

**Céide Coast Community Company Ltd,  
Eco Campus, Main Street,  
Ballycastle  
Co. Mayo F26 W544**

**21st of January 2026**



**Subject:**

Glenora Windfarm (An Coimisiun Pleanala Ref. 318701-23)

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To Whom It May Concern,

The Ceide Coastal Walk has been given Part 8 planning many months ago. Representatives from Failte Ireland (Wild Atlantic Way section), Sport Ireland, the NPWS and Mayo County Council have met with the proposers of the project (the Ceide Coast Community) and have expressed support for the project. The project has also been given the full support of a number of TD's and local councillors as the potential economic boost to local businesses, food services, accommodation providers and the wider North Mayo tourism offerings as a result of increased levels of footfall generated will be significant and a potential game changer for the area. Walking tourism makes significant contributions to any local and county's economy. We fully expect the walk to be developed in the coming years after years of time and investment spent.

The applicants referral to the proposed coastal walk relates to the development of a walking trail amenity for recreational use, tourism use and as an educational resource, that will run between the Ceide Fields in Glenurla through the townlands of Muingelly, Doonfeeney Upper, Rynn, Killerduff, Lisbrin, Ballymacugh, Castletown, Knockaun and end at the first car park next to the entrance at Downpatrick Head, Ballycastle, Co. Mayo.

It is for the reasons described below in detail that we make our submission, the integrity and visual amenity that our amazingly beautiful and pristine landscape provides is beyond any price or short term gain. The fields in this area have been farmed for well over 5000 years and in our view that this should continue well into the future unhindered. This is not an area for industrial windfarms given its natural beauty both from a visual and archaeological perspective amongst others.

The information provided below forms the basis for our submission and we are vehemently against any such development proceeding as proposed.

Yours faithfully,

For and on behalf of the  
Céide Coast Community Company

Secretary

*Maura Doherty*

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**CHY 22662**  
**COMPANY No: 616734**

## Ceide Coast Community's Concerns

With regard to Section 1.1.2.6 of the response document submitted by MKO titled: "Response to Observations Received Glenora Wind Farm (ABP Ref. 318701-23) as part of a response to a request issued by An Bord Pleanála (now An Coimisiún Pleanála) on the 29<sup>th</sup> February 2024 and the board's letter dated 28<sup>th</sup> March 2024, we the Ceide Coast Community having significant concerns with regard to the quality and credibility of some of the information submitted by the applicant (MKO acting on behalf of Glenora Wind Farm DAC) pertaining to the proposed development.

Section 1.1.2.6 refers to the proposed Ceide to Downpatrick Head Coastal Walk stating the following with regard to the Ceide Coast Community previous submission as part of this process:

"Third party submissions note that the route will provide views along the coastline overlooking the neolithic landscape and that the proposed turbines will be out of character and negatively impact the visual and scenic amenity of the landscape."

The narrative continues stating that "Plate 1-2 below shows an extract from the website (<http://www.ceidecoast.ie/projects>) indicating part of the proposed coastal walk."



Plate 1-2 Extract from the CCCC page on the Ceide to Downpatrick Head Coastal Walk (accessed 08.04.2024)

This map is also attached as Appendix 1 for clarity.

The above map was then referred to stating that it "shows a proposed extent of the route from Downpatrick Head to the Ceide Fields visitor centre"

In this instance, the applicant has rather naively assumed that the black line on the map represents the proposed coastal walk. This categorically not true (Actual coastal walk as drawn up by an engineering company designated for the project shown in Appendix 3).

Firstly, the map referred to above contains detail with regard to the '30 signature points' a number of which can clearly be seen marked along the actual physical coastline itself adjacent to the sea. This same map clearly states that relevant landowners have signed up for the walk. In this instance, it is incorrect to assume and imply that the walk would follow the trail of the R314 Ballycastle to Belmullet Road. There would be no logic in having a 'coastal walk' away from the coast and on the same conduit as a high number of tourist traffic which traverses the route on a regular basis between Downpatrick Head and the Ceide Fields.

Secondly, and from a logical perspective, why would any landowners even need to be involved if a walk, as incorrectly assumed by the applicant, was on the R314 road and not on lands owned by landowners?

Thirdly, the applicant is also incorrect in stating that the route of the coastal walk follows that of the Wild Atlantic Way. It does not. It follows the physical coastline edge and cliffs directly adjacent to the sea from the Ceide Fields to Downpatrick Head.

