

Lacken Humbert Development
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23rd 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, Castlelacken Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

Submission on Behalf of Humbert Development Association

The Humbert Development Association wishes to formally object in the strongest possible terms to the proposed Tirawley Wind Farm development by Constant Energy Limited.

Our association represents a community deeply connected to the landscape, history, culture and tourism economy of the Lacken and Kilcummin area. We believe that this development would cause significant and irreversible harm to one of Ireland's most important coastal landscapes and would fundamentally alter the character of a community that has worked tirelessly for generations to preserve and promote its natural and cultural heritage.

This submission is based upon our review of the planning application documentation, the Environmental Impact Assessment Report, associated appendices, and our direct knowledge of the receiving environment.

Lack of Meaningful Community Engagement

A fundamental concern throughout this process has been the failure of the developer to meaningfully engage with the Lacken community most directly affected by this proposal.

The Community Engagement Report acknowledges that attendance at the developer's public information event was extremely limited. Despite the scale of what is proposed, involving sixteen industrial-scale wind turbines, a large Battery Energy Storage System, a substantial 110kV substation and extensive associated infrastructure, the developer made no meaningful effort to engage with local community organisations such as the Humbert Development Association. The BESS and Substation were not included as part of the "event" and this is a very serious omission on behalf of the developer.

The developer's consultation process appears to have been designed to inform rather than genuinely consult. Local concerns raised by residents regarding landscape impacts, tourism, heritage, biodiversity, water supplies, noise, shadow flicker and cumulative effects remain largely unanswered.

The Lacken community is not simply a location on a map between Ballycastle and Killala. It is a vibrant, historic and established community with its own identity, traditions and heritage. The developer's documentation repeatedly fails to recognise this reality and instead treats the area as an available site for industrial development. It is not.

Impact on Tourism and the Local Economy

The proposed development represents a direct threat to the tourism economy upon which many businesses and community initiatives depend.

The North Mayo coast is recognised nationally and internationally for its unspoilt scenery, archaeological significance and unique visitor experience. The area forms an important part of the Wild Atlantic Way and contains some of the most significant heritage and landscape resources in Ireland.

Tourism within the area is not dependent upon industrial development but rather upon the preservation of the natural landscape, coastal scenery, tranquility and cultural heritage that attract visitors from across Ireland and abroad.

Visitors come to experience:

- The Céide Fields cultural landscape.
- Downpatrick Head.
- The Wild Atlantic Way.
- The North Mayo coastal scenery.
- The Western Way and local walking routes.

- Local heritage sites and monuments.
- The area's dark skies and natural tranquillity.
- Historic locations associated with General Humbert's 1798 landing and campaign.

The introduction of sixteen turbines reaching approximately 135 metres in height, together with aviation lighting, a large BESS facility and a major substation, would industrialise a landscape that is currently marketed and valued precisely because it remains largely undeveloped.

The Environmental Impact Assessment acknowledges significant visual impacts from numerous viewpoints. These impacts will not be experienced solely by residents but also by visitors using scenic roads, walking routes and tourism facilities throughout the area.

The Protected Western Way National Waymarked Trail passes through the wider landscape and visitors using this route will experience the turbines at close range. The quality of this walking experience will be significantly diminished.

The cumulative effect of existing, permitted and proposed wind energy developments throughout North Mayo must also be considered. The gradual industrialisation of the Mayo landscape threatens the long-term viability of tourism across the wider region.

Impact on the Historic and Cultural Landscape

The proposed development would be located within a landscape of exceptional archaeological and historical significance.

The wider area contains an extraordinary concentration of archaeological monuments, historic field systems, court tombs, ecclesiastical sites and cultural heritage features associated with the broader Céide Fields complex.

The cultural landscape extends far beyond the visitor centre itself and includes extensive archaeological remains preserved beneath blanket bog. Local knowledge, previous archaeological investigations and historic records demonstrate that the wider landscape contains significant archaeological potential that cannot be adequately assessed through desk studies alone.

The area contains and is influenced by numerous heritage assets including:

- Rathlacken Court Tomb.
- Rathfran Dominican Friary.
- Breastagh Ogham Stone.
- St Cummin's Church and Holy Well.

- Carbad More Court Tomb.
- Numerous historic field systems associated with the wider Céide Fields landscape.

The insertion of large-scale industrial infrastructure into this historic setting would permanently alter the character and setting of these assets.

No mitigation can remove the visual dominance of turbines of this scale within such a sensitive cultural landscape.

