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F26 V8W7
22nd 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 close proximity to the proposed Tirawley Wind Farm project, submitted by Constant Energy Limited, to formally lodge my objection to this Strategic Infrastructure Development application. My ancestors have lived here for generations and survived by way of fishing and farming which fed their families. Those skills have been handed down by my ancestors and I also farm and fish in Lacken.

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 Agriculture and Farming

Loss of Productive Agricultural Land

The Environmental Impact Assessment documentation confirms that approximately 9.21 hectares of land will be permanently occupied by wind farm infrastructure within the 108.06-hectare site. In addition, approximately 15.68 hectares of agricultural land will be altered for access roads, turbine hardstands, substations, and associated infrastructure.

Seven of the proposed turbines are located wholly or partially on agricultural land, resulting in a long-term reduction in available grazing land throughout the operational life of the project.

While the percentage loss may appear modest when viewed across the overall site area, the practical impact on individual farm holdings may be considerable. In rural areas where agricultural margins are already under pressure, the permanent removal and fragmentation of productive land can have significant economic consequences.

Fragmentation of Farming Operations

The construction of new access tracks and infrastructure corridors will divide existing fields and alter established farming patterns. This fragmentation may:

- Reduce operational efficiency.
- Increase machinery movement and fuel costs.
- Restrict livestock management practices.
- Create long-term access and land management difficulties.

The cumulative impact of multiple infrastructure elements across the site risks undermining the viability of traditional farming practices that have shaped the local landscape for generations.

Forestry Loss

The proposal also requires the clear-felling of approximately 31.86 hectares of commercial forestry. Beyond the direct economic loss, this represents a substantial alteration of the local landscape and ecological network.

Forestry plays an important role in supporting biodiversity, carbon storage, and local employment. The removal of such a significant area raises concerns regarding habitat disruption and long-term environmental degradation.

Concerns Regarding Mitigation

Although mitigation measures are proposed, they cannot reverse the permanent loss of land or restore traditional agricultural practices once infrastructure has been constructed. The effects are therefore long-term and, in many respects, irreversible.

Lissadrone Bog, as referenced in the documents related to the Tirawley Wind Farm project, is part of our heritage where turf has been but for over 1000 years. This bog is an area that includes remnants of blanket bog habitat, which is recognised as a valuable ecological and cultural feature. The documents highlight that while much of the original blanket bog and heathland in the area has been cut or converted to pasture or forestry, some relatively intact blanket bog remnants remain, particularly in the northern and north-central sectors, including areas like Lacken Hill and Cloonanass-Lissadrone.

The heritage of cutting turf (peat) from bogs such as Lissadrone Bog is a traditional practice in Ireland, reflecting a long-standing cultural and economic activity connected to rural life. The documents emphasize the importance of preserving and enhancing remnants of blanket bog habitat, as seen in the Biodiversity Enhancement and Management Plan (BEMP) where areas of bog are conserved or restored to offset losses due to development.

Furthermore, during construction, specific measures are outlined to minimize disturbance to bog habitats, including careful management of peat excavation and re-vegetation to promote recovery. This indicates recognition of the ecological and cultural importance of bogs like Lissadrone.

In summary, Lissadrone Bog and the traditional practice of cutting turf are indeed part of local heritage, both ecologically and culturally. The project documents reflect an awareness of this heritage and include plans to protect and manage the remaining bog areas responsibly.

2. Impact on Fisheries and Aquatic Ecosystems
Hydrological Connection to Protected European Sites

The project site is hydrologically connected to a number of nationally and internationally protected habitats, including:

- Lacken Saltmarsh and Kilcummin Head SAC
- Killala Bay/Moy Estuary SAC
- Killala Bay/Moy Estuary SPA

These protected areas support important aquatic habitats, bird populations, and marine ecosystems of European significance.

Water Quality Risks

Construction activities inevitably carry risks associated with:

- Sediment release.
- Suspended solids entering watercourses.
- Cement contamination.
- Fuel and hydrocarbon spillages.
- Surface water runoff.

Even short-term pollution events have the potential to affect sensitive aquatic ecosystems and downstream habitats.

Particular concern arises from the potential impact on fish spawning and nursery areas that depend upon high water quality standards.

Peat Stability Concerns

Although the project documentation classifies peat slide risk as low, the consequences of any peat failure event would be severe.

A significant peat slide could release large volumes of sediment into downstream catchments, causing:

- Long-term water quality deterioration.
- Smothering of aquatic habitats.
- Damage to fisheries resources.
- Harm to protected species and habitats.

Given the sensitivity of receiving waters, the precautionary principle should apply.

Cumulative Environmental Effects

The wider catchment already contains forestry operations and other wind energy developments. The combined effect of these activities on water quality and aquatic ecosystems remains uncertain.

While each project may individually claim limited impact, cumulative effects can result in environmental degradation that is greater than the sum of individual developments.

The potential for cumulative impacts on fisheries, estuarine habitats, and protected conservation sites warrants significant concern.

3. Impact on Infrastructure and Public Services
Pressure on Local Road Network

The transportation of turbine components requires substantial upgrades to local roads and junctions.

The dimensions and weight of turbine blades, tower sections, and associated equipment necessitate abnormal load deliveries that place considerable pressure on rural infrastructure.