What cause us significant concern as a voluntary community group is that there is information that has been used incorrectly with regard to the coastal walk and its true actual location which has led to even further incorrect information in the Landscape and Visual chapters of the Glenora application which has been submitted with a direct issue regards what can and can't be seen from various viewpoints/'Zone of Theoretical Visibility'. Figure 1-5 (below) of the applicants submission referring to this 'Zone of Theoretical Visibility' of the proposed turbines from the proposed walking route has now clearly no solid foundation or credibility due to the lack of rigorous oversight and poor quality of assessment contained within the report.

Figure 1-5 shows (Also Appendix 2 for clarity) these 'Zones of Theoretical Visibility' on a legend with various colours representing the number of turbines that would be visible from each shaded location. Logic would now indicate that if the position of the 'assumed coastal walk' is now in reality moved to its real location directly adjacent to the Atlantic Ocean and along the physical coastlines edge from the Ceide Fields to Downpatrick Head (further back and way from the hills of Ceide, Glenurla, Muingelly and Ballycastle) then these shaded zones on Figure 1-5 are incorrect. A truer and more accurate map should have shading showing much higher number of turbines but this is not the case.

Again, and of grave concern to us as a voluntary community group vested in our own locality and its common good, is the quality and accuracy of the information submitted which is clearly and utterly incorrect and disingenuous. Had the applicant taken the

appropriate time to comprehensively and rigorously assess the quality of information submitted, then the correct walk may have been used instead of an assumed one.

***This now calls into serious question, the foundation for the information submitted and subsequently as a result, the credibility and narrative of the Landscape and Visual element of the reports.***

