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22nd June 2026

An Coimisiún Pleanála
64 Marlborough Street
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D01 V902

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,

We wish to lodge a strong objection to the proposed Tirawley Wind Farm development by Constant Energy Limited, comprising sixteen wind turbines, a Battery Energy Storage System (BESS), substation, associated access roads, grid infrastructure and ancillary works within the Lacken and Kilcummin area of County Mayo.

Having reviewed the planning application and supporting Environmental Impact Assessment Report (EIAR), I am not satisfied that the applicant has adequately identified, assessed or mitigated the significant adverse impacts this development would have on the local community, landscape, tourism economy, cultural heritage, biodiversity, residential amenity and public infrastructure.

This development represents the industrialisation of one of Ireland's most environmentally, culturally and historically important coastal landscapes and is entirely inappropriate in both scale and location. The impacts would be permanent, extensive and irreversible, while the benefits to the local community remain uncertain and largely temporary.

1. Impact on the Local Community

One of the most concerning aspects of this application is the lack of meaningful engagement with the community that will be expected to live with this development for decades to come.

While the applicant refers to consultation activities, attendance at the public information event was extremely limited considering the scale of the proposal. Many residents remained unaware of the full extent of the development until the planning application was lodged. Those who did participate raised concerns regarding residential impacts, environmental effects, site suitability and the lack of clarity surrounding community benefits. These concerns remain largely unresolved. It should be noted that the BESS and Substation were not included in this information day. Also the “event” was held 30 kilometres away from our community – this further shows the developers lack of engagement when you consider we have an excellent facility in the community with Lacken enterprise centre.

The applicant places considerable reliance on future consultation, future monitoring and future mitigation measures. Such an approach provides little comfort to residents who will experience the direct effects of the development. It is not sufficient to defer critical matters until after permission has been granted.

Furthermore, while reference is made to a community benefit fund, there is little certainty regarding its administration, distribution or long-term guarantees. The reality is that no financial contribution can compensate for the permanent loss of landscape character, tranquillity and residential amenity experienced by those living closest to the development.

2. Threat to Tourism and the Local Economy

The proposed development threatens one of the most important long-term economic assets of the North Mayo region – its landscape and tourism appeal.

Lacken occupies a unique position along the North Mayo coast and forms an important part of the wider tourism offering associated with the Céide Fields, Downpatrick Head, the Wild Atlantic Way and numerous archaeological and cultural attractions. Visitors are drawn to the area because of its dramatic scenery, open landscapes, tranquillity and cultural significance.

The introduction of sixteen industrial-scale turbines, associated aviation lighting, a BESS facility and a substantial electrical substation would fundamentally alter the character of the area and diminish the visitor experience.

The applicant concludes that impacts on tourism will not be significant. This conclusion is difficult to reconcile with the acknowledged visibility of the turbines from important viewpoints and with concerns previously raised regarding the area's exceptional scenic and tourism value.

Tourism businesses depend upon the preservation of the very landscape qualities that this development would damage. Once those qualities are lost, they cannot be restored.

3. Landscape and Visual Impacts

The visual impacts of the proposed development have been consistently underestimated throughout the application.

The proposed turbines would dominate large areas of the landscape and would become defining features of views throughout the region. Their scale and height are entirely out of character with the existing landscape and far exceed anything currently present within the area.

The dispersed turbine layout further increases visual intrusion by spreading industrial structures across a wider geographical area rather than concentrating impacts within a more confined location. This results in a fragmented and cluttered landscape, reducing visual cohesion and significantly diminishing the area's sense of place.

The development would be visible from numerous scenic viewpoints and routes and would intrude upon views towards iconic coastal landmarks including Downpatrick Head and the Céide Coast.

The cumulative effect of existing, permitted and proposed wind farms across North Mayo must also be considered. The addition of sixteen further turbines would contribute significantly to the ongoing industrialisation of the Mayo landscape and would undermine the rural character that attracts both residents and visitors to the area.

4. Cultural Heritage and Archaeology

The Lacken area contains an extraordinary concentration of archaeological monuments, protected structures and historic landscapes.

Particularly concerning is the proximity of the development to the wider Céide Fields archaeological landscape, one of the most significant prehistoric landscapes in Europe and a site previously included on Ireland's UNESCO Tentative World Heritage List.

The significance of these heritage assets extend beyond their physical boundaries. Their setting, landscape context and relationship with the surrounding environment are integral components of their cultural value.

The introduction of turbines of this scale into the wider setting of these sites would permanently alter their character and diminish the historic landscape that has survived for thousands of years. The impacts would be particularly severe in relation to the wider Céide Fields landscape, the Lacken Gazebo and numerous archaeological sites throughout the area.

While archaeological monitoring and recording may reduce direct impacts on known features, such measures cannot mitigate the permanent alteration of the wider historic landscape.

