

Marion & Hugh Galt
Carrowkeel, Kincon, Ballina, Co Mayo, F26X6Y4
E-mail: mariongalt@gmail.com Tel: 087-9244108

The Secretary
An Coimisiun Pleanála
64 Marlborough Street
Dublin D01V902

Dear Sir/Madam

RE: Proposed Tirawley Windfarm PAX16.324258

My husband and I live near the proposed Tirawley wind farm development proposed by Constance Energy Limited and we would like to object to the development.

While mindful of Ireland's need to increase its renewable energy supply, this particular development poses a risk to local environment, biodiversity, tourism development, human health and wildlife habitats. Especially in the context of the multiple other windfarm projects in the area.

The visual impact of 16 135m turbines, the traffic disruption of a 24-month construction combined with the lack of engagement by the developer with the affected community are all sound basis for refusal of this project.

Although the turbine setback in the Tirawley project falls within current Irish regulations, these rules date back to 2006. In our case, Tirawley turbine proximity, combined with the Clydagh/Glenora/Keerglen cluster of 52 180m-turbines just 6k away, gives us cause for concern regarding noise, infrasound, visual intrusion and construction disruption. There are wider concerns, too, of damage to the area's tranquility and present environment.

Consultation

We live within 1.2k of turbine AT02 and within 1.7k of turbines A03 and A04 so we consider ourselves 'primary receptor', according to the EIAR's standard practice. Despite this, we found the consultation process did not seek to engage with us. Nor was the Public Information Day, held in June 2023, sufficiently advertised for us to notice, a fact underlined by the scant attendance of only 31 people, according to the Pre-Application Community Consultation report. This is contrary to the spirit of community engagement envisioned by the Planning and Development Act.

It is a shame as we would like to have engaged with the developers and gained earlier clarity on the project. Constant Energy advertised in the Western People, which we do not regularly buy. It also claims, in the PACC report April 2026, to have spread notice by 'word of mouth'. This is an insufficient effort to advertise a project of this magnitude. A simple notice in the letterbox of receptors within the 2k boundary would have been helpful. Also, there does not appear to have been second PID prior to Constant Energy lodging a second application.

Cumulative Impact

In its deliberations, the EIAR is concerned only with the 16-turbine Tirawley project but residents and visitors experience the cumulative effect of the severe wind farms visually evident. The EIAR's Appendix 1.2 refers to 15 other wind farms within 20k of Tirawley.

The nearest projects to Tirawley include:

- Clydagh Wind Farm (22 turbines) 3k from Tirawley, proposed.
- Glenora Wind Farm (22 turbines) 6.9k away, permission granted.
- Keerglen Wind Farm (6 turbines) 6.5k away, permission granted.
- Killala Community Wind Farm (6 turbines), 6k away, operational.
- Oweninny Wind Farm (78 turbines), 14k distant, operational and under expansion.
- Muingmore Wind Farm (13 turbines). 15k distant, proposed.
- Cooneal Wind Farm (14 turbines) about 20k away, proposed.
- Aries Wind Farm (11 turbines) 18k away, pre-planning.

That amounts to 172 turbines within a 20k area.

Noise and health Implications

Because windfarms have been either proposed or granted both to the north and south of our home, we will have to contend with the aerodynamic 'whoosh', mechanical noise, low frequency noise (LFN) and infrasound whatever direction the wind is coming from.

Tirawley's EIAR predicts up to 45dB in worse case scenarios. This exceeds the WHO's recommend maximum 40dB outside the bedroom to prevent

adverse health effects. Given there are over 250 houses within 2k of the site, we believe the sound issue of this project need to be more thoroughly considered.

Given the sleep problems and fatigue already present in our household, any increase in environmental noise created by the turbines will have an impact on our quality of life and is of concern to us.

- Low Frequency Noise and Infrasound

We have noted the ongoing scientific debate about the effects of LFN and infrasound on human and animal health. Scientific research, while sometimes controversial, raises concerns. LFN has been said to cause headaches, loss of concentration, anxiety and irritability, fatigue, dizziness, tinnitus, aural pain, and sleep disturbances. There is also scientific research into Infrasound which raises concerns, though this research is as yet controversial.

A report in Nature's Scientific Reports in September 2021, *Effects of low-frequency noise from wind turbines on heart rate variability in healthy individuals* by Chun-Hsiang Chiu et al, indicated that LFN can cause an imbalance in the autonomic nervous system which may increase morbidity and mortality of cardiovascular diseases.

