted.

"From the first day the turbines came into operation, I developed a constant *brain fog*," explains Van Heuven. "My body started to vibrate involuntarily as soon as I was in the house. You can feel the mechanical vibrations physically moving in through the floor and the furniture."

In the months that followed, she developed severe hypertension, heart palpitations, chronic insomnia, and panic attacks —symptoms that eventually cost her her job.

Failing measurement methodologies and the political precedent

The core problem behind the social stalemate lies in the acoustic standards used.

Official measurements by authorities use the so-called dBA conversion. This specific filtering method is designed to mimic human hearing sensitivity and actually flattens the lower frequencies in terms of measurement.

On paper, this means that all legal standards are met, while the physical, pathogenic vibrations remain outside the statistics.

The Delft report breaks through this dogma by demonstrating that the current dBA nuisance standards fall short when there is structural low-frequency loading. It thus functions as a crucial institutional precedent.

"This is the institutional breakthrough that victims throughout the Netherlands have been waiting for. It proves in black and white that the current noise standards offer citizens zero protection. The scientific consensus is now there; Politicians can no longer look away." — **Renata van Heuven, victim**

With the publication of the findings from Delft, the discussion about the energy transition and public health has reached an irreversible tipping point.

The priority is undeniably shifting to The Hague: politicians will have to formulate

conclusive, explicitly focused on low-frequency noise legislation to effectively protect their citizens against the dark sides of modern climate technology.