Geraldine McManus
Lissadrone,
Ballycastle,
Co. Mayo,
F26 RX92
14th January 2026

An Coimisiún Pleanála,

RE: Case Reference PA16-318701
10-year planning permission for proposed wind energy development consisting of 22 wind turbines and all associated infrastructure

Dear Sir/Madam,
I wish to make the following observations on case Reference PA16-318701: Glenora Wind Farm, Co. Mayo.
The observations address the following:

1. Cumulative Impact on the Wild Atlantic Way, Downpatrick Head and the Céide Fields
2. Impact on Downpatrick Head
3. Impact on Céide Fields and UNESCO World Heritage Potential
4. Impact on the Wild Atlantic Way
5. Impact on the Western Way Trail
6. Presence and prevalence of previous peat failures
7. Photomontages
8. Exclusion of Grid Connection Works from the Planning Permission Sought

1. Cumulative Impact on the Wild Atlantic Way, Downpatrick Head, and the Céide Fields

The proposed Glenora Wind Farm must be assessed not only in isolation but in terms of its cumulative impact on the nationally and internationally significant landscape assets of North Mayo including the Wild Atlantic Way (WAW), Downpatrick Head, and the Céide Fields. These three elements form an interconnected cultural, scenic and experiential landscape that underpins the identity, tourism economy and heritage value of the entire region.
The County Development Plan includes "*NEO 27 To ensure all development proposals are consistent with the Landscape Appraisal of County Mayo and the associated Landscape Sensitivity Matrix and future editions thereof.*" The development appears to be in Policy area 3 but will be visible from a large area of Policy area 1. In both these areas wind farms are deemed as high-sensitivity landscapes – "*high potential to create adverse impacts on existing landscape character. Having regard ... it is unlikely that such impacts can be reduced to a widely acceptable level*." (Mayo County Development Plan p.186)
At the meeting of the elected members of Mayo County Council held on 10 November 2025, (Minutes of Mayo County Council Meeting, 10 November 2025, Item 5, pp.7–8), councillors expressly acknowledged that wind farm development in the North Mayo / Lacken area would seriously compromise the visual amenity and outstanding natural landscape of the region. Members identified unacceptable impacts on iconic locations including Céide Fields, Downpatrick Head, Lacken Hill, Kilcummin and Killala, and confirmed that such development would undermine the Wild Atlantic Way and "destroy tourism investment" by Mayo County Council, local communities and Fáilte Ireland. Councillors further noted that permitting wind

farm development would conflict with the County Development Plan objective of securing UNESCO World Heritage status for the Céide Fields complex.
These formally recorded concerns of elected members constitute material planning considerations and provide clear and compelling grounds to object to wind farm development in this location.

2. Impact on Downpatrick Head

Downpatrick Head is a Signature Discovery Point on the Wild Atlantic Way and one of the most photographed and widely recognised natural features in Ireland. Its value to North Mayo's cultural, scenic and economic identity derives from:

- its dramatic, open and uninterrupted Atlantic views
- the wild, rugged and exposed coastal setting
- the cultural associations linked to St. Patrick, the wartime Éire sign, long-established pilgrimage traditions and layers of local folklore

The Mayo County Development Plan (Vol. 1, Variation No. 1) places a clear and binding obligation on planning authorities to **protect the scenic, physical and visual character of sensitive landscapes**, including the North Mayo coastline and its nationally significant heritage and tourism sites. Policies NEP 14 and Objective NEO 27 (pp.188–189) require that development proposals be fully consistent with the **Landscape Appraisal** and **Landscape Sensitivity Matrix**, which identify coastal and upland areas in North Mayo as landscapes of **high sensitivity** with limited capacity to accommodate intrusive development.
Downpatrick Head is explicitly recognised within this sensitive and high value landscape, forming a core element of the region's national tourism offering. As such, the preservation of its setting is essential to the protection of the county's most valued scenic resources.
Photomontage 3 submitted by the applicant confirms that **multiple turbines will be clearly visible from Downpatrick Head**, appearing prominently along the inland skyline. This represents a major alteration of views that are currently characterised by their expansive openness, elemental wildness, and the near-absence of industrial features. Such visibility conflicts directly with the Development Plan's requirement (pp.108–109) to maintain the scenic integrity of Mayo's most important landscapes.
The introduction of an array of 180-metre turbines inland from this location would:

- erode the characteristic sense of remoteness and wildness that defines Downpatrick Head
- introduce industrial-scale vertical structures into wide, panoramic coastal views
- diminish the tourism experience for the thousands of annual visitors who come specifically for the unspoilt coastal setting
- contradict the Development Plan's policy to safeguard scenic views, landscape character and heritage assets (pp.108–109)

Downpatrick Head's national tourism significance as a curated and promoted Signature Discovery Point on the Wild Atlantic Way means that its landscape setting carries elevated importance. Any visual intrusion from large scale industrial infrastructure fundamentally undermines the asset upon which North Mayo's tourism economy relies.

3. Impact on the Céide Fields and UNESCO World Heritage Potential

UNESCO Potential and the Céide Fields Cultural Landscape

The applicant's statement that the Céide Fields are not included on Ireland's 2022 UNESCO Tentative List should not be taken as evidence of reduced heritage value or diminished sensitivity. The Céide Fields were included on Ireland's 2010 UNESCO Tentative List for more than a decade, reflecting their recognised international significance as one of the world's largest and most important Neolithic cultural landscapes.

While the Céide Fields are not currently included on the updated tentative list, their international archaeological importance is unchanged. The absence of the site from the current list does not negate its cultural significance, nor does it diminish the relevance of established national and local planning policy protections. The reasons for the change in tentative list status do not form part of the planning application before the Board and, in any event, do not alter the requirement to assess the proposed development against the full heritage, landscape and archaeological sensitivity of the Céide Fields and their wider setting.

Crucially, the Mayo County Development Plan (Objective BEO 2) states:

"To protect the tentative World Heritage Site in Mayo on the UNESCO Tentative List – Ireland 2010, The Céide Fields, from inappropriate development and support its nomination to World Heritage Status."

This objective remains in force and constitutes a material planning consideration. It requires that the landscape setting, integrity and archaeological potential of the Céide Fields be protected in order to support any future nomination. Accordingly, it is not appropriate to rely on the current UNESCO tentative list status as a basis to downplay or discount the potential impacts of large-scale industrial development on the Céide Fields cultural landscape or its wider setting.

Céide Fields as a Prehistoric Cultural Landscape of Global Importance

The Céide Fields constitute one of the most extensive and best-preserved Neolithic landscapes in the world, representing over 6,000 years of continuous archaeological and cultural history. Their importance extends far beyond the excavated areas near the visitor centre and encompasses vast, intact prehistoric field systems, domestic structures and ritual sites preserved beneath extensive blanket bog across North Mayo. This broader landscape retains the characteristics that previously earned it a place on Ireland's UNESCO Tentative List and continues to exhibit the Outstanding Universal Value that underpins its international reputation.

The applicant suggests that the proposed wind farm will have "no impact" on the Céide landscape. This conclusion is fundamentally unsound. The Céide Fields extend across a large archaeological zone, much of which remains **unexcavated, untested and not fully archaeologically assessed**. It is therefore impossible to credibly assert that turbine construction, skyline intrusion or indirect landscape modification will have no effect on the wider cultural landscape.

Indeed, the applicant's own EIAR 13.3.2.3.1 confirms that "*the Céide Fields surveyed walls measure merely 1 km to the east of the nearest proposed turbine."* (Section 13.3.2.6) acknowledges that "*additional prehistoric walls may be uncovered during construction activities".*

Landscape, Visual and UNESCO Integrity Impacts
The introduction of 22 turbines at approximately 180 metres in height would:

- visually intrude upon the wider Céide landscape and the approach routes that help convey its prehistoric character
- erode the sense of antiquity, isolation and environmental continuity that define the Neolithic landscape
- compromise the integrity and authenticity required for UNESCO World Heritage nomination
- conflict with CDP objectives requiring the protection of heritage landscapes and sensitive environments (**BEO 2**, **NEP 14**, **NEO 27**)

UNESCO's operational guidelines emphasise that **integrity, authenticity and setting** are essential components of any cultural landscape. The Céide Fields derive much of their meaning and value from their **undeveloped, expansive and continuous bogland backdrop**. The proposed development would introduce industrial structures that break this prehistoric continuity, diminishing the cultural landscape and undermining the ability of Ireland and Mayo County Council to advance the Céide Fields toward UNESCO designation.