Landscape and Visual Impact

The proposed development would have profound visual consequences across the Lacken area and wider North Mayo coast. The negative visual impact of the proposed development is highlighted in this photo. The elevation of the area is not suitable for this development as it would be such an intrusive destructive feature on this historic landscape.



Mayo County Council has previously identified concerns regarding the visual sensitivity of the receiving environment. The area is recognised for its scenic quality and forms part of an internationally promoted tourism destination.

The turbines would be visible from extensive areas of the coastline, public roads, residential properties, recreational routes and community facilities. Their scale, movement and aviation lighting would introduce an industrial character into a landscape currently valued for its natural appearance and tranquillity.

The cumulative visual impact is particularly concerning given the increasing number of existing, approved and proposed wind energy developments throughout Mayo and neighbouring counties.

Noise, Shadow Flicker and Human Health Concerns

The Association remains deeply concerned regarding the potential impacts of turbine noise and shadow flicker on local residents.

Many homes throughout the area will experience a substantial change in their living environment. While the applicant asserts compliance with existing guidance, significant concerns remain regarding the adequacy of the assessment methodology, the treatment of amplitude modulation and the long-term impacts on residential amenity.

Particular concern exists regarding vulnerable individuals, including older residents and those suffering from migraines, sensory sensitivities and other health conditions that may be aggravated by turbine operation.

The community remains unconvinced that the proposed mitigation measures can adequately protect residential amenity over the lifetime of the project.

Water Environment and Drinking Water Concerns

The Association is particularly concerned regarding the potential impact on groundwater, springs, watercourses and downstream protected habitats.

Many homes in the area depend upon private wells and natural spring-fed water supplies. These water sources are essential to daily life and are vulnerable to disturbance arising from excavation, drainage works, turbine foundations, forestry clearance and associated construction activities.

The proposal involves extensive excavation within a sensitive hydrological environment. Any disruption to groundwater pathways, spring flows or water quality could have serious consequences for local residents and for downstream ecological receptors.

Of particular concern is the hydrological connectivity between the development site and the Lacken Saltmarsh and wider Killala Bay/Moy Estuary designated sites.

Impact on SACs, SPAs and Biodiversity

The development lies within the zone of influence of several European-designated conservation sites, including:

- Lacken Saltmarsh and Kilcummin Head SAC.
- Killala Bay/Moy Estuary SPA.

The applicant acknowledges potential pathways for impact yet relies heavily upon mitigation measures and future monitoring.

We submit that significant uncertainty remains regarding the effectiveness of these measures. Also who will be responsible for the monitoring of these mitigation measures - the applicant has not shown in its documents that it can be relied upon to protect the area.

The area supports important bird populations, sensitive habitats, bat species and ecological networks that extend far beyond the red-line boundary used by the applicant.

We are particularly concerned that aspects of the ornithological and ecological baseline data are no longer sufficiently current to support a development of this scale.

Traffic and Construction Impacts

The construction phase would generate substantial disruption throughout the area. Both during and after construction with the road infrastructure being seriously adversely affected which in turn will hamper tourism in the area.

Local roads were not designed to accommodate the transportation of turbine components of the scale proposed. The abnormal loads required for the project will place significant pressure on existing infrastructure and create disruption for residents, businesses and visitors.

The impact on local roads, bridges and tourism routes has not been adequately addressed.

Failure to Demonstrate Proper Planning and Sustainable Development

The planning system must balance renewable energy objectives with environmental protection, heritage conservation, community wellbeing and sustainable rural development.

This proposal fails to achieve that balance.

The development would industrialise a highly sensitive coastal landscape, undermine tourism, adversely affect cultural heritage, threaten important ecological resources and impose substantial burdens on the local community while delivering limited local benefit.

The cumulative evidence demonstrates that this proposal is not an appropriate development for this location.

Conclusion

For all of the reasons outlined above, the Humbert Development Association respectfully requests that An Coimisiún Pleanála refuse permission for the proposed Tirawley Wind Farm development.

The proposal represents an inappropriate industrialisation of an internationally significant coastal landscape and would result in unacceptable impacts on tourism, heritage, biodiversity, residential amenity, water resources and community wellbeing.

The Lacken area is one of Mayo's greatest assets. Its future lies in the protection and enhancement of its unique landscape, heritage and tourism potential rather than in the introduction of large-scale industrial infrastructure.

We therefore respectfully request that permission be refused in the interests of proper planning and sustainable development.

Yours faithfully,

Leo Loughney

Humbert Development Association