



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Maria McLoughlin

(b) Observer's postal address

Castletown, Carrowmore Lacken, Ballina, Co. Mayo

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

"Not applicable"

(b) Agent's postal address

"Not applicable"

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

☒

The agent at the postal address in Part 2

☐

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Coimisiún Pleanála case number for the current application (if available)**

(for example: 300000)

PAX16.324258

- (b) **Name or description of proposed development**

The proposed development consists of up to 16 no. wind turbines (Tirawley Wind Farm), including a 110kV sub-station on site, an energy storage system in the form of a battery array located within container units and all associated infrastructure

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Townlands of Ballymurphy, Ballynaleck, Barnhill Lower, Barnhill Upper, Barroe, Billoos, Carn, Carrickanass, Carrowmore, Castlelackan Demense, Castletown, Conaghra, Glebe, Lackanhill, Lecarrowntemple, Lissadrone East and Lissadrone West, Co. Mayo. The Grid connection Route commencing in the townlands of Barroe and onto the townlands of Carrbad More, Tawnaghmore Upper, Rathbaun, Carrickanass, Cloonavarry, Doonamona, Rathcash, Castlereagh, Rathowen West, Rathowen East, Magherabrack, Cloonawillin, Killala, Mullafarry, Lisglennon, Tawnaghmore Lower, Ballinteean and Carrowreagh Co. Mayo

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

In relation to the proposed Development I wish to object to it based on the following grounds:

Scoping: Initial Scoping Response Appendix 1.3 dates back to initial Pre-Planning with Mayo County Council date of 18th August 2023, in relation to the proposed development consisting of 25 wind turbines – expressions of concern at that meeting include visual impact, non-use of public roads forming part of the site boundary, archaeology, haul routes including concerns regarding protection of structures such as Palmerstown Bridge as the setting of the bridge is affected by the land-take for the road widening haulage. In relation to roads, Mayo County Council stated it was not in favour of laying electricity cables in the road carriageway and that given the proximity of the proposed development to Killala Bay/Moy Estuary SPA (Site Code 004036), Killala Bay/Moy Estuary SAC (Site Code 000364) and Lacken Saltmarsh and Kilcummin Head SAC (Site Code 000516), an AA and EIAR would be need to be included and that Mayo County Council would not be in favour of such proposed Development at this location.

A rescoping meeting held on 090326 between Mayo County Council's Planning Section, Fire Office/Department and the Developers Consultant made reference to the current proposed Development of 16 Turbines with BESS unit, 110kV underground cable and grid connection, site office permanent 110kV substation, meteorological mast, construction compounds and operations building. **It was concluded that Mayo County Council would not be in favour of such proposed Development at this location.**

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Planning Statement (April 2026):

The previous application ACP-323778 (EIAR incomplete – did not describe what was being applied for in Planning Statement reference regarding permission being sought for an onsite 110 kV substation, also stated that a second connection option was considered in the EIAR for a 110 KV underground connector cable between development and proposed hydrogen plan – no design flexibility was sought or given and therefore the option was not open to be availed of. The proposed BESS was not discussed or specifically referenced during pre-application stage and HSA were not consulted as a prescribed body. In addition, the EIAR mentioned modelling for varying numbers of turbines. The EIAR also assessed two grid options, but design flexibility was not sought or provided).

The current application **PAX16.324258** states in the Developer's application form to An Coimisiún Pleanála or the Commission, that the area of site to which the application relates in hectares is 108.39 ha (page 4 of the application form), however, in the Planning Statement (April 2026) there is a figure of 108.06 ha (page 6), followed by another reference to the Windfarm site area containing approximately 172 ha of commercial forestry (page 7) – such variance in figures does not give a clear figure of hectares or information to which the application relates to. Reference is made in the Planning Statement to construction of a new tail fed 110 kV Gas Insulated Switchgear (GIS) substation on the Wind Farm Site – however, this specific description should have been included in the Site and Newspaper Notices and the Developer's Application, to give a clearer picture of what was being proposed and being applied for. In relation to the BESS compound (no specific model or type is named) in the Planning Statement (April 2026) and references such as 'BESS compound is not part of the substation and can be completed either at the date of construction of the substation or at a later date" and again 'each container will house a modular array of Lithium-ion batteries or similar technology' are not adequate and are vague – specifications in relation to BESS units and associated specific technologies should be clear in order to better inform the community of the proposed Development. The Planning Statement (April 2026) refers to Community Engagement – reference is made stating that notices were advertised in the local Newspaper. Advertisements were placed in the Mayo

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News dated 28/04/26 and the Irish Independent date 29/04/26 – the Mayo News is not local North Mayo Newspaper – this publication is published in Westport – a local newspaper in North Mayo Area is the Western People. The Irish Independent is a National Newspaper. I attended the Ballina Manor Hotel in June 2023, where the information provided was limited and it referred to planning in relation to the proposed Development at the time for initially 24 Turbines. I left details with JOD Consultant's in order for the Consultant's to forward information regarding maps, I am still awaiting copies of maps requested i.e in June 2026.

