

Lissadrone Bed & Breakfast

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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, Castlelacken Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

RE: Objection to Proposed Tirawley Wind Farm Development (PAX16.324258)

To An Bord Pleanála,

I was born and reared in Lissadrone and emigrated to the UK after leaving school to work. My husband and I built our home in Lissadrone in 1999 and moved back home in 2005 with our young family to live and rear our children. We moved home for peace and tranquility to enjoy the slower pace of life, stunning natural landscapes, and strong sense of community. Our family attended the local schools, and they had a wonderful upbringing beside the sea.

This proposed Tirawley Wind Farm was advertised in the Western People and stated "the proposed Tirawley wind farm development within the barony of Tirawley incorporating the townlands of Lacken and Ballycastle, Co. Mayo. This was the first I heard of this development. There was no consultation from the Developer with locals, no engagement, no leaflets, no liaison officer, just a shroud of secrecy until the advert appeared. Given that local landowners were all involved, it was the best kept secret of all times. It is a disgraceful and disrespectful way to treat us and our community.

I wish to formally object to the nature of the proposed wind turbine development due to the significant concerns it raises for residents living in close proximity to the site, including my own property which is located approximately 1km from the proposed turbine location.

A recent application 323778 was rejected and the reason was the incorrect number of turbines noted. I could not believe the same with this planning application, there are 21 and 31 turbines noted in different sections of the documents. How can I possibly make an informed submission not knowing the exact number of turbines proposed for the Tirawley Wind Farm?

I believe this proposal would have significant adverse impacts on the rural environment, local farming operations, residential amenity, water resources, biodiversity, and the long-term sustainability of the local community.

A particular concern of mine relates to the exclusion of Lackenhill Cemetery (new) and Lackenhill Cemetery (old). The whole cluster of turbines beginning with AT07, AT08, AT09, AT10, AT11, AT12, AT13, AT14, AT15 with AT16 either surround or are visible to both graveyards. AT16 is located directly above both graveyards showing little respect for our deceased family and community who are resting here in peace. Where is the respect shown to our deceased family members, has the developer carried out a comprehensive assessment of our graveyards as they are part of our cultural heritage. My Grandfather was the first man to dig a grave in the Lackenhill new graveyard when it was opened. All my deceased family members are buried in both graveyards.

Why were Lackenhill graveyards excluded when photo montages of Rathfran, Kilbride, Killala and Crossmolina were included in applicants photo montages.

Historically we are a farming and fishing community and this has sustained many families for generations.

Has a comprehensive assessment been conducted to measure the impact of the development on agricultural activity within the area. Farming remains the principal land use throughout this part of North Mayo and many farms operate across fragmented holdings connected by local roads. The movement of cattle and sheep between lands is an established and essential part of everyday farming practice. The proposed development would introduce a substantial volume of construction traffic, including heavy goods vehicles, abnormal loads, excavators and other machinery onto roads that currently serve both local residents and agricultural users. The interaction between frequent construction traffic and livestock movements raises serious concerns regarding road safety, farmer safety, animal welfare and the practical operation of farms.

The main industries in North Mayo are farming and tourism. Both will be very negatively impacted by the mitigation measures the applicant has included are not sufficient to deal with the enormity of the adverse detrimental effect the wind farm will have.

I am very concerned about the cumulative impact the Tirawley wind farm will have on tourism in not only the Lacken Area but also in Ballycastle. Recently the Glenora wind farm has been approved by An Coimisiún Pleanála for 22 turbines. The coast road from Lacken to Ballycastle is an extremely important part of the Wild Atlantic Way and is an extremely important economic asset to the area. The cumulative effect of Tirawley, Glenora, Keerglen and potentially Clydagh will have on tourism in the area cannot be ignored. The communities involved have worked extremely hard over the years to promote the areas, and the recently launched Failte Ireland and Mayo County Council tourism plan for the area is a significant boost for the area. This cumulative wind energy development that is planned for the north west coast of Mayo is eroding the future that our communities can have. The Lacken Ballycastle coastline is impressively historic with the Céide fields complex and down Patrick head, the future that residents could have will become negligible if ACP do not consider fully the cumulative impact of all projects in the area. I do not believe that the applicant has fully considered all the cumulative effects.

