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25th 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 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, Castlелacken Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

This is a second submission by the Lacken Ballycastle Protection Group in relation to the proposed Tirawley Wind Farm project, submitted by Constant Energy Limited, to formally lodge an objection to this Strategic Infrastructure Development application. This development poses significant and irreversible risks to the local environment, biodiversity and local residents.

Having reviewed the public information provided and engaged with the community consultation materials, I wish to raise the following concerns:

Overview

This document will summarise the main points found in each chapter of the proposed Tirawley Wind Farm application. It is illustrated chapter by chapter.

Chapter 1 - Introduction

- This is the project's third iteration through the SID process: 31 turbines (2023) -> 21 -> 18 with BESS added (2024) -> a full application submitted Sept 2025 that ACP formally returned as incomplete in Nov 2025 -> the current 16-turbine layout (Jan 2026).
- The Public Information Day (31 attendees, 14 forms completed) was held in 2023 for the original 31-turbine scheme - the public has never been directly consulted on the actual final 16-turbine layout.
- 32 of 50 listed consultees did not respond at all, including Bat Conservation Ireland, BirdWatch Ireland, the Heritage Council, and the Irish Peatland Conservation Council - bodies directly relevant to findings elsewhere in this review.
- Inland Fisheries Ireland responded at the early Scoping stage but not at the final EIAR stage - a more precise finding than 'no response at all'.

Chapter 2 - Development Description

- Only two concrete chute-washout points exist on the entire site (south of AT01, south of AT12) - nothing near the northern AT13-AT16 cluster, meaning trucks must travel a meaningful distance with a loaded chute.
- Horizontal directional drilling at Palmerstown Bridge (a Protected Structure) uses the same generic mitigation measures as the other two HDD crossings, with no bridge-specific provisions despite MCC's 2023 concerns.
- The candidate turbine (Vestas V117) is built on a platform launched in 2010, with the specific 4.0/4.2MW variant dating to 2017; no newer turbine models appear to have been assessed as alternatives in this chapter.
- The 35-year consent period understates the true physical legacy: foundations remain in-situ permanently, access tracks may be retained rather than removed, and the converted farmhouse becomes permanent infrastructure.

Chapter 3 - Alternatives Considered

- Section 3.5 states the site is 'not located in, or close to any' SAC or SPA - directly contradicted by Chapter 6 (1.2km SAC connectivity), Chapter 7/the NIS (SPA assessment), and this same chapter's own Table 3.1, which discusses 'designated sites with hydrological connectivity'.
- Chapter 2 states 'no flexibility' in turbine dimensions; Chapter 3 states 'the final turbine model will be subject to a competitive tendering process' - a direct contradiction with real consequences, since every noise/bat/flicker calculation in the EIAR is V117-specific.
- The developer's own design-iteration comparison table (Table 3.3) states 'no material environmental difference' for population and human health between the original 42-turbine concept and the final 16-turbine layout.

- The Killala Community Wind Farm is cited as 'successful precedent' for siting turbines on non-designated land, but that development uses much smaller, community-scale turbines (49m blades vs 135m tip height here) - not a genuinely comparable precedent.

Chapter 4 – Planning Policy

- This is now the THIRD time across this whole EIAR that a chapter has flatly denied the site is near any SAC or SPA - and it's just as wrong here as it was in Chapter 3. The fact that this same incorrect line appears independently in three different chapters, by different authors, suggests it might be a stock paragraph copied across the document without ever being checked against their own Biodiversity chapter's findings.
- Their own landscape table splits the site into two character areas. One of them (where the northern turbines and the Gazebo sit) is explicitly described by their own text as having 'an inherent inability to be absorbed, physically or visually' - their words, not ours. Their only proposed fix for that area is calling the V117 a 'compact' turbine with a 'minimal tip height,' which is a stretch for a 135 metre structure.
- On the BESS - confirmed, there's no dedicated planning policy discussion for it anywhere in this chapter. It gets one sentence, treated as an add-on to the wind farm rather than assessed as the major piece of infrastructure it actually is.