Uppsala University's Prof. Ken Mattsson has spent 25 years studying infrasound and has shown it can reach 10k distances from wind turbines. In a lecture in October last year entitled *Separating Myth from Fact in Wind Turbine Noise*, Prof Mattsson demonstrated that developers tend to underestimate turbine noise by up to 20dB in a single day.

- Legal issues

This issue of turbine noise appears to be an evolving one. A recent landmark High Court judgement (*Byrne & Moorhead v ABO Energy Ltd, June 2025*) resulted in half the Gibbett Hill turbines in Co Wexford being shut down. The judge found that erratic and sustained turbine noise constituted actionable private nuisance, despite the turbines operating within permitted decibel limits.

In light of the above, and given that there are 100 homes within 1k of the Tirawley site and 266 within 2k, more extensive and better monitoring and estimations of noise emissions would be reassuring for residents.

Construction Impact

The EIAR Chapter 17 (and the Appendix 1.6 Community Engagement Report) predicts over 11,022 heavy good vehicles traffic over 21 months of the construction phase. I have been unable to ascertain if this is one-way load deliveries. If it is, the resulting 22,044 lorries in the area will have considerable impact on the local roadways. There is also the increased traffic of construction workers, spoil removal and the transport of 14,500 tonnes of timber to be removed from the site.

Such heavy traffic on the R314, our daily route to Killala and Ballycastle, will make driving difficult and dangerous for us and other residents, especially during summer tourism season.

Our other possible route to Ballycastle is the narrow R315. But the Glenora Windfarm (22 turbines) proposal says construction traffic, HGVs, concrete deliveries and staff vehicles may travel the R315 (Glenora EIAR Chapter 17). Clydagh windfarm (22 turbines), yet to be decided on, is situated even nearer the R315, a twisty, narrow road. This would mean difficulty and danger getting to and from Ballycastle, curtailing our our main shopping, social, gardening and other actives in Ballycastle.

Given the cumulative effect of various wind farm construction activity on the two main roads of the area, the R314 and R315, traffic flow and road safety for the area and its residents has not been adequately addressed.

Diversions have been mentioned but routes have not been identified - but given our road network any such routes are likely to be long and onerous.

Palmerstown Bridge

One of the oldest surviving bridges in Mayo is Palmerstown Bridge with eleven stone arches. Listed by the National Inventory of Architectural Heritage, No.31301417, it is described as an important example of 18th century engineering in Mayo. It even featured in a film about the 1798 rebellion!

The Palmerston Bridge structural report is dated 25 January 2023, when a visual inspection of the bridge judged it to be in good structural condition. However, the inspection was unable to ascertain foundations or soils condition.

The EIAR noted the bridge foundations had not been investigated and the inherent uncertainty when foundation details are unknown. In light of this and the historic, protected nature of the bridge, which is only 4.6m wide, a more thorough assessment, especially taking into account the repeated heavy traffic ion a 21-month construction period, would be advisable.

The bridge and its future would benefit from a monitoring programme to track any cracks, vibrations or other damage. Will the developer cover the cost of any repairs or restoration necessary as a result of the prolonged heavy construction traffic.

Tourism Impact

The EIAR's Chapter 13, Material Assets describes the area's archaeology as a '*critical component of the emerging Ceide Coast experience*'. This is a sound observation and reflects the launch recently in Ballycastle of the Wild Mayo Destination and Experience Development Plan (DEDP). This 5-year plan by Mayo County Council identifies North Mayo as a priority area of new walking trails and increased visitor numbers.

In Chapter 5, Population & Human Health, the EIAR correctly underscores the importance of protecting the area's recreational amenity and 'sense of place' as key to the long-term economic and social health of the local population.

Failte Ireland's Key Overseas Visitor Survey quantified the key reasons for visitor choosing Ireland; respondents said beautiful scenery (89%) and unspoilt environment (78%). Tirawely site's scenery, tranquility, archaeology and wildlife all reflect these qualities and are central to the area's development and, thus, the socio-economic health of its residents.

As a keen walker, I see the area's evolving trails and walks; the Western Walk, the Rathlacken Court Tomb walk, the Gazebo, the Ceide Coast Path are all important to this development.

