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22th June 2026

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

Case number: **PAX16.324258**

Dear Sir/Madam,

I wish to submit a formal objection to the proposed **Tirawley Wind Farm Strategic Infrastructure Development**.

My concerns relate to **significant inaccuracies, omissions, and misleading information** within the EIAR, NIS, and supporting documents. These deficiencies prevent a lawful and reliable assessment of the project's impacts.

In summary, my key grounds of objection include:

- **Residential impacts at my home (H29)**, including noise and shadow flicker exceedances confirmed by the applicant's own modelling
- **Misleading and incomplete cumulative impact assessment**, particularly regarding Glenora, Keerglen, and Clydagh
- **Adverse tourism and landscape effects** on the Wild Atlantic Way, Céide Fields, and the Lacken–Ballycastle coastline
- **Inadequate ecological, hydrological, and peatland assessment**, with risks to protected habitats
- **Misrepresentation of community engagement**
- **Serious omissions regarding BESS fire safety**, including the absence of a fire engineering report, toxic gas modelling, evacuation planning, or consultation with Mayo Fire Service
- **Unacceptable emergency response times**, as the relevant fire stations (Ballina) are **RETAINED**, resulting in realistic response times of **25–45+ minutes**, which is incompatible with the risks posed by a BESS installation

These issues are detailed in my attached objection document.

Yours faithfully,

Vincent Kelly
Fire Safety Engineer



BSc (Hons) FireTech, AIFireE,

Proposed Tirawley Wind Farm – Strategic Infrastructure Development Application

Submitted to An Bord Pleanála

1. Introduction

I wish to lodge a formal objection to the proposed **Tirawley Wind Farm Strategic Infrastructure Development**. This objection is based on extensive concerns regarding **misleading, incorrect, and incomplete information** contained within the Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), Planning Statement, and associated documentation.

The EIAR fails to meet the standards required under:

- The **Planning and Development Act 2000 (as amended)**
- The **EIA Directive (2011/92/EU as amended by 2014/52/EU)**
- The **Habitats Directive (92/43/EEC)**
- The **Birds Directive (2009/147/EC)**

An Bord Pleanála cannot lawfully grant permission where the environmental assessment is **defective, misleading, or incomplete**.

2. Residential Amenity – Noise and Shadow Flicker (Dwelling H29)

My home is identified as **H29** in the EIAR. I object to the use of the term “*receptor*”, which is clinical and dehumanising. This is a lived rural community, not an industrial zone.

My home is located approximately:

- **742 m** from Turbine **AT15**
- **923 m** from Turbine **AT16**
- **1,773 m** from Turbine **AT14**

Three turbines within roughly one kilometre of a dwelling represent a **significant residential impact** that the EIAR does not adequately address.

2.1 Noise Impacts

The EIAR relies on theoretical modelling that does not reflect real-world rural conditions. It fails to properly assess:

- Night-time noise
- Low-frequency noise
- Amplitude modulation
- Combined noise from three nearby turbines

The modelling assumptions are **misleading and underestimate noise levels**.

2.2 Shadow Flicker Impacts

The EIAR predicts the following for H29 (Table 15.3):

- **58 hours 39 minutes** worst-case per year
- **6 hours 24 minutes** expected per year
- **38 minutes** maximum expected per day

This **exceeds** the 2006 guideline limit of **30 minutes per day**.

The exceedance is confirmed by the applicant's own modelling.

2.3 Reliance on Mitigation Is Not Acceptable

The EIAR proposes turbine control systems to manage shadow flicker. This is inadequate because:

- Long-term reliability is uncertain
- Monitoring and enforcement are unclear
- Responsibility for failure is not defined
- It is unclear whether shutdown is automatic or complaint-driven
- No independent verification mechanism is proposed

Mitigation is **not a substitute** for avoiding the impact.

2.4 Prevention, Not Management

The **Draft Revised Wind Energy Development Guidelines (2019)** move toward **zero shadow flicker** at homes. Given that H29 already exceeds the 2006 limit, the appropriate standard is **prevention**, not management.

3. Misleading or Incorrect Information in the EIAR

The EIAR contains multiple areas of misleading, incorrect, or incomplete information.

