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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,

We are writing as residents of Lacken within 900m distance of 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.

The Place We Call Home

It is impossible for us to explain why we object to this development without first explaining what Lacken means to us. This submission is not simply about a planning application or a proposed wind farm. It is about the future of the place where we have built our lives, where our families have lived for generations and where we are now raising our own children.

People who visit North Mayo often speak about the spectacular scenery, the Wild Atlantic coastline, the beaches and the archaeological treasures that make this area so unique. While all of those things are true, they only tell part of the story. To those of us who live here, this landscape is far more than something to be admired. It is part of our everyday lives. It is where we work, where our children play, where neighbours stop to chat on quiet country roads and where generations of families have created memories that cannot simply be replaced. It is a place where the natural environment is not a backdrop to life but an integral part of it.

If someone asked us why we have always felt drawn to this place, our answer would be remarkably simple. It is the sound of the sea. That may seem an unusual answer in a planning submission, but it captures something that is difficult to express in technical reports or environmental assessments. On a calm evening, when we step outside our home, the dominant sound is often the Atlantic Ocean. It reminds us every day why this landscape is so special. The peace and tranquillity that exist here are not accidental; they are the result of generations of careful stewardship and of planning decisions that have allowed this area to retain its distinctive rural character.

Like many young families, we had choices about where to build our lives. We chose to remain in Lacken because we wanted our children to grow up surrounded by nature, history and a strong sense of community. We wanted them to experience the same freedom that we enjoyed as children, to understand the value of the natural environment and to appreciate the unique heritage that surrounds them. We believe those opportunities are becoming increasingly rare, and they are among the greatest strengths of rural Ireland.

Our commitment to this area extends beyond simply living here. Over many years we have been actively involved in local community initiatives, biodiversity projects and voluntary organisations because we believe communities thrive when local people are prepared to invest their time and energy in improving the places they call home. That commitment has strengthened our appreciation of the environmental, cultural and social value of this landscape and has given us the opportunity to work alongside many others who share a deep affection for this part of North Mayo.

When the proposed Tirawley Wind Farm first came to our attention, we approached it with an open mind. We accepted that renewable energy forms an important part of Ireland's future and that every proposal deserves to be considered on its own merits. We did not begin this process determined to object. Instead, we wanted to understand exactly what was being proposed and whether it could be accommodated within this landscape without fundamentally changing the qualities that make it such a special place to live.

The more we learned about the proposal, the more concerned we became. What initially appeared to be a wind farm gradually revealed itself to be something much larger. The application includes sixteen industrial-scale wind turbines, a substantial Battery Energy Storage System, a permanent 110kV electrical substation, extensive new roads, major excavation works, forestry clearance, spoil deposition areas and associated electrical infrastructure. Together these elements represent a major industrial energy complex that would permanently alter the character of the landscape that has shaped our lives and the lives of countless others.

Why We Believe This Development Does Not Represent Proper Planning and Sustainable Development

As we began reading the planning application, we expected that the Environmental Impact Assessment would answer many of the questions that had been raised within the community. We assumed that the applicant would demonstrate not only why renewable energy was needed, but why this particular location had been selected and how the development could proceed without causing unacceptable harm. Like many people, we believed that a project of this scale would only be brought forward if it could clearly satisfy the principles of proper planning and sustainable development.

To understand the proposal properly, we spent many evenings reading the Environmental Impact Assessment Report, the Natura Impact Statement, the Non-Technical Summary and the supporting technical reports. This was not something we undertook because of any professional expertise. We did it because we believed that if a decision of such significance was going to affect the place where our family lives, we had a responsibility to understand it as fully as we possibly could.

As we progressed through the documentation, one theme emerged repeatedly. Each technical chapter considered a different aspect of the development, identified potential impacts and proposed mitigation measures before concluding that the remaining effects would be acceptable. Landscape could be mitigated. Noise could be managed. Biodiversity could be protected. Water resources could be safeguarded. Traffic could be controlled. Archaeological impacts could be minimised. When viewed individually, those conclusions appeared reassuring. However, when we stepped back and considered the development as a whole, we found ourselves asking a much more fundamental question. If every aspect of the project requires mitigation in order to become acceptable, is the chosen location really suitable for the development in the first place?

That question lies at the heart of this submission. We fully accept that no significant development is entirely free from environmental effects and that mitigation is an essential part of the planning process. However, mitigation should not become a substitute for careful site selection. In our respectful opinion, the planning system should first ask whether a landscape can reasonably accommodate a development before considering how its impacts might be reduced. Where extensive mitigation is required across numerous environmental

disciplines, it is entirely reasonable to question whether the receiving environment is simply too sensitive for the scale of development proposed.

Our own experience of the planning system has reinforced that view. Like many rural families, we have had to comply with planning policies and development standards when making decisions about our own property. We understand that planning exists to protect neighbours, preserve the character of rural areas and ensure that development takes place in a sustainable manner. Those principles are important and we fully support them. It is therefore difficult to reconcile those expectations with a proposal that would introduce such extensive industrial infrastructure into a landscape that has remained largely unchanged for generations.

