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24th June 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Case reference: PAX16.324258

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.

Dear Sir/Madam,

I wish to lodge a formal objection to the proposed Tirawley Wind Farm Strategic Infrastructure Development application by Constant Energy Limited.

As a resident of Beltra, Carrowmore Lacken, living approximately 808 metres from the proposed turbines, I will be directly affected by this development. My home is identified as receptor H52 in the EIAR.

I have significant concerns regarding the serious and potentially irreversible impacts this project would have on the local environment, biodiversity, landscape, residential amenity, and the health and wellbeing of my family and neighbouring residents.

The scale of the proposed development—comprising 16 large wind turbines, a permanent 110kV substation, extensive underground cabling and associated infrastructure—amounts to a major industrialisation of a sensitive rural landscape in north Mayo. In my opinion, the application does not sufficiently address key environmental, planning and community concerns and is therefore inconsistent with the principles of proper planning and sustainable development.

1. Introduction

My name is Marie Kelly, and I reside in the townland of Beltra, Carrowmore Lacken, County Mayo. My home is located approximately 800 metres from the nearest proposed turbine (AT15), placing it in close proximity to the development and within the zone of likely significant effects.

My husband has long-standing family ties to this area, and the home in which we now live was originally built by his father, reflecting a strong generational connection to the locality. Together, we have made a conscious decision to live here, raise our two young children, and contribute to and support the growth and sustainability of the local community.

We chose this location because of its rural character, tranquillity, environmental quality, and strong community identity, all of which form an essential part of our daily lives and wellbeing.

I am particularly concerned about the potential impact of this development on my family. My husband has a serious heart condition (dilated cardiomyopathy), which makes him especially vulnerable to environmental stressors such as noise disturbance and disrupted sleep. In addition, we are raising two very young children, aged 8 months and 3 years, both at critical stages of development and reliant on a stable and healthy living environment.

I am concerned about the potential impacts of the proposed development on both my husband's and I, ability to work from home. We work remotely and are heavily dependent on reliable mobile phone coverage, broadband connectivity and internet access in order to carry out our employment. As a rural household, we already rely significantly on the available telecommunications infrastructure, and any deterioration in signal quality, mobile reception or internet reliability could have serious implications for our abilities to continue working effectively from home.

Remote working is increasingly important in sustaining rural communities and allowing families such as ours to remain living in areas like North Mayo while maintaining employment. I am concerned that the scale of the proposed wind farm, and the associated infrastructure, may have the potential to adversely affect telecommunications services upon which our household depends. Any disruption to these services would have a direct impact on our family's livelihood and long-term ability to remain and work within the local community.

I am further concerned about the impact that the proposed development may have on future opportunities available to our family. Given the location of our home within an area renowned for its landscape, tranquillity and proximity to significant tourism attractions including the Céide Fields, Downpatrick Head and the Wild Atlantic Way,

we have considered the possibility of offering guest accommodation or Airbnb accommodation from our property in the future.

The attractiveness of any such accommodation would depend largely on the peaceful rural environment, scenic views and sense of escape that visitors expect when choosing to stay in North Mayo. The presence of a large-scale industrial wind farm located approximately 800 metres from our home would, in my opinion, significantly diminish the appeal of the property as a tourism accommodation offering. Visitors seeking a rural retreat are unlikely to be attracted to accommodation that is directly affected by the visual presence of large turbines, turbine lighting, operational noise and shadow flicker.

This concern is particularly relevant given that nearby residential dwellings, including my own, are acknowledged as sensitive receptors in respect of noise, shadow flicker and visual impacts. If these effects are considered capable of affecting the residential amenity of those living close to the development. The proposed development therefore has the potential not only to affect our current quality of life but also to restrict future economic opportunities available to our family.

In my view, these impacts have not been adequately assessed or mitigated by the applicant.

This submission therefore sets out my objection to the proposed development and outlines why it is inconsistent with the principles of proper planning and sustainable development, fails to adequately protect human health and residential amenity, and would result in significant adverse effects on the receiving environment and local community.

2. Summary of Principal Concerns

Having reviewed the planning application, Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and associated documentation, I have significant concerns regarding the proposed Tirawley Wind Farm and its potential impacts on my family, my home, the Lacken community and the wider North Mayo area.

In summary, my principal concerns relate to:

- The potential adverse effects on **human health, family wellbeing and residential amenity**, particularly having regard to the proximity of the proposed turbines to my home, the presence of two very young children, and my husband's serious cardiovascular condition;

- The risk of **noise disturbance, sleep disruption and shadow flicker**, and the long-term effects these may have on our quality of life and enjoyment of our home;
- The significant **visual impact** of multiple large-scale turbines and the resulting loss of the rural character, tranquillity and landscape quality that attracted our family to this area;
- The wider **industrialisation of the local environment** through the introduction of turbines, substations, cabling, access roads and associated infrastructure within what is currently a peaceful rural setting;
- Potential impacts on **telecommunications infrastructure**, including mobile phone coverage, broadband services and internet connectivity, upon which my husband and I abilities to work remotely depends;
- The potential loss of future **tourism and rural enterprise opportunities**, including the possibility of providing guest accommodation or Airbnb accommodation from our property in the future;
- The failure of the application to properly identify and assess **Lacken as the host community**, resulting in an incomplete and potentially misleading assessment of local impacts;
- Serious concerns regarding the adequacy of the **public consultation and community engagement process**, including the lack of direct engagement with affected residents and the failure to consult on the final project design;
- The impact of the proposed development on important **community facilities and sensitive receptors**, including St. Patrick's College and the Lacken Sensory Garden;
- The adverse effects on the **landscape, heritage and tourism assets** of North Mayo, including the Céide Fields, Downpatrick Head, the Wild Atlantic Way and the distinctive character of the local area;
- Concerns relating to the proposed **Battery Energy Storage System (BESS)**, including fire safety, emergency response arrangements and public safety considerations; and
- The inadequacy of the **cumulative impact assessment**, particularly when the proposed development is considered alongside existing, approved and potential future wind energy developments in the region.

For the reasons set out in the following sections of this submission, I believe the proposed development would result in significant adverse effects on residential amenity, community wellbeing, landscape character and the overall sustainability of the receiving environment. I respectfully submit that these matters should be afforded substantial weight by An Coimisiún Pleanála in determining this application.

3. Human Health, Family Wellbeing and Residential Amenity

3.1 Policy and Legislative Context

The protection of human health and residential amenity is a fundamental consideration within the Irish planning system and must be afforded significant weight in the assessment of wind energy developments.

Under Section 172 of the Planning and Development Act 2000 (as amended), the Environmental Impact Assessment Report (EIAR) is required to identify, describe and assess the likely significant effects of a proposed development on, inter alia, population and human health. The Board must therefore be satisfied that the proposed development will not give rise to unacceptable impacts on nearby residents and that human health has been properly assessed.

The principal national planning guidance relating to wind energy development is contained within the **Wind Energy Development Guidelines for Planning Authorities (2006)**, issued under Section 28 of the Planning and Development Act 2000. These Guidelines require both planning authorities and An Comisiún Pleanála to have regard to their provisions when assessing wind energy developments.

