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19th June 2026

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

**Re: Objection to the Proposed Tirawley Wind Farm Strategic Infrastructure
Development Objection Submission to An Coimisiún Pleanála**

Re: Planning permission for the construction of Tirawley Windfarm consisting of 16 no. wind turbines, a permanent 110kV substation, 110kV underground cable and grid connection, and ancillary development in the townlands of Ballymurphy, Ballynaleck, Barnhill Lower & Upper, Barroe, Billoos, Carn, Carrickanass, Carrowmore, Castlelacken Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

I am writing as a resident of the area within proximity to the proposed Tirawley Wind Farm project, submitted by Constant Energy Limited, to formally lodge my objection to this Strategic Infrastructure Development application. This development poses significant and irreversible risks to the local environment, biodiversity and local residents. In particular the proposal threatens critical habitats for protected species such as the Hen Harrier, involves substantial habitat removal including over 4 km of hedgerow, and raises serious concerns regarding visual impact, traffic disruption, and inadequate community consultation. These issues, coupled with shortcomings in the Environmental Impact Assessment Report, justify a refusal of permission for this project.

Having reviewed the public information provided and engaged with the community consultation materials, I wish to raise the following concerns:

1. Impact on water that supplies our home

We are residents of Lacken and my household is not connected to any public or group water supply scheme. Our family relies entirely on a private well and spring-fed groundwater source for all drinking water, cooking, washing and domestic use. Consequently, we have serious concerns regarding the potential impact of the proposed Tirawley Wind Farm development on both the quality and quantity of my water supply.

Several turbines are proposed for an upslope from my farm and sheds water supply. My farm is supplied from my private well nearby and the development will involve significant disturbance of the ground in several locations above the well. I believe this will result in both an unpredictable diversion of water flows underground as well as the possibility of cementitious and other chemicals entering the water being fed to my animals.

The proposed development involves extensive excavation works, turbine foundations, access roads, drainage infrastructure, forestry felling and associated construction activities across an area that is highly dependent on shallow groundwater systems. The Environmental Impact Assessment Report (EIAR) acknowledges that groundwater within the area commonly emerges as springs (Section 9.5.1.9), yet it does not appear to adequately assess the dependence of local households on these groundwater sources for their daily drinking water supplies.

Many homes in the area are supplied by shallow groundwater springs which are collected and piped directly to individual dwellings. These springs represent the only semi-reliable source of potable water available to many residents. A significant number of these sources originate at elevations similar to those proposed for turbine foundations and associated infrastructure. As a result, they may be highly susceptible to changes in groundwater levels, groundwater flow paths and hydrogeological conditions arising from large-scale excavation, blasting, piling and construction activities.

These springs are already known to experience reduced flows or complete drying during prolonged periods of drought. Any alteration of groundwater pathways, interception of groundwater flows or disruption of subsurface hydrological systems could further reduce water availability and place existing domestic water supplies at risk. Such impacts would have significant consequences for residents who have no practical alternative water source.

Particularly concerning is the fact that parts of the development area are underlain by karstified geological formations. Karst aquifers are recognised as highly sensitive hydrogeological environments due to the rapid movement of groundwater through fissures, fractures and solution channels. Small changes in groundwater flow regimes can have disproportionate impacts on springs and water supplies located considerable distances away from the source of disturbance. Given the importance of these groundwater-fed springs to local communities, An Coimisiún Pleanála must be satisfied beyond reasonable scientific doubt that the development will not adversely affect either the quantity or quality of these water supplies.

Furthermore, the Geological Survey Ireland groundwater vulnerability mapping identifies the wind farm area as being within a High Groundwater Vulnerability zone. This classification indicates that groundwater in the area is particularly susceptible to contamination, with pollutants capable of entering the groundwater system rapidly and subsequently discharging to springs, wells and surface waters.