Chapter 5 - Population and Human Health

- The Emergency Response Plan (CEMP Appendix 2.1, Management Plan 1) is an unfilled template: no named Site Manager, no key holder contacts, no chemical inventory - all blank fields, despite being referenced repeatedly throughout the spill-response procedures.
- The one emergency number that IS filled in (for blocked/flooded roads) is a Northern Ireland Department for Infrastructure number, not a Mayo County Council one.
- The Water Quality Management Plan explicitly defers its own spill response to this same incomplete Emergency Response Plan.
- Lacken Sensory Garden, Lacken Church, and Lacken Cross Secondary School are not named anywhere in this chapter, despite other chapters naming specific schools and cemeteries.
- Killala's population is stated as 58,710 - an obvious data error (likely a CSO reference code mistakenly entered as a population figure); the real figure is a few hundred.
- Core health-effects evidence base (NHMRC 2013, Knopper et al. 2014) is now 12-13 years old.

Chapter 6 - Biodiversity

- The Wind Farm Site itself (not just the grid connection) is confirmed hydrologically connected to the Lacken Saltmarsh and Kilcummin Head SAC, 1.2km away.
- 201 existing/consented turbines already exist within 20km, confirmed in the developer's own cumulative effects section.
- 12 of 16 turbines require bat curtailment - three-quarters of the array - with a phased 'blanket then smart' curtailment strategy that implicitly admits genuine uncertainty about real-world mortality.
- A confirmed common lizard population and a confirmed newt population both occur at the disused quarry where AT15/AT16 are sited.
- Survey data is explicitly admitted by the developer to be approaching or exceeding 3 years old, per the EIAR's own CIEEM-referenced Appendix 6.5.
- No reference anywhere to the active TB outbreak and Department of Agriculture badger snaring reported by the community in Billoos/Barnhill.

- Japanese knotweed record cited is 11 years old (2015, Carrowcur) and does not specifically address the Billoos area.

Chapter 7 - Ornithology

- The NIS states there is 'no evidence of flights inland' by golden plover/curlew toward the wind farm - while citing the exact Chapter 7 sections that record two such flights, including a flock of 100 birds at rotor height.
- Chapter 7 states 2,224 existing turbines within 20km; the NIS and Chapter 6 both state 201 - a tenfold discrepancy in the same sentence structure.
- The Lackan Bay winter hen harrier roost has grown from 1-2 to 3-4 birds since the original survey, but the displacement significance rating is still calibrated to the smaller historical figure.
- Three Red-listed species (Kestrel, Snipe, Woodcock) and several Annex I species are confirmed using the site regularly - this is not a low-sensitivity ornithological site.
- Core survey methodology relies heavily on Scottish NatureScot/SNH guidance without justification for why Irish-specific guidance wasn't used as primary.

Chapter 8 - Soils and Geology, Peat Landslide Hazard Assessment, Flood Risk

- The Peat Stability and Landslide Hazard Assessment states in its own Executive Summary that it is 'for consideration by Sligo County Council' and references 'Section 6 of the EIAR' - both wrong; this is a Mayo application and Section 6 is Biodiversity, not Soils.
- The same report's own turbine-by-turbine table rates 8 of 16 turbines plus the substation as 'Low Risk' for peat landslide, not 'Negligible' as shown in Chapter 8's simplified summary table.
- The report itself discusses the 2003 Dooncarton/Barnachuille bogslides (Co. Mayo), the 2003 Derrybrien disaster (Co. Galway, leading to an EU infringement case), and a fatal 2016 peat landslide at Derrysallagh.
- Chapter 8 concludes bedrock excavation effects are 'not significant' while admitting in the same section that 'a detailed assessment of the bedrock character has not been undertaken at this stage'.
- No evidence the Environmental Health Service's specific request for a private well survey was ever carried out.
- No recorded Inland Fisheries Ireland consultation response found anywhere across these documents, despite IFI being referenced repeatedly as a body that 'should' be consulted.
- The separate Flood Risk Assessment -the weak link is specifically the Peat Landslide assessment.