Throughout this process we have also reflected on the meaning of sustainable development. To us, it is not simply about producing renewable electricity or reducing carbon emissions. True sustainability requires a balance between environmental protection, social wellbeing and economic development. It should seek to address climate change while also safeguarding biodiversity, protecting cultural heritage, respecting established communities and preserving landscapes of exceptional value. These objectives are not mutually exclusive. They should work together. We do not believe that granting permission for this proposal would achieve that balance.

Our conclusion has therefore been reached not through emotion or instinct, but through careful consideration of the applicant's own evidence. We have read the reports with an open mind, acknowledged the importance of renewable energy and recognised the expertise of those who prepared the application. Despite that, we remain firmly of the opinion that the applicant has not demonstrated that this proposal represents proper planning and sustainable development. It is for that reason that we respectfully ask An Coimisiún Pleanála to refuse planning permission for the proposed Tirawley Wind Farm.

A Community That Never Felt Properly Heard

Public participation is one of the cornerstones of the Irish planning system. It exists because developments of significant scale do not simply affect the land on which they are constructed; they affect the people who live around them for many years afterwards. The applicant has stated their compliance with the statutory consultation procedures required for a Strategic Infrastructure Development application, we are not of the opinion that they actually have. However, even if the board determine that the applicant has legally complied this is the minimum standard rather than the measure of successful community engagement. Our experience, and the experience of many people living in this area, is that there was no consultation or proper information provided to this community its residents or groups in relation to this development until the application was lodged.

When we first became aware of the proposal, we, like many others, believed that it related primarily to a wind farm. It was only as we worked our way through the planning documentation that the true scale of the development became apparent. This application is not simply seeking permission for sixteen wind turbines. It also includes a substantial Battery

Energy Storage System, a permanent 110kV electrical substation, extensive new access roads, significant forestry clearance, spoil deposition areas and associated electrical infrastructure. These are major industrial developments in their own right, each with their own environmental, visual and operational implications. Yet many people in our community were genuinely surprised when they discovered the extent of what was proposed, particularly the Battery Energy Storage System and the permanent electrical infrastructure. We believe that if local residents only came to fully appreciate the scale of the project after the planning application had been lodged, then the consultation process cannot be regarded as having fully achieved its purpose.

One of the greatest difficulties facing ordinary members of the public is the imbalance that inevitably exists between a developer and a local community. The applicant has had several years to assemble a team of planners, engineers, ecologists, hydrologists, noise specialists, landscape architects and legal advisers to prepare this application. By comparison, local residents were expected to absorb and understand thousands of pages of highly technical documentation within a relatively short statutory period while continuing to manage work, family life and everyday responsibilities. Many people simply do not have the time, resources or technical background to analyse documentation of this complexity. That does not mean their views are any less valid. The planning system should not place ordinary members of the public at a disadvantage simply because they cannot commission expert reports or devote months to studying planning documents.

Throughout this process we have spoken with many neighbours and local residents. With the exception of those that will gain financially there is no support forthcoming from any other individuals or groups who would support the development, this is opposition is represented by the number of observations the board has received objecting to this proposal. What united a great number of our conversations, however, was a shared feeling that the community had not been given a genuine opportunity to influence the project at any stage when meaningful changes could still be made. Consultation should be more than presenting information and recording comments. It should be an opportunity for local knowledge to inform the design of a development before positions become fixed. We cannot help but feel that, by the time the community fully understood the extent of the proposal, the project had already reached a stage where fundamental aspects of its design were no longer open to meaningful discussion.

Perhaps the greatest omission throughout the consultation process was the limited recognition given to the knowledge held by the people who actually live here. Local residents understand this landscape in ways that cannot be learned during a series of site visits. They know which roads become hazardous during severe weather, where private springs emerge after prolonged rainfall, where wildlife is regularly observed and how visitors experience this part of the Wild Atlantic Way and the future Ceide Coastal Walk. They understand the rhythms of the community because they live them every day. This local knowledge should not be seen as an alternative to professional expertise, but as an essential part of it. We believe that planning decisions are strongest when technical assessment is informed by the lived experience of the communities most directly affected.

We respectfully ask An Coimisiún Pleanála to consider not only whether the statutory requirements for consultation were satisfied, but also whether the process genuinely achieved its wider purpose of enabling informed and meaningful public participation. This development will shape our community for decades. The people who will live with its consequences should have had every reasonable opportunity to understand its full extent, to have their concerns heard and to influence its evolution before the application reached its final form. In our respectful opinion, that did not happen, and we ask the Board to take this into account when assessing whether the application represents proper planning and sustainable development.

A Landscape That Cannot Be Replaced

If somebody were to ask us why we have chosen to spend our lives in Lacken, we would probably struggle to give a simple answer. It is not one particular view, one beach or one historic monument that makes this place special. Rather, it is the combination of everything that exists here together. It is the Atlantic Ocean stretching endlessly towards the horizon, the patchwork of fields bounded by traditional stone walls, the blanket bog, the quiet country roads, the archaeological heritage, the wildlife and the sense of peace that has become increasingly difficult to find elsewhere. These individual elements combine to create a landscape that is not only visually beautiful but deeply rooted in the identity of the people who live here. It is this sense of place that we believe is at risk.