I am the owner of a seasonal Bed & Breakfast, which is totally dependent on tourists coming from abroad. My main customers are European and come for peace and tranquility, enjoy nature, walking routes and all our area has to offer. My business has not been identified as tourist accommodation in the planning document. The Landscape and Visual Amenity chapter 12 assess visual impacts from public roads, individually named heritage structures such as the Gazebo but no single bed and breakfast, guesthouse or other tourist accommodation has been named, located or individually assessed as a receptor anywhere in the EIAR's landscape, population and human health, or material assets chapters in the planning document.

My business is marketed on uninterrupted views of the Gazebo and Lacken Strand from my outdoor breakfast seating area, the proposed development is in the direct catchment of AT07, AT08, AT09, AT10, AT11, AT12, AT13, AT14, AT15 and AT16 and my business was never specifically identified, I was never contacted, surveyed or assessed by the developers consultants. The EIAR assesses visual impact from cemeteries 15km away as established in the Landscape chapter observation. It does not assess the visual impact from any individual tourism accommodation business anywhere in the study area, despite naming this category of business explicitly in its own baseline as a receptor that matters.

The developers only economic claim about accommodation providers is explicitly 'anecdotal' and addresses a different question entirely. To quote precisely 'anecdotal evidence received by the Developer on other wind farms construction projects shows that local businesses such as accommodation providers welcome the enhanced level of occupancy that is achieved due to the construction contractors using their accommodation on a year-round basis. Whilst the overall contribution of the development itself to the tourism economy is considered to be negligible and not significant, the benefits to individual businesses serving the tourism economy will be substantial and significant'.

This only addresses short term accommodation during the 21 month construction phase with the possibility construction workers may need beds. This is based on 'anecdotal evidence' from other projects, not from any survey, contact or assessment of accommodation businesses in this

area. A short term increase in beds for construction workers will not offset the full economic impact that my business will incur during the 35 year operational lifetime of the windfarm.

Chapter 5 explicitly names B&B's, hotels and other accommodation providers as part of the tourism economy the development will affect, and describes the area as transitioning into a 'primary destination for national and international tourism' where protecting the 'sense of place' is a key consideration. Despite this, no chapter reviewed in this planning document, Landscape and Visual Amenity, Population and Human Health, Material Assets or Cultural Heritage - identifies, locates, or individually assesses a single named tourism accommodation business as a receptor whether for visual impact, noise or general amenity.

In the EIAR's own Cultural Heritage and Landscape chapters they confirm the Gazebo, Lacken Strand and the Ceide Coast will experience a 'Significant' rated effect. Therefore as i was never individually assessed by the Developer, how can the EIAR's tourism conclusions be relied upon as complete and accurate?

In conclusion I request that ACP bear in mind the negative impact this development will have on my business established in 2016.

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 Ceide Coastal walk.
- The Wild Atlantic Way.
- The North Mayo coastal scenery.
- Velo cycle routes.
- The Western Way and local walking routes (Blue & Red loop).
- Local heritage sites and monuments - The Lacken Gazebo.
- The area's dark skies and natural tranquillity.
- Historic locations associated with General Humbert's 1798 landing and campaign.

The Ceide Coastal Walk is a project which links the Céide Fields with Downpatrick Head.

This incorporates a 13.5Km walking trail along the coastline. This project was revealed to great fanfare at the same time that Glenora Wind Farm 22 turbines at a height of 180m

were granted planning permission. This development will be clearly visible from parts of the Ceide Coastal Walk.

Our future tourism potential is in direct conflict with this proposed Wind Farm development. It is tourism that is the future for this area, it is tourism that will not only provide advancement for its residents but it will protect our culture, our history and our future.

There are 30 signature points along the Ceide Coastal Walk including:

- Polladarky Blow Hole (Bigger then Poll na Sean Tine)
- Leim Giant Steps
- Doonfeeney Sea Arch

The Ceide Coastal walk will support tourism and recreational activities but will also act as an outdoor living laboratory complementing the Eco Campus facility.