Chapter 9 - Hydrology and Hydrogeology

- The CEMP confirms a slatted cattle shed and associated slurry pit (reported locally as having a leaking tank) will be demolished at the northern TCC site near AT12; Chapter 9's blanket 'no contaminated land was noted' statement shows no sign of targeted sampling at this specific location.
- No spring survey exists anywhere in the chapter; the entire private well baseline rests on just 5 wells from a desk-based GSI database search, with no evidence of direct farmer/landowner consultation.
- The chapter's blanket 'no limitations or difficulties were encountered' statement does not reflect its own admittedly thin well/spring data.

- The core technical hydrology (WFD catchment mapping, GSI aquifer classification, bedrock referencing) is genuinely solid, comparable to the best-prepared chapter in the whole EIAR.

Chapter 10 - Air Quality and Climate

- BESS fire risk receives a single sentence, deferring entirely to a future Fire Safety Assessment, with no air quality/emissions/dispersion analysis of a thermal runaway event.
- The chapter confirms the prevailing wind is south-to-west and separately discusses dust mitigation, but never connects the two facts to assess dust deposition risk on the Lacken Saltmarsh SAC.
- Air quality and meteorological baselines are drawn from Ballina (16km), Castlebar (42km) and Belmullet (44km) - no monitoring was carried out at the site itself.

Chapter 11 - Noise

- Receptor H3 (555m from nearest turbine) is the worst-performing receptor in the whole assessment - in breach of the night-time limit before curtailment.
- After curtailment, the predicted level at H3 is 42.9 dB against a 43 dB limit - a 0.1 dB margin, not a real engineering safety factor.
- No baseline noise monitor was ever placed at H3 itself, despite it being the receptor requiring bespoke curtailment.
- The 2 km study area boundary excludes Kilcummin, Foghill and Carrowtrasna entirely, despite the site's elevated terrain and prevailing westerly wind favouring long-range propagation.
- ISO 9613-2 propagation modelling is acknowledged even by the EIAR's own text to underestimate noise at distance and in downwind conditions.
- Assessment uses the outdated 2006 Guidelines rather than the stricter 2019 Draft, despite the developer's own cited noise consultant publicly explaining the 2019 Draft would be 'very restrictive' for marginal sites like this one.

Chapter 12 - Landscape and Visual Amenity

- The Lacken Gazebo (VP36), 300m from AT15/16, is rated 'Substantial-moderate' - the highest individual rating in the chapter - yet folded into an overall 'Not Significant' conclusion.
- Lacken Hill Cemetery is omitted entirely as a viewpoint, despite cemeteries 15km away being assessed in detail.
- A 'High-medium' cumulative magnitude finding (74.6% of the study area affected once Glenora/Keerglen are added) sits beside a headline conclusion of 'no significant effects'.
- 31.86 ha of forestry felling receives no standalone landscape/visual assessment.
- Cumulative methodology relies on Scottish NatureScot guidance without explanation of why Irish-specific guidance wasn't used.
- The 20km (rather than 25km) ZTV study radius is justified by claiming no internationally important landscape exists nearby - directly contradicted by the same chapter's description of the Céide Fields as having 'the oldest known field patterns globally'.

Chapter 13 - Material Assets and Other Issues

- Mayo County Council's most recent pre-planning meeting (9th March 2026), addressing the actual final 16-turbine layout, is recorded verbatim stating: 'MCC does not consider the proposal suitable at this location' and that the area's heritage and scenic significance 'renders the area unsuitable for industrial scale windfarms' - with no developer response recorded anywhere in the same table.
- The standard site-location paragraph used across this EIAR never names Lacken/Lackan, the parish in which the site actually sits, describing it only by distance from larger towns.
- Construction-phase recreation/amenity effects are rated 'High-medium' magnitude in the same sentence that concludes they are 'not considered to be significant' - an internal inconsistency against the EIAR's own significance matrix.
- No documented landowner consent evidence anywhere for TDR road-widening works or the 13.55km Grid Connection Route, distinct from the turbine-site Landowner Agreements.