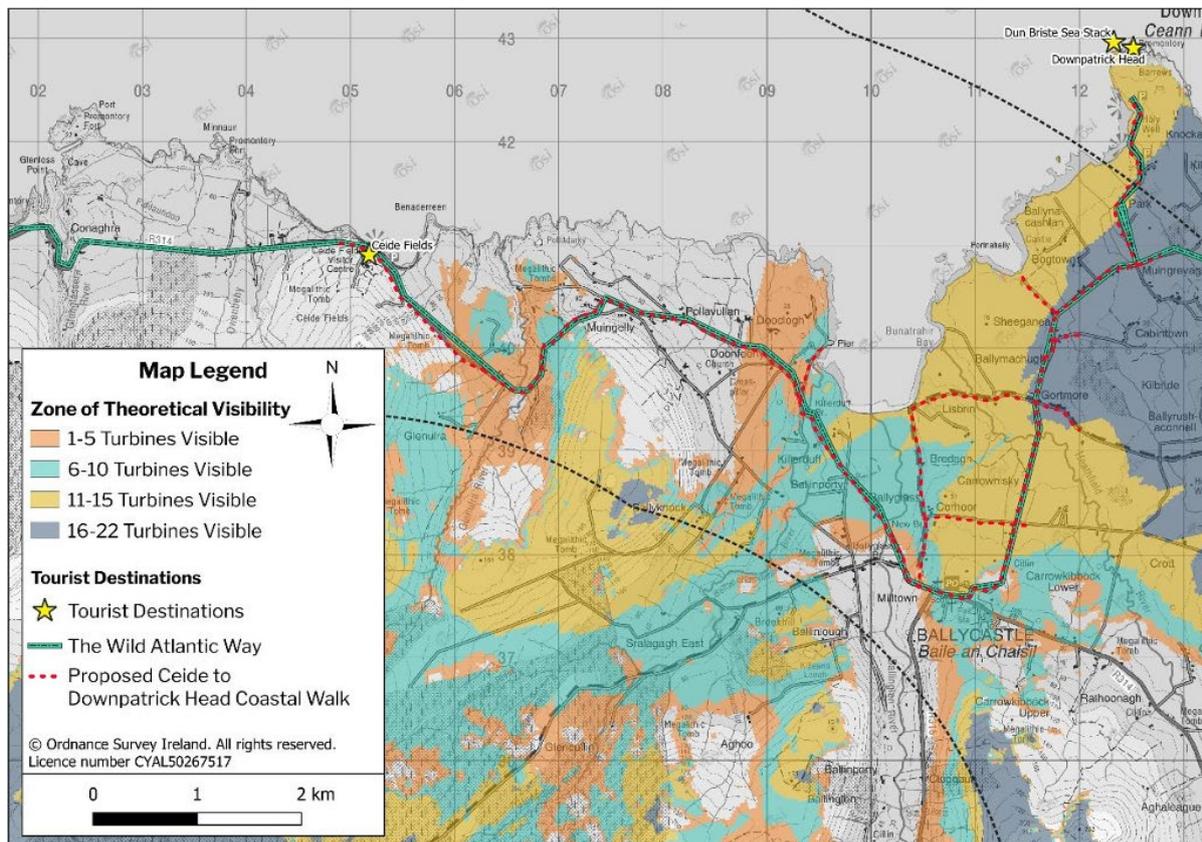
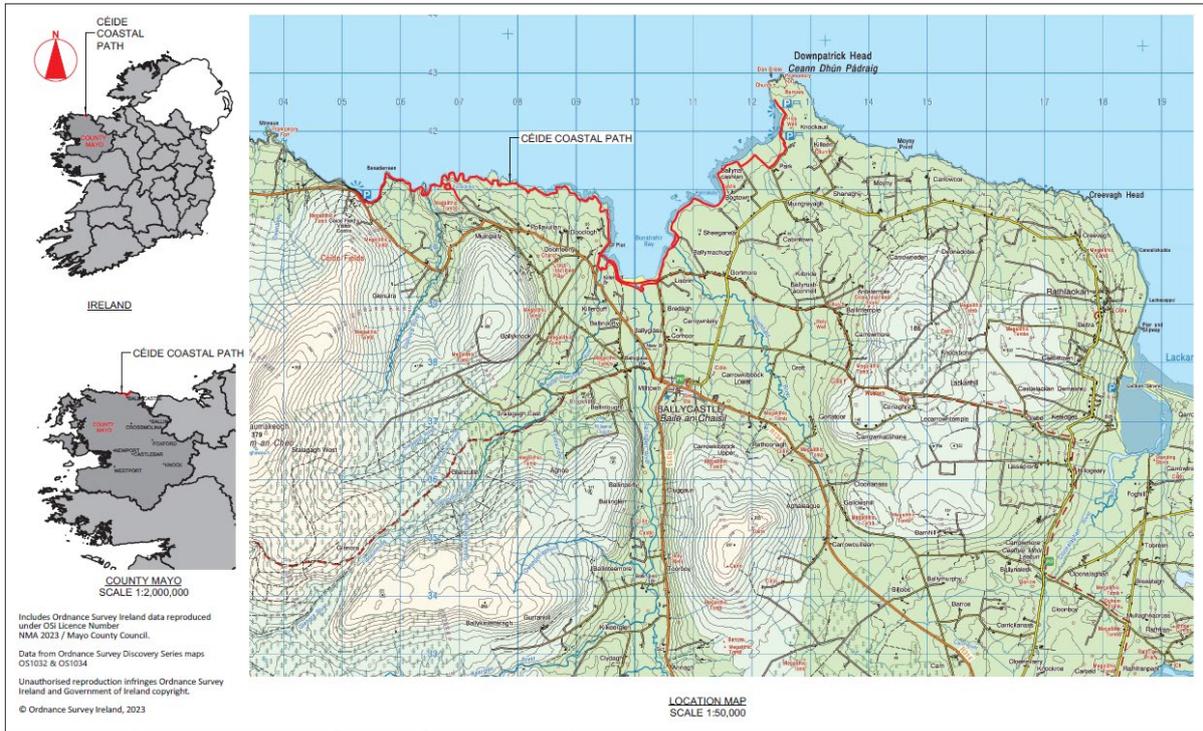


Figure 1-5 Zone of Theoretical Visibility of the Proposed Turbines from the Proposed Walking Route