The Ceide Coastal Walk is a complementary resource for this area to support local employment opportunities. The negative impact of all planned/proposed 210 windfarms in the local area in a 20km radius of Tirawley will be detrimental for this walk and the North Mayo area as a whole.

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 and cycling 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.

The Lacken Gazebo is a Folly, one of the most unusual protected structures in Ireland which can be viewed from Sligo, Leitrim, Donegal and all over Mayo. It is formed from a double arch of rough stones. It is situated on the summit of Lacken Hill to the rear of Castle Lacken: seat of the Palmer family from the sixteenth century. This was constructed during the latter part of the eighteenth century by either Sir Roger or Sir John Palmer. This structure is located 300m from

the nearest turbine AT16, how can this historical monument be protected in light of the planned development? Has a comprehensive study been conducted as this structure needs essential repair works, has this matter been addressed?

The Environmental Impact Assessment should fully examine the extent of existing livestock movements on local roads and assess how these movements will be accommodated during construction. Failure to adequately assess this issue risks underestimating the impact of the project on farming enterprises that have operated in the area for generations. While construction impacts may be temporary, they have the potential to disrupt farming activities over a prolonged period and increase labour requirements, operational costs and risks associated with handling livestock.

I am also concerned about the potential impact of the development on private wells, groundwater resources and local water supplies. Many households and farms in the area depend on private water sources for domestic use and livestock watering. The scale of excavation, foundation construction, road building and associated works proposed creates a risk of interference with groundwater flows, drainage patterns and water quality. Any contamination or disruption of private water supplies could have serious consequences for local residents and farming operations. Given the importance of groundwater resources in the area, a detailed and independently reviewed hydrogeological assessment should be undertaken together with long-term monitoring and enforceable protection measures.

The proposal also raises significant concerns regarding biodiversity, habitats and the environmental improvements already achieved by local farmers through participation in State-supported schemes including ACRES, ANC and other Common Agricultural Policy measures. Local farmers have invested considerable time, labour and financial resources in habitat enhancement, hedgerow management, watercourse protection, biodiversity improvement and environmental stewardship. These efforts support national environmental objectives and contribute positively to the ecological value of the landscape. It is therefore essential that the Environmental Impact Assessment fully evaluates whether construction activities, road works, excavation, turbine operation and associated infrastructure could undermine these environmental gains or adversely affect wildlife corridors, pollinator networks, habitats and protected species.

The cumulative impact of the proposed development must also be carefully considered. This proposal cannot be viewed in isolation. The scale of infrastructure proposed, together with concerns regarding future energy developments in the wider area, has the potential to fundamentally alter the character of North Mayo. The cumulative impact on rural communities, farming activity, landscape character, biodiversity and tourism requires comprehensive assessment. Incremental industrialisation of a predominantly agricultural landscape risks creating long-term conflicts between traditional rural land uses and large-scale energy infrastructure.

The impact on residential amenity is another matter of significant concern. Residents chose to live in this area because of its rural character, scenic landscape and peaceful environment. The

proposed turbines would become dominant features within the landscape and would permanently alter the visual character of the area. Concerns also remain regarding turbine noise and shadow flicker and whether the assessments submitted by the applicant adequately reflect real-world operating conditions. Independent verification of these assessments should be undertaken to ensure that nearby residents are not subjected to unacceptable impacts over the lifetime of the development.

Further concern arises from the potential effects of quarrying activity, excavation works and the use of heavy construction machinery associated with the project. Increased extraction of stone and aggregate, together with prolonged operation of large machinery, may generate vibration and disturbance affecting local residents and potentially impacting local structures and community assets. These effects should be independently assessed and appropriate safeguards imposed if the project proceeds.

The proposal must also be considered in the context of local heritage, peatland systems and traditional land uses. Concerns remain regarding the potential impact on nearby bogland areas, including hydrology, drainage patterns, habitat quality and long-established local usage rights. Peatlands are of significant environmental, cultural and ecological importance and any development with the potential to affect their condition should be subject to the highest level of scrutiny.

I am further concerned by the lack of meaningful engagement with those most directly affected by the proposal. A development of this scale requires genuine consultation with local residents and farming families whose homes, businesses and livelihoods may be impacted. Many members of the community feel that their concerns have not been adequately addressed and that insufficient weight has been given to the knowledge and experience of those who live and work in the area.