The EIAR appears to focus primarily on potential impacts to surface waters and ecological receptors. However, insufficient consideration has been given to the risks posed to private drinking water supplies. Potential contamination pathways may arise from fuel spills, concrete washout, sediment-laden runoff, forestry operations,

chemical use, construction activities and the mobilisation of naturally occurring iron-rich ("red water") groundwater during excavation and piling works. Any mixing of deeper groundwater with the clean shallow groundwater currently supplying domestic wells and springs could have serious implications for water quality.

The potential consequences of groundwater contamination extend beyond environmental impacts and directly affect public health. Residents who rely on private water supplies have no alternative source available should contamination occur. Once groundwater systems are damaged or polluted, remediation may be difficult, costly or impossible.

In light of the acknowledged hydrogeological sensitivity of the area, the widespread reliance of local residents on spring-fed water supplies, the presence of highly vulnerable groundwater and the apparent absence of a detailed assessment of impacts on private drinking water sources, I submit that the EIAR has failed to adequately assess a critical aspect of the receiving environment. Accordingly, An Coimisiún Pleanála should require a comprehensive hydrogeological assessment of all private wells, springs and domestic water supplies that may be affected by the proposed development before any determination is made.

Until it can be conclusively demonstrated that the development will not adversely affect existing private drinking water supplies, the precautionary principle should apply and permission should be refused.

2. Noise Impact

As per the applicant's documents my house has been identified as H64. We would like it noted that we have an issue with the term "receptor" as it appears to detach the development from the fact that it is being proposed for an area that is home to so many people. The area is not a barren site, it's our home and our community.

My House is located approximately:

963m from Turbine AT16 – Table 15.1

1154m from Turbine AT15

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

Noise Impact Concerns

The proposed turbine AT16 is located only approximately 963 metres from my house (H64). I consider this separation distance insufficient to protect residential amenity, particularly given the scale of modern turbines and the quiet rural environment in which my home is located.

The assessment relies heavily on predicted modelling. I request that An Coimisiún Pleanála carefully examine whether the modelling fully represents the actual conditions experienced at H48, including:

- night-time noise impacts when background noise levels are naturally low;
- periods with specific wind direction where turbines AT16, AT15 may all contribute simultaneously;

- amplitude modulation (“blade swish” or changing character of turbine noise);
- low-frequency noise impacts;
- the cumulative noise contribution from multiple turbines.

A predicted compliance with a numerical noise limit does not necessarily mean that there will be no significant loss of residential amenity. A change from the existing quiet rural soundscape to continuous operational turbine noise has the potential to materially affect my enjoyment of my home, garden and surrounding property.

I request that a more precautionary assessment be applied to H64 given its proximity to AT16 and the combined influence of three turbines.

Shadow Flicker

The EIAR identifies my house, H64, as being approximately 963 metres from turbine AT16. Table 15.3 of Chapter 15 predicts that H64 will experience:

- 9 hours 20 minutes worst-case shadow flicker per year
- 1 hours 30 minutes expected shadow flicker per year
- 21 minutes maximum expected shadow flicker per day

This exceeds the 2006 Wind Energy Development Guidelines recommendation of no more than 30 minutes per day.

I consider this significant because the applicant’s own modelling confirms that my home is one of the receptors where the guideline threshold is exceeded. The issue is not a theoretical concern — the impact has already been identified within the EIAR.

While the EIAR refers to mitigation measures in Section 15.2.9.3, including turbine control measures/shadow flicker control systems, I do not consider reliance on future mitigation alone to be sufficient justification for permitting a development that is predicted to create an exceedance at my home.

The mitigation proposal effectively acknowledges that turbines have the potential to cause unacceptable shadow flicker impacts unless active intervention occurs. This raises concerns regarding:

- long-term reliability of control systems;
- monitoring and enforcement arrangements;
- responsibility if mitigation fails;
- whether shutdown will occur automatically or only after complaints;
- how compliance at H64 will be independently verified throughout the lifetime of the wind farm.