There was no public consultation for this current proposed Development i.e of 16 Turbines and so therefore community engagement and public consultation for this current proposed Development did not occur. References are made in the Planning Statement (April 2026) regarding The National Planning Framework which drives policies and planning strategies in relation to social, economic and cultural development in Ireland. The Regional Renewable Electricity Capacity Allocations in **Table 9.1** of the Planning Statement (April 2026), refers to the Northern and Western Region, however, it is worth noting that Mayo has contributed significantly regarding permitted wind energy production alone and 'surpasses the **600 MW** renewable energy target set out in Objective REO23 of Mayo's County Development Plan', with Mayo producing 812.4 GWh from wind energy i.e almost a quarter of wind generation from within the North & Western Regional Assembly area in 2024

Ref: Renewable Energy Strategy for County Mayo 2026 (pages 19,39).

Counties in the other Eastern and Midlands and Southern Regions must play a greater role in relation to Renewables. In the Planning Statement (April 2026), accompanying this application inaccurate references are made in relation to **Table 4.5** Drumlins and Inland Lowlands Policies and Project Influence – reference is made after Policy 16, in the influence section, **'The proposed Development is located on agricultural, commercial forestry and lowlands. Of the 21 no turbines, only one turbine is located on degraded bog' – Planning Statement (April 2026) page 74. The current application is for 16 turbines.**

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The Planning Statement (April 2026) refers to reviewing policy for the Southern Region and Local County Limerick policies and finds the Project complies with key renewable energy and environmental policy objectives. The proposed development is in North Mayo and not in the Southern Region.

Ref: The Planning Statement (April 2026) page 89.

Such errors/inaccuracies provided in the Planning Statement leads to misinformation/confusion regarding the proposed Development Application.

AA and NIS: In relation to the AA Screening and NIS, the zone of influence in relation to Source-Pathway-Receptor model should include the tidal, transitional, marine environment associated with Lacken Bay. Mitigation measures for freshwater intrusion from surface water flash rainfall and the effects on the marine environment have not being assessed. Additional windfarms in the area i.e Glenora and Keerglen should be included under the in-combination effects. The precautionary principle which relates to a European Court of Justice Case in the Waddenzee Judgement (Case C0127/02) must apply for this proposed development, in light of the number of windfarms operational, consented and for repowering (i.e least 16) within a 20 km of the proposed development. The NIS has not included in-combination effects of the proposed felling of 31.86 hectares of forestry regarding this proposed development particularly effects on WFD watercourses within the catchments and sub-catchments. As part of screening matrix and as the Lacken Saltmarsh and Kilcummin Head SAC is within close proximity to the proposed development interference with the key relationships that define the structure or ecological function – the significance of impacts should be thoroughly assessed.

EIAR:

Introduction and Development Description: The summary proposed development description refers to 17 on site deposition sites, Site Notices refer to development of on-site deposition sites and Appendix 18.1 Summary of Mitigation measures refer to 19 deposition sites. These inaccuracies do not provide a comprehensive read of the EIAR document.

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Alternatives Considered: Alternatives considered Report refers to various iteratives of the proposed development, from an initial 42 Turbines to the sixth iterative of 16 Turbines. A Solar Farm is briefly mentioned as an alternative, however, there is no mention of geo-thermal or offshore. A Do-Nothing Scenario might be the better option given that the proposed development footprint is extensive. The Alternatives Considered Report in its concluding statement refers to **18** Turbines.

