Seamus Bourke
Rathlacken
Carrowmore – Lacken

Ballina
County Mayo
F26HP28
[Email Address]
20th 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 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 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.

2. **Site Suitability and Landscape Impact**
   The location has been described 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.

3. **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.

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 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.

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.

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.

8. **Noise and shadow flicker**

   My dwelling is located approximately:
   1. 1.68KM from Turbine AT15
   2. 1.88KM from Turbine AT16

   While my home is not the closest receptor assessed within the EIAR, I am concerned about the cumulative impact of multiple turbines surrounding my home and the resulting effect on residential amenity.

   Operational Noise

   I note that my home H220 has been included within the operational noise assessment as a residential receptor.

   This demonstrates that the applicant recognises that operational turbine noise has the potential to affect my home.

I am concerned that the assessment relies primarily on predicted modelling and does not fully reflect the long-term experience of residents living in a quiet rural environment.

Particular consideration should be given to:

- cumulative noise from multiple turbines operating simultaneously;
- night-time impacts when background noise levels are lowest;
- changing wind directions and atmospheric conditions;
- amplitude modulation and fluctuating turbine noise characteristics;

the overall change from the existing rural sound environment.

While compliance with numerical limits may be predicted, such compliance does not necessarily ensure protection of residential amenity.

Shadow Flicker

My home, H220 has been excluded from detailed shadow flicker assessment, I request clarification regarding the basis for that exclusion and confirmation that no shadow flicker impact can occur at the dwelling.

Where turbine control and shutdown systems are proposed under Section 15.2.9.3 of the EIAR, these measures should be available to protect all potentially affected dwellings and not only those included within the detailed modelling area.

The Draft Revised Wind Energy Development Guidelines (2019) indicate that modern turbine technology can prevent shadow flicker impacts and support a zero-shadow-flicker approach at sensitive residential receptors.

Cumulative Residential Amenity Impact

My principal concern relates to the cumulative effect of two turbines located between approximately 1.68KM and 1.88KM from my home.
The combined impact of:

- turbine noise;
- visual presence;
- continuous blade movement;
- aviation lighting where applicable;
- and the industrialisation of the surrounding rural landscape,

should be considered together rather than in isolation.

The assessment of residential amenity should take account not only of compliance with individual technical standards but also of the overall effect on those living permanently within the area.

9. Impact on Horses and Equine Activities
   We are concerned that the Environmental Impact Assessment has not adequately assessed the potential impacts of this development on horses and equine activities within the area. Horses are highly sensitive animals that can react unpredictable to

sudden or unfamiliar stimuli, including turbine noise, low frequency sound, shadow flicker, moving blades, aviation lighting, construction activity and heavy vehicle movements.

The proposed development will involve a prolonged construction phase with significant volumes of heavy goods vehicles using local roads that are also used by hours riders, horse owners and agricultural users. The movement of abnormal loads, cranes and construction traffic has the potential to startle horses, creating a safety risk for riders, handlers and other road users.

During operation, the continuous movement of turbine noise, aviation lighting and periodic maintenance traffic may affect the behaviour and welfare of horses grazing or exercising in proximity to the development. Research has shown that horses can exhibit stress responses to novel visual and acoustic stimuli, and individual animals can vary significantly in their reactions.

The applicant does not appear to have identified local equine activities, horse owners, agricultural horse use, or potential impacts on equine welfare and rider safety. No site-specific assessment appears to have been undertaken to determine how horses may respond to the combination of turbine operation, shadow flicker, noise and construction disturbance.

Given the rural nature of Lacken and the presence of horses on local farms and holding, An Coimisiún Pleanála should require a specific assessment of impacts on equine welfare and road safety before determining this application.

The proposed turbine delivery routes pass through narrow rural roads used by local residents, farmers and equestrian users. The transportation of oversized turbine components, cranes and construction materials presents a significant safety concern for horse riders and handlers. No evidence has been presented that consultation has taken place with local equestrian interests or that the effects on horses have been assessed in a meaningful manner.

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,
Seamus and Veronica Bourke