I further note that the Draft Revised Wind Energy Development Guidelines (2019) recognise that modern turbine technology can prevent shadow flicker and move towards a zero shadow flicker approach at sensitive receptors.

Table 11.16: Predicted Noise Levels as LA90 at Varying Wind Speeds from the Proposed Development

	ING	ING	4 m/s	5 m/s	6 m/s	7 m/s	8 m/s	9+ m/s
House ID	Easting	Northing	dBA	dBA	dBA	dBA	dBA	dBA
H45	515873	833236	29.7	33.8	37.6	39.9	40.2	40.2
H46	516625	836322	31.2	35.3	39.1	41.4	41.7	41.7
H47	517758	837737	28.4	32.5	36.3	38.6	38.9	38.9
H48	516764	835557	29.8	33.9	37.7	40	40.3	40.3
H49	517632	838261	28.2	32.3	36.1	38.4	38.7	38.7
H50	517638	837109	28.3	32.4	36.2	38.5	38.8	38.8
H51	517742	837283	28	32.1	35.9	38.2	38.5	38.5
H52	517457	838516	27.8	31.9	35.7	38	38.3	38.3
H53	516738	836261	30.4	34.5	38.3	40.6	40.9	40.9
H54	517836	837697	27.6	31.7	35.5	37.8	38.1	38.1
H55	516774	835227	28.7	32.8	36.6	38.9	39.2	39.2
H56	517806	837295	27.5	31.6	35.4	37.7	38	38
H57	516697	836380	30.7	34.8	38.6	40.9	41.2	41.2
H58	517489	838569	27.2	31.3	35.1	37.4	37.7	37.7
H59	517798	837225	27.4	31.5	35.3	37.6	37.9	37.9
H60	515557	831893	26.9	31	34.8	37.1	37.4	37.4
H61	516384	834641	28.8	32.9	36.7	39	39.3	39.3
H62	517792	837189	27.4	31.5	35.3	37.6	37.9	37.9
H63	516320	834718	29.3	33.4	37.2	39.5	39.8	39.8
H64	517729	837077	27.5	31.6	35.4	37.7	38	38

Table 15.1: Properties within the Shadow Flicker Study Area

Current ID	House	Easting ITM	Northing ITM	Closest Turbine	Closest Distance to Turbine (m)
H55		516774	835227	AT07	879
H56		517806	837295	AT16	884
H57		516697	836380	AT08	891
H58		517489	838569	AT15	892
H59		517798	837225	AT16	902
H60		515557	831893	AT02	905
H61		516384	834641	AT01	905
H62		517792	837189	AT16	911
H63		516320	834718	AT07	912
H64		517729	837077	AT16	913

3. Tourism cumulative impact

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

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

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

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

Visitors come to experience:

- The Céide Fields cultural landscape.
- Downpatrick Head.
- The Wild Atlantic Way.
- The North Mayo coastal scenery.
- The Western Way and local walking routes.
- Local heritage sites and monuments - The Lacken Gazebo.
- The area's dark skies and natural tranquillity.
- Historic locations associated with General Humbert's 1798 landing and campaign.

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

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

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

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

The Lacken Gazebo is a Folly, one of the most unusual protected structures in Ireland which can be viewed from Sligo, Leitrim, Donegal and all over Mayo. It is formed from a double arch of rough stones. It is situated on the summit of Lacken Hill to the rear of Castle Lacken: seat of the Palmer family from the sixteenth century. This was constructed during the latter part of the eighteenth century by either Sir Roger or Sir John Palmer. This structure is located 300m from the nearest turbine AT16, how can this historical monument be protected in light of the planned development?

4. Site Suitability and Landscape Impact

The area includes sensitive landscapes, visible from the Wild Atlantic Way and other designated scenic routes, which would be adversely affected by this wind farm. The visual intrusion on the unique coastal and rural landscape is unacceptable and contrary to the policies outlined in the Mayo County Development Plan regarding landscape protection and visual amenities.