One sentence kept returning to us while preparing this submission. If someone asked us why we always feel drawn back to Lacken, our answer would simply be **the sound of the sea**. That may appear an unusual statement in a planning observation, yet it captures something that no landscape assessment or photomontage can ever adequately describe. On a calm evening, when we step outside our home, the dominant sound is often the Atlantic. That quietness is not an absence of activity; it is part of the character of this place. It is one of the reasons visitors travel here, why families choose to remain here and why so many people feel a deep emotional connection to this coastline. It is a quality that has developed naturally over generations and one that cannot simply be recreated elsewhere.

The photomontages and viewpoints are extremely biased and fail to show the true extent of the impact on the community. No viewpoint has been shown of the new and old Lacken hill graveyards. Both of these graveyards are located beneath the comforting shadow of the Gazebo one of our local historic landmarks. The applicants have conveniently not mention of Lacken Hill cemetery both old and new despite having done so for Kilbride, Rathfran, Killala and Crossmolina. Lacken hill cemeteries will be directly in the shadow of these turbines there will only be a distance of approximately 680m AT16 but the cluster of turbines from AT07 to AT15 inclusive will have an impact on the sacred ground. As we mourn our dead at funerals, remember our dead at annual masses and prayers and as we tend to the graves and look for a quiet moment – this will all be taken from us. It is deeply offensive to our cultural heritage. This development goes against everything that the people in the area have strived to create.

The applicant concludes that many of the landscape and visual effects can be regarded as acceptable or moderate when assessed against recognised methodology. We respectfully disagree, not because we question the methodology itself, but because we believe there are some landscapes where the significance of change cannot be measured solely by professional assessment criteria. This part of North Mayo is internationally recognised for its scenic beauty, archaeological heritage and natural environment. It forms part of the wider landscape associated with the Céide Fields Complex, the Wild Atlantic Way and one of the most distinctive coastal environments in Ireland.

Faillte Ireland and Mayo County Council have ambitious plans for tourism in North Mayo which includes the construction of the Ceide Coastal Walk and all this could be put in jeopardy by this proposed development. How is it our ancestors were capable of building remarkable architectural structures such as the Rathlacken Court Tomb and today with all our education and technological advancement the best we can do is build steel monstrosities and harmful industrial compounds that completely alter the landscape? As a country we should do better and our government in its National Policies and Strategies should endeavour to protect the culture and history of our nation, or have we not learnt from past mistakes where we built right on top of our Viking historic settlements in Dublin in the 1970s – when we will learn from our mistakes?

Introducing sixteen industrial-scale wind turbines together with a Battery Energy Storage System, a major electrical substation and associated infrastructure represent far more than a visual alteration. It changes the very character of the landscape and the way it is experienced by those who live within it.

The board has previously refused applications for residential housing based on their negative visual impact on the area. My own planning application was refused ACP PL16.248123 / MCC P16/955 as the board felt it would have been too much of a “negative visual impact on the amenities of the area”. Mayo County Council refused the planning as it was considered that a residential building would “constitute an obtrusive feature on the landscape”, the board agreed with this finding based on its refusal. If a residential property is considered “obtrusive” then the cumulative effect of 16 turbines with a blade tip height of 135m down right offensive and on this impact alone the board must refuse this application. The site for which this refusal was made is less than 900m away from turbines AT15 AND AT16. The board has also refused applications for the development of tourism lettings such as a glamping site - ACP PL16.318430 / MCC 23/60248 on the basis that the road infrastructure would not be able to withstand the potential increase in ordinary car traffic amongst other reasons. While understanding the concept of for “the greater good” fair and proper planning must ensure that there is some sort of level playing field for planning applications for individual and corporate applications.

Rural Ireland is continually being told that residential building in rural Ireland in contrary to national planning policy as it is considered “unsustainable” yet a strategy for extensive wind energy that is destroying our Landscape, history, sensitive habitats, our marine life our ornithology etc. is being staunchly followed.

The board should not now be able to decide that the annihilation of the visual impact and the destruction of the roads is okay for wind energy.

The national government policy for establishing green energy policy largely driven by onshore wind energy is flawed and misguided. As the government appears to be unable to establish proper updated guidelines for wind turbines or indeed proper legislative guidelines for the BESS how can ACP continue to approve wind farms on out-of-date guidelines that were initially prepare for turbines of a much lower height? It is not a case that the government suggest the 2006 guidelines are out of date it is a fact proven by the government's continued failed attempts to produce up to date guidelines for wind energy. Scientific advancements continue to happen every day and reports and studies continue to be done on the negative impact living within such close proximity to these developments have on people's lives yet ACP and the Government continue to push the flawed strategy.

Landscape is often described as a resource, but to us it is something much more personal. It is the backdrop to our lives and to the lives of our children. It is where birthdays have been celebrated, where family walks have taken place, where neighbours meet unexpectedly on quiet roads and where generations before us built the community, we are fortunate enough to inherit. Once the essential character of a landscape has been fundamentally altered, it cannot simply be restored through mitigation or replacement planting. We therefore respectfully ask An Coimisiún Pleanála to look beyond the visual simulations and technical assessments and consider the broader question that lies at the heart of this application. Is this particular landscape, with all of its environmental, cultural and community value, the right place for an industrial development of this scale? Having considered the applicant's own evidence and reflected carefully on what this place means to us; we respectfully believe that it is not.

