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

Re: Objection to the Proposed Tirawley Wind Farm Strategic Infrastructure

Development Objection Submission to An Coimisiún Pleanála

Re: Planning permission for the construction of Tirawley Windfarm consisting of 16 no. wind turbines, a permanent 110kV substation, 110kV underground cable and grid connection, and ancillary development in the townlands of Ballymurphy, Ballynaleck, Barnhill Lower & Upper, Barroe, Billoos, Carn, Carrickanass, Carrowmore, Castlelacken Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

I am writing as a resident of the area within proximity to the proposed Tirawley Wind Farm project, submitted by Constant Energy Limited, to formally lodge my objection to this Strategic Infrastructure Development application.

I 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 I endorse the concerns raised regarding cumulative wind farm development across North Mayo, impacts on the Ceide Fields cultural landscape, effects on tourism and recreation, biodiversity impacts, inadequacies in community consultation, and the assessment of

the Battery Energy Storage System. While I do not repeat those detailed arguments in full, I request that they be considered as forming part of this submission.

I do however, have further concerns with regards to Health and Safety, in particular shadow flicker and the risks it poses to individuals with photosensitive epilepsy.

I wish to highlight a serious health and safety concern that has not been adequately addressed in the application: the risk that turbine shadow flicker poses to individuals with photosensitive epilepsy and other neurological sensitivities.

Shadow flicker occurs when rotating turbine blades periodically block sunlight, creating a strobing effect. This flicker can occur at considerable distances from turbines, depending on sun angle, weather conditions, and turbine height. Modern turbines of the scale proposed—up to 180m+—produce longer and more far-reaching shadow flicker than older models.

For individuals with photosensitive epilepsy like our daughter, exposure to flicker at certain frequencies can trigger seizures. International medical guidance, including from the Epilepsy Society and the International League Against Epilepsy, identifies flicker frequencies between 3–30 Hz as particularly hazardous. While turbine blade rotation typically produces flicker at lower frequencies, cumulative effects, atmospheric conditions, and reflections can still pose a risk. The precautionary principle must therefore apply.

The EIAR does not provide sufficient reassurance that vulnerable residents will be protected. In particular:

- The modelling of shadow flicker impacts appears limited and does not fully account for worst-case scenarios, cumulative effects from multiple turbines, or the increased flicker reach associated with very tall turbine structures.
- No meaningful mitigation strategy is proposed for households where individuals have epilepsy or other neurological conditions.
- The applicant has not engaged directly with affected residents to identify medically vulnerable individuals or assess the potential health impacts on them.
- There is no commitment to mandatory turbine curtailment during predicted flicker periods for at-risk dwellings, a measure that is standard practice in other jurisdictions.

Given that shadow flicker is a foreseeable and preventable health hazard, the absence of robust assessment and enforceable mitigation is unacceptable. The potential for triggering seizures represents a significant risk to public health and safety, particularly for those living or working in close proximity to the proposed turbines.

As a family directly affected, this issue is not abstract: our daughter, a young wheelchair-bound woman with neurological vulnerabilities, would be placed at real and avoidable risk from turbine shadow flicker. Should the development for this wind farm be permitted to proceed; multiple turbines and their resultant shadow flickers and strobing affects, will be completely visible from our home. Is it genuinely the applicant's expectation that she should remain indoors with curtains drawn to protect herself from a hazard created by this development?

For these reasons, I believe the application fails to demonstrate that the development will not endanger the health and wellbeing of residents, and this should weigh strongly in your review. With this mind, alongside the myriad of other concerns laid out by the Lacken Ballycastle Community Landscape Protection Group, 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,

Thomas and Karen Murphy