4. Impact on the Wild Atlantic Way

The Wild Atlantic Way is one of Ireland's most important national tourism initiatives, conceived and curated by Fáilte Ireland to showcase the country's most distinctive and high-quality coastal landscapes along a 2,500 km route from Donegal to Cork. It is a flagship tourism product of national economic significance, forming a central pillar of Ireland's international tourism brand and contributing substantially to regional employment, rural enterprise and local economies. Within this context, County Mayo occupies a pivotal position along the route, containing some of the Wild Atlantic Way's most dramatic and least-modified coastal landscapes, including signature locations such as Downpatrick Head, the Céide Fields landscape, and extensive stretches of unspoilt coastline, peatland and upland hinterland. Mayo's section of the Wild Atlantic Way is marketed specifically for its sense of wildness, remoteness and authenticity**,** qualities that are increasingly rare and which differentiate the county within the national tourism offering. The continued success of the Wild Atlantic Way in Mayo is therefore fundamentally dependent on the protection of its scenic integrity and the avoidance of visually intrusive development that would erode the very landscape character upon which this nationally significant tourism initiative relies.
The introduction of 22 turbines at 180 metres in height within the inland visual basin of this stretch of coastline creates a cumulative industrial presence that is irreconcilable with the expectations of visitors who travel the route seeking wilderness, tranquillity, and natural heritage.

5. Impact on the Western Way Recreational Trail

The Western Way is a nationally recognised long-distance walking route and an important recreational amenity for both local communities and visitors. The proposed development directly traverses the Western Way Trail, placing large-scale industrial infrastructure into the immediate experience of trail users.
The EIAR itself acknowledges significant negative impacts on this public amenity:

- Users will experience "moderate residual visual effects," including cumulative visual impacts arising from the combination of this proposal, the proposed Sheskin South Wind Farm, and the permitted ABO Sheskin Wind Farm.

- There will be a “substantial magnitude of change” along the section of the Western Way that passes through the development site.

These statements confirm that the development will **materially alter the character** of the trail environment. Walkers on the Western Way seek **nature, tranquillity, landscape quality, and unspoilt views**—qualities that are integral to the trail’s identity, attractiveness, and economic value for the region. The installation of industrial turbines, access roads, overhead movement of blades, and associated construction activity directly undermines these qualities.

The resulting landscape and recreational degradation are inconsistent with:

- Mayo County Development Plan policies requiring the protection of public amenities, walking routes, and sensitive landscapes;
- National policy promoting rural recreation**,** outdoor activity, and the development of sustainable, high-quality visitor experiences; and
- Tourism strategies for North Mayo**,** w6hich emphasise the area’s unique archaeological landscapes, scenic walking routes, and unspoilt natural settings as key attractions.

The EIAR acknowledges adverse impacts but significantly downplays their consequence. The transformation of a nationally important walking trail into an industrialised corridor cannot be considered acceptable under good planning practice or under established amenity-protection objectives.

6. Presence and Prevalence of Previous Peat Failures

The proposed Glenora Wind Farm site is located within an upland blanket peat system characterised by gently to moderately sloping ground, shallow bedrock, and a continuous peat mantle intersected by forestry roads and drains. Within this peat system, **Appendix 8-1 (Section 3.3.1)** confirms the existence of a **recorded peat failure approximately 300 m north-east of the proposed Turbine 5 location**, on the south-eastern side of an existing forestry road. This establishes that peat instability has **already occurred within the same peat and hydrological system as the proposed development**.