Noise, Health and the Peace of Our Home

One of the reasons we chose to build our lives in Lacken was because of the peace that this landscape offers. Peace and quiet are often taken for granted until they are threatened, but they are fundamental to our quality of life. They influence how we sleep, how we relax after work, how our children experience the outdoors and how we enjoy our own home. It is difficult to place a monetary value on tranquility, yet once it is lost it is almost impossible to restore. As we read the Noise and Vibration Chapter of the Environmental Impact Assessment, we became increasingly concerned that the applicant's assessment concentrated primarily on demonstrating compliance with recognised noise limits, while giving much less consideration to what the permanent introduction of industrial noise would mean for the people who live here every day.

We fully appreciate that noise assessments must be based on recognised methodologies and objective measurements. The applicant has undertaken detailed modelling and concludes that operational noise levels will comply with the applicable guidance at surrounding properties. We do not question the technical competence of those carrying out the assessment. However, we respectfully question whether compliance with a numerical limit is, by itself, sufficient to

conclude that residential amenity will be adequately protected. A home is much more than a receptor on a noise contour plan. It is the place where families spend their evenings, where children sleep, where people recover after illness and where many older residents spend the majority of their time. The planning system should seek not only to avoid excessive noise, but also to preserve the peaceful living environment that already exists where that is reasonably possible.

As we considered the applicant's conclusions, we were also conscious of the guidance published by the World Health Organization regarding environmental noise and its relationship with human health and wellbeing. The WHO recognises that prolonged exposure to environmental noise has implications beyond simple annoyance and may affect sleep, quality of life and overall health. We appreciate that planning authorities must apply the relevant Irish guidance and policy framework. Nevertheless, we believe that internationally recognised health guidance should also inform the Board's consideration of what constitutes an acceptable living environment, particularly where a development will introduce a new and permanent source of industrial noise into an otherwise quiet rural landscape.

Our concerns extend beyond the wind turbines themselves. The proposed Battery Energy Storage System, electrical substation, transformers, cooling equipment and associated infrastructure introduce additional sources of operational noise that will exist continuously alongside the turbines. While each individual element has been assessed within its respective chapter, the experience of local residents will be of one integrated industrial development operating throughout the lifetime of the project. We therefore believe that the cumulative effect of these different sources of noise deserves greater consideration than it has received within the application. Living beside one item of infrastructure is very different from living beside an entire energy complex, and we are not satisfied that this distinction has been fully reflected in the assessment.

Perhaps the greatest difficulty we have with the applicant's approach is that it inevitably reduces the experience of living in this landscape to a series of predicted decibel levels. Our own experience tells us that the character of a place is determined by much more than numbers. On many evenings the dominant sound outside our home is the Atlantic Ocean. At other times it is birdsong, livestock or simply silence. These are the sounds that define rural life in this part of Mayo. They are the reason many people choose to live here and the reason visitors travel here seeking tranquillity. Introducing permanent industrial noise into that soundscape represents a fundamental change that cannot be fully appreciated through modelling alone.

For these reasons, we respectfully ask An Coimisiún Pleanála to look beyond whether the proposal can comply with prescribed noise limits and to consider the broader planning question of whether it is appropriate to introduce this level of industrial activity into an area whose defining characteristic is its peace and tranquillity. Having carefully considered the applicant's assessment and reflected on our own experience of living here, we remain unconvinced that the long-term impact on residential amenity has been fully recognised or

that the existing quality of life enjoyed by local residents can be adequately protected if this development proceeds.

The Battery Energy Storage System – A Development in Its Own Right

As we worked our way through the planning application, one aspect of the proposal concerned us more than almost any other. Like many people in the community, our initial understanding was that this application related primarily to a wind farm. It was only after carefully reading the planning documentation that we fully appreciated the scale of the proposed Battery Energy Storage System and associated electrical infrastructure. Once we understood what was being proposed, we found it difficult to view the Battery Energy Storage System as merely an ancillary component of the wind farm. In our opinion, it represents a substantial industrial development in its own right and should be considered accordingly when assessing the overall impact of this application.

Battery Energy Storage Systems are becoming an increasingly important part of Ireland's electricity network, and we recognise the role they can play in supporting renewable energy generation and improving grid stability. Our question is if this BESS requires its own EIAR and whether the Board fully assessed the BESS when making its SID decision. We question the suitability of locating a large-scale Battery Energy Storage System within this particular rural landscape and in close proximity to established homes and community. Unlike the wind turbines, which are readily identifiable as the principal element of the project, the Battery Energy Storage System introduces a range of issues relating to operational safety, fire protection, emergency response, continuous operational noise and long-term management that many local residents had little previous knowledge of before this application was submitted.

