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17th 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

My name is Stephen Meany, the local observer mentioned in the Ornithology Report. I have been familiar with the Lacken area since 1995 when I moved to Mayo, and more particularly since 2005, when I started working regularly in Lacken, until eventually buying a site and building a home in Lissadrone in 2020.

I moved to Lacken because I was attracted by the outstanding natural beauty of the area, coupled with the rich bird life, both on the shore from Killala Bay to Lacken Bay and the cliffs at Creevagh, to the many unimproved fields (a good thing for birds!) and bog land.

I have been interested in birds since childhood, and collected eggs as a schoolboy (wouldn't be allowed now!) I have actively been involved in birdwatching and survey work for Birdwatch Ireland since 1997. I have taken part in IWEBs surveys every year since, in Clew Bay, Lough Cullin, Inisbofin and Killala Bay.

I have read the report of the EIAR conducted by the proposers. They have reviewed all the available information and carried out the appropriate surveys. It was important for them to establish that there is no major flight line connection between Lacken Bay and the proposed windfarm. They have probably done that, but the surveys have also clearly revealed that the area holds good numbers of many birds on the red and amber lists.

While birds are extremely site faithful, and particular species will return year after year to a particular habitat, or field, they are also always on the move, and on the lookout for new feeding,

breeding and roosting grounds. In my birding lifetime, I have seen the arrival of three species of egret, the buzzard, the great spotted woodpecker, the osprey, the glossy ibis, and a huge upsurge in blackcap numbers. This is to a large extent the result of climate change, but also partly due to a change in our behaviour.

Several times over the last few winters, whooper swans have grazed in small groups near the salt marsh. The whole Moy Valley is an important wintering ground for them. They are seen arriving and leaving in spring and autumn but generally at a safe altitude. A caveat to that is that for the last two autumns there have been sightings of good numbers of whoopers heading east from the Belderg direction, crossing Ballycastle Bay and heading over Lacken Hill right by the gazebo. It seems that they sometimes make landfall a bit too far west along the North Mayo coastline, and then track east until they hit the familiar territory of the Mayo Estuary. This would be a disaster after the construction of the proposed windfarm.

Peregrines regularly hunt the area of the proposed windfarm. There is at least one resident barn owl, long-eared owls are definitely breeding in the conifers near the water tower. Short-eared owls are regular visitors to the dune systems at Lacken Strand.

Creevagh Head holds extensive seabird colonies, hundreds of kittiwakes, guillemots, lesser numbers of razorbills, shag, fulmar, and good numbers of rock pipit and rock dove. I accept the point that most of these birds will be largely unaffected by the proposed development. One big exception to this is the flocks of golden plover which use Lacken Bay, often to be seen on the sand at the inner bay along with dunlin, sanderling, godwits and curlew. They have also been seen roosting in the rough fields exactly where AT9 and AT10 are planned. Golden plover are everywhere in serious decline, this would be another nail in their coffin.

The whole area is a very important feeding ground for redwing and fieldfare, especially in springtime as they prepare to depart for their summer breeding grounds. Their chattering is often audible.

Over towards the gazebo, there is a beautiful network of small stone-walled fields, often of unimproved grassland, the best habitat for many passerines.

While the reports suggest that any disturbance would be temporary (unimportant, negligible), my contention is that all these activities are cumulative and damaging. Everywhere one looks, habitats are being ripped out, hedgerows disappear, wetlands are drained, roads are widened- it all adds up.

If this windfarm gets the go-ahead, it makes it more inevitable that the next windfarm gets the green light. The meadow pipits, sedge-warblers, larks, grasshopper warblers, siskins, redpoll, twite (remember them?) just get squeezed and squeezed.

For a data centre?

Mankind's solution to the constant squeezing and curtailment of the habitats of wild birds is to accept the ongoing destruction, and to try to belatedly protect the remaining enclaves that the birds are increasingly confined to. Even these little ghettos are under constant attack from proposed developments. Most of these sites only survive because, so far, they have alluded man's ability to tame them.

It is mentioned in the report that I have recorded hen harries around Lacken Salt Marsh. I live in Lissadrone, less than a mile from the saltmarsh, and roughly half way up to Lissadrone Bog. Two of my neighbours, Ger Healy and Fionntan Gogarty, both sheep farmers out and about, have also reported sightings of hen harriers to me. I have seen a hen harrier from my kitchen window (to go with sparrowhawk, buzzard, kestrel and barn owl). Unfortunately, I will also see a wind turbine from the same window if the plan succeeds.

