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14th 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,

We are writing as residents of the area within proximity to the proposed Tirawley Wind Farm project, submitted by Constant Energy Limited, to formally lodge our 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 applicants document, we 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.

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 & Shadow Flicker – H39

Our home is identified as “receptor” H39 in the EIAR. 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.

Our home is located approximately:

- **790 metres from turbine AT16 stated in Table 15.1**
- **899 metres from turbine AT15**

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

Noise Impact Concerns

The proposed turbine AT16 is located only approximately **790 metres from our home (H39)**. We 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. We request that An Coimisiún Pleanála carefully examine whether the modelling fully represents the actual conditions experienced at H39, including:

- night-time noise impacts when background noise levels are naturally low;
- periods with specific wind direction where turbines AT16 and 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.

We request that a more precautionary assessment be applied to H39 given its proximity to AT16 and the combined influence of two turbines.

Shadow Flicker

The EIAR identifies our home, H39, as being approximately 790 metres from turbine AT16. Table 15.3 of Chapter 15 predicts that H39 will experience:

- 44 hours 14 minutes worst-case shadow flicker per year
- 8 hours 14 minutes expected shadow flicker per year
- 34 minutes maximum expected shadow flicker per day

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

We consider this significant because the applicant's own modelling confirms that our 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, we do not consider reliance on future mitigation alone to be sufficient justification for permitting a development that is predicted to create an exceedance of shadow flicker 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 H39 will be independently verified throughout the lifetime of the wind farm.

We 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.

Given that H39 is already predicted to exceed the 2006 daily guideline, we submit that the appropriate standard should be prevention rather than management.

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
H17	515390	832068	29.5	33.6	37.4	39.7	40	40
H18	517622	837746	30.2	34.3	38.1	40.4	40.7	40.7
H19	517552	838096	30	34.1	37.9	40.2	40.5	40.5
H20	515559	834678	31.3	35.4	39.2	41.5	41.8	41.8
H21	516744	836946	32	36.1	39.9	42.2	42.5	42.5
H22	514721	837259	31.8	35.9	39.7	42	42.3	42.3
H23	515805	834702	31	35.1	38.9	41.2	41.5	41.5
H24	517581	838054	29.9	34	37.8	40.1	40.4	40.4
H25	515641	832856	31.1	35.2	39	41.3	41.6	41.6
H26	515947	834836	30.8	34.9	38.7	41	41.3	41.3
H27	517606	838071	29.5	33.6	37.4	39.7	40	40
H28	515886	834729	30.8	34.9	38.7	41	41.3	41.3
H29	517490	838353	28.8	32.9	36.7	39	39.3	39.3
H30	515462	834716	31.3	35.4	39.2	41.5	41.8	41.8
H31	516107	834819	30.4	34.5	38.3	40.6	40.9	40.9
H32	517583	838226	28.9	33	36.8	39.1	39.4	39.4
H33	515398	834709	31.5	35.6	39.4	41.7	42	42
H34	517725	837501	28.6	32.7	36.5	38.8	39.1	39.1
H35	517434	838443	28.6	32.7	36.5	38.8	39.1	39.1
H36	517697	837346	28.5	32.6	36.4	38.7	39	39
H37	514129	833845	30.2	34.3	38.1	40.4	40.7	40.7
H38	517741	837449	28.3	32.4	36.2	38.5	38.8	38.8
H39	517762	837602	28.3	32.4	36.2	38.5	38.8	38.8

Table 15.1 Properties within the Shadow Flicker Study Area

Current House ID	Easting ITM	Northing ITM	Closest Turbine	Closest Distance to Turbine (m)
H23	515805	834702	AT01	687
H24	517581	838054	AT15	691
H25	515641	832856	AT02	715
H26	515947	834836	AT07	719
H27	517606	838071	AT15	720
H28	515886	834729	AT01	727
H29	517490	838353	AT15	742
H30	515462	834716	AT01	744
H31	516107	834819	AT07	751
H32	517583	838226	AT15	753
H33	515398	834709	AT05	753
H34	517725	837501	AT16	758
H35	517434	838443	AT15	762
H36	517697	837346	AT16	764
H37	514129	833845	AT06	769
H38	517741	837449	AT16	781
H39	517762	837602	AT16	790

Table 15.3; Summary of Potential Shadow Flicker Listing for All Properties

Receptor ID	Specimen Turbine		
	Worst Case Shadow [h/year]	Expected Shadow [h/year]	Max. Expected Shadow [h/day]
H28	06:57	01:02	00:22
H29	58:39	06:24	00:38
H30	16:56	02:31	00:34
H31	03:38	00:32	00:17
H32	52:03	06:23	00:37
H33	20:15	03:02	00:36
H34	64:07	11:34	00:36
H35	53:07	05:34	00:38
H36	50:22	09:09	00:37
H37	22:02	02:24	00:27
H38	60:03	10:45	00:36
H39	44:14	08:14	00:34

3. Residential and Property Impact

The proposed wind turbines are located uncomfortably close to existing homes. Despite the stated 540m buffer, the visual impact, noise pollution, and potential shadow flicker effects will significantly disrupt our residential amenity and quality of life. There is also a genuine concern about the likely devaluation of property prices due to proximity to large-scale industrial turbines.

(Reference: Appendix 1.6 Community Engagement Report, Pages 7-13)

4. 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 30km away from Lacken 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.

(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 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.

(Reference: Appendix 1.6 Community Engagement Report, Pages 13-14; Planning Statement, Pages 69-71)

6. Impact on Hen Harrier Habitat

We are 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.

We are 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, we 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. We do not believe that proper surveys have been carried out on historic structures such as the Palmerstown Bridge. The roads around the area are narrow, this level of construction traffic and ongoing maintenance traffic after construction will have a disastrous effect on the road infrastructure in the area.

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

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. I do not believe that this development would constitute proper planning given the numerous residential applications that have been refused over the years for the area.

(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 applicant does not acknowledge that Glenora in Ballycastle has received approval from ACP or that the Keerglen wind farm received approval from Mayo County Council and is on appeal with ACP. 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, we 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. We urge An Coimisiún Pleanála to refuse permission for this development in the interests of proper planning and sustainable development.

Thank you for considering our submission.

Yours faithfully,

Michael & Gabrielle Kieran