A key objective of the 2006 Guidelines is the protection of residential amenity. The Guidelines recognise that wind energy developments can impact nearby residents through visual effects, noise, shadow flicker and general disturbance and require these factors to be carefully assessed as part of the planning process.

The Guidelines further state that careful site selection and project design should seek to avoid shadow flicker effects in the first instance, rather than relying solely on mitigation measures after impacts arise.

3.2 Draft Revised Wind Energy Development Guidelines (2019)

The Draft Revised Wind Energy Development Guidelines published by the Department of Housing, Planning and Local Government in December 2019 recognise that public concern regarding wind energy development has evolved significantly since the publication of the 2006 Guidelines. The review specifically focused on issues including:

- Human health;
- Noise;
- Shadow flicker;

- Visual amenity;
- Setback distances; and
- Community engagement.

The Draft Guidelines propose substantially enhanced protections for residents living near wind energy developments.

These include:

Enhanced Noise Standards

The Draft Guidelines propose noise limits based upon the most up-to-date international evidence and specifically reference the World Health Organization Environmental Noise Guidelines for the European Region.

The proposed standards recognise that:

- Noise impacts are not limited to average sound levels;
- Amplitude modulation can increase annoyance;
- Tonal noise can increase disturbance;
- Low-frequency noise requires separate assessment.

The Draft Guidelines propose operational restrictions where low-frequency noise thresholds are exceeded and introduce specific penalties for noise characteristics known to increase annoyance among nearby residents.

Setback Distances

The Draft Guidelines propose a setback distance for visual amenity purposes of four times the turbine tip height from the curtilage of nearby residential properties, subject to a minimum separation distance of 500 metres. This proposal reflects an acknowledgement at national policy level that proximity to large-scale turbines can have significant impacts upon residential amenity and quality of life.

Shadow Flicker Protection

The Draft Guidelines further propose that automatic shadow flicker control mechanisms should be in place throughout the operational life of a wind farm. This reflects a move towards preventing shadow flicker impacts rather than simply responding to complaints after impacts occur.

3.3 World Health Organization Guidance

The World Health Organization (WHO) recognises environmental noise as an important public health issue and has identified a range of health effects associated with long-term exposure to environmental noise, including:

- Sleep disturbance;
- Annoyance;
- Impacts on wellbeing;
- Cardiovascular effects;
- Stress-related health outcomes; and
- Reduced quality of life.

In its **Environmental Noise Guidelines for the European Region (2018)**, the WHO specifically examined wind turbine noise and concluded that exposure above recommended levels is associated with adverse health effects. The WHO conditionally recommends reducing exposure to wind turbine noise to below 45 dB Lden in order to protect human health and wellbeing.

The WHO guidelines are particularly relevant because they recognise that the effects of environmental noise extend beyond simple compliance with technical limits and include impacts on:

- Rest and sleep;
- Stress and annoyance;
- Mental wellbeing;
- Quality of life; and
- Long-term health outcomes.

Importantly, the WHO highlights that vulnerable groups, including children and those with existing health conditions, may be more susceptible to adverse impacts arising from environmental noise exposure.

3.4 Application to My Family Circumstances

Having regard to the above policy framework, I am concerned that the EIAR adopts a largely technical and generic assessment of human health and residential amenity and does not adequately consider the particular circumstances of households located closest to the development.

My home is located approximately 800 metres from the nearest proposed turbine. My household includes:

- A resident with a serious cardiovascular condition (dilated cardiomyopathy);
- Two very young children aged 8 months and 3 years; and
- A family intending to remain living in the area long-term.

The Board's assessment should therefore not be confined solely to whether predicted impacts comply with numerical thresholds. It must also consider whether the development appropriately protects human health, residential amenity, family wellbeing and quality of life, consistent with the objectives of the Planning and Development Act, the Wind Energy Development Guidelines and the recommendations of the World Health Organization.

3.5 Impact on My Husband's Heart Condition

My husband suffers from dilated cardiomyopathy, a serious cardiovascular condition which requires ongoing medical management and careful attention to overall wellbeing. A key aspect of managing such a condition is maintaining a stable living environment that supports adequate rest, good sleep quality and the avoidance of unnecessary physical and emotional stress.

The World Health Organization (WHO) has identified environmental noise as an important public health issue and recognises links between noise exposure, sleep disturbance, annoyance, stress responses and cardiovascular health outcomes.

While I acknowledge that the scientific literature regarding wind turbine-related health effects continues to evolve, there is broad recognition that sleep disturbance can adversely affect overall health and wellbeing. The Draft Revised Wind Energy Development Guidelines (2019) specifically recognise that particular characteristics of wind turbine noise, including amplitude modulation, tonal noise and low-frequency noise, may increase disturbance and annoyance for nearby residents.

The EIAR adopts a generalised assessment approach and does not appear to consider whether households containing individuals with pre-existing medical conditions may be more susceptible to environmental disturbance.

In circumstances where a medically vulnerable individual resides in close proximity to a proposed wind energy development, I believe a precautionary approach should be adopted. The Board should be satisfied not only that technical standards can be achieved, but that the long-term health and wellbeing of affected residents will be adequately protected throughout the operational life of the development.

3.6 Impact on Young Children and Family Wellbeing

I am equally concerned about the effect that the proposed development may have on my two young children, who are currently aged 8 months and 3 years.

Our children are at critical stages of physical, cognitive and emotional development. As parents, we made the deliberate decision to raise our family in a quiet rural environment where they could benefit from natural surroundings, tranquillity and a strong sense of community.

The WHO Environmental Noise Guidelines recognise that children represent a particularly sensitive group in relation to environmental noise exposure and that environmental noise may affect sleep, wellbeing and aspects of child development.

The proposed development would introduce:

- Large industrial-scale turbines;
- Continuous turbine movement;
- Aviation lighting;
- Operational noise;
- Shadow flicker effects; and
- A substantial visual presence within the local landscape.

While the EIAR assesses residential properties as receptors, it does not adequately consider the experience of the people living within those homes, particularly young children who may be exposed to these effects over many years.

The assessment also fails to adequately consider the cumulative effect of living in the immediate vicinity of a major energy development throughout a child's formative years.

3.7 Residential Amenity, Noise and Proximity to Turbines

My home is identified as **receptor H52** in the EIAR.

According to Table 15.1 of the EIAR, my dwelling is located approximately:

- **808 metres from Turbine AT15;**
- **1,015 metres from Turbine AT16;** and
- **1,818 metres from Turbine AT14.**

I am concerned that the EIAR does not adequately address the practical residential impact of having three large-scale turbines located within approximately one kilometre of my home.

While the assessment concludes that predicted noise levels comply with applicable standards, numerical compliance alone does not necessarily mean that residential amenity will be protected. The relevant consideration for the Board is not solely whether guideline limits are met, but whether the proposal would result in an acceptable living environment for nearby residents over the lifetime of the development.

The proposed Turbine AT15 is located only approximately 808 metres from my dwelling. I consider this separation distance insufficient having regard to the scale of modern turbines and the quiet rural environment in which my family currently lives.

I request that the Board carefully consider whether the applicant's modelling adequately reflects real-world conditions at H52, including:

- Night-time periods when background noise levels are naturally lower;
- Wind conditions in which Turbines AT15, AT16 and AT14 may contribute simultaneously;
- Amplitude modulation, often described as the characteristic "blade swish" associated with wind turbines;
- Low-frequency noise;
- Variations in weather conditions;
- The cumulative impact arising from multiple turbines operating in close proximity.