Firstly, there are questions concerning the landowner consent documentation submitted with the application. It appears that one of the addresses used for a landowner consent relates to the private residence of a person who previously owned land affected by the proposal. I request that the Planning Authority verify that all consent forms have been signed by the current registered landowners and that the ownership details correspond correctly with the relevant folios and land registry records. Clarification should also be provided regarding any discrepancies between the submitted consent forms, folio boundaries, and mapping accompanying the application.

I am also concerned about the adequacy of the mapping submitted as part of the application. Given the importance of establishing the precise extent of lands affected by the development, the Planning Authority should be satisfied that all maps accurately reflect registered folio boundaries and that no lands have been included without the knowledge and consent of the lawful owners.

There are further concerns regarding the public notices associated with the application. The typeface used on the planning signs is extremely small and difficult to read without magnification. In addition, the signs have been positioned unusually low to the ground, making

them less visible to passing members of the public. I ask the Planning Authority to consider whether the public notice requirements have been fully complied with and whether the public has been afforded a reasonable opportunity to examine the details of the proposal.

The local road infrastructure at Lackenhill also requires careful consideration. The area has experienced significant infrastructure issues in the past, including the collapse of part of the Lackenhill road network in 1998. These roads were built for horses and carts back in the day. Given this history, I believe a detailed assessment of the capacity, condition and resilience of the local roads should be undertaken, particularly having regard to construction traffic, operational traffic and any long-term impacts arising from the development.

I wish to raise concerns regarding the planning history of this area, particularly in relation to the decision of An Bord Pleanála in Case No. 239901 (Planning Authority Reference P11/409), dated 5 September 2012, in which planning permission was refused for a development comprising four wind turbines with a hub height of 45 metres.

The refusal of that application is a material planning consideration that should be carefully examined as part of the assessment of the current proposal. While the present application may differ in its specific design and operational characteristics, both developments involve significant energy-related infrastructure within the same general area. As such, it is important that the Planning Authority considers whether any of the concerns identified by An Bord Pleanála in reaching its decision remain relevant to the assessment of the current proposal.

The decision of An Bord Pleanála reflects a previous determination that the location was not considered suitable for the proposed development at that time. I am concerned that insufficient attention may be given to the planning history of the area and to the findings of the Board when considering the cumulative impacts, landscape implications, environmental sensitivities, effects on residential amenity, infrastructure constraints and the overall suitability of the location for large-scale energy infrastructure.

I respectfully request that the Planning Authority fully consider the Board's decision in Case No. 239901 and clearly demonstrate how the current proposal differs from, or satisfactorily addresses, the issues that contributed to the refusal of permission in 2012. Where the applicant contends that circumstances have materially changed since that decision, the basis for such a conclusion should be clearly established and supported by objective evidence.

Given the scale and significance of the current proposal, it is essential that the planning history of the area, including the refusal by An Bord Pleanála in 2012, is afforded appropriate weight in the overall assessment and determination of the application.

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 the height, scale and extent in an exposed location overlooking Killala Bay, the proposed development would have a disproportionate and obtrusive visual impact and the proposed development would, therefore, be contrary to policy P/EH-LC 1

of the Mayo County Development Plan 2008-2014, and be contrary to the proper planning and sustainable development of the area.'

The visual impact of sixteen 135m turbines would be colossal compared to four small turbines. Therefore the reasons stated for refusal previously by An Coimisiún Planála in relation to P11/409 still stand and are even more relevant in the context of the current proposal.

If planning permission is granted to Constant Energy, this would constitute wholesale discrimination and be morally wrong on all counts.

Particular attention should be given to fire risk. Lissadrone Bog was the site of a significant bog fire in 1976, and the surrounding area is now substantially enclosed by forestry. This raises concerns regarding the potential consequences of future fires and the risks posed to nearby residents. The Planning Authority should be satisfied that a comprehensive fire risk assessment has been completed and that adequate emergency response measures are in place to protect both local communities and the surrounding environment.