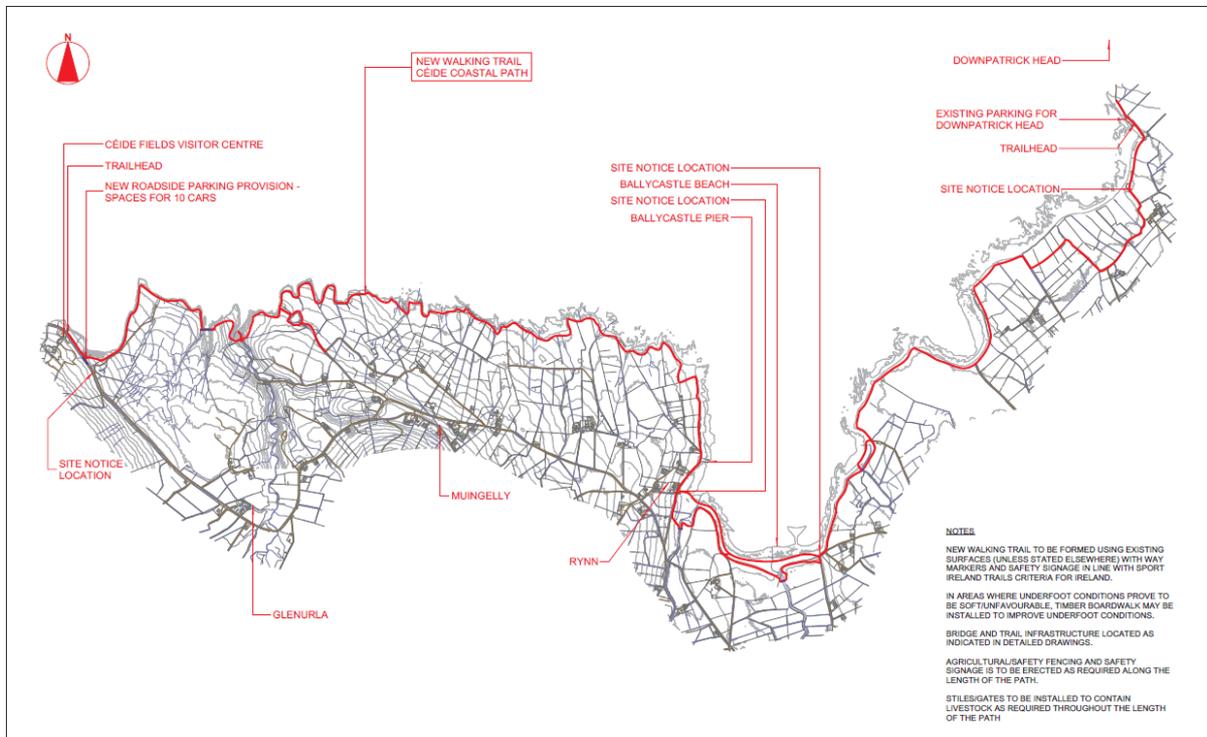
Over 5km is not the distance from the nearest turbine to the actual proposed coastal walk. It is in fact a greater distance back towards the sea from the hills which now logically results in a greater number of turbines being visible from the shaded areas as shown in Figure 1-5. The number will be much more than has been described incorrectly by the applicant. If this is the level of scrutiny and assessment within this chapter of the reporting and EIAR, then we as a community would have serious reservations and concerns with regard to the rest of the EIAR chapters and their content.

To state that ‘there will be a ‘Not Significant’ visual effect overall on the proposed Ceide Coastal Walk from the Ceide Fields to Downpatrick Head as a result of the proposed Glenora windfarm development is categorically incorrect and disingenuous.

The statement that ‘the proposed walkway follows the same route as that of the Wild Atlantic Way’ is also categorically incorrect.



Actual route (in red) of the proposed Ceide Coastal Walk as drawn by the assigned engineering company CAKE to the project (Appendix 3).



Actual route (in red) of the proposed Ceide Coastal Walk as drawn by the assigned engineering company to the project (Appendix 3).

## **Conclusion**

In conclusion, the Céide Coast Community Company maintains its total objection to the proposed Glenora Wind Farm development (An Coimisiún Pleanála Ref. 318701-23) on the basis that the application, and in particular the applicant's response documentation, demonstrates material deficiencies in accuracy, assessment methodology, and evidential reliability.

The applicant's treatment of the proposed Céide to Downpatrick Head Coastal Walk in Section 1.1.2.6 of the MKO response document is demonstrably incorrect. A publicly available map relating to "signature points" has been misconstrued and presented as if it depicts the route of the Coastal Walk. This is not the case. The actual route, as designed by the engineering team engaged for the project, follows the physical coastline and cliff edge as a coastal amenity, rather than the R314 road corridor as the applicant has assumed. The applicant's further assertion that the Coastal Walk follows the Wild Atlantic Way is also incorrect. These are not minor errors: they go to the heart of what receptors exist, where they are located, and what the public will experience.