Most but not all of these sightings have been in wintertime. Fionntan Gogarty and I witnessed a male hen harrier in Lissadrone Bog in June 2022.

I always suspected that there was a small roost of hen harriers in the saltmarsh in Lacken. Over the years I would regularly stop at dusk to observe and I would often be rewarded with a sighting.

Last winter, I decided to do a more concerted watch. Starting in early December, I set up at a good vantage point, affording wide views of the marsh from a westerly direction. I completed 15 watches in December, 17 in January and 15 in February. I quickly established that this is a very active winter roost. I never failed in those three months and 47 watches to record at least one bird, usually 3 and sometimes 4 - 7 birds. I was very strict with recording, as there can be a danger of double counting, with birds settling down and then taking off again.

My first no-show was on the third of March, in keeping with the general understanding of harrier behaviour.

It is important to point out that winter roosts are equally as vital as summer breeding grounds for the survival of our rare native hen harriers. And although they have not bred in this area to anyone's knowledge, they could someday, especially if there is continuing pressure on their regular breeding sites.

As I write, there's a hobby in Antrim, ospreys are breeding in Leitrim, let's not close off the future.

I have only spoken about ornithology, but on a personal level, I find this planned windfarm to be deeply disturbing. Apart from the Nimby argument, (it actually **is** in my back yard!) This imposition of 16 behemoths in a small rural community in an area of outstanding natural beauty, so close to so many homes, based on badly out-dated guidelines, completely dominating the skyline, seems to me to be deeply anti-democratic and extremely divisive.

1. Noise & Shadow Flicker – H46

Our home is identified as a "receptor" H46 in the EIAR. We would like it noted that we have an issue with the term "receptor" as it appears to detach the development from the fact that it is being proposed for an area that is home to so many people. The area is not a barren site, it's our home and our community.

Our home is located approximately:

- **798 metres from turbine AT08 stated in Table 15.1**
- **981 metres from turbine AT07**
- **995 metres from turbine AT09**

- **1015 metres from turbine AT10**
- **AT11, AT12, AT13 and AT14 are located just over 1 km from my home**

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

Noise Impact Concerns

The proposed turbine AT08 is located only approximately **798 metres from my home (H46)**. We 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. We request that An Coimisiún Pleanála carefully examine whether the modelling fully represents the actual conditions experienced at H46, including:

- night-time noise impacts when background noise levels are naturally low;
- periods with specific wind direction where turbines **AT07, AT08, AT09 and AT10** 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.

We request that a more precautionary assessment be applied to H46 given its proximity to AT16 and the combined influence of eight 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

Shadow Flicker

The EIAR identifies our home, H46, as being approximately 624 metres from turbine A. Table 15.3 of Chapter 15 predicts that H46 will experience:

- 99 hours 27 minutes worst-case shadow flicker per year
- 14 hours 20 minutes expected shadow flicker per year
- 37 minutes maximum expected shadow flicker per day

This exceeds the 2006 Wind Energy Development Guidelines recommendation of no more than 30 minutes per day by 07 minutes.

We consider this significant because the applicant's own modelling confirms that our 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, we do not consider reliance on future mitigation alone to be sufficient justification for permitting a development that is predicted to create an exceedance of shadow flicker 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 H46 will be independently verified throughout the lifetime of the wind farm.

We 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 H46 is already predicted to exceed the 2006 daily guideline, we submit that the appropriate standard should be prevention rather than management.

Current ID	House	Easting ITM	Northing ITM	Closest Turbine	Closest Distance to Turbine (m)
H23		515805	834702	AT01	687
H24		517581	838054	AT15	691
H25		515641	832856	AT02	715
H26		515947	834836	AT07	719
H27		517606	838071	AT15	720
H28		515886	834729	AT01	727
H29		517490	838353	AT15	742
H30		515462	834716	AT01	744
H31		516107	834819	AT07	751
H32		517583	838226	AT15	753
H33		515396	834709	AT05	753
H34		517725	837501	AT16	758
H35		517434	838443	AT15	762
H36		517697	837346	AT16	764
H37		514129	833845	AT06	769
H38		517741	837449	AT16	781
H39		517762	837602	AT16	790
H40		517663	838130	AT15	791
H41		517766	837561	AT16	794
H42		517762	837501	AT16	795
H43		517767	837579	AT16	795
H44		517742	837383	AT16	796
H45		515873	833236	AT01	798
H46		516625	836322	AT08	798

2. Site Suitability and Landscape Impact

We are concerned that the applicant does not appreciate that the Lacken area is not a “site” between Killala and Ballycastle. It is our community with over 600 people living in the area. The applicant does not give any consideration to the community for which it is proposing such a development. The complete industrialisation of our beautiful, historic area simply does not fit. The lack of consideration is evident by the total inadequate attempt at community engagement by holding one information day that was for a completely different site layout and as far as we are aware did not even include details of the BESS and Substation. The exclusion of this significant detail for the information day in our opinion constitutes that there was NO community engagement. The developer never came to our door to give information on the proposed development and we support the Lacken Ballycastle Community Landscape Protection Group in their submission relating to this and all other points.

