

Robert & Heather Bourke
Carrowmore House
Carrowmore-Lacken
Ballina
County Mayo
F26 AV84
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 Wind Farm 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, Castlелacken Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

I am writing as a resident of the area within proximity to the proposed Tirawley Wind Farm project, submitted by Constant Energy Limited, to formally lodge my 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.

I have lived in Carrowmore House all my life, as have several generations of my family. My home was constructed circa. 1700, and is located in the townland of Carrowmore. My home and its associated structures such as its entrance gates and walled gardens are registered as protected structures. It is officially recognised as a protected structure by the  [Mayo County Council](#) and is catalogued in the National Inventory of Architectural Heritage.

I am writing to formally lodge an observation against the proposed Tirawley Wind Farm development. My primary objection relates explicitly to the placement of an industrial wind turbine just 879 metres from my home Carrowmore House, which holds statutory protection under the Mayo County Development Plan (Record of Protected Structures, Ref: 0190).

The proximity of this massive industrial infrastructure represents a fundamental violation of architectural heritage protection guidelines and severely diminishes the historical landscape integrity of North Mayo. I urge An Coimisiún Pleanála to refuse planning permission based on the following planning grounds:

Ground 1: Severe Devaluation and Material Injury to the "Setting" of a Protected Structure

- The Context: Carrowmore House is a detached, three-bay, two-storey early 18th-century country estate (built c. 1830) that incorporates elements of an older 18th-century dwelling. The house was first documented in writings by Mary Pendarves on June 21st 1732. Its architectural significance relies entirely on its uninterrupted, pristine rural "setting" and historical demesne vistas.
- The Impact: Introducing a massive industrial wind turbine (with blade tip heights scaling up to 135+ metres) a mere 879 metres away creates an unacceptable visual intrusion. The turbine will visually dominate and visually overwhelm the historic house, fundamentally severing the property from its classical landscape context.
- Policy Violation: This directly contravenes Policy BHP 1 (and associated architectural heritage objectives) of the Mayo County Development Plan, which mandates the protection of the character, setting, and integrity of structures listed on the RPS.

Ground 2: Threat to the Curtilage and Historic Fabric

- Structural Integrity: The statutory protection of Carrowmore House legally extends to its curtilage, gates and its 1838 polygonal walled garden.
- Construction Risks: The heavy civil engineering works required for a turbine within a 1km radius—including massive concrete foundation pouring, intensive turbine transport haulage, and pile driving—pose a verified threat of micro-vibrations. These vibrations risk causing structural cracking and destabilisation of fragile, lime-mortared historic masonry that has stood for over two centuries.

Ground 3: Extreme Impact on Residential Amenity (Noise and Shadow Flicker)

- Shadow Flicker: At a restricted distance of 879m, the sweeping rotation of the turbine blades will cause intermittent, high-frequency shadow flicker across the historic windows, curtilage, and lawns of Carrowmore House. This creates a highly disruptive, strobe-like effect that impairs the peaceful enjoyment of the property.
- Acoustic Intrusion: The low-frequency aerodynamic "humming" and hub noise generated by industrial turbines will permanently degrade the baseline tranquility intrinsic to historical country estates, rendering the immediate external environment inhospitable.

Ground 4: Alignment with Local Planning Authority Consensus

- Account must be taken of the fact that Mayo County Council's elected representatives and executive planners have previously noted profound landscape and heritage degradation concerns regarding this project layout. The inclusion of a turbine at this proximity to our historic properties goes entirely against local zoning goals and landscape sensitivity designations for the Ballycastle/Tirawley region.

In relation to a previous application to an Coimisiún Planála Case No. 239901, Planning Authority Reference P11/409. Planning permission was refused for 4 small turbines, hub height 45m, the following was the decision of ABP on 5 September 2012.

'The proposed development is located on an elevated site in an unspoilt and exposed upland location within a rural scenic landscape in close proximity to the coastline adjoining Killala Bay. It is considered that, by reason of the height, scale and extent in an exposed location overlooking Killala Bay, the proposed development would have a disproportionate and obtrusive visual impact and the proposed development would, therefore, be contrary to policy P/EH-LC 1 of the Mayo County Development Plan 2008-2014, and be contrary to the proper planning and sustainable development of the area.'

The visual impact of sixteen 135m turbines would be colossal compared to four small turbines. Therefore the reasons stated for refusal previously by An Coimisiún Planála in relation to P11/409 still stand and are even more relevant in the context of the current proposal.

If planning permission is granted to Constant Energy, this would constitute wholesale discrimination and be morally wrong on all counts.

Having reviewed the public information provided and engaged with neighbours; I wish to also raise the following concerns:

1. 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)

2. Noise Impact Concerns

My home is identified as **receptor H55** in the EIAR.

My home is located approximately:

- **879 metres from turbine AT07 stated in Table 15.1**
- **991 metres from turbine AT08 stated in Table 15.1**

- **AT01, AT09 and AT10 are located within 2km of Carrowmore House**

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

The proposed turbine AT07 is located only approximately **879 metres from my dwelling (H55)**. I 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. I request that An Coimisiún Pleanála carefully examine whether the modelling fully represents the actual conditions experienced at H55, including:

- night-time noise impacts when background noise levels are naturally low;
- periods with specific wind direction where turbines AT07, AT08 and AT09 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.

I request that a more precautionary assessment be applied to H55 given its proximity to AT07, AT08 and AT09 and the combined influence of three turbines.