Residents may experience:

- Traffic delays.
- Road closures.

- Restricted access.
- Increased road maintenance requirements.

The burden of such disruption falls disproportionately on local communities.

Abnormal Load Deliveries

The frequency and scale of heavy transport movements create risks including:

- Damage to existing road surfaces.
- Structural stress on bridges and junctions.
- Increased safety risks for road users.
- Long periods of disruption during construction.

The complexity of managing these movements raises concerns regarding the adequacy of mitigation measures proposed by the developer.

Telecommunications Concerns

Documentation indicates that concerns were raised regarding interference with existing telecommunications infrastructure.

Although route adjustments and technical solutions have been proposed, the possibility of disruption during construction and operation remains a concern for local residents and businesses that increasingly depend on reliable communications services.

Aviation and Safety Considerations

The proposed turbines, with blade tip heights reaching approximately 135 metres, represent substantial vertical structures within the landscape.

The requirement for aviation warning lights further highlights the scale of the development and introduces additional visual impacts during nighttime hours.

While no significant aviation effects are predicted, the introduction of numerous large structures inevitably alters the character of the area and presents additional safety and navigational considerations.

4. Impact on Tourism and Landscape Character

Adverse Visual Impact

One of the most significant concerns associated with the proposed development is its effect on the landscape.

The site is visible from important locations along the Wild Atlantic Way and is situated close to nationally recognised scenic and heritage destinations, including:

- Ballycastle
- Lacken Strand
- Rathlacken Pier
- Creevagh Head
- Céide Coast
- Downpatrick Head

These areas form part of Mayo's tourism identity and attract visitors seeking authentic natural and cultural experiences.

Impact on Tourism and Community-Led Economic Development

Lacken Enterprise Centre has been actively involved in supporting tourism initiatives, community events and projects aimed at promoting the area as a destination for visitors.

The local economy benefits significantly from visitors who come to experience the natural beauty, history and tranquillity of the North Mayo coast.

The area's appeal is built upon its unspoilt landscapes, spectacular coastal scenery, archaeological heritage, walking routes and strong sense of place.

- The wider Céide Fields cultural landscape.
- The Wild Atlantic Way.
  Downpatrick Head.
- Local walking routes in Lacken.
- Velo cycle route.
- Lacken Strand
- Rathlacken Pier
- Creevagh Head
- The Western Way.
- The area's dark skies and natural tranquillity.
  Historic sites associated with General Humbert and the rich history of North Mayo.
- The unique rural character of the Lacken and Kilcummin area.

The introduction of sixteen 135-metre turbines, aviation lighting, a BESS facility and a major electrical substation will fundamentally alter the visitor experience.

Conflict with Regional Tourism Strategy

North Mayo's tourism economy depends heavily on:

- Unspoiled coastal scenery.
- Archaeological heritage.
- Rural landscape character.
- Outdoor recreation.

The introduction of a large-scale industrial wind energy development into this landscape risks undermining the very qualities that attract visitors to the region.

The visual dominance of up to sixteen large turbines, associated substations, roads, and ancillary infrastructure represents a substantial change to the character of the area.

Construction Phase Impacts

The Environmental Impact Assessment acknowledges short-term negative impacts during construction arising from:

- Increased traffic.
- Construction noise.
- Visual disturbance.
- Heavy machinery operations.

These effects may reduce visitor enjoyment and adversely affect tourism businesses during the construction period.

Long-Term Economic Risks

Tourism is a sustainable and growing component of the local economy.

Unlike temporary construction employment, tourism supports long-term jobs across accommodation providers, restaurants, visitor attractions, transport services, and local retailers.

The potential loss of landscape quality and visitor appeal therefore carries wider economic implications that extend well beyond the immediate development site.

Mayo County Council Concerns

Particular weight should be attached to Mayo County Council's previously expressed concerns regarding the suitability of this location for industrial-scale wind energy development.

The Council identified the area's scenic, archaeological, cultural, and environmental sensitivities as significant constraints on development.

These concerns reflect a recognition that certain landscapes possess exceptional value that cannot be adequately protected through mitigation measures alone.

The proposed Tirawley Wind Farm would result in significant and long-lasting impacts on agriculture, fisheries, infrastructure, landscape character, and tourism within North Mayo.

The evidence contained within the applicant's own documentation demonstrates:

- Permanent loss and fragmentation of productive agricultural land.
- Significant forestry clearance.

- Risks to protected aquatic habitats and fisheries.
- Increased pressure on local infrastructure and transport networks.
- Adverse effects on nationally important scenic landscapes.
- Potential damage to the tourism economy upon which many local livelihoods depend.
- Conflict with established planning concerns previously identified by Mayo County Council.

Taken together, these impacts raise serious questions regarding the suitability of the proposed location for a development of this scale.

The cumulative environmental, economic, and social consequences cannot be dismissed as minor or temporary. They represent a fundamental alteration of the character and functioning of a highly sensitive rural and coastal landscape.

Accordingly, it is submitted that the proposed Tirawley Wind Farm does not represent proper planning and sustainable development and should be refused permission in order to protect the environmental integrity, cultural heritage, economic sustainability, and quality of life of the North Mayo region.

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.
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,
Patrick Joseph Forde