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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 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.

Having reviewed the extensive documentation relating to the documentation, I wish to 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. I am greatly concerned about this as it will I believe have a considerable negative impact on my children in the future. (Reference: Appendix 1.6 Community Engagement Report, Pages 7-13)

2. Site Suitability and Landscape Impact

Lacken is not a “site” between Killala and Ballycastle, it is our home and our community with over 600 people living in the area and during the summer the population increases with the many families that return for holidays. The developer from reading all the documents would have you believe that land for this development is separate to our community when in actual fact they are in the heart of the area and as such should not be viewed in isolation.

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)

3. Environmental and Ecological Concerns

The area 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. No man-made attempt at a biodiversity habitat in my opinion will make up for the destruction that this development would impose on our area.

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

4. Impact on Hen Harrier Habitat

I am 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.

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.

5. Traffic and Infrastructure Impact

The applicant has not accounted for the fact that the Glenora wind farm has been given approval by ACP or that Mayo County Council have approved Keerglen wind farm which is now under appeal to ACP. The roads around the area will simply not be able to withstand the amount of construction traffic this development will generate. There has been no proper engineering survey done on Palmerstown Bridge in this application, what is included falls far short of what is required in my opinion. Palmerstown Bridge is a historic 18th-century road bridge located on the borders of Lacken, Kilfian and Killala, County Mayo. It is officially registered as a [RPS 017] (Record of Protected Structures identifier 0017) on the [Mayo County Council Record of Protected Structures](#).

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. The devastating impact that this development will have on our own daily lives has not been given full and proper consideration in this application. This further proves the applicants lack of awareness of the community in which it is proposing the development for.

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

6. 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. There is no amount of community fund money that will make up for the destruction that will be caused and one has to wonder why the community fund is only discussed in terms of 15 years – is this because the applicant knows that should the development get planning the community will be effectively decimated by then as the younger generation will not be able to live in the area. It makes no sense to me that young people cannot get planning permission for a simple residential property because of “negative visual

impact” and yet an application like this could, even though its impact would be far greater and worse.

(Reference: Appendix 1.6 Community Engagement Report, Pages 7-14)

7. 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. I do not feel that the full cumulative effect of wind farms in the north west Mayo has been given full consideration in this application

(Reference: Mayo County Council submission, EIAR Chapter 17, Pages 9-10)

8. Health Concerns

As someone who works with vulnerable people I have very serious concerns regarding the impact this development will have on vulnerable residents living in the area. We are a community that does our best to look after and out for one another and therefore I believe that the cumulative effect of construction, noise shadow flicker and other negative consequences of this development will have such a negative impact it will be devastating to any vulnerable members in our community. There is increasing evidence relating to health concerns, the noise and shadow flicker, aviation lights and pollutants that this type of development inevitably results in.

I believe particular consideration should be given to vulnerable members of the community, including those living with anxiety disorders, depression, post-traumatic stress disorder (PTSD), autism spectrum conditions, dementia, and other mental health or cognitive difficulties. While the scientific literature does not establish a direct causal link between wind turbines and mental illness, a number of studies have identified associations between wind turbine noise, sleep disturbance, annoyance, and increased stress in some residents living near wind energy developments. Sleep disruption and chronic stress are recognised factors that can worsen existing mental health conditions and reduce overall wellbeing. Individuals who are already vulnerable may therefore experience a disproportionate impact from environmental changes, persistent noise, shadow flicker, aviation lighting, or the perceived loss of tranquillity in their home environment. It is also important to recognise that some affected residents may be unable to effectively articulate or advocate for their concerns due to illness, disability, age, or cognitive impairment. For this reason, planning authorities should apply the precautionary principle and ensure that the potential impacts on vulnerable and underrepresented members of the community are fully assessed before development consent is granted.

A study carried out by the Clean Energy Council in Australia states that assessed suggests that there are unlikely to be any significant effects on physical or mental health at distances greater than 1,500 m from wind farms. Unfortunately we will have vulnerable residents living much closer to the proposed Tirawley Wind Farm.

<https://www.nhmrc.gov.au/file/19045/download?token=0IAI7MHu>

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,
Rosemary Syron