Patricia &Vincent Kelly
Castletown Carrowmore
Lacken Ballina
County Mayo
trishcall@yhaoo.co.uk
22th 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,

Impact on Lacken Cross Secondary School (R314)

As a parent with children attending Lacken Cross Secondary School, I am extremely concerned that the planning application does not assess any impact on the school, even though it sits directly on the R314, the same route proposed for heavy construction traffic, turbine deliveries, and BESS-related transport.

The R314 is the only safe access route for students, school buses, and parents. It is narrow, busy, and already hazardous at peak times. Introducing abnormal turbine loads, HGVs, and BESS transport vehicles would create serious and unacceptable safety risks for children travelling to and from school.

The EIAR does not identify the school as a sensitive receptor, does not assess traffic risks at school times, and does not consider the implications of a BESS emergency on a route the school depends on for evacuation and emergency access. This is a major omission.

Fire Safety Concerns Relating to the BESS and School Safety

The developer has submitted a document titled “Fire Safety Assessment & Advice Report, Tirawley BESS Facility”, but this is only a desktop study, not a full fire-safety design. It was prepared solely to support the planning application and does not meet Irish fire-safety requirements for a high-risk industrial installation such as a large-scale BESS.

A BESS presents well-documented risks including thermal runaway, explosion, toxic smoke release, and long-duration fires. These risks are particularly relevant for a school located on the same primary access route.

Despite this, the application presents the BESS as if fire safety has been fully addressed. This is misleading and does not reflect the true level of risk.

Missing Fire-Safety Elements

The fire-safety assessment does not include:

- Fire suppression system design
- Fire detection system design
- Electrical safety design
- Emergency response procedures
- Toxic smoke modelling
- Water supply requirements
- Firefighting access routes

None of these omissions are acknowledged in the application.

No Consultation With Mayo Fire Service

There is no evidence that Mayo Fire Service has been consulted on:

- Firefighting access
- Water supply
- Pre-incident planning
- Emergency response procedures
- Suitability of rural roads for emergency vehicles
- Toxic smoke plume modelling

A BESS fire can burn for days and requires specialised response protocols. Without fire-service consultation, the Board cannot be satisfied that the development is safe or that emergency services could reach the school if the R314 were compromised.

No Emergency Response Plan

The application contains no Emergency Response Plan, despite the fire report recommending one. Missing items include:

- Firefighting strategy
- Evacuation procedures
- Toxic smoke hazard analysis
- Fire-water containment
- Incident command structure

This is a serious planning defect.

No Separation Distances Provided

The application does not provide clear, enforceable separation distances between:

- Battery containers
- The BESS compound and the 110 kV substation
- The BESS compound and the public road
- The BESS compound and the nearest dwelling

International standards such as NFPA 855 and UL 9540A require minimum separation distances to prevent fire spread and reduce explosion risk. The applicant has not demonstrated compliance with any recognised standard.

No Toxic Smoke Plume Modelling

BESS fires release hydrogen fluoride (HF) and other toxic gases. The EIAR contains no modelling of:

- Smoke plume direction
- Concentration levels
- Impact on nearby homes
- Impact on schools, farms, or public roads

This omission prevents proper assessment of public-health risk, including risks to students and staff at Lacken Cross Secondary School.

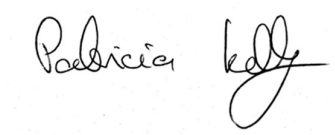
Conclusion

As a parents, we cannot accept a development that places heavy construction traffic, abnormal turbine loads, and a high-risk BESS installation on the same route used daily by hundreds of schoolchildren, without any assessment of the risks involved.

The failure to assess the school, the lack of a full fire-safety design, the absence of toxic-smoke modelling, and the complete lack of consultation with Mayo Fire Service represent material planning defects.

Until a full, school-specific assessment is completed, including traffic safety, fire safety, emergency access, and toxic-smoke risk this application should not be granted permission.

Yours faithfully,



Patricia Kelly