Another major peat failure at Keerglen in the 1950s, approximately 1 km away, is acknowledged but its scale is understated**.** Peat instability operates at catchment scale and must be considered part of baseline conditions.

In peatland environments, hydrology, pore-water pressure, and shear strength operate at catchment and slope scale, rather than at arbitrary planning red-line boundaries. For this reason, the recorded peat failure must be regarded as part of the baseline environmental condition of the Glenora site, rather than as an off-site or contextual event.

A peat failure within the Glenora Wind Farm site would have the potential to cause serious and long-lasting impacts on the local area, including the sudden release of large volumes of peat and peat-laden water downslope into streams, drains and watercourses, leading to severe siltation, deterioration of water quality, and damage to aquatic habitats. Such failures can block or overwhelm drainage infrastructure, increase local flood risk, and result in the burial or destabilisation of farmland, forestry lands, access roads and habitats. Irish experience demonstrates that these impacts are not theoretical: the Derrybrien landslide occurred during wind farm construction and caused extensive downstream environmental damage, while a peat slide at the Meenbog Wind Farm occurred during access road works despite modern peat assessments and mitigation measures. These cases show that peat failures associated with wind farm developments can be widespread, difficult to contain,

and extremely costly to remediate, with effects extending well beyond the immediate footprint of the slide. In addition to environmental harm, such events pose public safety risks, disrupt local infrastructure, and can result in permanent landscape scarring, fundamentally altering the character and functioning of upland peatland environments. While it is not possible to express peat failure risk meaningfully as a single percentage, the prevalence of recorded peat failures and susceptibility indicators in the Glenora area is significant. The Geological Survey Ireland Landslide Events Map records multiple historic peat slide events in the wider area, and GSI Landslide Susceptibility Mapping indicates that a substantial proportion of the proposed development footprint is located within **zones classified as having a "Moderately High" likelihood of landslide occurrence**, **including turbine locations 2, 7, 11, 15, 18, 20, 21 and 22.** This demonstrates that peat instability is not isolated or exceptional, but a recognised characteristic of the receiving environment. The **Irish Peatland Conservation Council (IPCC)** in Table 8-1-Summary of Scoping Responses relating to Land, Soils & Geology has advised that any development proposed on, or in close proximity to, peatland habitats must adhere to the **highest standards of best practice and precaution**, and recommends that developers be guided by the EPA-funded **BOGLAND Project**, which sets out best-practice measures to prevent damaging development on peat soils and peatlands of conservation value. The IPCC has further highlighted that current peat stability and landslide risk assessment methodologies may not be fully fit for purpose, particularly in light of recent peat failures where causation remains uncertain and multifactorial. Recent Irish examples include the Meenbog bog flow, the Boleybrack Mountain peat slide, and the Knockanefune Mountain bog slide, where contributory factors may have included afforestation, access roads, drainage, land-use change, and extreme rainfall. Taken together, this evidence demonstrates that peatland instability is a credible, ongoing, and locally evidenced risk in upland peat environments and must be treated as a central and determining consideration in the assessment of the proposed Glenora Wind Farm development.

A point to note as stated in the EIAR 8.2.2 "site investigations to address the land, soil and geology section of the EIAR included the following: A total of 520 no. peat probe depths were carried out by FT, in July and August 2021, and MKO in May 2022, to determine the depth and geomorphology of the blanket peat at the site; A geotechnical assessment of peat stability by FT (August 2022);". Peat stability is inherently seasonally sensitive and is strongly influenced by hydrological conditions, pore-water pressures, antecedent rainfall and extreme weather events, all of which typically peak during autumn and winter periods in upland Atlantic peat environments. In this context, it is not sufficient for an assessment to rely primarily on data gathered during drier summer conditions unless it clearly demonstrates how wet-season conditions, elevated pore-water pressures and extreme rainfall scenarios have been robustly modelled, stress-tested and incorporated into the stability analysis.