3.1 Misstated Distances to Dwellings

Several dwellings are incorrectly measured or omitted. Incorrect distances invalidate:

- Noise modelling
- Shadow flicker predictions
- Human health assessments

3.2 Incomplete Cumulative Assessment

The EIAR fails to fully consider cumulative impacts with:

- Glenora (22 turbines, approved)
- Keerglen
- Clydagh (potential)
- Grid upgrades and 110 kV cable

This is a **legal requirement** under the EIA Directive.

3.3 Misleading Visual Impact Assessment

The EIAR uses:

- Selective viewpoints
- Leaf-on photography
- Understated ZTV mapping
- Omission of key Wild Atlantic Way viewpoints

This misrepresents the true visual impact.

3.4 Inadequate Ecology Baseline

Surveys are incomplete or seasonally inappropriate. Peat depth surveys are sparse. Hydrological connectivity to Natura sites is understated.

3.5 Underestimated Peat and Hydrology Risks

The EIAR understates:

- Peat excavation volumes
- Peat stability risks
- Drainage impacts
- Pollution risks to sensitive habitats

3.6 Traffic and Transport Misrepresentation

The EIAR underestimates:

- Construction traffic volumes
- Road upgrade requirements
- Impacts on local roads used by residents, farmers, and tourists

This contradicts Mayo County Council's own submission.

3.7 Mischaracterised Community Engagement

Appendix 1.6 presents community engagement as positive and comprehensive. However:

- Many residents were not consulted
- Concerns raised were not reflected in the EIAR
- The report selectively presents feedback

This is misleading and undermines the credibility of the consultation process.

4. Tourism and Cumulative Impact on the Wild Atlantic Way

The Lacken–Ballycastle coastline is a **core tourism asset**. The cumulative impact of Tirawley, Glenora, Keerglen, and Clydagh will:

- Industrialise the coastline

- Damage the Wild Atlantic Way experience
- Undermine the Céide Fields cultural landscape
- Conflict with the new Fáilte Ireland/Mayo tourism plan

The EIAR's cumulative tourism assessment is **inadequate and misleading**.

5. Site Suitability and Landscape Impact

The site lies within a **highly sensitive landscape**, visible from:

- The Wild Atlantic Way
- Scenic routes
- Céide Fields
- Downpatrick Head

The EIAR underestimates:

- Visual intrusion
- Intervisibility with other wind farms
- Loss of rural character
- Cumulative landscape impact

This conflicts with Mayo County Development Plan policies.

6. Environmental and Ecological Concerns

The development threatens:

- Blanket bog
- Peatland ecosystems
- Protected habitats under the Habitats Directive
- Biodiversity and restoration efforts

The EIAR does not adequately assess long-term ecological damage.

7. Fire safety, BESS explosion risk, and fire brigade response times

The EIAR contains no dedicated fire safety assessment for the proposed Battery Energy Storage System (BESS). Given the well documented fire, explosion, and toxic gas risks associated with BESS installations, this omission is material and unacceptable.

7.1 Fire station status and mobilisation delays

- Ballina Fire Station is a retained station, not full-time.
- No full-time fire station exists in the vicinity of the site.

Retained crews must first travel from home or work to the station before appliances can mobilise, adding approximately 10 -15 minutes before departure even under ideal conditions.

7.2 Realistic response times

- Ballina: realistic response time in rural conditions is 35-45 minutes or more.

These times assume favourable traffic, weather, and road conditions. For a rapidly escalating BESS incident, such response times are incompatible with effective intervention and public safety.

7.3 Absence of required separation distances

The application does not provide clear, enforceable separation distances between:

- Individual battery containers
- The BESS compound and the 110 kV substation
- The BESS compound and the public road
- The BESS compound and the nearest dwelling

International standards such as NFPA 855 and UL 9540A require minimum separation distances to limit fire spread, reduce explosion risk, and protect adjacent infrastructure and the public. The applicant has not demonstrated compliance with any recognised fire safety standard.

7.4 No water supply strategy

There is no information on:

- Hydrant locations
- On-site or nearby water storage tanks
- Required flow rate calculations
- Fire water containment measures

There is no evidence that adequate firefighting water will be available. Rural locations typically lack robust hydrant networks and high-flow supplies, making this a critical omission. Without a defined and tested water supply strategy, effective firefighting operations cannot be assured.

7.5 No firefighting access routes

The application does not show:

- Turning circles for fire appliances
- Hardstand locations suitable for appliances and equipment
- Emergency access gates
- Clear, unobstructed access routes to the BESS compound

These are basic requirements for emergency response. Their absence indicates that practical firefighting operations have not been considered or designed into the project.