Planning Policies and Context: Having regard to the following

Policies/Acts/Plans/Frameworks/Draft Guidelines/Strategies/Assessments:

European, Regional and National Policies and Guidance

Paris Agreement (2015)

Climate Action and Low Carbon Development Act 2015, as amended

Climate Action Plan 2024

Project Ireland 2040

National Planning Framework

Draft National Wind Energy Guidelines

Mayo County Council Development Plan 2022-2028

Draft Mayo County Council Renewable Energy Strategy 2026

County Mayo's Landscape Assessment Volume 4 Supporting Document for Mayo County Development Plan 2022-2028

Under Climate Action Plan 2024, Section 11.2.3 "Spatial and Planning Policy", the National Planning Framework (NPF), climate change objectives integration under National Policy Objectives (NPO) – NPO 55 provides for 'the promotion of renewable energy use and generation at **appropriate locations** within the built and natural environment to meet national climate objectives towards achieving a low carbon economy by 2050' I believe that the dispersive nature (proposed development over numerous townlands), throughout the landscape, are not appropriate locations and would conflict with NPO 55 and section 11.2.3 of CAP 2024, this in turn would not be consistent with Section 15(1)(a) of the Climate Action

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and Low Carbon Development Act 2015 as amended and with layout conformation listed in the Draft Revised Wind Energy Development Guidelines of 2019.

The area identified for the proposed developed is listed in the Mayo County Council Development Plan 2022-2028 Volume 4 Landscape Appraisal for County Mayo Section 2.5

Area D: North Coast Plateaux which include the following critical Landscape factors:

- **Elevated Coastal Vistas** due to uncomplicated straight arrangement of this coast and the elevated road level of the R314, stunning vistas along the coastline are available, with main concern for the natural linear features such as coastlines and ridgelines **is to avoid penetration by development that will interrupt and reduce the integrity of such elements.**
- **Smooth Terrain:** This allows vistas over long distances against a planar surface without breaking up fore and middle ground. In this terrain, distances can appear shorter and development closer or larger. **As a result development can have a disproportionate visual impact in such terrain, due to an inherent inability to be absorbed, physically or visually.**
- **Low Vegetation:** Low vegetation represented by moorland and bog type grasses has similar characteristics to smooth terrain with grassland vegetation failing to break up vistas and allowing long distance visibility. **This inability to absorb development identifies low vegetation as a critical landscape factor.**

Area Designations: 3.1(a) Areas designated as Vulnerable include the coastline (including shorelines of the **Cloonalaghan River, Cloonaghmore River**), the skylines and ridges of upland areas and all headlands including **Killogeary** and **Rathlacken**.

3.1(b) Policy with regard to Areas Designated as Vulnerable – development in the environs of these vulnerable areas must be shown not to impinge in any significant way upon its character, integrity or uniformity when viewed from the surroundings. **Attention should be given to the preservation of the character of the distinctiveness of these areas as viewed from scenic routes and the environs of archaeological and historic sites.**

3.7(a) Areas designated as Highly Scenic Vistas

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R314 at Ceide Fields (looking towards the Atlantic Ocean)

3.7(b) Policy with regard to Protected Views.

Highly scenic views or vistas. New development only considered where it can be demonstrated that it does not obstruct or designated highly scenic vistas **nor alters or degrades the character of the surrounding landscape**

Ref: Landscape Appraisal for County Mayo page 53

In light of the above policies regarding specifically Area D and regarding areas designated as **Vulnerable with Highly Scenic Vistas**,

I believe that the proposed development would contravene the above policies of the Landscape Appraisal for County Mayo and in turn Mayo's County Development 2022-2028 Plan for County Mayo.

Population and Human Health:

scope of the Assessment The effect of a Proposed Development on population and human health includes the following broad areas of investigation: • Population and Settlement Patterns • Economic Activity • Employment • Land Use and Topography • Tourism • Health effects of Wind Farms • Property Value • Major Accidents and Natural Disast

The current population of Lacken (North and South) and Ballycastle based on CSO 2022 figures is less than 800 persons and 585 respectively. There are 266 properties located within the environs of the proposed development. Economic Activity and employment consists mainly of Agriculture, Building and Construction, Manufacturing and Professional Services. Fáilte Ireland in its scoping consultation refers to tourism assets including Céide Fields, Downpatrick Head and Western Way Walking Trail in the immediate area. A Property Value study in Norway in 2026 indicated that residential property prices decline in proximity to operating windfarms. In a Business Report in 2014 by Ferghal O'Connor, it estimated that windfarms could devalue nearby Irish homes by 11%. Major Accidents and Natural Disasters for this proposed development based on its expansive nature, over different landscape types include flooding, bog bursts and fire. Mitigation measures to address these issues regarding the proposed development in its entirety including the BESS unit are not adequate. Health

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studies including Karasmanaki (2022) indicated that there may be an impact with sleep regarding Wind Turbine Noise. A recent case regarding a couple bringing a private law nuisance and winning action against a windfarm, where the plaintiff claimed that the windfarm caused by means of noise a substantial interference with their day-to-day living.