(Reference: Mayo County Council submission, EIAR Chapter 17 - Traffic and Transport, Pages 9-10; Planning Statement, Pages 69-71)

5. Environmental and Ecological Concerns

The Lacken area includes sensitive habitats such as blanket bogs and areas with ecological significance under the Habitats Directive. The large volumes of peat to be

extracted and the disturbance to these habitats could have long-term detrimental effects on biodiversity and peatland restoration efforts.
(Reference: Appendix 1.6 Community Engagement Report, Pages 13-14; Planning Statement, Pages 69-71)

6. Impact on Hen Harrier Habitat

I am particularly concerned about the impact of the proposed development on the hen harrier, an Annex I protected species under the EU Birds Directive and one whose Irish population has declined significantly in recent years. The EIAR acknowledges that hen harriers are present within the study area and that the site provides suitable autumn and winter foraging habitat. The site contains a combination of blanket bog, scrub, wet grassland, semi-improved grassland and hedgerow networks, all of which are important habitats for foraging and roosting hen harriers.

Of particular concern is that a winter hen harrier roost was recorded within the study area, yet no comprehensive winter roost survey appears to have been undertaken across the wind farm site itself. The applicant's roost surveys focused primarily on areas outside the development footprint, despite evidence that hen harriers utilise habitats within the proposed development area. In the absence of a robust assessment of winter roosting activity, it is difficult to conclude that the impacts on this protected species have been fully assessed.

The development will result in the permanent loss and fragmentation of habitats used by hen harriers, including substantial hedgerow removal, loss of blanket bog habitat, forestry felling and the construction of extensive site roads and infrastructure. While mitigation is proposed, there remains uncertainty as to whether replacement habitats can adequately replicate the ecological value of the habitats being lost, particularly in the short to medium term.

I am also concerned about the cumulative effects of habitat loss, construction disturbance and operational displacement. Research has shown that hen harriers may avoid otherwise suitable habitat in the vicinity of operational turbines, resulting in a reduction in available foraging area. The application does not appear to adequately assess or mitigate this displacement effect.

Given the conservation status of the species, the acknowledged presence of suitable habitat and recorded winter roosting activity within the study area, I do not believe sufficient scientific certainty has been provided to demonstrate that the proposed development will not adversely affect the hen harrier population using this landscape. The precautionary principle should therefore apply.

7. Traffic and Infrastructure Impact

The construction phase will bring significant disruption to the local road network due to the delivery of abnormal loads and turbine components. The existing roads will require widening and modifications that will impact local traffic flow and road safety. The scale of this impact has not been adequately mitigated in the proposal.

(Reference: EIAR Chapter 17 - Traffic and Transport, Pages 6-10; Appendix 1.6 Community Engagement Report, Pages 11-12)

I am concerned about the impact that the construction will have on my ability to get to work and other appointments as the amount of road works this will involve is significant. I do not consider that there have been sufficient surveys done on the Palmerstown Bridge and this need to be assessed appropriately.

8. Community and Socio-Economic Issues

While I acknowledge the need for renewable energy and some regional economic benefits, the socio-economic impact on sustainable family farms and local amenities is concerning. The proposal does not sufficiently address the community's needs or provide clear, direct benefits to local residents. The proposed community benefit package remains vague and unconvincing.

(Reference: Appendix 1.6 Community Engagement Report, Pages 7-14)

9. Cumulative Impact and Strategic Considerations

The project overlaps with areas where other developments are planned or existing, increasing cumulative environmental, visual, and infrastructural pressures. The scale and height of modern turbines, as noted by Mayo County Council, raise questions about the suitability of this site compared to previous assessments.

(Reference: Mayo County Council submission, EIAR Chapter 17, Pages 9-10)

In conclusion, I respectfully submit that the proposed Tirawley Wind Farm project 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 Coimisiún Pleanála to refuse permission for this development in the interests of proper planning and sustainable development.

Thank you for considering my submission.

Yours faithfully,

Marie McLoughlin