One of the issues that has troubled us throughout this process is the apparent lack of detailed public understanding regarding the Battery Energy Storage System. During conversations with neighbours and other members of the community, it became clear that many people had focused their attention on the visual impact of the wind turbines without realising that a significant battery storage installation and permanent electrical substation also formed part of the proposal. It reinforces our belief that the Battery Energy Storage System should have been presented much more prominently during the consultation process so that local residents could fully appreciate the scale and nature of the complete development before the application was finalised. We do not believe the applicant has fully assessed the BESS properly – the Board needs to address this.

The applicant hasn't considered matters such as fire safety, emergency procedures and operational management within the application documentation to a sufficient level to ease our communities' concerns. While significant advances have been made in battery safety, international experience demonstrates that incidents, although uncommon, can have complex consequences and require specialised emergency response procedures. This naturally gives rise to questions within local communities, particularly where people have had little previous

experience of such facilities. There is no proper emergency response plan provided by the applicant.

The Battery Energy Storage System cannot be considered in isolation. It forms part of a much larger industrial energy complex comprising sixteen wind turbines, a permanent 110kV electrical substation, transformers, underground electrical infrastructure, access roads and extensive engineering works. The cumulative effect of all of these elements is considerably greater than the effect of any one component on its own. While the application assesses each element within separate technical chapters, the lived experience for residents will be of one integrated industrial development operating continuously within the landscape for many decades. It is this cumulative industrialisation of the area that gives us our greatest concern.

For these reasons, we respectfully ask An Coimisiún Pleanála to consider the Battery Energy Storage System not simply as supporting infrastructure but as a significant element of the proposed development in its own right. We believe the Board should carefully examine whether its location, scale and long-term implications are appropriate within this rural setting and whether sufficient certainty has been provided regarding operational safety, emergency planning and the cumulative impact of combining this infrastructure with the wider wind farm development. We are unconvinced that these issues have been fully resolved and respectfully submit that they weigh significantly against the granting of planning permission.

Roads, Tourism and Rural Life

One of the things that becomes immediately apparent when reading the Traffic and Transport Assessment is the sheer scale of the construction operation required to deliver this project. The application is not simply seeking permission to erect sixteen wind turbines. It requires the transport of turbine components, heavy construction machinery, concrete, stone, electrical equipment and other materials over an extended construction period. To facilitate this, the proposal includes extensive road works, new access points and modifications to sections of the existing road network. While these works are presented as engineering solutions that make the development possible, we believe they also demonstrate the extraordinary scale of the project and the significant demands it will place upon a rural road network that was never designed for this type of industrial activity.

For those who do not live here, these roads may simply appear as lines on a map connecting one location to another. For us, they are part of our daily lives. They are the roads our children travel to school, the roads elderly residents depend upon to attend hospital appointments, the roads farmers use to move livestock and machinery and the roads visitors travel when they come to experience the Wild Atlantic Way, Céide Fields and the unique beauty of North Mayo. They are also the roads upon which emergency services depend when responding to accidents, medical emergencies or severe weather events. Unlike larger urban areas, there are often no convenient alternative routes. When disruption occurs, the entire community feels its effects.

We question the applicants traffic surveys, prepared swept path analyses and proposed traffic management measures. We do not believe proper traffic counts were done, what was done

was done on a Friday during the summer holidays from school – this again shows the applicants lack of assessment with regard St Patricks Secondary school, this in turn calls into question the applicant's integrity and their credibility. Is an applicant allowed to do surveys such as this on a Friday – the Board might clarify this point? These are all necessary components of a project of this nature. However, we believe they cannot fully capture the lived reality of using these roads every day. Local people understand where visibility is poor, where roads regularly flood, where agricultural traffic is particularly heavy and where two large vehicles already struggle to pass safely. This knowledge comes not from engineering drawings but from years of experience. It is one of the reasons why many residents remain deeply concerned about the practical implications of introducing abnormal loads and sustained construction traffic into this area over a prolonged period.

The impact extends beyond those who live here permanently. Tourism has become an increasingly important part of the local economy and is closely linked to the character of the landscape and the experience of travelling through it. Visitors do not simply arrive at a destination; they experience the journey itself. They come to enjoy quiet coastal roads, dramatic scenery, historic sites and the sense of escaping the pace of modern life. The prolonged presence of heavy construction traffic, road works and industrial activity inevitably changes that experience. While construction may be described as temporary in planning terms, it will last for many months and, for businesses that depend upon seasonal tourism, even one disrupted season can have significant consequences.

Perhaps our greatest concern is that the transport assessment necessarily focuses on whether traffic can be managed safely, whereas we believe the more fundamental question is whether a development that requires such extensive intervention in the existing road network is appropriate for this location in the first place. If substantial modifications are required simply to make it possible to deliver the turbines and associated infrastructure, that should prompt careful reflection on whether the receiving environment is genuinely suited to a development of this scale.

We respectfully ask An Coimisiún Pleanála to consider the traffic impacts of this proposal not only in engineering terms but also in the wider context of rural life. Roads are far more than transport corridors; they connect homes, schools, farms, businesses and communities. They support tourism, emergency services and everyday life. Having considered the applicant's assessment and reflected on our own experience of using these roads every day, we remain unconvinced that the long-term disruption and cumulative impact on the community have been fully recognised.