However, the construction phase to the Tirawley project involving 21 months of HGV traffic, multiple diversions, and the erection of four turbines (AT11, AT12, AT31, AT14) directly on the Western Way and another four in close proximity (AT9, AT10 and AT15, AT16) will have a marked impact on the usability and attraction of these walks and trails.

The Tirawley application mentions 'diversions' but no routes are posited. Two turbines are within 350m of the Lacken Gazebo, (listed No. 3130708 in the National Inventory of Architectural Heritage). The nearby Rathlacken Court Tomb is one of only a handful of easily-accessible, excavated court tombs in Ireland. It abuts the Western Way and is an important feature of the Ceide Coast product and the Lacken Loop walks.

The visual impact will also affect the area's other 'big draws'; Downpatrick Head and the planned Ceide Coast Path, financed by Failte Ireland.

While The EIAR acknowledges the area's archaeological and tourism assets in Chapters 5 and 13, it has failed to adequately consider how the Tirawley project will impact such a sensitive and scenic area and how much at odds it is with Failte Ireland's development plans.

Environmental and Bird Concerns

Constant Energy proposes building 16 turbines, a substation, battery storage facilities and connecting grid lines. Table 17.22 of the EIAR estimates 15,948sq metre of concrete in 1,994 deliveries

Onshore turbine foundations require roughly 600-1,000 m cubed concrete foundations - which means roughly 29,000 tonnes of reinforced concrete on a site which comprises blanket bog, scrub, wet grassland and hedgerows. It is also proposed to remove at least four kilometre of existing hedgerows, trees and vegetation.

All this will impact bird habitat and biodiversity, altering the character of the area. On many local walks, I have seen or heard birds listed in the EU Birds Directive as well as the Bird of Conservation Concern in Ireland. Grouse, lark and snipe, for instance, are all protected species and either red- or amber-listed. Curlews and chough are regularly seen and are red-listed under Birds of Conservation Concern in Ireland. The protected sparrowhawk is regularly seen.

In its Ornithology chapter, the EIAR identified the Hen Harrier as a winter visitor to the area. It acknowledges it to be of national importance with an Annex 1 listing with the EU Birds Directive, and whose population is in decline in Ireland.

However, the roost habitats were mainly surveyed in the Lacken Bay area *outside* the site footprint. The project's influence on this endangered bird's roosting activity needs to be more thoroughly assessed.

The conclusion of EIAR's Ornithology chapter suggests that nest disturbance will be avoided completely by restricting zones around identified nests. While this is laudable and may leave the nests untouched, the danger of nearby noise and activity means nests are less likely to be well attended by the birds, affecting reproduction.

The April 2012 edition of the *Journal of Applied Ecology* found that grouse, snipe and curlew populations declined on windfarm sites during construction. While the grouse populations recovered over time, snipe and curlew populations did not. The same study found that a windfarm's construction phase can have greater impact on birds than the actual operational phase.

Conclusion

We recognise the country's need to develop renewable energy to meet our climate objectives. However, the appropriateness of the project to this location must be a consideration.

We believe the Tirawley Wind Farm will have unacceptable effects on our recreational and travel amenities, on tourism highlights in the area, on the biodiversity and its bird species, on the protected monuments around us. And the unique and tranquil nature of our surrounding landscape will be changed irretrievably forever.

We would also suggest that the Tirawley development should be judged in light of the multiple other windfarms in the area (outlined above). The EIAR has substantially underestimated the potential damage this project would inflict on the locality.

For these reasons, we would request that An Coimisiún Pleanála refuse permission for the Tirawley Wind Farm development. Should ACP grant permission, we would request further substantial assessment along with robust strictures to protect us, the monuments, biodiversity, tourism assets and the wider Mayo landscape.

Thank you for considering this submission.

We also wish to adopt and support the detailed submission made by the Lacken Ballycastle Community Landscape Protection Group in relation to the Tirawley Wind Farm application (PAX.16.324258).

In particular, I endorse the concerns regarding:

- cumulative windfarm development across north Mayo;
- the impact on the Ceide Fields cultural landscape;
- effects on tourism and recreation;
- biodiversity impacts;
- inadequacies in community consultation;
- the assessment the Battery Energy Storage System.

While I do not repeat those detailed arguments in full, I request that they be considered as forming part of this submission.

Marion and Hugh Galt