Ref: Karasmanaki, E. (2022). Is it safe to live near wind turbines? reviewing the impacts of wind turbine noise. *Energy for Sustainable Development*, 69, 87–102.

www.CSO.ie

<https://www.sciencedirect.com/science/article/abs/pii/S0928765526000205>

<https://www.businesspost.ie/legacy/windfarms-could-devalue-nearby-irish-homes-by-11-per-cent/>

Biodiversity:

Biodiversity: The Mayo County Development Plan under Natural Environment Policy 1 (NEP1) supports the protection, conservation and enhancement of the natural heritage and biodiversity of County Mayo, including the protection of the integrity of European sites, that form part of the Natura 2000 network, the protection of Natural Heritage Areas, proposed Natural Heritage Areas Ramsar Sites, Nature Reserves and Wild Fowl Sanctuaries (and other designated sites including any future designations).

Ref: Mayo County Development Plan 2022-2028 Written Statement Page 182.

Habitats: The proposed development site was visited on various dates between May 2022 and February 2024, i.e 19th and 20th May 2022, 12th & 13th August 2022, 9th September 2022, 15th & 16th May 2023, 7th September 2023, 15th December 2023 and 25th February 2024 with cursory visit on 16th April 2026. Terrestrial fauna visits included 21st May 2022, 13th & 14th October 2023 and 7th & 8th February 2024. The optimal survey period for surveying and habitat mapping generally is between April to September (Smith *et al.*, 2011)

Ref Smith G., O'Donoghue, P., O'Hara, K, Delaney, E Best Practice Guidance for Habitat Survey and Mapping 2011

No habitat map was provided for the proposed development which would provide a clear visual of habitats within the area. Given the level of structures within the landscape, Barn Owl surveys should have been completed in order to assess their distribution in the proposed development site.

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Mitigation measures refer to replanting of hedging, trees and scrub of 3658m 1.39 Ha, however, these replacements will take time to grow and establish and challenges exist for habitat can exist for habitat creation. This loss of such important habitats with this proposed development would be contrary to the proper planning and sustainable development of the area. I am concerned also for the impact of such replanting on bird species particularly Hen Harrier and Merlin (Annex 1 of Birds Directive) Sparrowhawk (Greenlisted), Peregrine Falcon, Kestrel (Red listed), Meadow pipit (Red listed), Skylark (Amber listed) Willow Warbler (Amber listed) Red wing (Red listed) and Snipe (Red listed) as.

Ref: (Robson, P, Challenges of Habitat Creation: A case study of lowland heath (2022)

Lacken Bay is an important foraging location for numerous species including species of Whooper Swan which I personally observed (approx. 40) flying over Castletown Area onto Lacken Saltmarsh within the last year. In late 2025, I also observed Hen Harrier in the area. Large scale displacement effecting feeding areas for Geese and Swans with fewer birds returning to areas once windfarms are built (Rees, 2102)

Bats: As bats are a key environmental receptor it is important to ensure all data in relation to the species for the proposed development expansive location is assessed in order to get an overall idea of the species occurring in the area (historical data and current data). There is no reference in relation to NPWS online search regarding existing or recorded bat species existing in the entire proposed development as part of a desktop study. Five bat species were noted and recorded within the current redraft of the proposed development application – *Common pipistrelle*, *Soprano pipistrelle*, *Leisler's bat*, *Brown Long-eared bat* and *Natterer's bat* – all species are protected under Annex IV of the Habitats Directive and the Wildlife Act 1976. The report states that all of the roosts found within the surroundings were classified as satellite roosts. Given the extensive footprint of the proposed development, it must be considered that nursery roosts must be present in the proposed development landscape. Wind turbines kill bats either through collision with the blades of turbines or from barotrauma. Mitigation measures mentioned feathering of blades, curtailment of cut-in-speeds, creation of buffer zones and habitat replacement following the removal of 1.604km of linear features and 0.29 ha of scrub. Given the foraging range of Leisler's bats of 13.5 km (Sheil *et al.*, 1999), a wider survey area should have being studied in order to get an idea of cumulative effects of bat species present.