The EIAR does not clearly demonstrate how winter ground conditions or extreme rainfall events which are increasingly frequent and intense in the west of Ireland have been explicitly accounted for in the peat stability assessment. In the absence of such a demonstration, the assessment cannot be regarded as adequately addressing worst-case conditions, which are critical to a precautionary evaluation of peat failure risk in this environment.

7. Photomontages

The photomontages are inadequate and do not fully represent the scale, prominence, or cumulative visual impact of the proposed development as it would be experienced on the ground across the wider North Mayo landscape.
In particular:

- The photomontages rely on static and limited viewpoints and fail to reflect the panoramic and dynamic experience of visitors travelling through and between key tourism destinations, including Céide Fields, Downpatrick Head, and other coastal and upland viewpoints along the Wild Atlantic Way. Visitors experience these landscapes sequentially, moving along approach roads, coastal routes, and walking paths, with constantly changing sightlines that are not reflected in the submitted visualisations.
- The assessment understates the visual prominence of 180-metre turbines when viewed against open sky and elevated inland and coastal horizons, particularly in clear Atlantic conditions typical of this area.
- The photomontages do not adequately convey the cumulative visual effect of multiple turbines appearing simultaneously across the skyline, nor their intervisibility with existing and proposed wind energy developments in the wider North Mayo area.
- The methodology fails to reflect the visitor experience at nationally promoted tourism destinations, where the reasonable expectation is of unspoilt, coherent, and elemental landscapes, rather than intermittent or partial views of large-scale industrial structures.

The inadequacy of the visual assessment is of particular concern given that these locations are protected, curated, and actively promoted tourism assets, where landscape quality and visual integrity are central to their appeal and to significant public investment. A visual impact assessment that understates or fails to fully communicate the true extent of visual intrusion cannot provide a reliable basis for informed decision-making.
These concerns have been formally acknowledged by the elected members of Mayo County Council. At the Council meeting held on 25 March 2024, councillors raised concerns in relation to the proposed development, stating:
"We have invested a lot of money in Downpatrick Head, which has protected views, and we ask that the report carefully examine the photomontages developed for the project, as a number of turbines may be visible. We want to protect our views and the Wild Atlantic Way." (Minutes of Mayo County Council Meeting, 25 March 2024, Item No. 4, p.5).
In light of the clear visibility of turbines from multiple tourism destinations, the inadequacy of the photomontages in representing the true visual and cumulative impacts, and the acknowledged policy position of the planning authority, the proposed development would result in an unacceptable adverse impact on nationally significant tourism and landscape assets. This impact is contrary to the objectives of the Mayo County Development Plan and should weigh heavily against the granting of permission.

8. Exclusion of Grid Connection Works from the Planning Permission Sought

This observation concerns the **exclusion of grid connection works from the planning permission sought**, notwithstanding that those works are described, relied upon, and environmentally assessed within the Environmental Impact Assessment Report (EIAR) and associated documentation submitted with the application.
This submission is made having regard to:

- The Planning and Development Acts 2000–2023
- Directive 2011/92/EU, as amended (the EIA Directive)
- Relevant Irish and EU case law on project splitting
- The contents of the EIAR and appendices submitted with this application

The Grid Connection Is an Integral Part of the Project
The EIAR explicitly describes underground grid connection works, including trenching, cabling, watercourse crossings, and associated construction impacts.
These works are neither optional nor ancillary. They are necessary for the project to function and therefore form an integral part of the overall development.
Without a grid connection:

- The turbines cannot export electricity
- The development cannot operate as a wind farm
- The project, as described, cannot exist in practice

Accordingly, the grid connection constitutes part of the "project" for the purposes of environmental assessment and development consent

Environmental Assessment Without Development Consent
While the EIAR assesses the environmental impacts of the grid connection under multiple headings — including soils, hydrology, ecology, water framework compliance, and population — planning permission is not being sought for those works.
As a result:

- The grid connection is assessed but not consented
- The grid route lies outside the red-line boundary of the application
- No enforceable planning conditions can attach to the grid works
- No statutory planning decision is being made as to whether those works are acceptable in planning terms

This creates a consent gap between environmental assessment and development authorisation.