I am also concerned about the potential impact of the proposal on turbary rights associated with Lissadrone Bog. Clarification should be provided regarding the existence of any turbary rights, whether farmers have been consulted, and whether the proposed development could interfere with the continued exercise of cutting turf and access to the bog is part of our cultural heritage.

The application also proposes the change of use of a private residence to an operational building, office and associated ancillary works. Given the rural character of the area, questions arise as to whether this use is appropriate in this location and whether it accords with National Planning policy and the objectives of the relevant Mayo County Development plan. The Planning Authority should carefully assess whether the proposed operational and administrative functions are compatible with the established rural environment.

Consideration should also be given to the historical and cultural significance of the area. Historical sources, including Wilson's Topography, refer to the presence of chalybeate springs at Lissadrone. It should be established whether these springs will be protected and whether the proposed development could adversely affect any associated heritage, hydrological or environmental features.

Finally, I wish to raise concerns regarding consultation with prescribed bodies. From the information available, it is unclear whether all prescribed bodies were fully informed of every aspect of the proposed development. In particular, there appears to be no specific reference to the Battery Energy Storage System (BESS) within the correspondence issued by the applicant. The Planning Authority should confirm that all prescribed bodies received complete and accurate information concerning the entire development proposal, including the BESS component, so that they could provide fully informed observations.

I wish to express my concern regarding the potential impact of this development on the character, beauty and quality of life of the local area. This is a rural landscape that has long

been valued for its natural beauty, tranquillity and unspoilt character. These qualities contribute significantly to the identity of the area and to the wellbeing of those who live and work here.

The local economy is heavily dependent on agriculture, rural enterprise and tourism. Family farms form an integral part of the landscape and local community, while tourism-related businesses, including bed and breakfast accommodation and other visitor services, rely on the area's scenic attractiveness and peaceful rural environment. Any industrial-scale development has the potential to alter the character of the area and may affect its attractiveness as a destination for visitors seeking a traditional rural experience.

I am concerned that the cumulative impact of the proposed development, together with its associated infrastructure, could have adverse effects on the visual amenity of the area and on the rural way of life that local residents have enjoyed for generations. The area's landscape is not merely a backdrop to development but a valuable resource that supports farming, tourism, recreation and community life.

The one positive this planning application has brought about is the coming together of our community and the support our local opposition group; Lacken Ballycastle Community Landscape Protection Group have received is invaluable. Long live our community!

The Planning Authority should carefully consider whether the scale and nature of the proposed development are compatible with the existing rural character of the area and whether sufficient regard has been given to the long-term social, economic and environmental consequences for local residents, farming families, tourism operators and future generations.

In assessing this application, I respectfully request that significant weight be given to the protection of the area's landscape, rural character, agricultural heritage, tourism potential and the established way of life of the local community.

In light of the ownership questions, mapping concerns, road infrastructure issues, fire risks, turbary rights implications, change of use proposals, heritage considerations and consultation matters outlined above, I respectfully request that the Planning Authority fully investigate these issues and satisfy itself that all legal, environmental, safety and planning requirements have been met before reaching a determination on this application.

“When is enough enough”? It is incumbent on the board to stop the industrialisation of our lands and pervert our history and heritage. Have we not learnt any lessons in preserving our heritage, beauty and way of life from past decisions and surely it is time to actually engage the principles of proper planning.

I also wish to adopt and support the detailed submission made by the Lacken Ballycastle Community Landscape Protection Group in relation to the proposed Tirawley Wind Farm development. In particular, I support the concerns raised regarding cumulative wind farm development across North Mayo, impacts on the Céide Fields cultural landscape, effects on tourism and recreation, biodiversity impacts, deficiencies in community consultation and

concerns relating to the proposed Battery Energy Storage System. I respectfully request that these matters be considered as part of my objection.

Having regard to the potential impacts on farming operations, livestock management, road safety, water supplies, biodiversity, peatland systems, residential amenity, landscape character and the long-term sustainability of rural communities, I respectfully submit that the proposed development would not represent appropriate or sustainable development in this location. I therefore request that An Bord Pleanála refuse planning permission for the Tirawley Wind Farm proposal.

Yours faithfully,

Jacqueline Brady

Lissadrone Bed & Breakfast