The Draft Revised Wind Energy Development Guidelines (2019) recognise that tonal noise, amplitude modulation and low-frequency noise may have a greater impact on residents than simple average sound levels indicate and propose more robust mechanisms for noise assessment and protection of nearby communities.

For my family, the issue is not simply compliance with a noise limit but the long-term alteration of the rural environment in which we live, work and raise our children.

The introduction of continuous operational turbine noise into what is currently a quiet rural setting has the potential to significantly affect our enjoyment of our home, outdoor space and overall quality of life.

In light of the proximity of Turbine AT15 and the combined influence of three nearby turbines, I submit that a more precautionary assessment should be applied to H52.

3.8 Shadow Flicker Impact at Dwelling H52

I am also concerned about the predicted shadow flicker impacts at my home.

The EIAR identifies H52 as being potentially affected by shadow flicker associated with the proposed development. According to Table 15.3 of Chapter 15, the applicant's own modelling predicts that H52 may experience:

- **45 hours 58 minutes worst-case shadow flicker per year;**
- **4 hours 36 minutes expected shadow flicker per year;**
- **37 minutes maximum expected shadow flicker per day.**

The predicted daily exposure exceeds the recommendation contained in the Wind Energy Development Guidelines for Planning Authorities (2006), which state that shadow flicker at neighbouring dwellings should not exceed 30 minutes per day.

The significance of this exceedance should not be understated. The concern does not arise from speculation or resident fears but from the applicant's own assessment. The EIAR itself identifies my home as one of the receptors where the recommended guideline threshold is exceeded.

While the EIAR refers to mitigation measures and turbine control systems, I do not consider reliance upon future mitigation measures to be a sufficient justification for permitting a development that is already predicted to exceed recognised guidance.

The proposed mitigation strategy raises a number of important questions, including:

- The long-term reliability of control systems over the operational lifetime of the wind farm;
- How shadow flicker impacts will be monitored;
- How compliance will be independently verified;
- Who will be responsible if mitigation measures fail;
- Whether turbine shutdown will occur automatically; and
- Whether action will only be taken following complaints from affected residents.

The reliance upon mitigation effectively acknowledges that unacceptable shadow flicker effects may occur unless active intervention takes place.

I further note that the Draft Revised Wind Energy Development Guidelines (2019) place greater emphasis on avoiding shadow flicker impacts through design and require automatic shadow flicker controls throughout the operational life of wind energy developments.

In circumstances where the applicant's own assessment predicts an exceedance of the 2006 guideline at H52, I submit that the appropriate planning response should be prevention rather than management.

The Board should therefore carefully consider whether it is appropriate to permit a development that is acknowledged by the applicant to create shadow flicker impacts in excess of nationally recognised guidance at a family home occupied by two young children and a resident with a serious cardiovascular condition.

3.9 Conclusion

Having regard to the Planning and Development Act 2000, the Wind Energy Development Guidelines for Planning Authorities (2006), the Draft Revised Wind Energy Development Guidelines (2019), and the guidance of the World Health Organization, I do not believe that the applicant has adequately demonstrated that human health, family wellbeing and residential amenity will be protected.

In particular, insufficient weight has been afforded to:

- The presence of a medically vulnerable resident within the household;
- The presence of two very young children;
- The potential for sleep disturbance and stress-related effects;
- The cumulative impact of noise, shadow flicker and visual intrusion; and
- The long-term effect of industrialising a previously tranquil rural environment.

Accordingly, I submit that the Board cannot be satisfied that the proposed development adequately safeguards human health, residential amenity or family wellbeing and that these matters should be afforded substantial weight in the determination of this application.

4. Telecommunications, Remote Working and Rural Sustainability

4.1 Introduction

An issue that has received insufficient consideration within the planning application is the importance of telecommunications infrastructure to the sustainability of rural households and rural communities.

My husband and I, work remotely from our home and relies heavily on:

- Mobile phone coverage;
- Broadband connectivity;

- Internet reliability;
- Data communications; and
- Remote access systems required for employment.

For our family, telecommunications infrastructure is not a convenience but an essential service. The ability to work remotely allows us to live in a rural area, contribute to the local community, and raise our children in the environment we have chosen.

The planning documentation does not adequately address the potential consequences that disruption to telecommunications services could have for households that rely upon remote working for their livelihood.

4.2 Importance of Remote Working in Rural Communities

Remote and hybrid working have become increasingly important in supporting the viability and sustainability of rural communities throughout Ireland.

Government policy increasingly recognises the importance of digital connectivity in enabling people to live and work in rural areas while maintaining access to employment opportunities. High-quality telecommunications infrastructure is therefore a critical component of sustainable rural development.

For families such as mine, remote working provides the opportunity to remain living within our local community rather than relocating to larger urban centres in order to access employment.

The ability to work remotely supports:

- Population retention in rural areas;
- Community sustainability;
- Local economic activity;
- Family wellbeing; and
- Reduced commuting and associated environmental impacts.

Any reduction in the reliability of telecommunications services would therefore have consequences extending beyond the individual household and would undermine broader objectives relating to rural development and community sustainability.

4.3 Conclusion

I am concerned that the application does not adequately assess the potential implications of the proposed development for telecommunications infrastructure, remote working and rural sustainability. In particular:

- My husband and I, depend on reliable telecommunications services for our employment;
- The potential consequences of service disruption have not been fully assessed;
- The application lacks detail regarding monitoring and mitigation measures;
- The impact on rural livelihoods has not been adequately considered; and
- Insufficient weight has been given to the role of digital connectivity in supporting sustainable rural communities.

Accordingly, I submit that the Board cannot be fully satisfied that the proposed development would protect the interests of households that depend on telecommunications infrastructure for employment and everyday life, and this issue should be afforded significant weight in the determination of the application.

5. Tourism, Rural Enterprise and Future Economic Opportunities

5.1 Introduction

North Mayo is widely recognised for its outstanding natural beauty, coastal landscapes, archaeological heritage and rural character. The area attracts visitors from across Ireland and internationally who come to experience its unspoilt scenery, tranquillity and unique cultural heritage.

Key attractions in the vicinity of the proposed development include:

- The Céide Fields;
- Downpatrick Head;
- The Wild Atlantic Way;
- The Lacken coastline;
- Local walking routes and scenic viewpoints; and
- The wider landscape of north Mayo.

Tourism plays an important role in supporting the local economy and providing opportunities for rural families and small businesses. The quality of the landscape is therefore not merely an environmental asset but an economic resource upon which many local livelihoods depend.

5.2 Future Tourism and Accommodation Opportunities

As a family living in a scenic rural location, we have considered the possibility of developing tourism-related accommodation in the future through guest accommodation or Airbnb-style accommodation.

Such opportunities are increasingly important in rural Ireland and provide an opportunity for families to generate supplementary income while supporting the local tourism economy.

The attractiveness of our property for visitors would depend heavily upon:

- The surrounding landscape;
- Scenic views;
- Peace and tranquillity;
- Dark skies;
- A sense of remoteness and escape; and
- The overall quality of the visitor experience.

