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The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re: Objection to Proposed Tirawley Wind Farm Strategic Infrastructure Development

Case Reference: PAX16.324258

Dear Sir/Madam,

I wish to formally object to the proposed Tirawley Wind Farm development by Constant Energy Limited. Having reviewed the planning application, Environmental Impact Assessment Report (EIAR), Natura Impact Statement and supporting documentation, I believe this development represents an inappropriate industrialisation of a highly sensitive rural landscape and will result in significant adverse impacts on local residents, biodiversity, protected habitats, water resources, cultural heritage, tourism, and the long-term sustainability of the wider Lacken, Kilcummin and Ballycastle area.

While I recognise the importance of renewable energy generation, I firmly believe that renewable energy projects must be located in suitable locations and must not come at the expense of communities, protected habitats, internationally important landscapes, or public health. In my view, this proposal fails to achieve an appropriate balance between national renewable energy objectives and the protection of the environment and communities that will be forced to live with the consequences of this development for generations.

1. Lack of Community Acceptance and Meaningful Engagement

One of the most striking aspects of this application is the overwhelming opposition from the community in which it is proposed. The development has been consistently opposed by local residents, community organisations, tourism interests and environmental groups.

Many residents only became aware of the true scale of the proposal when the application documentation became available. The developer's engagement with the community has been wholly inadequate for a project of this scale. Meaningful consultation requires active engagement, listening to concerns and adapting proposals accordingly. Instead, local people feel that this development is being imposed upon them.

Community organisations within the area have expressed serious concerns regarding the development. The failure to secure community support should weigh heavily in the Board's assessment of whether this constitutes sustainable development.

2. Battery Energy Storage System (BESS) – Fire, Explosion and Public Safety Risks

I have serious concerns regarding the proposed Battery Energy Storage System and associated substation infrastructure.

The proposed BESS located just 432 metres from my health that I use, will consist of approximately twenty containerised battery storage units capable of storing up to 150 MW of electricity. While presented as ancillary infrastructure, the BESS is in reality a substantial industrial facility with significant inherent risks.

The applicant's own documentation acknowledges that battery storage technology presents fire safety challenges and that fire safety guidance relating to BESS facilities remains an evolving field. The Fire Safety Assessment confirms that thermal runaway events remain a recognised risk and that current emergency response strategies often involve allowing batteries to burn themselves out because extinguishment can be extremely difficult.

This approach is deeply concerning.

The potential consequences of a thermal runaway event include:

- Fire and explosion;
- Release of toxic gases and airborne contaminants;
- Prolonged burning events lasting many hours or days;
- Contamination of surrounding land and watercourses;
- Spread of fire into surrounding vegetation and forestry;
- Significant risks to emergency responders and nearby residents.

The proposal relies heavily upon mitigation measures such as CCTV monitoring, fencing, lightning protection systems and emergency response plans. While these measures may reduce risk, they do not eliminate it.

Of particular concern is the fact that internationally recognised guidance in some jurisdictions has adopted precautionary separation distances of up to 500 metres from BESS facilities due to uncertainty regarding thermal runaway events and fire propagation. No such precautionary approach appears to have been adopted in this application.

The proposed BESS is located within a rural landscape containing forestry, agricultural land, dwellings and environmentally sensitive areas. A major fire event could have consequences extending far beyond the site boundary.

Given the acknowledged uncertainty surrounding large-scale battery storage safety, the absence of definitive Irish guidance, and the potentially severe consequences of a failure event, I submit that the precautionary principle should apply.

3. Permanent Industrialisation of a Rural Landscape

The BESS and substation infrastructure represent a permanent industrialisation of what is currently a rural landscape.

The development includes:

- A large Battery Energy Storage System compound;
- A permanent 110kV electrical substation;
- Transformers;
- Security fencing;
- Access roads;
- Lighting infrastructure;
- Electrical equipment compounds;
- Ancillary buildings;
- Underground cabling.

The BESS compound alone occupies approximately 6,360 square metres, excluding the substation and associated infrastructure.

This infrastructure will require substantial land clearance, ground works, excavation, levelling and vegetation removal. Existing hedgerows and natural screening features will be permanently removed or altered.

The proposed 2.6-metre-high palisade fencing, lighting, transformers and industrial structures will fundamentally alter the character of the landscape and introduce an industrial appearance entirely inconsistent with the existing rural setting.

Unlike the turbines, which may eventually be removed, there is a real possibility that energy infrastructure such as substations and battery facilities could remain in place long into the future, permanently changing the character of the area.

4. Residential Amenity, Noise and Human Health

The proposed development raises significant concerns regarding residential amenity.

The project will introduce sixteen industrial-scale turbines with blade tip heights of 135 metres, together with a BESS compound and electrical substation.

Residents will be exposed to:

- Turbine noise;

- Amplitude modulation;
- Night-time operational noise;
- Aviation warning lights;
- Visual dominance;
- Shadow flicker;
- Construction disturbance;
- Traffic impacts.

The cumulative effect of these impacts should not be underestimated.