Chapter 14 - Cultural Heritage

- The chapter's own indirect-effects section rates the impact on the Lacken Gazebo as 'a long-term indirect impact of high magnitude...resulting in a Significant significance of indirect effect' - while the chapter's headline and cumulative conclusions are carefully scoped to 'direct' effects only, producing a more reassuring top-line message.
- No field survey photographs exist for the Met Mast (inaccessible), the BESS/substation/compound, or the operations building - confirmed 'n/a' in the chapter's own table.
- The Gazebo's construction date is given as both 'c. 1840' and '1794' in two different sections of the same chapter.
- The National Museum of Ireland Topographical Files search underpinning the artefact baseline (including a recorded gold bracelet find at Lissadrone West) dates from April 2022 - now 4 years old.

Chapter 15 - Shadow Flicker

- Three different, mutually inconsistent receptor totals appear in the same chapter: 100 (methodology), then 108, then 119 (summary) - a ~20% unexplained discrepancy.
- Assessment uses the more permissive 2006 Guidelines rather than the 2019 Draft's near-zero-tolerance standard.
- No discussion of whether the site's elevated terrain extends shadow-casting distance beyond standard flat-ground assumptions.
- No consideration anywhere of children with sensory/additional needs - only photosensitive epilepsy is addressed, and the chapter explicitly recasts all other effects as 'amenity' not 'health'.

Chapter 16 - Major Accidents and Natural Disasters

- The BESS fire/explosion scenario is rated Consequence Level 2 ('Limited': single fatality, 6-24 hour displacement) on the chapter's own 5-point DoEHLG scale - difficult to reconcile with MCC's own fire safety guidance elsewhere in this EIAR that the current approach to BESS thermal runaway is to 'let it burn out', implying a multi-day event.
- No specific distance between the BESS and the nearest residence is stated anywhere in this chapter - it is deferred to a future Fire Safety Certificate process.

- No connection is made anywhere between heat wave/high-temperature conditions (listed as a generic natural hazard) and the BESS's specific, internationally-documented sensitivity to ambient temperature as a thermal runaway trigger.
- On the chapter's own scoring, Peat Stability, Contamination, and BESS Fire/Explosion are all tied for the highest risk score recorded anywhere in the chapter (4 of a possible 25) - if the BESS consequence rating were corrected upward per the finding above, it would become the single highest-scoring risk in the entire chapter.
- This chapter's own stated BESS emergency response plan is the same Emergency Response Plan (CEMP Appendix 2.1) already found elsewhere in this review to be an unfilled template with no named contacts.

Chapter 17 - Traffic and Transport

- Traffic baseline relies on a single, three-year-old Friday count at one location (Palmerstown Bridge) - no counts on the actual local roads carrying most construction HGVs.
- No Road Safety Audit was carried out despite the route passing two schools (Culleen NS, St Patrick's College) and the EIAR's own admission of 'potentially high impact' pedestrian risk.
- Five of sixteen turbines sit on land with no positive renewable energy designation in the Mayo RES; MCC has objected twice.
- No emergency access assessment exists for the 150MW BESS despite MCC's own fire safety concerns.
- No structural survey evidence for local roads despite MCC flagging 'poor structural condition' in 2023; vehicles up to 100 tonnes will use these roads.
- 290 abnormal night-time loads through residential areas with no noise/amenity assessment specific to night delivery.
- Precedent research: strongest comparable Irish refusals (Gougane Barra, Waterford, Killimordaly, Glenties) combine landscape/heritage/tourism grounds with siting-policy failures - directly mirrored by Tirawley's own Tier 1/2/non-designated split and Wild Atlantic Way proximity.
- The Coolglass Supreme Court ruling (cited by the developer to argue climate law compels approval) does not in fact override genuine heritage, tourism or siting objections - the Court explicitly rejected a 'climate always wins' formula.

Cross-Cutting Themes Across the Whole EIAR

Several patterns recur across multiple chapters. Taken individually each might be dismissed as a one-off drafting slip; taken together, they describe a consistent pattern across this entire application.