These are precisely the qualities that attract visitors to North Mayo and form a key part of the area's tourism offering.

5.3 Impact of the Proposed Development on Visitor Experience

The proposed development would introduce a significant industrial presence into what is currently a largely undeveloped rural landscape.

Visitors choosing to stay in the area may be exposed to:

- Large-scale wind turbines;
- Continuous turbine movement;
- Aviation lighting;
- Operational noise;
- Shadow flicker effects; and
- Associated infrastructure including substations and access roads.

In my view, these features would fundamentally alter the character of the landscape experienced by visitors.

Tourists who choose North Mayo generally do so because they are seeking a landscape that is distinct from urban and industrial environments. The attraction of the area lies in its natural scenery, cultural heritage and sense of tranquillity.

The introduction of industrial-scale turbines in close proximity to our property would reduce the appeal of any future tourism accommodation that we may seek to develop and could adversely affect our ability to benefit from tourism opportunities in the future.

5.4 Loss of Future Economic Potential

The planning system should have regard not only to existing land uses but also to reasonable future opportunities available to rural residents.

The proposed development has the potential to restrict the future options available to our family by reducing the attractiveness of our property as a tourism destination.

The EIAR does not appear to adequately assess the effect that visual impacts, noise, shadow flicker and landscape change may have on:

- Small-scale tourism enterprises;
- Future accommodation providers;
- Rural diversification opportunities; and
- Family-based tourism initiatives.

While these opportunities may not currently be in operation, they represent realistic and legitimate future uses of our property.

In my view, insufficient weight has been given to the potential economic consequences for local residents whose future plans may depend upon maintaining the scenic and environmental quality of the area.

5.5 Impact on the Wild Atlantic Way

The proposed development is located within an area strongly associated with the Wild Atlantic Way, one of Ireland's most important tourism initiatives.

The success of the Wild Atlantic Way is founded upon:

- Outstanding coastal scenery;
- Natural landscapes;
- Cultural heritage;
- Sense of place; and
- Authentic rural experiences.

Visitors travel to North Mayo specifically to experience these qualities.

The cumulative introduction of large-scale wind energy developments within the wider area raises concerns regarding the gradual industrialisation of landscapes that are central to the Wild Atlantic Way experience.

While individual viewpoints may be assessed in isolation, the overall visitor experience involves travelling through and experiencing the wider landscape as a whole. It is therefore important that the cumulative effect on tourism amenity and landscape character is fully considered.

5.6 Céide Fields, UNESCO World Heritage Aspirations and the Cultural Landscape

The Céide Fields represent one of Ireland's most important archaeological and cultural heritage assets and serve as a focal point for tourism, education and cultural identity in North Mayo.

The significance of the Céide Fields extends far beyond the archaeological remains themselves. The site is internationally recognised as one of the most extensive Neolithic landscapes in the world and derives much of its value from the relationship between the preserved field systems, the surrounding blanket bog, the dramatic Atlantic coastline and the wider North Mayo landscape.

Importantly, the Céide Fields and the wider North Mayo Boglands have been the subject of efforts to secure **UNESCO World Heritage Site recognition**, reflecting the exceptional international significance of this landscape and its cultural and natural heritage value.

The proposed development would introduce large-scale modern industrial structures into a landscape strongly associated with:

- Archaeological heritage;
- Neolithic land use and settlement;
- Extensive blanket bog landscapes;
- Coastal scenery and Atlantic views;
- Cultural identity and sense of place; and
- The unique setting of the Céide Fields.

I am concerned that the visual presence of multiple turbines, together with the cumulative impact of existing, approved and proposed wind energy developments in North Mayo, has the potential to erode the landscape context that contributes so significantly to the cultural and tourism value of the Céide Fields.

In assessing this application, the Board should have regard not only to direct impacts on heritage assets but also to the wider cultural landscape within which those assets are located. This is particularly important in an area that is seeking international recognition for its outstanding heritage significance.

Given the importance of the Céide Fields to tourism, cultural heritage and the identity of North Mayo, I believe that the cumulative impact of large-scale wind energy development on the wider landscape setting has not been adequately assessed and should be afforded significant weight in the determination of this application.

5.7 Cumulative Tourism Impacts

The proposed Tirawley Wind Farm cannot be considered in isolation.

The wider area is already subject to existing, approved and proposed wind energy developments, including:

- Glenora Wind Farm,
- Keerglen Wind Farm,
- Clydagh Wind Farm, and
- Other renewable energy infrastructure proposals.

The cumulative impact of multiple developments has the potential to create a perception of increasing industrialisation across the North Mayo landscape.

This may affect:

- Visitor perceptions;
- Landscape quality;
- Tourism appeal;
- Community identity; and
- Future tourism investment.

While the impact of any individual project may be considered manageable, the combined effect of multiple projects could significantly alter the character of the receiving environment.

5.9 Conclusion

I am concerned that the applicant has underestimated the potential impact of the proposed development on tourism, rural enterprise and future economic opportunities.

In particular:

- The development would alter the character of a landscape that is central to the tourism appeal of North Mayo;
- It has the potential to diminish future opportunities for family-based tourism accommodation at our property;
- Insufficient regard has been given to the visitor experience associated with the Wild Atlantic Way and Céide Fields;
- The cumulative effects of multiple wind energy developments have not been adequately assessed; and
- The long-term economic consequences for local residents and rural communities remain uncertain.

I am especially concerned about the potential impact on the wider setting of the **Céide Fields**, one of Ireland's most important archaeological, cultural and tourism assets. The significance of the Céide Fields extends beyond the archaeological remains themselves and is intrinsically linked to the surrounding blanket bog, open landscapes, Atlantic coastline and sense of place that characterise North Mayo.

Accordingly, I submit that the Board should afford significant weight to the potential impacts on tourism, landscape quality, cultural heritage, future rural economic opportunities and the wider setting of the Céide Fields when determining this application.

6. Lacken as the Host Community (Material Deficiency in the Application)

6.1 Introduction

One of the most concerning aspects of the application is the failure to properly identify and acknowledge Lacken as the host community for the proposed development.

The project documentation repeatedly refers to the proposed development as being located "between Ballycastle and Killala" rather than explicitly identifying Lacken as the community within which the turbines and associated infrastructure are located.

While this may appear to be a matter of terminology, it has significant implications for the assessment of environmental, social and community impacts. The Environmental Impact Assessment process is required to provide an accurate description of the receiving environment, including the population and communities likely to be affected by the proposed development.

As a resident of Beltra, Carrowmore Lacken, I consider this omission to be a significant deficiency in the application.

6.2 Failure to Properly Identify the Host Community

Lacken is not simply a nearby settlement or neighbouring area. It is the community within which the proposed development will be located and where many of the most significant impacts will be experienced.

Residents of Lacken will be directly affected by:

- Visual impacts;
- Noise impacts;
- Shadow flicker;
- Construction activities;
- Traffic movements;
- Landscape change;
- Potential tourism impacts; and
- The long-term presence of associated infrastructure.

Despite this, the planning documentation frequently describes the project location in broader geographical terms without clearly acknowledging Lacken's role as the principal host community.

In my view, this creates a misleading impression regarding the true location of the proposed development and the communities that will experience its effects.