Particular concern exists regarding vulnerable individuals, including elderly residents, children, those suffering from migraines, and individuals who may be particularly sensitive to environmental disturbances.

Research has indicated that repetitive low-frequency noise, fluctuating noise characteristics and sleep disturbance can contribute to increased stress, anxiety and reduced quality of life.

The applicant's assessments appear heavily reliant on modelling assumptions and mitigation measures which may not reflect real-world operating conditions.

Where uncertainty exists, the Board should apply the precautionary principle.

5. Impact on Landscape, Tourism and Cultural Heritage

The proposed development would fundamentally alter one of the most distinctive landscapes in County Mayo.

The wider Lacken and Ballycastle area forms part of an internationally recognised landscape that includes:

- The wider Céide Fields archaeological landscape;
- The Wild Atlantic Way;
- The North Mayo coastline;
- Important scenic routes;
- Significant archaeological sites;
- Historic cultural landscapes associated with General Humbert and the French landing;
- Tourism attractions relied upon by local businesses.

For decades local communities have worked tirelessly to establish the area as a tourism destination. The area's appeal is founded upon its natural beauty, archaeological significance, dark skies, tranquillity and unspoilt character.

The introduction of sixteen turbines, extensive forestry felling, a large BESS facility and a substantial substation would irrevocably alter that character.

Tourism is one of the few sustainable economic opportunities available to remote rural communities such as ours. Any decline in visitor numbers will have consequences for accommodation providers, restaurants, shops, activity operators and local employment.

The visual impact of the turbines will extend across a substantial area and will contribute to the ongoing industrialisation of the wider Mayo landscape.

6. Impact on Hen Harrier and Protected Species

I remain deeply concerned regarding the potential impact on Hen Harrier populations and other protected species.

The site contains habitat recognised as suitable for foraging and roosting by Hen Harriers, including:

- Blanket bog;
- Wet grassland;
- Scrub habitat;
- Semi-improved grassland;
- Hedgerow networks;
- Forestry edges.

The documentation acknowledges the presence of a winter Hen Harrier roost within the study area.

However, it remains unclear whether sufficient survey work has been undertaken to fully assess the importance of the site for winter roosting activity.

The development will result in:

- Habitat loss;
- Habitat fragmentation;
- Forestry clearance;
- Removal of hedgerows;
- Increased disturbance;
- Collision risk;
- Potential displacement from otherwise suitable habitat.

The cumulative impact of these effects has not, in my opinion, been adequately assessed.

Given the conservation status of the species and the acknowledged presence of suitable habitat, there remains scientific uncertainty regarding the true extent of the impact.

7. Water Resources, Hydrology and Peatland Concerns

I am particularly concerned regarding the risks posed to local water resources and sensitive hydrological systems.

The development will involve extensive excavation works, road construction, turbine foundations, cable trenches and the construction of the BESS and substation compounds.

The area contains sensitive hydrological systems that ultimately connect to designated conservation areas and watercourses.

Potential risks include:

- Sediment release;
- Pollution incidents;
- Fuel contamination;
- Changes to groundwater movement;
- Impacts on springs and wells;
- Alteration of drainage patterns;
- Peat instability.

Many local residents depend upon private water supplies and springs for drinking water and for farming. Any disruption to these sources could have severe consequences, and pose a danger to animals.

The proposed mitigation measures cannot entirely eliminate the risk of pollution or hydrological disturbance.

8. Traffic and Construction Impacts

The construction phase will place extraordinary pressure on the local road network.

The transportation of turbine components, cranes, transformers and battery units will require extensive abnormal load movements through rural roads that were never designed for such traffic.

The proposed road modifications, widening works and temporary traffic management measures will cause disruption to residents, local businesses and road users.

There are legitimate concerns regarding road safety, damage to local infrastructure and the long-term impacts on the character of rural roads.

9. Cumulative Impact

The Board must consider this proposal in the context of the growing concentration of wind energy developments throughout County Mayo.

Residents are already experiencing the visual effects of turbines in neighbouring areas and there are additional projects at various stages of the planning process.

The cumulative impact on:

- Landscape character;
- Tourism;
- Biodiversity;
- Residential amenity;
- Cultural heritage;
- Rural identity;

has not been adequately addressed.

There comes a point at which a landscape becomes saturated with industrial energy infrastructure. I believe that point has already been reached in many parts of Mayo.

Conclusion

The Tirawley Wind Farm proposal represents a major industrial development in a highly sensitive rural landscape. It poses significant risks to residential amenity, biodiversity, protected species, water resources, landscape character, tourism and cultural heritage.

Of particular concern are the unresolved risks associated with the proposed Battery Energy Storage System, the permanent industrialisation of the landscape through the BESS and substation infrastructure, the impacts on protected habitats and species, and the absence of meaningful community support.

The applicant has not demonstrated beyond reasonable scientific doubt that the development can proceed without causing significant adverse environmental and social impacts.

For all of the reasons outlined above, I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed Tirawley Wind Farm development (Case Reference PAX16.324258).

Yours faithfully,

Sean O'Grady