Nature, Water and the Living Landscape

Throughout the preparation of this submission, one theme has emerged more strongly than any other. Everything in this landscape is connected. The streams flow through the forests before reaching the coast. The peat stores water that feeds springs and watercourses. The hedgerows provide shelter for birds, insects and mammals. The bog, farmland and coastline

together create a network of habitats that supports an extraordinary diversity of wildlife. Reading the Environmental Impact Assessment reinforced our appreciation of just how environmentally important this part of North Mayo is. It also strengthened our belief that assessing each environmental topic in isolation risks overlooking the cumulative impact on the living landscape as a whole.

We have spent much of our lives enjoying and caring for the natural environment around us. Through our involvement in community biodiversity projects, we have worked alongside local residents, schools and environmental specialists to encourage pollinators, improve habitats and promote a greater appreciation of the wildlife that exists within our parish. Those experiences have shown us that nature rarely conforms neatly to chapter headings or survey boundaries. Wildlife does not recognise planning red lines, and ecological systems cannot be separated into independent components. The health of the streams depends upon the peatlands, the peatlands influence groundwater, the groundwater feeds springs, and together they support habitats that extend far beyond the boundaries of the proposed development.

The applicant has undertaken extensive ecological surveys and concludes that, with appropriate mitigation, the impacts on biodiversity can be reduced to acceptable levels. We are conscious that environmental assessment can only ever represent a snapshot of a living landscape. Species appear unexpectedly, populations fluctuate over time and local observations often reveal information that formal survey periods may not capture. The surveys carried out are out of date and the Board should not make a decision on out-of-date information. The applicant was aware of the out-of-date surveys when submitting these applications as it is noted in the documents. Throughout this planning process we have become increasingly convinced that the knowledge of those who live and work within this landscape should complement the technical surveys rather than be regarded as secondary to them.

Water is another issue that has caused us considerable concern. Like many rural families, we understand how dependent local communities are upon private wells, springs and natural watercourses. These water supplies have sustained homes and farms for generations and are not easily replaced if they become damaged or contaminated. The application proposes a range of mitigation measures to protect water quality during construction and operation. While these measures are welcome, they also demonstrate the inherent vulnerability of the receiving environment. Once again, we found ourselves asking whether the need for such extensive mitigation indicates that this landscape may simply be too sensitive for a development of this scale.

Perhaps the most important lesson we have learned throughout this process is that biodiversity and water cannot be considered separately from the people who live here. They shape the character of the landscape, support farming, attract visitors and contribute to the quality of life enjoyed by local residents. Damage to one part of this interconnected system inevitably affects the wider environment. For that reason, we believe the Board should consider not only the individual conclusions reached within each technical chapter but also the cumulative implications for the ecological integrity of the landscape as a whole.

For these reasons, we respectfully ask An Coimisiún Pleanála to adopt a precautionary approach when considering the environmental impacts of this proposal. We believe the ecological value of this landscape, together with the uncertainty that inevitably accompanies long-term predictions, justifies the highest level of protection. Having carefully considered the applicant's assessments alongside our own knowledge of the area, we remain unconvinced that the long-term effects on biodiversity, water resources and the wider ecological network have been fully understood or adequately addressed.

Our Heritage and the Legacy We Leave Behind

One of the greatest privileges of living in Lacken is that history is not something we visit; it is something we live with every day. From the internationally significant Céide landscape to the ancient monuments scattered throughout the parish, this area tells the story of generations of people who have lived, farmed and built communities here over thousands of years. Long before we understood the archaeological importance of these places, they were simply part of the landscape around us. As children we played among them, walked past them and accepted them as part of everyday life. Only later did we come to appreciate that people travel from all over the world to experience the heritage that we have been fortunate enough to grow up with.

We were left with the feeling that the assessment inevitably views heritage as a series of individual sites rather than as a living cultural landscape. While each monument is considered separately, the true significance of this part of North Mayo lies in the relationship between them. The archaeology, the field systems, the blanket bog, the coastline, the churches, the old roads and the traditional pattern of settlement together tell the story of a community that has evolved over countless generations. It is this wider landscape that gives meaning to the individual monuments, and it is this landscape that we believe is at risk of being fundamentally altered.

The applicant concludes that the impacts on many heritage assets are acceptable or can be mitigated through appropriate measures. Our concern, is not confined to the monuments themselves. It is the gradual erosion of the setting in which they exist. A prehistoric monument cannot be separated from the landscape that has surrounded it for centuries. Equally, the experience of visiting an ancient church, a holy well or a historic burial ground is shaped not only by the monument itself but also by the quiet rural environment in which it sits. Once that wider setting changes, something important is lost, even if the monument remains physically untouched.

This landscape also holds a more personal significance that cannot be measured in archaeological reports. It is where generations of local families are buried, where traditions continue to be observed and where memories are created and passed from one generation to the next. The historic landscape of Lacken is not simply an attraction for visitors or a collection of protected sites. It remains part of the identity of the people who live here. That identity has been shaped by the relationship between the community and the landscape over many centuries, and we believe that relationship deserves significant weight when considering a proposal of this scale.