6.3 Legislative and Environmental Assessment Requirements

Under the Planning and Development Act 2000 (as amended) and the Environmental Impact Assessment Directive, an Environmental Impact Assessment Report must contain a description of the existing environment and the population likely to be significantly affected by the development. The purpose of this requirement is to ensure that decision-makers have a complete and accurate understanding of the receiving environment before determining a planning application.

An accurate description of the receiving environment is particularly important where the assessment seeks to evaluate:

- Human health impacts;
- Community impacts;
- Residential amenity;
- Socio-economic effects;
- Tourism impacts; and
- Population effects.

If the host community is not properly identified, there is a risk that the significance of these impacts may be underestimated.

6.4 Impact on Community Identity and Sense of Place

Lacken is a distinct rural community with its own identity, history, heritage and social infrastructure.

Residents have strong connections to:

- The local landscape;
- The coastline;
- Agricultural traditions;
- Community organisations;
- Sporting clubs;
- Educational facilities;
- Religious institutions; and
- Family networks extending back generations.

My own family reflects these connections. My husband's family have deep roots in this area and the home in which we live was built by his father. The decision to make our home here was influenced by the unique character of the community and the quality of life available in Lacken.

By failing to properly acknowledge Lacken as the host community, the application fails to adequately recognise the importance of these social and cultural connections.

The assessment instead tends to treat the area as a geographical location rather than a living community with established social, cultural and family ties.

6.5 Inadequacies in Community Engagement

The failure to properly acknowledge Lacken as the host community is also reflected in the consultation process.

As discussed elsewhere in this submission, I have serious concerns regarding:

- The adequacy of community consultation;
- The lack of direct engagement with affected residents;
- The absence of meaningful consultation on the final project design; and
- The limited evidence that local feedback influenced the development proposal.

The apparent failure to recognise Lacken as the principal affected community may help explain why many residents feel that meaningful engagement did not occur.

Effective consultation depends upon correctly identifying the community that will be most affected by a development.

If that community is not properly recognised at the outset, meaningful engagement becomes much more difficult to achieve.

6.6 Community Facilities and Local Assets

I am also concerned that the application demonstrates an insufficient understanding of local community facilities and assets.

Elsewhere within the application documentation there appear to be inaccuracies regarding community facilities, including references that classify important local facilities as dwellings rather than community resources.

Such errors may appear minor in isolation but collectively they raise concerns regarding the accuracy of the baseline assessment and the applicant's understanding of the receiving environment.

A development of this scale should be based upon a thorough understanding of the local community and the facilities, services and amenities upon which residents depend.

6.7 Conflict with Principles of Proper Planning and Sustainable Development

Proper planning and sustainable development require that communities likely to be significantly affected by a proposal are properly identified, assessed and engaged.

The planning system places considerable emphasis on:

- Public participation;
- Community engagement;
- Transparency;
- Accurate environmental assessment; and
- Consideration of social impacts.

In my opinion, the failure to properly identify Lacken as the host community is inconsistent with these principles.

A development cannot be properly assessed if the community most directly affected has not been clearly recognised within the planning documentation.

6.8 Conclusion

The omission of Lacken as the host community represents a significant deficiency in the application.

In particular:

- The proposed development is located within the Lacken area and will have substantial effects on Lacken residents;
- The planning documentation fails to adequately acknowledge this reality;
- The omission undermines the assessment of community, social and population impacts;
- It raises concerns regarding the adequacy of consultation and engagement; and
- It calls into question the accuracy and completeness of the characterisation of the receiving environment.

Accordingly, I submit that the Board should afford significant weight to this issue when assessing the adequacy of the Environmental Impact Assessment and determining whether the proposed development is consistent with the principles of proper planning and sustainable development.

7. Public Consultation and Community Engagement (Material Deficiencies and Procedural Concerns)

7.1 Introduction

Meaningful public consultation is a fundamental component of the Irish planning system and the Environmental Impact Assessment process. Effective consultation helps ensure that local knowledge is incorporated into project design, that potential impacts are identified at an early stage, and that affected communities have a genuine opportunity to participate in decision-making.

The applicant places considerable reliance on the consultation process undertaken in support of this application. However, based on my own experience as a resident living approximately 800 metres from the nearest proposed turbine, I do not believe that the consultation undertaken can reasonably be described as meaningful, comprehensive or effective.

I am concerned that the consultation process failed to adequately engage with the residents most likely to be affected by the proposed development.

7.2 Importance of Public Participation in the Planning Process

Public participation is a core principle of the Environmental Impact Assessment process and is recognised in:

- The Planning and Development Act 2000 (as amended);
- The Environmental Impact Assessment Directive;
- The Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters; and
- National planning guidance relating to wind energy development.

The Aarhus Convention emphasises that public participation should occur at an early stage when all options remain open and when public input can genuinely influence outcomes.

Similarly, the Wind Energy Development Guidelines for Planning Authorities (2006) recognise the importance of engaging with communities likely to be affected by wind energy developments. The Draft Revised Wind Energy Development Guidelines (2019) place even greater emphasis on early, transparent and ongoing consultation between developers and local communities.

7.3 Lack of Direct Engagement with Affected Residents

The EIAR states that engagement was undertaken with local residents and members of the community.

However, despite living approximately 800 metres from the proposed development and being among the households will be directly affected, I did not receive any meaningful direct engagement from the developer.

In particular:

- No representative of the applicant visited my home;
- No direct consultation meeting was arranged;
- No meaningful discussion occurred regarding the impacts on my family;
- No attempt was made to understand the particular circumstances of my household; and
- No opportunity was provided for me to discuss specific concerns regarding health, family wellbeing, remote working or future tourism opportunities.

This is particularly concerning given that my home would be located within an area identified as being subject to potential noise, visual and shadow flicker effects.

The absence of direct engagement with nearby households raises serious questions regarding the extent to which the applicant sought to understand the concerns of those most likely to be affected.

7.4 Consultation Relating to an Earlier Proposal

A further concern arises from the fact that much of the consultation appears to have been undertaken in relation to an earlier version of the project.

The development currently before An Coimisiún Pleanála differs from previous iterations of the proposal and reflects changes made to the turbine layout and overall project design.

However, it is not clear that affected residents were given a meaningful opportunity to review and comment on the final proposal now under consideration.

As a result:

- Consultation occurred in relation to an earlier design;
- Residents were not adequately consulted regarding subsequent changes;
- The community was not given an opportunity to assess the final layout; and

- There is limited evidence that local concerns informed the eventual design.

Meaningful participation requires engagement throughout the evolution of a project, not simply consultation at an early stage followed by significant amendments without further community involvement.

7.5 Lack of Transparency Regarding Community Feedback

The consultation documentation provides limited information regarding:

- The number of residents consulted;
- The nature of concerns raised;
- How concerns were analysed;
- Whether concerns influenced design decisions; and
- Why certain concerns were accepted or rejected.

The consultation process therefore appears largely one-directional, with information being provided to the public rather than genuine dialogue taking place.

In my view, meaningful consultation requires more than simply informing residents that a project is proposed. It requires a transparent process demonstrating how community feedback has contributed to the development of the proposal.

The documentation submitted does not clearly demonstrate this.

7.6 Failure to Engage With the Host Community

As outlined in Section 6, the application fails to adequately identify Lacken as the host community for the development.