5. Residential Amenity, Noise and Shadow Flicker

The applicant's own assessments demonstrate that this development has the potential to significantly impact residential amenity. We would like it noted that we have an issue with the term receptor as the receptors outlined are the homes within our community. The term receptor appears to detach the development from what is being proposed for our community and homes. The area is not a barren site, it is our home and our community.

Particularly concerning is the prediction that shadow flicker may affect 108 of the 119 homes assessed within the study area. This is an exceptionally high number and highlights the extent of the potential impact on local residents.

The applicant proposes a shadow control system as mitigation. However, the effectiveness of this system relies entirely upon future monitoring, maintenance and enforcement. Residents should not be expected to accept significant adverse impacts on their homes in

reliance upon technological controls that may or may not operate as intended throughout the lifespan of the project.

Noise is an equally important concern. The applicant acknowledges circumstances where predicted noise levels exceed 2006 guidelines limits. While reliance is placed upon ownership and occupancy arrangements, such assumptions do not address broader concerns regarding operational noise, low-frequency noise, amplitude modulation and sleep disturbance.

For many residents, the principal attraction of living in the area is its peace and tranquility. This development would permanently alter that environment.

6. Ecological and Ornithological Concerns

The ecological assessment supporting this application contains significant uncertainties.

There is concern that portions of the survey data relied upon by the applicant are now approaching or exceeding accepted validity periods. This raises legitimate questions regarding the reliability of the ecological baseline upon which the assessment is based.

The Lacken area supports important populations of protected bird species and lies within a wider landscape of significant ecological value. The potential for habitat loss, displacement and collision risk cannot be dismissed.

The applicant's reliance upon future surveys and future mitigation measures introduces uncertainty into the assessment process and places the burden of risk on protected species and habitats.

The site 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. Once the lands involved in this development have been destroyed, they are gone forever, no man-made biodiversity habitat can replace what is such a natural habitat.

Where uncertainty exists regarding potential impacts on biodiversity, the precautionary principle should apply.

7. Traffic, Road Safety and Palmerstown Bridge

The construction phase would place enormous pressure on local infrastructure.

The roads surrounding the development area are narrow rural roads that were never designed to accommodate the volume and scale of heavy construction traffic associated with a development of this magnitude. Residents have legitimate concerns regarding traffic safety, road damage, dust, noise and disruption.

Of particular concern is Palmerstown Bridge, a protected structure of considerable heritage importance. While the applicant proposes temporary protection measures, the bridge remains vulnerable due to its age and historic construction. The volume and weight of abnormal loads proposed create an unacceptable level of risk to this important structure.

Once damage occurs to a protected structure of this nature, it may be impossible to fully restore its historic integrity.

8. Cumulative Impact

The cumulative impact of this development must not be considered in isolation.

North Mayo has already experienced substantial wind energy development, with numerous existing, permitted and proposed projects visible across the wider landscape.

Residents are increasingly concerned that the cumulative effect of multiple developments is fundamentally altering the character of County Mayo. Each new proposal contributes incrementally to landscape degradation, visual clutter and the erosion of rural amenity.

The addition of the Tirawley Wind Farm would significantly worsen this situation and would further industrialise a landscape that is internationally recognised for its scenic, archaeological and environmental value.

9. Site Suitability and Landscape Impact

We are concerned that the applicant does not appreciate that the Lacken area is not a “site” between Killala and Ballycastle. It is our community with over 600 people living in the area. The applicant does not give any consideration to the community for which it is proposing such a development. The complete industrialisation of our beautiful, historic area simply does not fit. The lack of consideration is evident by the total inadequate attempt at community engagement by holding one information day that was for a completely different site layout and as far as we are aware did not even include details of the BESS and Substation. The exclusion of this significant detail for the information day in our opinion constitutes that there was NO community engagement. The developer never came to our door to give information on the proposed development and we support the Lacken Ballycastle Community Landscape Protection Group in their submission relating to this and all other points.

Mayo County Council has described the location as scattered and not suitable for a development of this scale. 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.

Conclusion

The proposed Tirawley Wind Farm is unsuitable in both scale and location.

The application fails to adequately address significant concerns relating to community impact, tourism, landscape character, cultural heritage, ecology, residential amenity, traffic and cumulative effects. The development would permanently alter the character of the Lacken area and would result in irreversible impacts on one of the most important landscapes in County Mayo.

The claimed benefits of the project do not outweigh the substantial environmental, cultural, social and economic harm that would arise if permission were granted.

I wish to adopt and support the detailed submission made by the Lacken Ballycastle Community Landscape Protection Group in relation to the proposed Tirawley Wind Farm development (PAX16.324258). In particular, I endorse the concerns raised regarding cumulative wind farm development across North Mayo, impacts on the Céide Fields cultural landscape, effects on tourism and recreation, biodiversity impacts, inadequacies in community consultation, and the assessment of 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.

For these reasons, I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed Tirawley Wind Farm development.

Yours faithfully,

Mattie Lynn

Kathleen Lynn