As a direct consequence, the applicant's Landscape and Visual Impact assessment—particularly the analysis of visibility and the Zone of Theoretical Visibility presented for the Coastal Walk - cannot be relied upon. If the underlying receptor alignment is wrong, then the ZTV mapping and any associated conclusions regarding turbine visibility, magnitude of change, and significance of effect are necessarily undermined. The applicant's conclusion that visual effects on the proposed Coastal Walk would be "Not Significant" is therefore unsupported by a robust baseline, lacks credibility, and cannot be accepted as a sound planning or environmental conclusion.

The Coastal Walk is a strategic community-led and publicly supported tourism, recreation and educational project, granted Part 8 planning and supported by relevant statutory and sectoral stakeholders. It is intended to showcase the exceptional coastal landscape and its associated archaeological and cultural heritage. The proposed industrial wind farm would fundamentally conflict with this amenity and with the integrity, character and scenic quality of the receiving environment that the walk is specifically designed to celebrate and utilise as an economic and community asset.

Given the inaccuracies identified, and the consequential doubts raised as to the integrity of the applicant's Landscape and Visual assessment, the Céide Coast Community Company has serious reservations regarding the overall quality assurance applied across the EIAR and associated documentation. Where a key and readily verifiable receptor has been incorrectly represented, it is reasonable and prudent for the competent authority to treat the remainder of the assessment with heightened caution.

***For these reasons, and for the wider reasons already set out in our previous submission regarding the unsuitability of this location for industrial wind farm development in a sensitive coastal, scenic and archaeologically significant landscape, we respectfully request that An Coimisiún Pleanála refuse permission for the proposed Glenora Wind Farm development.***

Appendix 1 Ceide Coastal Walk Map which  
only shows Feature Point locations along  
the route

## Ceide to Downpatrick Head Coastal Walk

This is the flagship project for the group, the development of a coastal walk from Downpatrick Head to Ceide. This incorporates a 13.5Km walking trail along the coastline.

There are 30 signature points along the way including:

- Polladarky Blow Hole (Bigger than Pollinaseantine)
- Leim Giant Steps
- Doonfeeney Sea Arch

It will support tourism and recreational activities but will also act as an outdoor living laboratory complementing the Eco Campus facility. A complementary resource for this area to support local employment opportunities.

### Update:

- All the relevant land owners have been consulted and support the project.
- Fóite Ireland representatives have visited the project and support it.
- Mayo County Council LIDAR survey gone to tender to be complete Q4 2022.
- Feasibility Study to be completed in Q4 2022.
- Mayo County Council to secure Part 8 Planning for the project in early 2023 – walk then to be allocated funding and commencement.

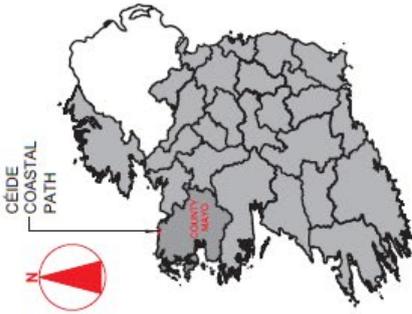


Plate 1-2 Extract from the CCCC page on the Ceide to Downpatrick Head Coastal Walk (accessed 08.04.2024)

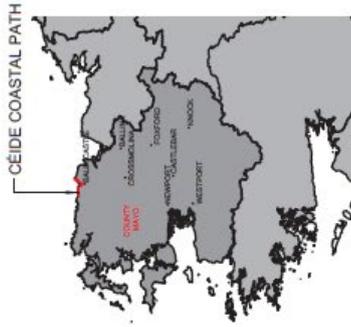
## Appendix 2 Map 1-5 regarding the 'Zones of Theoretical Visibility'