This failure appears to be reflected in the consultation process itself.

A robust consultation process would be expected to include:

- Identification of the host community;
- Direct engagement with local residents;
- Engagement with community groups;
- Consultation with local facilities and organisations; and
- Ongoing dialogue throughout project development.

There is limited evidence that such an approach was adopted in relation to Lacken.

Many residents who will experience the direct effects of the development feel that they were not meaningfully involved in the process.

This undermines confidence in both the consultation process and the conclusions drawn from it.

7.7 Community Facilities and Stakeholders

I am also concerned that insufficient engagement appears to have taken place with important community stakeholders and facilities within the area.

Particular concern arises regarding:

- St Patrick's College;
- The Lacken Sensory Garden;
- Local community organisations;
- Tourism interests; and
- Families living within close proximity to the proposed turbines.

These facilities and groups form an important part of the social infrastructure of the local community and should have been afforded a greater role within the consultation process.

The absence of clear evidence regarding engagement with these stakeholders calls into question the completeness of the applicant's assessment of community impacts.

7.8 Conflict with National Guidance and Best Practice

The consultation process appears to fall short of the principles promoted within:

[Wind Energy Development Guidelines \(2006\)](#)

The 2006 Guidelines recognise the importance of community engagement and encourage developers to engage with local communities when preparing wind energy proposals.

[Draft Revised Wind Energy Development Guidelines \(2019\)](#)

The Draft Guidelines place a strong emphasis on:

- Early consultation;
- Transparent communication;

- Continuous community engagement;
- Meaningful participation; and
- Building trust between developers and communities.

The consultation undertaken in this case does not appear to fully reflect these principles.

Aarhus Convention Principles

The Aarhus Convention requires that public participation occurs at a stage when options remain open and when public input can genuinely influence decision-making.

In this case, many residents reasonably feel that consultation occurred largely as a procedural exercise rather than a genuine attempt to involve the community in shaping the project.

7.9 Impact on Confidence in the Planning Process

Meaningful public engagement is essential to maintaining public confidence in the planning system.

Where residents believe that:

- Their concerns have not been heard;
- Their community has not been properly identified;
- Consultation has been limited;
- Decisions have already been made; or
- Feedback has not influenced outcomes,

confidence in both the development process and the environmental assessment process can be undermined.

As a resident who will be directly affected by the proposed development, I am concerned that the consultation process has not met the standard that should be expected for a project of this scale and significance.

7.10 Conclusion

The consultation and community engagement process undertaken by the applicant contains a number of significant deficiencies.

In particular:

- Nearby residents were not meaningfully engaged;
- Consultation appears to have focused on earlier versions of the project;
- Lacken was not properly recognised as the host community;
- There is limited evidence that community feedback influenced the final design;
- Important local stakeholders do not appear to have been adequately consulted; and
- The process falls short of the principles promoted by national planning guidance and international best practice.

Accordingly, I submit that significant weight should be attached to these consultation deficiencies when assessing the adequacy of the application and determining whether the proposed development is consistent with the principles of proper planning, environmental justice and sustainable development.

8. Community Facilities, Sensitive Receptors and Community Wellbeing

8.1 Introduction

The proposed development has the potential to affect not only individual households but also a range of community facilities and amenities that contribute significantly to the social, educational and recreational life of the Lacken area.

While the EIAR focuses primarily on residential properties, insufficient consideration has been given to the broader community environment and to those facilities which are used daily by children, families, older persons, visitors and members of the wider community.

I am concerned that several important community assets have either been omitted from detailed assessment or have not been given sufficient weight in the evaluation of potential impacts.

8.2 St Patrick's College as a Sensitive Receptor

I am concerned that St Patrick's College has not been adequately recognised or assessed as a sensitive community receptor.

Educational facilities warrant particular consideration within environmental assessments because they serve children and young people who may be more sensitive to environmental disturbance.

The application documentation appears to contain inaccuracies regarding the classification of St Patrick's College, which at one stage is identified as a dwelling rather than an educational facility.

While this may appear to be a minor error, it raises concerns regarding the applicant's understanding of local community infrastructure and the accuracy of the baseline assessment.

Schools should be afforded particular protection in the planning process because they are places where:

- Students spend significant periods of time;
- Teaching and learning activities occur;
- Outdoor recreational activities take place; and
- A high-quality environment is important for wellbeing and development.

I am concerned that insufficient consideration has been given to the potential impact of visual effects, shadow flicker and landscape change on the school environment.

8.3 The Lacken Sensory Garden

The Lacken Sensory Garden is a valuable community resource that provides a peaceful, therapeutic and inclusive outdoor space for local residents and visitors.

Facilities such as the Sensory Garden contribute significantly to community wellbeing and provide opportunities for recreation, relaxation and engagement with nature.

The purpose of the Sensory Garden is closely linked to:

- Tranquillity;
- Sensory experience;
- Accessibility;
- Community wellbeing; and
- Connection with the natural environment.

I am concerned that insufficient consideration has been given to the potential effects of the proposed development on the setting and experience of this important facility.

The introduction of large turbines into the surrounding landscape has the potential to alter the character of the environment that the Sensory Garden was specifically designed to provide.

This issue is particularly important for:

- Young children;
- Families;
- Individuals seeking a calm outdoor environment; and
- Those who may be particularly sensitive to environmental change.

8.6 Inadequate Assessment of Community Receptors

I am concerned that the assessment undertaken by the applicant focuses heavily on residential properties while giving comparatively little attention to community receptors.

Important facilities, including educational, recreational and wellbeing resources, deserve separate consideration because they serve functions different from private dwellings.

A comprehensive assessment should have considered:

- Educational facilities;
- Community amenities;
- Recreational assets;
- Wellbeing infrastructure;
- Community gathering places; and
- Facilities used by children and families.

The absence of such detailed consideration suggests that the wider social impacts of the development may have been underestimated.

8.7 Conclusion

The proposed development has the potential to affect a number of important community facilities and sensitive receptors within the Lacken area.

In particular:

- St Patrick's College has not been adequately assessed as an educational receptor;
- The importance of children and young people within the receiving environment has not been sufficiently considered;
- The Lacken Sensory Garden has not been adequately evaluated as a community wellbeing facility;

- Wider community impacts have been underestimated; and
- Insufficient regard has been given to the contribution of local amenities to community wellbeing and quality of life.

Accordingly, I submit that the Board should afford significant weight to the potential impacts on community facilities, sensitive receptors and community wellbeing when determining this application.

9. Fire Safety, Battery Energy Storage System (BESS) and Public Safety

9.1 Introduction

In addition to my concerns regarding human health, residential amenity, landscape impacts and community wellbeing, I am also concerned about the fire safety, emergency response and public safety implications of the proposed Battery Energy Storage System (BESS) and associated electrical infrastructure.

The proposed development includes a large-scale Battery Energy Storage System, which introduces risks that differ significantly from those associated with traditional wind turbine infrastructure. These risks include the potential for battery fire, thermal runaway, explosion, toxic gas release and prolonged firefighting operations.

While I acknowledge that battery storage technologies have an important role to play in supporting renewable energy generation, such developments must be accompanied by thorough and transparent assessments of public safety implications.