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Ref: *Sheil et al.*, (1999) Seasonal changes in the foraging behaviour of Leisler's bat *Nyctalus leisleri* in Ireland as revealed by radio-telemetry. *Journal of Zoology*, London **249**: 347-358

Large scale displacement effecting feeding areas for Geese and Swans with fewer birds returning to areas once windfarms are built (Rees, 2102) A review of Bird Strike Mortality at Irish Onshore Windfarms by Fennelly gives an idea of birds involved in bird strike in onshore windfarms in Ireland

Species	Scientific name	No. carcasses	% Total
White-tailed sea eagle	<i>Haliaeetus albicilla</i>	2	8
Black-headed gull	<i>Chroicocephalus ridibundus</i>	1	4
Kestrel	<i>Falco tinnunculus</i>	5	20
Snipe	<i>Gallinago gallinago</i>	2	8
Hen harrier	<i>Circus cyaneus</i>	1	4
Merlin	<i>Falco columbarius</i>	1	4
Starling	<i>Sturnus vulgaris</i>	1	4
Buzzard	<i>Buteo buteo</i>	2	8
Chaffinch	<i>Fringilla coelebs</i>	1	4
Hooded crow	<i>Corvus cornix</i>	3	12
Raven	<i>Corvus corax</i>	1	4
Redwing	<i>Turdus iliacus</i>	1	4
Rook	<i>Corvus frugilegus</i>	1	4
Sparrowhawk	<i>Accipiter nisus</i>	2	8
Willow warbler	<i>Phylloscopus trochilus</i>	1	4
Total		25	100%

Table 1. Bird Fatalities from 25 windfarms (probable and confirmed combined).

Ref

Fennelly,R (2015) A review of Bird Strike Mortality at Irish Onshore Windfarms by Fennelly

Rees, E (2012) impacts of windfarms on swans and geese a review:Wildfowl

Air/Noise: Air pollution in terms of the production of particulates from traffic movements would have a deleterious effect on the health of the community. Clean air is a basic human right. Levels of Particulates and Nitrogen Dioxide are of particular concern in relation to proposed development. Noise levels modelled would be of particular concern in relation to the proposed development. Mitigation measures appears to depend on use of software and enforcement of any air or noise pollution can be difficult.

Cultural Heritage: The constraints report and a meeting by the Developer with Mayo County Council noted the level of archaeological and cultural heritage in the extensive landscape. Ceide fields (which is on the UNESCO Tentative World Heritage Site List would appear to be

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linked to field system in North Lacken and as such the area is an important site for cultural heritage.

Visual and Shadow Flicker – the visual aspect of the proposed development in this observation was discussed previously. The Shadow Flicker survey appears to give unusual inconsistent readings e.g two houses within close proximity to each other gives a result of one appearing to be effected by shadow flicker but the next door neighbour doesn't appear to be affected according to the modelling – how can this be?

Soils, Geology, Hydrology and Hydrogeology

GSI mapping indicates that Groundwater Aquifer vulnerability is Extreme with Rock at or near surface or Karst running from Rathlacken in the north to townlands of Beltra, Castletown, Keellogues Upper, Lackanhill, Lissadrone, Lecarrowtemple, Conaghra, Knockboha, Glebe, Barnhill Upper, Carbadmore – the latter being townlands in the proposed development site. Groundwater recharge according to GSI mapping contains an area of Locally Important Aquifer – Bedrock which is Generally Moderate Productive and are within the proposed Development footprint. Given the proposed development location over an extensive area with varying contours and extensive drainage I **do not agree** with the statement on page 13 Local Hydrology that a 'low Impact on the 'natural hydrology' as a result of the proposed development would be anticipated. There are a number of stream crossings for the development that pose a risk regarding surface water pollution and to groundwater (important drinking water source for private wells in the area). Mitigation measures including use of swales and 'Siltbuster' – regarding the latter, how effective is this effort in terms of flash flooding and what chemicals are used in relation for this method to work effectively with large volumes.

Landslide Susceptibility: In Tabe 8.4 assessment of 'Do Nothing Scenario' the assessment of states that GSI records indicate no significant historic soils and rock movement within the Wind Farm Site boundary, although such events are recorded **within the region**. GSI landslide susceptibility mapping also shows that the site has a predominately low to moderately low landslide susceptibility, although small discrete areas of **high** susceptibility are also present within the Redline Boundary. Given that the closest landslide events are

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approximately 6.3 km northwest and 6.0 km southwest of the Redline Boundary, a comprehensive review of these events should be included in this chapter of EIAR.