Theme A: The Same Documents Contradict Themselves, Not Just Each Other

- Chapter 3 denies SAC/SPA proximity in one section while its own Table 3.1 (a few pages later) discusses 'designated sites with hydrological connectivity'.
- Chapter 14 rates the Gazebo's indirect effect as 'Significant' while its headline conclusion says 'no significant effects' (narrowly scoped to direct effects only).
- Chapter 13 rates recreation/amenity effects as 'High-medium' magnitude and 'not significant' in the same sentence.
- Chapter 15 gives three different total receptor counts (100, 108, 119) within a single chapter.
- Chapter 14 gives two different construction dates (1794 and c.1840) for the same protected structure.

Theme B: Numbers Don't Match Across Chapters

- Cumulative turbine count: 201 (Chapter 6, NIS) vs 2,224 (Chapter 7) - a tenfold discrepancy in near-identical sentences.
- Killala's population: stated as 58,710 in Chapter 5 against a real figure of a few hundred.
- Carbon savings: the chapter's own formula and inputs (Chapter 10) produce 53,516 tonnes/year; the chapter states 49,719 tonnes.

Theme C: Mayo County Council's Own Objections Are Recorded but Not Engaged With

- The clearest example: Chapter 13's verbatim record of MCC's 9th March 2026 statement that the proposal is 'not suitable at this location' - with no developer rebuttal anywhere in the same table.
- MCC's BESS fire safety concerns (fire certificate, 2 access points, 500m exclusion zone reference, toxin risk) are recorded in Chapter 17/13 but not carried through into a dedicated emergency access or air-quality dispersion assessment in Chapters 10 or 16.
- MCC's 2023 concern about Palmerstown Bridge's setting being affected by land-take is recorded but not answered with bridge-specific HDD mitigation in either Chapter 2 or Chapter 14.

Theme D: The BESS Is Consistently Under-Assessed Relative to Its Scale

- No emergency access assessment (Traffic).
- No air quality/dispersion assessment of a fire scenario (Air Quality).
- No distance to nearest residence stated (Major Accidents).
- No heat-wave-specific thermal risk discussion (Major Accidents).
- Consequence rating for fire/explosion that appears to understate realistic international experience (Major Accidents).
- No field survey photograph of the BESS compound (Cultural Heritage).
- The emergency response plan that is meant to cover a BESS incident is itself an unfilled template (Population and Human Health / CEMP).

Theme E: Survey and Baseline Data Currency Is a Recurring Weakness

- Ecological/ornithological survey data explicitly admitted by the developer's own Appendix 6.5 to be approaching or exceeding 3 years old.
- National Museum of Ireland topographical search dated April 2022 - 4 years old by determination.
- Japanese knotweed record from 2015 - 11 years old, and not specific to the Billoos area raised by the community.
- Air quality and meteorological baselines drawn from monitoring stations 16-44km away rather than the site itself.
- Traffic baseline from a single day in June 2023.
- Killala's accident statistics baseline from 2016.

Theme F: Reliance on Scottish/UK Guidance Without Explanation

- Landscape cumulative methodology (NatureScot 2012, 2017).
- Ornithological vantage point survey methodology (SNH/NatureScot).
- Air quality carbon calculator (Scottish Government tool).
- The Peat Landslide Hazard Assessment itself uses British Standards throughout and was prepared by a Northern Ireland-based consultancy.

Theme G: Document Integrity Failures in Safety-Critical Appendices

- The Emergency Response Plan (CEMP Appendix 2.1) is an unfilled template with no named contacts and an incorrect Northern Ireland emergency phone number.
- The Peat Stability and Landslide Hazard Assessment names Sligo County Council and the wrong EIAR chapter number in its own Executive Summary.
- Both of these safety-critical documents - one covering emergency response, one covering the one hazard category with a documented Irish fatality precedent - show signs of being recycled from other, unrelated projects without being properly checked for this specific application.

Closing Note

The pattern that emerges is not simply a collection of unrelated minor errors. It is a consistent picture of: headline conclusions worded more reassuringly than the supporting technical detail justifies; safety-critical appendices that show signs of being adapted from other projects without being properly checked for this one; a statutory consultee's direct objection to the final design that goes unanswered in the developer's own documentation; and a Battery Energy Storage System that is repeatedly under-assessed relative to its scale and the genuine risk profile of grid-scale lithium battery storage internationally.

Yours faithfully,

Teresa Fagan

Chairperson