	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
H45	515873	833236	29.7	33.8	37.6	39.9	40.2	40.2
H46	516625	836322	31.2	35.3	39.1	41.4	41.7	41.7
H47	517758	837737	28.4	32.5	36.3	38.6	38.9	38.9
H48	516764	835557	29.8	33.9	37.7	40	40.3	40.3
H49	517632	838261	28.2	32.3	36.1	38.4	38.7	38.7
H50	517638	837109	28.3	32.4	36.2	38.5	38.8	38.8
H51	517742	837283	28	32.1	35.9	38.2	38.5	38.5
H52	517457	838516	27.8	31.9	35.7	38	38.3	38.3
H53	516738	836261	30.4	34.5	38.3	40.6	40.9	40.9
H54	517836	837697	27.6	31.7	35.5	37.8	38.1	38.1
H55	516774	835227	28.7	32.8	36.6	38.9	39.2	39.2
H56	517806	837295	27.5	31.6	35.4	37.7	38	38
H57	516697	836380	30.7	34.8	38.6	40.9	41.2	41.2
H58	517489	838569	27.2	31.3	35.1	37.4	37.7	37.7
H59	517798	837225	27.4	31.5	35.3	37.6	37.9	37.9
H60	515557	831893	26.9	31	34.8	37.1	37.4	37.4
H61	516384	834641	28.8	32.9	36.7	39	39.3	39.3
H62	517792	837189	27.4	31.5	35.3	37.6	37.9	37.9
H63	516320	834718	29.3	33.4	37.2	39.5	39.8	39.8
H64	517729	837077	27.5	31.6	35.4	37.7	38	38
H65	514818	831687	26.7	30.8	34.6	36.9	37.2	37.2
H66	516817	836244	29.8	33.9	37.7	40	40.3	40.3
H67	517748	838272	27.2	31.3	35.1	37.4	37.7	37.7
H68	517791	837155	27.3	31.4	35.2	37.5	37.8	37.8

Table 11.16: Predicted Noise Levels as LA90 at Varying Wind Speeds from the Proposed Development

Shadow Flicker – Dwelling H55

The EIAR identifies my dwelling, **H55**, as being approximately **879 metres from turbine AT07**. Table 15.3 of Chapter 15 predicts that H55 will experience:

- **40 hours 42 minutes worst-case shadow flicker per year**
- **7 hours 6 minutes expected shadow flicker per year**
- **33 minutes maximum expected shadow flicker per day**

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

I consider this significant because the applicant's own modelling confirms that my 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, I do not consider reliance on future mitigation alone to be sufficient justification for permitting a development that is predicted to create an excess 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 H55 will be independently verified throughout the lifetime of the wind farm.

I 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 H55 is already predicted to exceed the 2006 daily guideline, I submit that the appropriate standard should be prevention rather than management.

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
H40	40:10	05:21	00:35
H41	46:55	08:52	00:34
H42	58:45	10:41	00:35
H43	44:59	08:28	00:35
H44	52:31	09:25	00:36
H45	33:48	04:37	00:28
H46	99:27	14:20	00:37
H47	38:48	06:26	00:34
H48	48:17	08:57	00:35
H49	44:35	05:30	00:34
H50	00:00	00:00	00:00
H51	47:55	08:36	00:35
H52	45:58	04:36	00:37
H53	74:00	11:29	00:33
H54	32:58	05:37	00:31
H55	40:42	07:06	00:33
H56	43:06	07:50	00:32
H57	93:13	13:36	00:35
H58	38:54	03:51	00:33
H59	41:41	07:28	00:32
H60	00:00	00:00	00:00
H61	20:56	02:21	00:32
H62	37:51	06:42	00:32
H63	30:13	02:58	00:32
H64	09:20	01:30	00:21
H65	00:00	00:00	00:00
H66	66:36	10:27	00:30

3. Site Suitability and Landscape Impact

The location has been described as scattered and not suitable for a development of this scale. The Lacken 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)

4. Tourism

The proposed development will mark the end of tourism in our area. Notably our most precious assets are the Wild Atlantic Way, especially the Discovery Points at Downpatrick Head and Ceide. The "Wild Mayo" experience and Ceide Coastal Walk recently launched to great fanfare. Velo Cycle, Rathlacken and Kilcummin Piers, Gazebo Walking Trail, Green and Blue Loop Walks, Western Way, Green & blue loop walks.

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.

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

6. Impact on Hen Harrier Habitat

I am 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.

I am 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, I 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.

(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.

(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 scale and height of modern turbines, as noted by Mayo County Council, raise questions about the suitability of this site compared to previous assessments.

10. Emergency Vehicles

At our stage in life it is important for us to know emergency services would be able to attend our home, and surrounding areas in a timely manner. Given the extraordinary amount of construction traffic involved in the construction phase and the level of traffic during operation, we feel that response times at best would be severely impaired to the detriment of us and our neighbours.

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.

The proposed configuration fails to respect the basic setback principles required to preserve Irish architectural heritage. The placement of an industrial turbine within 879m of Carrowmore House represents a material injury to a Protected Structure.

Therefore, I respectfully request that An Coimisiún Pleanála protect the integrity of the Mayo Record of Protected Structures and REFUSE planning permission for the Tirawley Wind Farm development.

Thank you for considering my submission.

Yours faithfully,

Robert Bourke

Heather Bourke