Appendix 3 Engineers map showing the actual location of the Ceide Coastal Walk



IRELAND



COUNTY MAYO  
SCALE 1:2,000,000

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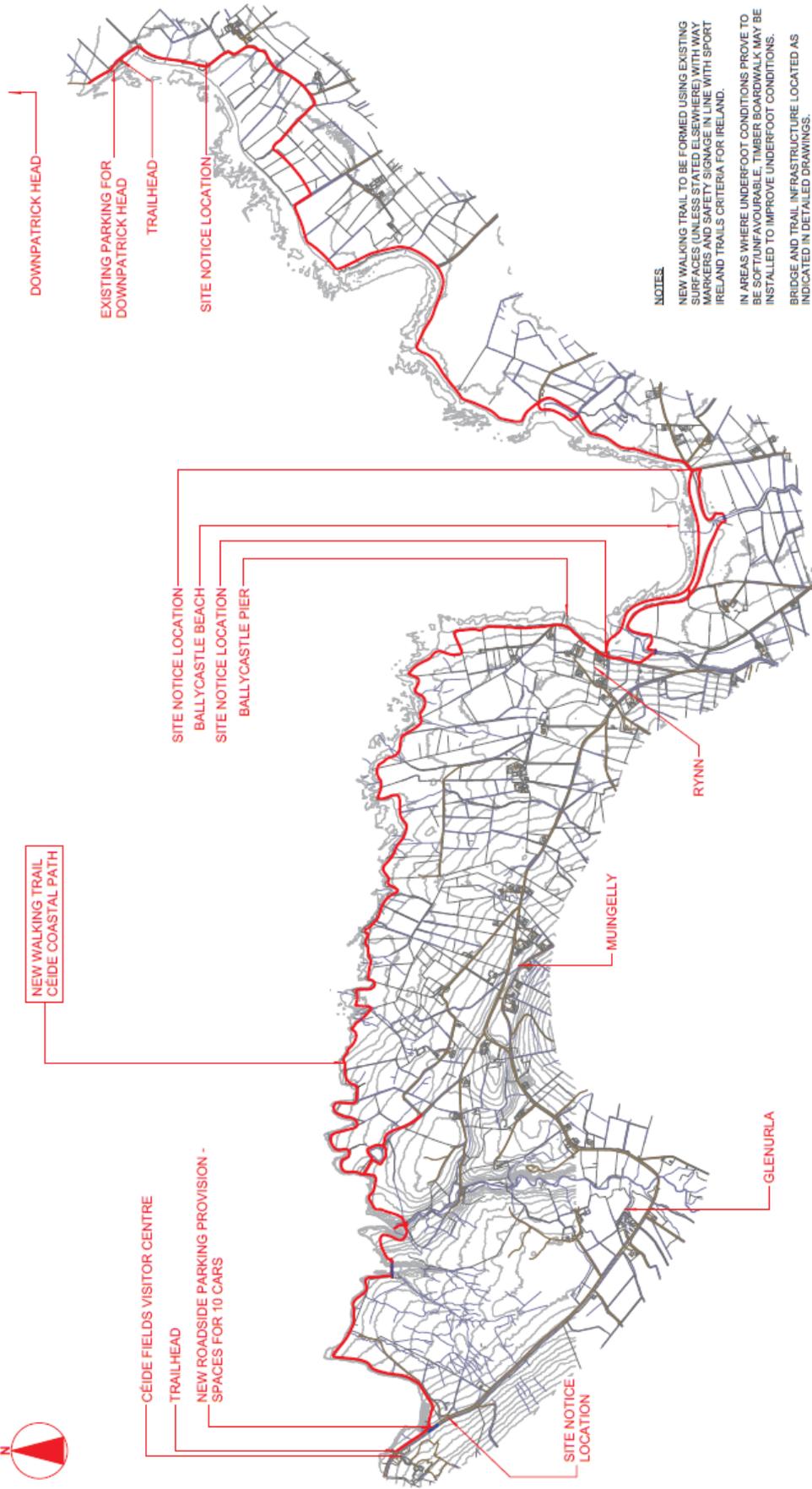
Data from Ordnance Survey Discovery Series maps OS1032 & OS1034

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LOCATION MAP  
SCALE 1:50,000



**NOTES**

NEW WALKING TRAIL TO BE FORMED USING EXISTING SURFACES (UNLESS STATED ELSEWHERE) WITH WAY MARKERS AND SAFETY SIGNAGE IN LINE WITH SPORT IRELAND TRAILS CRITERIA FOR IRELAND.

IN AREAS WHERE UNDERFOOT CONDITIONS PROVE TO BE SOFT/UNFAVOURABLE, TIMBER BOARDWALK MAY BE INSTALLED TO IMPROVE UNDERFOOT CONDITIONS.

BRIDGE AND TRAIL INFRASTRUCTURE LOCATED AS INDICATED IN DETAILED DRAWINGS.

AGRICULTURAL/SAFETY FENCING AND SAFETY SIGNAGE IS TO BE ERECTED AS REQUIRED ALONG THE LENGTH OF THE PATH.

STILES/GATES TO BE INSTALLED TO CONTAIN LIVESTOCK AS REQUIRED THROUGHOUT THE LENGTH OF THE PATH