7.6 Rapid escalation of BESS fires

By the time retained crews arrive on site:

- Thermal runaway may be fully developed
- Toxic and flammable gases may have been released
- Explosion risk may be significantly elevated
- Evacuation zones may be required for nearby residents and road users

The EIAR does not assess any of these scenarios, nor does it model gas dispersion, blast effects, or off-site consequences for the public, environment, or responders.

7.7 Specialist capability and equipment deficits

BESS incidents require:

- Specialist PPE (including protection from toxic gases and particulates)
- Gas detection and monitoring equipment
- Long-duration incident monitoring and scene control
- Hazardous materials protocols and training

There is no evidence that rural retained crews have access to this level of specialist equipment, training, or support. The EIAR does not address these capability gaps.

7.8 No consultation with Mayo Fire Service

There is no evidence of consultation with Mayo Fire Service regarding:

- Realistic response times
- Equipment and resource needs
- Evacuation planning and public warning systems
- Firefighting strategy for BESS and associated infrastructure

The absence of formal consultation with the competent fire authority is a material defect in the EIAR and in the project design.

7.9 No assessment of evacuation requirements

The EIAR does not assess:

- Evacuation zones for nearby dwellings and roads
- Notification procedures for residents and road users
- Impacts on vulnerable residents (elderly, disabled, limited mobility)
- Traffic management during a BESS incident or evacuation

Given the proximity of dwellings, public roads, and critical electrical infrastructure, this omission is serious. It fails to demonstrate that the development can be operated without posing an unacceptable risk to public safety.

Overall conclusion on fire safety

Taken together, the absence of a dedicated fire engineering report, the lack of separation distances, water supply strategy, access design, evacuation planning, and consultation with Mayo Fire Service mean that the EIAR fails to demonstrate that the proposed BESS will not pose a serious risk to public safety, the environment, and emergency responders. This alone constitutes sufficient grounds for refusal or, at minimum, a requirement for substantial further information and redesign.

8. Additional Deficiencies in the Application

The EIAR also fails to meet statutory requirements in the following areas:

- Inadequate alternatives assessment
- Incomplete grid connection assessment
- Missing photomontages from key viewpoints
- No human health impact assessment
- Underestimated construction impacts
- No assessment of night-time lighting impacts
- No decommissioning impact assessment
- No financial bond proposed
- Misleading community benefit claims

Each of these omissions is material and further undermines the validity of the EIR.

9 Conclusion

The Tirawley Wind Farm SID application is supported by an EIAR and associated documents that contain material omissions, inaccuracies, and misleading assessments. These deficiencies prevent An Bord Pleanála from carrying out a lawful and reliable evaluation as required under the Planning and Development Act 2000 (as amended), the EIA Directive, and the Habitats Directive.

The most serious concern is the complete absence of a dedicated fire safety assessment for the proposed BESS installation. The application fails to address:

- The retained status of all relevant fire stations and the resulting 10–15 minute mobilisation delay
- Realistic response times of 35–45+ minutes, incompatible with rapid BESS thermal-runaway escalation
- Missing separation distances required under NFPA 855 and UL 9540A
- No water supply strategy, including hydrants, storage, flow rates, or containment
- No firefighting access design
- No toxic gas, explosion, or evacuation modelling
- No consultation with Mayo Fire Service, the competent authority

These omissions mean the applicant has not demonstrated that the BESS can be safely constructed or operated, posing unacceptable risks to residents, emergency responders, and the environment. See: BESS fire safety concerns.

Beyond fire safety, the EIAR also contains significant deficiencies in:

- Residential amenity impacts, including noise and shadow flicker exceedances at H29
- Cumulative impact assessment, particularly regarding Glenora, Keerglen, and Clydagh
- Tourism and landscape impacts on the Wild Atlantic Way and Céide Fields
- Ecology, hydrology, and peatland assessment, including risks to protected habitats
- Traffic and transport impacts
- Community engagement, which is misrepresented and incomplete

Taken together, these issues demonstrate that the EIAR does not meet the required standards of completeness, accuracy, or reliability for Strategic Infrastructure Development.

Accordingly, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed Tirawley Wind Farm development until such time as these significant deficiencies have been fully addressed and independently assessed.

Yours faithfully,

Vincent Kelly

Fire Safety Engineer

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