I am concerned that the information provided within the planning application does not adequately demonstrate that the risks associated with the proposed BESS have been fully assessed or that nearby residents can be adequately protected throughout the lifetime of the development.

9.2 The Importance of Fire Safety Assessment

The Planning and Development Act 2000 (as amended) requires that the Board consider the likely effects of a development on population and human health as part of its assessment. Public safety is therefore a material planning consideration.

The proposed BESS represents a substantial industrial energy installation and, as such, requires careful consideration of:

- Fire risk;
- Emergency response arrangements;

- Potential impacts on nearby residents;
- Environmental contamination;
- Safety of emergency responders; and
- Risk management procedures.

I am concerned that many of these issues are either insufficiently addressed or deferred to a later stage of the project.

In my opinion, matters relating to public safety should be addressed before consent is granted rather than being left to post-permission design and operational stages.

9.3 Lack of a Comprehensive Emergency Response Plan

A significant concern is the apparent absence of a detailed and publicly available Emergency Response Plan for the proposed BESS facility.

While reference is made to fire safety measures within the application documentation, there appears to be limited information regarding:

- Emergency procedures;
- Incident response arrangements;
- Evacuation planning;
- Communication with residents;
- Emergency access protocols; and
- Coordination with emergency services.

An Emergency Response Plan would be expected to demonstrate:

- How incidents would be managed;
- The responsibilities of the operator;
- The role of emergency services;
- Procedures for protecting nearby residents; and
- Measures for minimising environmental damage.

Without this information, it is difficult for residents or decision-makers to fully understand the risks associated with the development.

9.4 Thermal Runaway and Battery Fire Risks

Battery Energy Storage Systems are capable of experiencing what is commonly referred to as "thermal runaway", whereby a failure within one battery cell can trigger a chain reaction resulting in fire, heat generation and the release of gases.

Although such events may be uncommon, they are recognised internationally as one of the principal hazards associated with battery storage facilities.

Potential consequences may include:

- Fire;
- Smoke generation;
- Release of hazardous gases;
- Damage to infrastructure;
- Environmental pollution; and
- Risks to emergency personnel.

Given the scale of the proposed BESS and its proximity to rural communities, I believe that a precautionary approach should be adopted.

The application should clearly demonstrate that these risks have been fully assessed and that appropriate safeguards are in place.

9.5 Potential Impact on Nearby Residents

As a resident living relatively close to the proposed development, I am concerned about the implications of any serious incident occurring at the BESS facility.

The application does not appear to provide sufficient information regarding:

- Potential impact zones;
- Separation distances;
- Emergency notification procedures;
- Protection of neighbouring properties;
- Safety of children and vulnerable residents; and
- Evacuation requirements.

My concerns are heightened by the fact that my household includes:

- Two very young children; and
- A family member with a significant cardiovascular condition.

The Board should be satisfied that all reasonably foreseeable risks to nearby residents have been adequately assessed before any permission is granted.

9.6 Emergency Response in a Rural Area

The proposed development is located within a rural area where emergency response resources may be more limited than in larger urban centres.

I am concerned that insufficient information has been provided regarding:

- Expected emergency response times;
- Access arrangements for emergency vehicles;
- Water supply availability;
- Site access during adverse weather conditions;
- Availability of specialist equipment; and
- Operational arrangements during a major incident.

The effectiveness of any emergency response strategy depends not only on the design of the facility but also on the ability of emergency services to access and manage an incident safely and efficiently.

These matters are particularly important in remote rural locations.

9.7 Lack of Evidence of Emergency Services Consultation

I am further concerned that the application provides limited evidence regarding the extent of engagement with relevant emergency services.

Given the nature of the proposed BESS, I would have expected detailed consultation regarding:

- Firefighting requirements;
- Hazard management;
- Emergency access;
- Water supply provision;
- Incident command arrangements; and
- Emergency planning.

Meaningful consultation with emergency services is an important part of ensuring that risks are properly understood and appropriately managed.

The absence of detailed information regarding such engagement raises concerns regarding the robustness of the assessment.

9.8 Public Health and Environmental Risks

In addition to fire-related concerns, any major incident involving a BESS could have potential implications for:

- Human health;
- Air quality;
- Surface water quality;
- Groundwater quality;
- Agricultural land; and
- Local biodiversity.

The surrounding area contains homes, farms, community facilities and environmentally sensitive landscapes.

Accordingly, any assessment of BESS safety should consider not only the facility itself but also the potential consequences for the wider receiving environment.

I am not satisfied that these matters have been assessed in sufficient detail within the application documentation.

9.9 Conclusion

I am concerned that the planning application does not provide sufficient information to demonstrate that the proposed Battery Energy Storage System can operate without giving rise to unacceptable risks to public safety, human health or the environment.

In particular:

- A comprehensive Emergency Response Plan has not been presented;
- Important details regarding fire safety remain unclear;
- Insufficient information has been provided regarding emergency response arrangements;
- The implications for nearby residents have not been adequately assessed;
- The potential consequences of battery fire and thermal runaway events require greater consideration; and
- The precautionary principle should be applied given the nature of the proposed development and the proximity of residential properties.

Accordingly, I submit that the Board cannot be fully satisfied that the proposed BESS has been demonstrated to be acceptable from a public safety perspective, and this matter should be afforded significant weight in the determination of the application.

10. Cumulative Impacts and the Gradual Industrialisation of North Mayo

10.1 Introduction

A fundamental principle of environmental assessment is that developments should not be considered in isolation where there are other existing, permitted or proposed developments that may contribute to the overall impact experienced by residents, communities and the environment.

The Environmental Impact Assessment process specifically requires the assessment of cumulative effects. This is intended to ensure that decision-makers understand not only the impact of an individual project, but also the combined impact of multiple developments operating within the same receiving environment.

In the case of the proposed Tirawley Wind Farm, I am concerned that the cumulative effects on the Lacken area and the wider North Mayo landscape have been significantly underestimated.

10.2 Legal and Policy Context

The Environmental Impact Assessment Directive requires consideration of cumulative effects as part of the environmental assessment process. This includes the interaction of the proposed development with other existing, approved and reasonably foreseeable projects.

Similarly, the Wind Energy Development Guidelines for Planning Authorities (2006) recognise that cumulative impacts may arise where multiple wind energy developments occur within the same geographical area and require such effects to be carefully assessed.

The purpose of cumulative assessment is to ensure that a series of developments do not collectively result in environmental or community impacts that would not be considered acceptable if viewed as a whole.

This principle is particularly important in North Mayo, where several wind energy developments have either been proposed, approved or developed in recent years.

10.3 Existing and Proposed Wind Energy Development in North Mayo

The proposed Tirawley Wind Farm forms part of a wider pattern of wind energy development within the region.

The cumulative assessment should consider the interaction between this proposal and:

- Glenora Wind Farm;
- Keerglen Wind Farm;
- Clydagh Wind Farm;
- Other existing wind energy developments within the wider area;
- Potential future wind energy projects;
- Associated transmission and grid infrastructure; and
- Other related energy developments.

Residents do not experience these projects separately.

Instead, they experience the overall effect of increasing wind energy infrastructure across the landscape.

When viewed collectively, these developments have the potential to create a level of environmental change significantly greater than that arising from any individual proposal.

