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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,

We wish to formally object to the proposed Tirawley Wind Farm development by Constant Energy Limited, comprising 16 wind turbines, a Battery Energy Storage System (BESS), substation, underground cable connection, access roads and associated infrastructure in the Lacken and Kilcummin area of County Mayo.

Having reviewed the planning application and Environmental Impact Assessment Report (EIAR), we do not believe the applicant has adequately assessed or mitigated the significant impacts that this development would have on farming, forestry, residential amenity, public safety, landscape character, rural infrastructure and the wider community.

While we support the transition to renewable energy, this proposal represents the industrialisation of a rural, agricultural and peatland landscape and is inappropriate in both scale and location. The impacts would be long-term and, in many instances, irreversible, while the benefits to the local community remain uncertain and largely temporary.

1. Farming and Agricultural Impacts

The proposal would permanently remove approximately 15.68 hectares of agricultural land from productive use. Seven turbines are located wholly or partly on agricultural lands, resulting in the fragmentation of farm holdings and the introduction of industrial infrastructure into active farming areas.

The applicant suggests that farming can continue around turbines; however, this does not reflect the reality of modern farming. Turbine foundations, hardstands, cabling, access roads and safety exclusion areas all interfere with normal farming operations, machinery movement and future farm planning.

The result is a permanent reduction in the efficiency, flexibility and long-term viability of agricultural land use.

2. Forestry Loss

The project requires the clear-felling of approximately 31.86 hectares of commercial conifer forestry.

This represents a significant loss of established forestry, including timber resources, carbon storage capacity, habitat value, landscape screening and shelter benefits. While replacement planting is proposed elsewhere, it does not compensate for the immediate and localised loss of these environmental and economic assets.

The impacts occur within the local area, while the proposed compensation is displaced elsewhere. We do not consider this to be effective mitigation.

3. Industrialisation of a Rural Landscape

The proposed development would fundamentally alter the character of the area.

This is not merely a wind farm. It includes:

- Wind turbines;
- Turbine foundations and hardstands;
- Internal access roads;
- A 110kV substation;
- Grid infrastructure;
- Construction compounds;
- Operations facilities;
- Security fencing; and
- A large-scale Battery Energy Storage System (BESS).

Collectively, these elements amount to a substantial industrial complex located within a rural landscape traditionally characterised by farming, forestry and peatland.

4. Traffic and Infrastructure Impacts

The scale of the project requires substantial road accommodation works and the movement of abnormal loads along the turbine delivery route.

The development would place considerable pressure on local roads, junctions and roadside infrastructure and would result in:

- Increased heavy goods vehicle movements;
- Road surface deterioration;
- Traffic delays;
- Temporary road closures;
- Disruption to farming activities;
- Safety concerns for residents and road users; and
- Disturbance to local communities.

While the applicant proposes a Traffic Management Plan, such measures do not remove the impacts; they merely attempt to manage them after they occur.

5. Noise, Shadow Flicker and Residential Amenity

The applicant relies heavily on predictive modelling to conclude that noise impacts will remain within acceptable limits.

However, compliance with numerical thresholds does not necessarily mean there will be no impact on residents. Wind turbine noise can be intrusive due to its distinctive characteristics, including swishing, pulsing, amplitude modulation and night-time audibility.

The fact that Turbine AT06 requires a Sound Optimised Mode demonstrates that noise is already recognised as a material issue within the assessment.

Similarly, the shadow flicker assessment identifies 108 out of 119 receptors as potentially affected. This is a significant number of households. The proposed reliance on software controls and operational mitigation measures effectively acknowledges that shadow flicker impacts are anticipated.

We do not believe residents should be required to rely on operational controls and future monitoring to protect their homes from impacts which should have been avoided through appropriate site selection and design.

6. Human Health and Quality of Life

The potential impact of the development on health and wellbeing should not be underestimated.

The World Health Organization has recognised environmental noise as a public health issue and has identified annoyance and sleep disturbance as potential adverse outcomes associated with wind turbine noise.

The combined effects of noise, shadow flicker, visual intrusion and the loss of rural tranquillity have the potential to adversely affect residential amenity and quality of life.