The Peat Stability Assessment indicated **some** locations to be at a LOW hazard of landslide. In terms of land contamination there is mention of negligible contamination of nature soils and groundwater, with the Net effect stating there will be small negative effect to groundwater as a result of the construction of the new wind farm that will decrease following completion of construction (this statement is not adequate – where is the evidence that this will occur or has occurred in the past), but will remain at a **minor** level throughout the lifetime of the wind farm. Reference is made to **estimated** volumes over 255,000m³ of excavated material being produced from the proposed development, with 152,251 m³ being stored permanently onsite – such activities including traffic movement for this to occur will affect soil stability and could lead to groundwater contamination and water flow patterns and an overall deleterious effect on the soils and geology of the area.

I do not agree to the statement on Page 56 under 1.2 Operational Phase under 1.2.1, in relation to Change to Hydrological Regime. The rate and amount of surface water run-off from the site will increase as a function of the replacement of vegetation, peat and sub-soils cover (which absorb rainfall) in parts of the site – where is the evidence for this statement – what data, research refers to this statement? The Landslide Susceptibility map should be broken down into townlands to give individual results – the wider view shown in the attached map in this report does not give a true townland indication of GSI mapping of high susceptibility. Trial Holes for the proposed turbine locations would indicate water strikes – indicating high water table at various water strike locations given rise to Groundwater Seepage. Mottling soils would indicate poor filtration and possibility of overland flow throughout the proposed development site. Site investigation works for proposed Barrow Pit site on page 2 refers to Adara Co. Donegal. The Peat Stability Report does not appear to take into account the forestry plantations throughout the proposed development landscape. The current uptake of water by trees within the proposed development footprint and the effect of drainage on site as a result of the proposed development will alter the overall soils and geology of the immediate landscape by proposed tree removal and loss of such tree root systems will likely give rise to stability loss of peat soils. Therefore, I do not agree with findings of the Peat Stability Report in relation to peat susceptibility to landslides and

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changes to hydrological regime. Shear stability testings were developed for mineral soils. I am not convinced that these techniques are applicable to peat.

Ref: Peat Stability Report

<https://www.gsi.ie/en-ie/data-and-maps/Pages/Geohazards.aspx#landslides>

Flood Risk Assessment:

Based on recharge coefficient estimates from the GSI (www.gsi.ie), an estimate of 15% recharge is taken for the Wind Farm Site as an overall average. A recharge coefficient at the lower end of the GSI scale was chosen due to the coverage of peat and poorly draining soils across much of the Wind Farm Site, the sloping nature of the area and the low to moderate permeability of the underlying bedrock aquifers. This means that the hydrology of the Wind Farm Site is characterised by **relatively high surface water runoff rates and low rates of groundwater recharge**. A 15% recharge would suggest that 85% of the remainder would runoff into the various waterbodies within the Glencullin (North Mayo)_SC_010 and Cloonaghmore_SC_010 sub-catchments. I do not agree with the statement that there is very little risk of Pluvial and Surface Water flooding regarding the proposed Development site as drainage moves relatively freely downslope due to the sloping topography of the landscape, the existing forestry drains and the high density of natural watercourses and streams in the area of the proposed development. Given the varying contours of the landscape, using Source-Pathway-Receptor model and peat susceptibility within the windfarm site, in times of flash rainfall floods will occur downstream of the proposed Development. Flooding has occurred in the past in Lacken see attached reference from 2006, it floods in times of heavy rainfall which drains surface waters from the surrounding landscape and catchments (particularly from lands greater than 70 m OD and with a >15% slope) thus leads to such flooding in terms of high tide. The proposed Windfarm Development dispersed nature i.e throughout various townlands, with varying soil types spread over a varied landscape, in terms of heavy rainfall (see attached average rainfall figures throughout 2023-2026) from Met Eireann, with drainage and overland flow rates within the catchment, this will lead to an *increase* in flooding downstream of the proposed Development. This excess of surface waters may have a negative effect on Lacken Saltmarsh and Kilcummin Head SAC (Site Code: 000516), particular salt tolerant species e.g Annex 1 species Atlantic Salt Meadows (*Glaucopuccinellietalia maritimae*)

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Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
2026	118.8	76.0	113.5	123.1	52.3	79.9				
2025	131.8	115.4	41.5	77.9	50.5	100.3	96.2	89.6	117.0	132.4
2024	117.1	115.4	91.8	95.2	46.5	55.6	80.6	208.1	45.5	132.1
2023	135.3	66.1	129.4	60.5	41.2	56.6	148.5	117.2	77.2	100.0

Monthly values for BELMULLET Total rainfall in millimetres for BELMULLET (Source: Met.ie)

Monthly values for BELMULLET Total rainfall in millimetres for BELMULLET (Source: Met.ie)