As parents, we often think about what we will leave behind for our children. We hope they will inherit not only the physical landscape that we inherited, but also the sense of history and belonging that comes from growing up in a place where the past is still visible in the everyday landscape. We want them to understand why this part of Mayo is special, not because someone told them it was, but because they experienced it for themselves. We fear that the cumulative industrialisation of this landscape risks weakening that connection in a way that can never be fully restored.

For these reasons, we respectfully ask An Coimisiún Pleanála to consider the proposed development not simply in terms of its direct impact on recorded monuments, but in the context of the wider cultural landscape that has evolved over thousands of years. We believe that proper planning requires more than protecting individual archaeological sites. It requires protecting the landscape that gives those sites their meaning. Having considered the applicant's own assessment together with our lifelong experience of living in this area, we respectfully believe that this proposal would fundamentally alter a cultural landscape of exceptional importance and should therefore be refused.

The Cumulative Impact – Looking Beyond Individual Chapters

As we reached the end of the Environmental Impact Assessment, we found ourselves reflecting not on any single chapter, but on the application as a whole. Throughout the documentation, each topic is assessed separately. There is a chapter on landscape, another on biodiversity, another on hydrology, another on traffic, another on noise and so on. This is entirely understandable from a technical perspective, as different specialists prepare different parts of the assessment. However, it is not how people experience a development. Those of us who live here will not experience the landscape impact on one day, the noise impact on another and the traffic impact on a third. We will experience all of these changes together, every day, throughout the lifetime of the project.

This is perhaps our greatest concern with the application. Many of the individual chapters conclude that, following mitigation, the residual impact will be slight, moderate or acceptable. If each conclusion is read in isolation, the overall impression is that the proposal can proceed without causing significant harm. Yet when all of those conclusions are considered collectively, a very different picture begins to emerge. Sixteen industrial wind turbines, a Battery Energy Storage System, a permanent electrical substation, extensive road construction, forestry clearance, spoil deposition areas, excavation works, underground electrical infrastructure and decades of industrial activity together represent a level of change that is far greater than the sum of its individual parts.

Throughout our reading of the application, we repeatedly found ourselves asking the same question. If so many aspects of the project require mitigation, management plans, monitoring programmes and ongoing controls in order to reduce their impacts to an acceptable level, does that not suggest that the receiving environment is exceptionally sensitive? In our opinion, the answer is yes. This is not a landscape that has already been substantially

industrialised. It is a rural community characterised by its natural environment, its archaeological heritage, its biodiversity and its tranquillity. It is precisely because these qualities still exist that the proposed development would have such a profound effect upon the character of the area.

The cumulative impact extends beyond the boundaries of this application. North Mayo has already experienced significant wind energy development, while additional projects have either been approved, are under appeal or are progressing through the planning system. Each application is assessed individually, yet the people who live here experience the combined effect of every development. Every new turbine, every additional substation and every further section of upgraded road contribute incrementally to the industrialisation of the wider landscape. We believe it is essential that this proposal is assessed within that broader context rather than as a standalone project.

There is also a cumulative effect on the community itself. Throughout this submission we have described concerns relating to landscape, noise, biodiversity, heritage, water resources and traffic. None of these issues exists in isolation. Together they influence the quality of life enjoyed by local residents, the attractiveness of the area for visitors, the viability of local businesses and the confidence of families considering their future within the community. Proper planning requires consideration not only of individual environmental effects but also of the overall impact that a development will have on the character and sustainability of the place in which it is located.

For these reasons, we respectfully ask An Coimisiún Pleanála to step back from the individual technical assessments and consider the proposal as one integrated development. We believe that when the cumulative effects are viewed in their entirety, the scale of change proposed is simply too great for this landscape and this community. Having carefully considered the application as a whole, we remain firmly of the opinion that the cumulative impact of the proposed development is incompatible with the proper planning and sustainable development of this part of North Mayo.

Why We Remain Unconvinced

When we first began reading this planning application, we genuinely hoped that the detailed environmental assessments and technical reports would answer the concerns that had been expressed within our community. We expected that, by the time we had worked our way through the Environmental Impact Assessment Report, the Natura Impact Statement and the supporting documentation, we would have a much clearer understanding of why this development had been chosen for this location and why the applicant believed that its impacts were acceptable. Instead, we reached the end of the application with more questions than answers. That is not because we failed to understand the reports, but because the more we read, the more apparent it became that many of the conclusions relied upon assumptions, mitigation measures and predictions about how the project would perform over many decades.

Throughout this submission we have referred to concerns relating to landscape, residential amenity, noise, biodiversity, water resources, archaeology, traffic, tourism and community wellbeing. None of these concerns exists in isolation and none should be dismissed simply because the applicant has proposed measures intended to reduce their impact. Mitigation is an important part of the planning process, but mitigation should not become a substitute for asking the more fundamental question of whether a development is appropriate in the first place. We respectfully believe that where extensive mitigation is required across numerous environmental disciplines, it is reasonable to ask whether the receiving environment is simply too sensitive to accommodate a project of this nature.