Assessment of these impacts cannot be based solely on compliance with technical standards. The lived experience of residents and the cumulative effect of long-term exposure to industrial-scale infrastructure within a rural environment must also be considered.

7. Family Lands, Farming Activities and Future Development Potential

Our family owns and actively farms lands in close proximity to the proposed development. In particular, our lands are located approximately **74.4 metres from the proposed Battery Energy Storage System (BESS)**.

This raises significant concerns regarding the future use and development potential of our property.

Our family has deep roots in the area and our three children hope to continue living within the local community. As with many farming families, we hope future generations will have the opportunity to build homes on family lands and remain connected to their community and farming heritage.

We are concerned that the proximity of the BESS, together with associated safety considerations and planning constraints, could sterilise or significantly diminish the future residential development potential of our lands.

Given the proposed 35-year operational lifespan of the project, any decision to grant permission could have consequences not only for our family today, but also for future generations.

8. Battery Energy Storage System (BESS), Public Safety and Environmental Concerns

The proposed BESS is one of the most significant aspects of the development and should be considered as a major industrial installation in its own right.

The facility would comprise 20 battery containers with a capacity of up to 150MW. Large-scale battery storage facilities are associated with recognised risks including:

- Thermal runaway events;
- Fire;
- Smoke and hazardous gas release;
- Contaminated fire-fighting water;
- Emergency response challenges; and
- Long-term operational uncertainties.

We are concerned that important fire safety, emergency response and risk management matters have been deferred to post-consent stages rather than being fully addressed as part of the planning application.

As nearby landowners and residents, we do not believe sufficient information has been provided regarding:

- Fire safety arrangements;
- Emergency response procedures;
- Emergency service consultation;
- Protection of neighbouring lands and properties; and
- Environmental protection measures in the event of an incident.

9. Proximity to Watercourses and Environmental Risk

A further concern is that the proposed BESS is located approximately **103 metres from a nearby river**.

In the event of a battery fire, thermal runaway incident or fire-fighting operation, there is potential for contaminants to enter nearby watercourses through runoff or drainage pathways.

Any such event could affect:

- Surface water quality;
- Aquatic habitats;
- Agricultural lands;
- Livestock;
- Groundwater resources; and
- The wider environment.

Given the proximity of the river to the proposed BESS, we do not believe the application provides sufficient detail regarding containment measures, emergency response arrangements or environmental safeguards.

10. Over-Reliance on Mitigation Measures

A key weakness of the proposal is its reliance on future mitigation, monitoring and management measures.

Examples include:

- Traffic impacts managed through a Traffic Management Plan;
- Noise impacts managed through operational curtailment;
- Shadow flicker managed through software controls;
- Forestry loss addressed through off-site replanting;
- BESS risks addressed through future operational procedures; and
- Environmental impacts managed through post-consent plans.

This approach seeks to manage impacts after permission is granted rather than demonstrating that those impacts can be avoided in the first instance.

We do not consider this to represent a robust planning approach for a development of this scale.

Conclusion

For the reasons outlined above, we believe the proposed Tirawley Wind Farm would result in significant and unacceptable impacts on farming, forestry, rural infrastructure, residential amenity, public safety and landscape character.

We are particularly concerned about the scale of the proposed Battery Energy Storage System, its proximity to our family lands, its potential impact on future residential development opportunities for our children, and the environmental and public safety risks associated with its location approximately 103 metres from a nearby river.

The proposal relies heavily on future mitigation, monitoring and operational controls rather than demonstrating that impacts have been avoided through appropriate site selection and design. In our view, this does not provide sufficient certainty that residents, farmers, property owners and the environment will be adequately protected throughout the 35-year lifespan of the development.

We also wish to adopt and support the submission of the **Lacken Ballycastle Community Landscape Protection Group** in relation to this application and request that its concerns be considered as part of this objection.

Accordingly, we respectfully request that **An Coimisiún Pleanála** refuse permission for the **proposed Tirawley Wind Farm development** in the interests of proper planning, sustainable development, public safety, environmental protection and the preservation of rural communities.

Yours faithfully,

Liam Boyd
Bernie Boyd