Reference:EIAR Flood Risk Assessment

https://www.floodinfo.ie/map/pf_addinfo_report/10231/

Major Accidents and Natural Disasters:

BESS:

A BESS unit is included in the latest version of the proposed development application. It will consist of installation of electrical inverters, electrical transformers, containerised battery storage modules, access roads, associated electrical infrastructure, security gates and site fencing and all associated ancillary infrastructure. As part of the EIAR, a Scoping and Rescoping (2025/2026) Application Document refers to a BESS meeting on 090326 between MCC officers and the Developers Consultant. At the meeting it was mentioned that Fire Safety concerns with BESS being a 'developing field' that there are no National Guidelines in relation to BESS units with current thinking of letting units 'burn out' in event of thermal runaway. Reference is also made to risk of toxins and consultation being necessary with EPA and HSA.

Ref: Scoping Document Tirawley Wind Farm EIAR (page 49)

The Developers Fire Consultant states in their Fire Safety Assessment and Advice Report that there was no definitive design, installation/construction and operation of energy storage facilities/systems at the time of writing of the report and that the proposed Development does not appear adhere to Fire Safety Technical Guidance, with ambiguity around Building Control Regulations for BESS facilities, with scoping not clear of Fire Services Acts 1981 and 2003 regarding BESS facilities. It also states that at the time of writing no particular data or specification were provided for any of the proposed equipment to be installed at this site, and that there is no provision by Energy Storage Ireland of any clear design guidance for BESS facilities. It also states that the design and construction of this proposed BESS unit, does not conform to examples in Technical Guidance Document

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B2024 Fire Safety Volume 1 – (“TGD-B”) and refers to ambiguity around the application of the Building Control Regulations for outdoor BESS facilities.

Ref: Fire Safety Assessment & Advice Report: Reagent Fire Consultants pages 6, 8, 9,10

The proposed development is located in a rural area, with agricultural lands and forestry surrounding the site. The Cloonalaghan_010 River Waterbody is in close proximity to the site and its current WFD ecological status is ‘good’ which must be maintained. The groundwater status for this proposed development’s location is currently described as being of ‘good’ status which must also be maintained. (www.epa.ie) The BESS unit model proposed for this site is not included in this Fire Safety Consultants report and as a result – in terms of clarity and completeness of this section of the proposed development – figure 2 page 8 of this report refers to the site layout plan, with statements such as ‘On completion of the project, the BESS facility will work in tandem with the proposed windfarm (and potential future expansion to include solar PV)’ – there is no mention in other documents of potential future expansion to include solar PV with this particular application. Numerous incidents regarding BESS infrastructure are quoted in this Fire Safety Assessment & Advice Report which are causes concern within the community. The list of identified hazards included that the proposed development will be an unmanned site, hazards such as thermal effects, internal short circuits, overvoltage, undervoltage, internal short circuits, external short circuits and Lithium Battery manufacturing defects to name just a few with thermal runaway being a significant hazard for this rural area, with the spreading of fire (originating in a BESS unit or transformer) to the surrounding vegetation and forestry. In 2024, in Mayo there were 59 vegetation and forestry fires alone which the Fire Department of Mayo County Council attended. Forestry is located north of the proposed BESS unit. Consideration of prevailing winds and weather condition effects should have modelled and have been included as part of design assessment stage. Numerous BESS burnouts have occurred throughout the world. No mitigation measures would adequately address effects on the hydrochemistry in the Groundwater which is an important source of drinking water for numerous private wells within the greater community nor would any mitigation measures address the effects of such a catastrophe on the Public Health of the community. The WFD Assessment April 2026 nor the CEMP Water Quality Management did not include a risk assessment of BESS unit Groundwater contamination effects, nor the effects on the Cloonalaghan Lacken Saltmarsh and Kilcummin SAC as a result of same. I wish to object to the proposed BESS unit in terms of site location suitability, in terms of lack of details of BESS unit design specifications, incomplete identification of hazards (e.g typical contaminated water volumes e.g water containing toxic substances such as PCB’s, HF and contents calculations), containment measures and disposal of contaminated water. The Emergency Response Plan (2026) lacks important information in relation to same and references such as Firefighting Tactics/Strategies such as ‘controlled burn’ are not adequate in terms of Public Health Safety. Discharges to the Environment would realistically need a Discharge License from a

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Regulatory Body for this development i.e EPA, however, it is noted in the Developers Planning Application to the Commission in relation to same the 'NO' box is ticked for the proposed development. Reference in the Mitigation Measures to Mayo County Council's Emergency Plan. The nearest Fire Station is over 40 minutes from the proposed BESS unit site i.e inadequate.