Project Splitting and the Ó Gríanna Principle
The High Court judgment in ***Ó Gríanna v An Bord Pleanála*** **[2014]** establishes a principle directly relevant to this application:
where a grid connection or other infrastructure forms an integral and necessary part of a project, it cannot be excluded from the development consent process while simultaneously being relied upon in environmental assessment.
In *Ó Gríanna* the Court found that:

- The grid connection was an integral component of the wind energy project

- Environmental assessment of that component without seeking consent for it gave rise to a legal defect
- A development cannot be defined so narrowly as to exclude essential elements in a manner that undermines the EIA process and public participation

While subsequent case law has clarified that staged consents may be permissible in limited circumstances, those decisions do not displace the core principle that project splitting is unlawful where it results in environmentally significant works being assessed but not authorised.

In the present case:

- The grid connection is essential to the operation of the project
- Its impacts are relied upon in the EIAR to support the application
- Yet it is excluded from the development for which permission is sought

This mirrors the defect identified in *Ó Gríanna v An Bord Pleanála* [2014] and gives rise to a real and material legal risk that the application is procedurally flawed.

Improper Division of the Development

Irish and EU jurisprudence is clear that a development cannot be artificially divided in a manner that:

- Avoids proper planning control
- Defers consent for environmentally significant elements
- Undermines public participation in the decision-making process

Where a component is necessary for the project to function, it must either:

1. Be included within the planning application and consented, or
2. Be the subject of a clearly defined, parallel statutory consent process that itself complies with EIA and public participation requirements

In this case, neither condition is met:

- The grid connection is not included in the permission sought
- No alternative statutory consent process is identified
- The Board is asked to rely on environmental assessment of works over which it is not being asked to grant consent

This approach risks unlawful project splitting, notwithstanding that the environmental impacts are described in the EIAR.

Public Participation Concerns

Members of the public are entitled to make submissions on:

- What is being proposed
- What is being authorised
- What conditions may apply

Assessing the grid connection while excluding it from the planning permission sought:

- Prevents meaningful engagement with the final authorised development
- Obscures the true scope of what may ultimately be constructed
- Limits the ability of third parties to challenge, seek conditions, or obtain legal certainty in respect of those works

This is contrary to the objectives of the EIA Directive and the Aarhus Convention.

Reliance on Future or Separate Consents Is Insufficient

Any suggestion that the grid connection can be addressed at a later stage by way of:

- Separate planning applications
- Wayleave agreements
- ESB or network operator processes

does not cure the defect identified.

Environmental effects must be assessed and consented together, not merely assessed in theory and authorised in fragments.

Conclusion

In summary:

- The grid connection is a necessary and integral part of the proposed development
- Its environmental impacts are relied upon in the EIAR to support the application
- No planning permission is sought for those works
- This results in a material legal and procedural defect, consistent with the principles identified in Ó Gríanna *v An Bord Pleanála* [2014]**,** whereby an integral component of a project is environmentally assessed but excluded from the development for which consent is sought.
- Further, should the Board consider that the EIAR is not sufficient in its assessment of the grid connection works**,** whether by reason of the absence of those works from the red-line boundary, uncertainty as to route, construction methodology or mitigation measures, or any lack of clarity as to the significance of environmental effects, it is submitted that permission cannot lawfully be granted in the absence of a complete and coherent environmental assessment of the entire project.

Overall Conclusion

Taken together, the cumulative impacts on the Wild Atlantic Way, Downpatrick Head, the Céide Fields cultural landscape, the Western Way recreational trail, and the sensitive upland peat environment represent an unacceptable level of landscape, amenity, heritage and environmental harm. These impacts conflict with the Mayo County Development Plan and with the formally recorded concerns of Mayo County Council. In addition, the exclusion of integral grid connection works from the planning permission sought gives rise to a material risk of unlawful project splitting. For these reasons, the proposed development is contrary to proper planning and sustainable development and permission should be refused.

Thank you for taking the time to consider these observations

Yours faithfully,

Geraldine McManus