10.4 Cumulative Impact on Residential Amenity

For residents living within the receiving environment, cumulative effects are often experienced most directly through changes in residential amenity.

The cumulative impact of multiple developments may include:

- Increased visual exposure to turbines;
- Increased perception of industrialisation;
- Greater landscape change;
- More widespread aviation lighting;
- Increased traffic associated with construction activities;
- Multiple sources of operational noise; and
- Ongoing environmental disturbance over an extended period.

While the applicant assesses the impacts of the Tirawley proposal on its own merits, I am concerned that insufficient weight has been given to the fact that residents may also be affected by other wind energy developments in the area.

The reality experienced by local communities is the cumulative effect of all developments rather than the effects of any one project in isolation.

10.5 Cumulative Landscape and Visual Impact

One of the most significant cumulative effects relates to landscape character.

As discussed in Section 9, the North Mayo landscape is highly valued for its:

- Open and expansive character;
- Natural scenery;
- Cultural heritage;
- Coastal views;
- Peatland landscapes; and
- Relative absence of industrial development.

A single wind farm has the potential to alter landscape character.

However, multiple wind farms operating within the same landscape can fundamentally transform the overall visual experience of an area.

The cumulative visual presence of turbines across a broad geographical area may lead to:

- The loss of landscape distinctiveness;
- Increased visual clutter;
- Reduced scenic quality;
- The perception of a more industrialised environment; and
- The erosion of the area's unique character.

In my opinion, the cumulative assessment does not adequately reflect the scale of this change.

10.6 Cumulative Effects on Tourism

Tourists do not visit North Mayo to see individual developments.

They visit to experience the wider landscape, coastline and cultural heritage of the region.

Accordingly, tourism impacts must be assessed from the perspective of the overall visitor experience.

The cumulative effect of multiple wind energy developments has the potential to influence:

- Scenic quality;
- Landscape character;
- Visitor experience;
- Perceptions of remoteness and tranquillity;
- The attractiveness of the Wild Atlantic Way; and
- The setting of important heritage attractions such as the Céide Fields.

While one development may not fundamentally alter the tourism offering of an area, multiple developments can collectively contribute to a gradual and significant transformation of the landscape upon which tourism depends.

This is a matter that should be afforded considerable weight by the Board.

10.7 Cumulative Effects on Community Identity

I am particularly concerned about the cumulative impact of development on community identity and sense of place.

Lacken and the wider North Mayo area are defined by:

- Strong family connections;
- Rural traditions;
- Agricultural activity;
- Heritage and culture;
- Community facilities; and
- A distinctive landscape setting.

The gradual introduction of large-scale energy infrastructure has the potential to alter the relationship between people and place.

Such impacts are difficult to quantify but are nonetheless real.

Over time, the cumulative effect of multiple developments may lead to:

- A reduction in rural character;
- Changes in community identity;
- Increased community division;
- Reduced perceptions of landscape quality; and
- A sense that the local environment is being progressively industrialised.

These social impacts should not be overlooked simply because they are difficult to measure.

10.8 The Gradual Industrialisation of North Mayo

A recurring theme throughout my submission is the concern that North Mayo is experiencing a gradual process of industrialisation through the cumulative addition of energy infrastructure.

The proposed Tirawley Wind Farm is not simply 16 turbines.

It forms part of a much broader network of:

- Wind farms;
- Substations;
- Grid infrastructure;
- Access roads;
- Underground cabling; and
- Energy generation facilities.

Each proposal may appear acceptable when considered individually.

However, when considered collectively, the result may be an overall pattern of development that fundamentally changes the character of the region.

This is precisely why cumulative assessment is required under the Environmental Impact Assessment process.

In my view, the applicant has not adequately demonstrated that this cumulative transformation of the landscape and community can be considered sustainable.

10.9 Conclusion

The proposed Tirawley Wind Farm cannot be assessed in isolation.

When considered alongside existing, approved and potential future developments, the proposal gives rise to significant concerns regarding cumulative impacts on:

- Residential amenity;
- Landscape character;
- Community wellbeing;
- Tourism;

- Cultural heritage;
- Rural identity; and
- The long-term sustainability of the North Mayo environment.

The cumulative effect of these developments has the potential to result in the gradual industrialisation of a landscape and community that are currently defined by their rural character, heritage and environmental quality.

Accordingly, I submit that the Board should afford substantial weight to cumulative effects when determining this application and should not assess Tirawley Wind Farm as a standalone development disconnected from the wider pattern of development occurring throughout North Mayo.

11. Conclusion

Having carefully reviewed the planning application, Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and supporting documentation submitted in respect of the proposed Tirawley Wind Farm Strategic Infrastructure Development, I remain firmly of the view that the proposed development would result in significant adverse impacts on my family, my home, my community and the wider North Mayo environment.

Throughout this submission I have outlined a number of serious concerns relating to:

- Human health and family wellbeing;
- Residential amenity;
- Noise and potential sleep disturbance;
- Shadow flicker;
- Visual dominance and landscape change;
- The industrialisation of a rural environment;
- Telecommunications and remote working;
- Future tourism and economic opportunities;
- Community consultation and public participation;
- The failure to properly identify Lacken as the host community;
- Impacts on community facilities and sensitive receptors;
- Landscape, heritage and tourism impacts;
- Fire safety and public safety concerns associated with the Battery Energy Storage System (BESS); and
- The cumulative impact of existing, approved and proposed wind energy developments throughout North Mayo.

While I fully recognise the importance of renewable energy development and Ireland's transition to a low-carbon future, it is essential that such development

occurs in locations where it can be accommodated without causing unacceptable adverse effects on local communities, residential amenity, human health and environmental quality.

In my opinion, the applicant has failed to adequately demonstrate that the proposed development can achieve this balance.

As a resident living approximately 800 metres from the nearest proposed turbine, I will experience the direct consequences of this development for decades. My concerns are not theoretical. They relate to the environment in which my husband and I have chosen to raise our two young children, the home that has long-standing family connections to this area, and the quality of life that we currently enjoy within the Lacken community.

I remain particularly concerned that insufficient consideration has been given to:

- The presence of a medically vulnerable resident within my household;
- The long-term wellbeing of two very young children;
- The protection of residential amenity over the proposed operational lifespan of the project;
- The cumulative impact of noise, shadow flicker, visual intrusion and landscape change;
- The impact on future economic opportunities available to rural families;
- The adequacy of the consultation process; and
- The cumulative industrialisation of an area renowned for its landscape, heritage and tourism value.

I am further concerned that significant deficiencies remain in the assessment of community impacts, public safety considerations and cumulative effects, and that important uncertainties have not been adequately resolved. In such circumstances, I believe the precautionary principle should apply.

The Board must not only consider the benefits of renewable energy generation but also its responsibility to protect established communities, family life, residential amenity, landscape character and the principles of proper planning and sustainable development.

For all of the reasons set out throughout this submission, I respectfully submit that the proposed Tirawley Wind Farm would have significant adverse effects on my family, the Lacken community and the wider North Mayo area and that these effects have not been adequately avoided, mitigated or justified by the applicant.

Accordingly, I respectfully request that **An Coimisiún Pleanála** refuse permission for the proposed Tirawley Wind Farm Strategic Infrastructure Development (Case Reference PAX16.324258).

Yours faithfully,

Marie Kelly