We have also become increasingly conscious of the distinction between certainty and confidence. The applicant expresses confidence that groundwater will be protected, that ecological impacts can be successfully mitigated, that operational noise will remain within recognised limits and that the character of the landscape can accommodate the proposed development. We are not convinced that these conclusions remove the uncertainty that inevitably accompanies a project of this scale. Planning decisions should not be based solely on the expectation that mitigation measures will perform exactly as predicted over several decades. They should also recognise that where uncertainty remains, particularly in relation to sensitive environments and established communities, caution is not a weakness but a fundamental principle of good planning.

One of the things that has struck us most throughout this process is how differently local people and technical reports often describe the same landscape. Consultants understandably assess habitats, receptors, viewpoints and infrastructure. Local residents describe places where families have lived for generations, where children grow up, where wildlife is encountered unexpectedly and where people find peace and belonging. Neither perspective is incorrect, but they are different. We believe that proper planning requires both to be considered together. A planning decision based solely upon technical assessment risks overlooking the human dimension of a place, just as a decision based solely upon personal opinion would fail to recognise the importance of objective evidence. This submission has sought to bring those two perspectives together.

We believe that the burden of demonstrating that this proposal represents proper planning and sustainable development rests with the applicant. It is not for local residents to prove beyond doubt that harm will occur. Rather, it is for the applicant to satisfy the Board that the proposed development is appropriate for this location and that any adverse impacts have been fully understood and can be satisfactorily addressed. Having carefully considered the application over many weeks, we remain respectfully unconvinced that this burden has been discharged. While the reports undoubtedly contain a significant amount of technical information, they have not persuaded us that this landscape, this community and this environment can accommodate a development of this scale without suffering unacceptable and irreversible change.

For these reasons, we respectfully ask An Coimisiún Pleanála to consider not only whether the application complies with individual technical standards, but whether it has genuinely

demonstrated that the proposal represents proper planning and sustainable development when viewed as a whole. Having reflected carefully on everything we have read and on our own lifelong experience of living in this community, we remain firmly of the opinion that it has not. It is for that reason, above all others, that we respectfully ask the Board to refuse planning permission.

A Final Reflection

As we come to the end of this submission, we find ourselves thinking less about planning reports and more about the responsibility that accompanies decisions of this significance. Planning applications come and go, and many affect only a relatively small number of people. This application is different. The decision reached by An Coimisiún Pleanála will shape the future of our community and the landscape in which we live for decades to come. Long after the planning process has ended, long after the reports have been archived and the consultants have moved on to other projects, the people of Lacken will continue to live with the consequences of whatever decision is made.

Preparing this submission has required an enormous commitment of time and effort. Like many local residents, we are not planning professionals. We have careers, family responsibilities and young children. The countless hours we have spent reading environmental reports, planning policies and technical assessments have been undertaken in our own time because we felt a responsibility to understand what was being proposed for the place where we have chosen to build our lives. We have approached this process honestly and respectfully. We have challenged aspects of the application where we believe they deserve closer examination.

This objection has never been about resisting change for its own sake. Rural communities have always evolved, and we fully accept that change is an inevitable part of progress. The planning system, exists precisely because not every development is suitable for every location. Good planning is about making informed choices, balancing competing interests and ensuring that development takes place in the right place, for the right reasons and in a manner that does not cause unacceptable harm to people or the environment. We respectfully believe that this proposal does not achieve that balance.

As parents, we often think about the legacy we will leave to our children. We hope they will inherit a community that remains vibrant, a landscape that retains its unique character and a place where they can experience the same sense of peace, belonging and connection with nature that has shaped our own lives. We recognise that every generation has a responsibility to leave something positive for those who follow. In our view, protecting exceptional landscapes and established communities is entirely consistent with supporting a more sustainable future. These are not competing objectives. They should complement one another through careful and thoughtful planning.

Before reaching a decision, we ask the Board considers not only the engineering drawings, technical assessments and policy objectives, but also the people who live here, the landscape

that has sustained generations of families and the responsibility we all share to pass that landscape on in the best possible condition to those who come after us.

We wish to adopt and support the detailed submission made by the Lacken Ballycastle Community Landscape Protection Group in relation to the proposed Tirawley Wind Farm development (PAX16.324258). In particular, we endorse the concerns raised regarding cumulative wind farm development across North Mayo, impacts on the Céide Fields cultural landscape, effects on tourism and recreation, biodiversity impacts, inadequacies in community consultation, and the assessment of the Battery Energy Storage System. While we do not repeat those detailed arguments in full, we request that they be considered as forming part of this submission.

For all of the reasons set out throughout this submission, we respectfully submit that the proposed Tirawley Wind Farm does not represent proper planning and sustainable development. We therefore ask An Coimisiún Pleanála to refuse planning permission for the proposed development and, in doing so, to protect a landscape, a community and a way of life that we believe are of enduring value not only to those who live here today, but to future generations.

In conclusion the old saying of “a rising tide lifts all boats” comes to mind however this development does not represent a rising tide it is more akin to a flooding of rural Ireland and the destruction of all that we should try to protect and preserve.

Yours faithfully

Teresa & David Fagan