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 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. Once the lands involved in this development have been destroyed, they are gone forever, no man-made biodiversity habitat can replace what is such a natural habitat.

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

4. 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. We do not believe that proper surveys have been carried out on historic structures such as the Palmerstown Bridge. The roads around the area are narrow, this level of construction traffic and ongoing maintenance traffic after construction will have a disastrous effect on the road infrastructure in the area.

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

5. 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. I do not believe that this development would constitute proper planning given the numerous residential applications that have been refused over the years for the area.

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

6. 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 applicant does not acknowledge that Glenora in Ballycastle has received approval from ACP or that the Keerglen wind farm received approval from Mayo County Council and is on appeal with ACP. 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.

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

7. Tourism cumulative impact

I am concerned about the cumulative impact the Tirawley wind farm will have on tourism in not only the Lacken Area but also in Ballycastle. Recently the Glenora wind farm has been approved by An Coimisiún Pleanála for 22 turbines. The coast road from Lacken to Ballycastle is an extremely important part of the Wild Atlantic Way and is an extremely important economic asset to the area. The cumulative effect of Tirawley, Glenora, Keerglen and potentially Clydagh will have on tourism in the area cannot be ignored. The communities involved have worked extremely hard over the years to promote the areas, and the recently launched Failte Ireland and Mayo County Council tourism plan for the area is a significant boost for the area. This cumulative wind energy development that is planned for the north west coast of Mayo is eroding the future that our communities can have. The Lacken Ballycastle coastline is impressively historic with the Céide fields complex and down Patrick head, the future that residents could have will become negligible if ACP do not consider fully the cumulative impact of all projects in the area. I do not believe that the applicant has fully considered all the cumulative effects.

The proposed development represents a direct threat to the tourism economy upon which many businesses and community initiatives depend.

The North Mayo coast is recognised nationally and internationally for its unspoilt scenery, archaeological significance and unique visitor experience. The area forms an important part of the Wild Atlantic Way and contains some of the most significant heritage and landscape resources in Ireland.

Tourism within the area is not dependent upon industrial development but rather upon the preservation of the natural landscape, coastal scenery, tranquility and cultural heritage that attract visitors from across Ireland and abroad.

Visitors come to experience:

- The Céide Fields cultural landscape.
- Downpatrick Head.
- The Wild Atlantic Way.
- The North Mayo coastal scenery.
- The Western Way and local walking routes.
- Local heritage sites and monuments - The Lacken Gazebo.
- The area's dark skies and natural tranquillity.
- Historic locations associated with General Humbert's 1798 landing and campaign.

The introduction of sixteen turbines reaching approximately 135 metres in height, together with aviation lighting, a large BESS facility and a major substation, would industrialise a landscape that is currently marketed and valued precisely because it remains largely undeveloped.

The Environmental Impact Assessment acknowledges significant visual impacts from numerous viewpoints. These impacts will not be experienced solely by residents but also by visitors using scenic roads, walking routes and tourism facilities throughout the area.

The Protected Western Way National Waymarked Trail passes through the wider landscape and visitors using this route will experience the turbines at close range. The quality of this walking experience will be significantly diminished.

The cumulative effect of existing, permitted and proposed wind energy developments throughout North Mayo must also be considered. The gradual industrialisation of the Mayo landscape threatens the long-term viability of tourism across the wider region.

The Lacken Gazebo is a Folly, one of the most unusual protected structures in Ireland which can be viewed from Sligo, Leitrim, Donegal and all over Mayo. It is formed from a double arch of rough stones. It is situated on the summit of Lacken Hill to the rear of Castle Lacken: seat of the Palmer family from the sixteenth century. This was constructed during the latter part of the eighteenth century by either Sir Roger or Sir John Palmer. This structure is located 300m from the nearest turbine AT16, how can this historical monument be protected in light of the planned development?

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,

Stephen Meany