Ref: <https://www.gov.ie/en/department-of-housing-local-government-and-heritage/collections/locations-of-fires-statistics/>
https://storagewiki.epri.com/index.php/BESS_Failure_Incident_Database

Traffic and Transportation: Local road infrastructure is inadequate to meet the transportation needs of the proposed development. The Department of Transport scoping response stating that 'the Department that the construction involved in providing this development and especially, the connection cables to the national grid may have effects on both the environment and the Regional and Local Road Network'. The number of estimated HGV movements for the proposed development 11,022 over a 21 month period, plus concurrent underground cabling over a 12 month period. The Local Road Network infrastructure is inadequate to deal with this high volume of activity. Mitigation measures refers to abnormal loads and references to various TDR's – in order to fully assess the Traffic and Transportation Chapter of this EIAR – mitigation measures for the first leg of TDR is lacking. Palmerstown Bridge Report in Appendix 17.1 is inadequate as there was no close inspection of status of abutments and arches, to give a true understanding of the risks associated with movements with GCR. Palmerstown Bridge is a Protected Structure RPS:0017

Mitigation measures in CEMP Plan 7 Traffic Management does not include adequate measures regarding the 12 month concurrent underground cabling after the initial 21 month period proposed development works. On a personal basis, I am concerned regarding my ability to travel to work, appointments and the volume of traffic movements regarding this proposed development.

In conclusion I wish to object to the proposed industrial development for the above reasons, the widely dispersed cluster extensive based industrial layout which would have visual impact, coupled with Fire Safety concerns regarding BESS unit, the proposed underground cabling in poor quality minor roads e.g L31142, L31143 and L5179. including those that are not identified in Figures 16, 17 18 19 of Appendix 17.1 Road Haulage Pinch points Turbine Delivery Report and the close proximity to environmental, heritage and community receptors which would have an adverse effect on same. I wish to object having regard to the site's close proximity to know breeding pairs of Hen Harrier and other birds that are on Green, Amber and Red Lists, the potential disturbance arising from the proposed development in

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terms of noise and air quality in terms of receptors, given the scale and height of the proposed turbines, the extensive location of the site in the landscape and existing wind farms in the overall landscape in scenic area rich in architectural heritage, which would negatively alter the character of the rural landscape with an unacceptable risk of pollution of watercourses in the area due to hydrological link with Lacken Saltmarsh and Kilcummin Head SAC which could cause environmental damage to this sensitive receptor. There are inaccuracies/errors throughout the EIAR documents as demonstrated above and inaccuracies regarding the drawing or map of Residential Dwellings within 2km of the windfarm site appears to show two H5's, two H6's etc and drawing 6289-PL-100 showing site layout plan grid referencing for AT02, AT03 Northings are the same. All these inaccuracies do not provide an accurate description of the proposed development.

In conclusion I wish to object to the proposed industrial development for the above reasons, the widely dispersed cluster extensive based industrial layout which would have visual impact, coupled with Fire Safety concerns regarding BESS unit, the proposed underground cabling in poor quality minor roads e.g L31142, L31143 and L5179. including those that are not identified in Figures 16, 17 18 19 of Appendix 17.1 Road Haulage Pinch points Turbine Delivery Report and the close proximity to environmental, heritage and community receptors which would have an adverse effect on same. I wish to object having regard to the site's close proximity to know breeding pairs of Hen Harrier and other birds that are on Green, Amber and Red Lists. potential disturbance arising from the proposed development. given the scale and height of the proposed turbines, the extensive location of the site in the landscape and existing wind farms in the overall landscape in scenic area rich in architectural heritage, which would negatively alter the character of the rural landscape with an unacceptable risk of pollution of water (surface water and groundwater) in the area due to hydrological link with Lacken Saltmarsh and Kilcummin Head SAC and Killala BayMoy Estuary SPA which could cause environmental damage to this sensitive receptor and to the health and wellbeing of the population within the proposed development area.

In conclusion, I respectfully submit that the proposed development is not appropriate for this location due to the significant negative impacts on residential amenity, local landscape, ecology, infrastructure and the community. I urge An Comisiún Pleanála to refuse permission for this development in the interests of proper planning and sustainable development. Thanking you for considering my submission.

Your sincerely,
Maria Mcloughlin

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to request the Coimisiún to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

☒

No, I do not wish to request an oral hearing

☐

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes