

22nd June 2026

Foghill
Carrowmore-Lacken,
Ballina,
Co. Mayo.

An Coimisiuin Pleanála,
64 Marlborough Street,
Dublin
D01 V902

RE: TYRAWLEY WINDFARM Ref 324258 : Strategic Infrastructure Development.

My submission relates mainly to the issue of cultural heritage which I set out below but firstly I wish to address a number of other issues as follows:

Failure to consider alternatives

The application is deficient, in that, it fails to consider the cumulative landscape, environmental cultural and heritage value of the Lacken area. I am concerned that insufficient consideration appears to have been given to alternative locations for this proposed windfarm. Given the exceptional scenic value, visual landscape, environmental, rich biodiversity, cultural heritage and tourism significance of the Lacken coastal area, it is imperative that the applicant demonstrate that less sensitive sites were thoroughly assessed and objectively considered before selecting this particular location.

The chosen site occupies a prominent coastal landscape where the visual, archaeological and environmental impacts are likely to be significant and long-lasting. It is not clear from the information provided that a robust site-selection process was undertaken that adequately considered alternative locations with lower landscape, ecological, heritage, tourism and community impacts.

A proper assessment of alternatives is a crucial part of sustainable development and environmental decision making. There is no evidence in the application that proper consideration was given to alternative locations. Without clear evidence and supporting documentation that reasonable alternatives were investigated, examined and compared, it is difficult to conclude that the proposed site represents the most appropriate location for a development of this scale.

Accordingly, I request that ACP carefully examine whether the assessment of alternatives is comprehensive, satisfactory, transparent and sufficient to justify the selection of this particular site.

Landscape and Visual Impact

The proposed development would be located within a highly scenic, pristine, unspoilt, coastal landscape that forms part of the unique character of the north Mayo coastline which is now internationally recognized. The industrial scale, height and extent of the turbines would introduce dominant, towering structures into an area valued for its natural beauty, open seascapes, significant archaeology, biodiversity and undeveloped character.

The development would negatively impact important views and vistas enjoyed by tourists, walkers and users of local amenities. The visual impact would be particularly significant given the prominence of the coastal setting and the cumulative visibility of multiple turbines.

Section 2.5.4 of Mayo County Development Plan Landscape Character Assessment states as follows: “The main concern of natural linear features such as coastlines and ridgelines is to avoid penetration by development that will interrupt and reduce the integrity of such elements.” The proposed turbines on the Lacken Hill will break both the ridge and skyline and will be contrary to planning rules. Anybody who has ever made a planning application in respect of a structure on the landscape will be totally aware of the need to blend it in with the landscape ridge and skyline. Applicants are invariably requested to erect a ‘Ridge Profile’. The photomontages in the application clearly demonstrate the substantial negative impact on the ridge and skyline. The main concern for natural linear features such as coastlines and ridgelines is to avoid penetration by development that will interrupt and reduce the integrity of such elements. The character, integrity and distinctiveness of the Lacken Hills will be seriously compromised and the proposed turbines will not be absorbed into the landscape but will dominate it to an alarming extent and dwarf a significant monument on Lacken Hill, namely “the Gazebo” an architecturally important obelisk constructed in the eighteenth century on an elevated position overlooking Lacken and Killala Bay’s.

The applicant completely fails to capture the most appropriate and visually revealing photomontages. It would appear that these have been deliberately omitted to discount the magnificent visual amenity. I contend that the most important viewing points are from the east of the proposed site, namely from the townlands of Carrowtrasna, Cashel, Tooreen, Foghill, Cloonalaghan and from the Kilcummin Backstrand. It is vital that ACP considers the proposed development from these areas. It is important to note also that the Lacken area just underneath and to the east of the proposed windfarm site contains one of the most impressive remaining examples in the country of the old Rundale System of agriculture based on the division of narrow strips of land running down towards the shoreline.

Biodiversity and Animal Life

The Lacken area supports significant natural habitats and rare species including migratory bird (hen harrier, curlews golden plover, brent geese and whooper swans), red listed mammals (bats and pine martens) and important ecological areas of special conservation and protection.

The applicant fails to fully identify and examine the significant detrimental ecological effects that would result from the project and fails to highlight that unique, fragile complex eco-system of the area. The mitigation measures suggested are inadequate and not sufficiently robust to address the deleterious impacts of the proposed development. The project would result in the loss of vast amounts of hedgerows which is in direct conflict with the EU Habitats Directive. It would also result in significant amounts of tree felling and the loss of blanket bogs. The Lacken area abounds with diverse animal life such as pine martens, badgers, deer, hare and bats. Amazingly, pine martens, a threatened species, were not referred to in the application documents. The survey data in the application is several years old and cannot be relied on to provide recent and representative data of animal activity. There is an obvious and clear risk that

the Lacken Saltmarsh could be seriously and adversely impacted by the construction of the proposed windfarm as it is just 1km distant from the site with several watercourses running into it. All of the rivers and streams draining into the area are in excellent condition with species of salmon and brown trout. Any runoff of sediment would result in contamination and a deterioration in water quality and pose a significant risk to fish life in the Palmerstown/Clooonaghmore rivers. Where uncertainty exists regarding environmental, ecological, or landscape impacts, the precautionary principle should apply.

Lack of public consultation

There was no public consultation from the developer. There was no proper or adequate notice of the open public meeting in June 2023. It was held 16 miles away from Ballina and not in any of the many local centres in Lacken, Ballycastle or Killala. No public liaison officer was appointed by the applicant as stated. The applicant ignored ACP's recommendations regarding the importance of transparency and good communication. This is totally in breach of the windfarm guidelines and the Aarhus Convention and constitutes a significant lapse in procedural fairness and basic democracy as the local population who stand to be greatly impacted had no say whatsoever in the whole process.

Tourism

Lacken is a significant destination on the Wild Atlantic Way and proximate to Downpatrick Head from where the turbines will be clearly visible. Tourism is important to the local economy and will be significantly negatively impacted by the proposed windfarm. Failte Irelands' Wild Mayo Destination project will be seriously compromised. The area around Downpatrick Head and Lacken coastline possess stunning natural scenery and rare geological features which has drawn recognition from visitors across the globe who are now coming in large numbers to view the areas of high scenic value allied to its rich cultural heritage. The area has considerable tourism potential and Failte Ireland are fully committed to developing and promoting the region. The potential cumulative impact of turbines will be hugely detrimental to tourism, especially cultural tourism in the area. Its impact on the Wild Atlantic Way in north Mayo could potentially be catastrophic.

The landscape of the area, in particular, the Lacken Hills will be totally transformed for the worse if the proposal is accepted. The whole character, integrity and distinctiveness of the area will be compromised. The photomontages do not highlight, in any meaningful way, the view from the east of the site, in particular from the Foghill, Carrowtrasna and Kilcummin areas. There are fine panoramic vistas from these locations, which is a growing tourist location, which will be destroyed by large turbines. North Mayo Tourism use an iconic image taken from Kilcummin Back Strand in their marketing of the area. The view looks right across the strand to the windfarm site.

The turbines will be clearly visible from the west Sligo area, from Easkey right up to Enniscrone and from the Moy Estuary Road to Ballina. They will also be visible from the North Coast Road which is classified as a scenic route and has designated scenic views. The Mayo County Development Plan objective is that development should not impinge in any significant way on the character, integrity and distinctiveness of the area. This development will be negative for tourism in the whole area, not just north Mayo but west Sligo and Ballina, and will impact on the integrity of the Wild Atlantic Way.

Noise and Infrasonic

On the 22nd of June 2026 in the Dutch Press there is a significant report entitled “Scientific breakthrough in Delft University of Technology exposes the danger of low frequency sound”. According to the research conducted the implications for the hundreds of thousands of Dutch people living near windfarm and industrial heat pumps are immense. According to the reports this study definitely shifts the debate from the question of whether people become ill from it to the question of when the government will take the responsibility to protect citizens. The Irish government have not updated the Irish Wind Energy Guidelines for over 20 years. They are hopelessly out of date with the result that Irish people are left totally exposed to ill health from the infrasonic from wind turbines. ACP are obliged to consider the implications of this latest study.

CULTURAL HERITAGE

1. Deficiencies in Applicant’s Assessment

The cultural heritage section of the application completely fails to recognise the exceptional archaeological sensitivity and national and international importance of the landscape proposed as the location for this development. The analysis presented by the applicant is fundamentally deficient, comprising only the most basic and cursory review of recorded monuments within a limited framework. The methodology adopted is predominantly based on a visual walkover survey and desk top studies which cannot identify peat-covered or sub-surface archaeology characteristic of this area. No proper investigative analysis has been carried out. As we will demonstrate, the basic fundamental methodological flaws and substantial omissions in this section cast serious doubt on the ability of the applicant to appreciate the significance both nationally and internationally of the cultural heritage of the Lacken area.

The location proposed for the development is close to the world renowned Ceide Fields complex – whose Neolithic field systems and dwellings extend invisibly beneath blanket bog for several kilometres and right into the Lacken area. As explained below, archaeological studies confirm this fact. The applicant has not carried out geophysical survey, test trenching or archaeological monitoring in order to establish if the Ceide field -system lies underneath the soil.

At a preplanning consultation held with Mayo County Council in August 2023, the council explained one of the reasons why the application could not be supported as follows:

“The turbines will be visible from the Ceide Fields which is on tentative UNESCO Tentative World Heritage Site. The development plan seeks to protect the Ceide Fields from inappropriate development. The full extent of the Ceide Fields archaeology site is unknown and may reach as far as the windfarm site. “

Given the supreme national and international value of the Ceide Fields system, it was remiss of the applicant to adopt a weak methodology such as desk reviews and walkovers to attempt to assess the archaeological profile of the area. Planning legislation requires the full

identification, protection and assessment of archaeological and architectural heritage and their settings. The applicant has failed to do this.

The applicant failed to highlight the archaeological significance of monuments in the area such as the megalithic monument, the Rathfran Court Tomb which is exceptionally well preserved with rare features. It is one of the finest examples of court tombs in the country located as it is within a prehistoric landscape of dwelling houses and megalithic tombs within a countryside of stone walled fields preserved beneath bogland constructed 5,300 years ago. Many archaeologists believe that the potential exploratory excavation of the Lacken Hill/Rathlacken area excavation could reveal a repository, a goldmine of valuable artefacts. To allow major construction activity in this area would potentially eliminate the possibility of further archaeological finds of potentially international, global importance. It would also deprive future generations of the possibility of studying, discovering and understanding the special significance of these rich and rare sites. Given, the basic, fundamental methodological flaws and material omissions in the Cultural Heritage section of the application, it is not possible to conclude that the proposed development would avoid, reduce or mitigate significant adverse effects on the immense cultural heritage of the area.

2. Cultural Heritage Treasure of the Lacken Area

In this section, we demonstrate the vital importance of this area in terms of cultural heritage and ancient history to explain why such an ancient sacred landscape should not be despoiled and degraded by a large-scale windfarm. We are talking about a revered, historic landscape characterised by archaeological complexes, vernacular heritages, ecclesiastical remains and protected structures. The Mayo County Development plan 2022-2028 specifically seeks to protect archaeological monuments and their setting. It also supports the tentative UNESCO status of the Ceide Fields landscape.

The coastal region around Killala Bay and Lacken Bay is very significant archaeologically. It comprises one of the richest archaeological landscapes in the west of Ireland. Recorded monuments and evidence of human activity stretching from the Neolithic period right up to the postmedieval period; it encompasses:

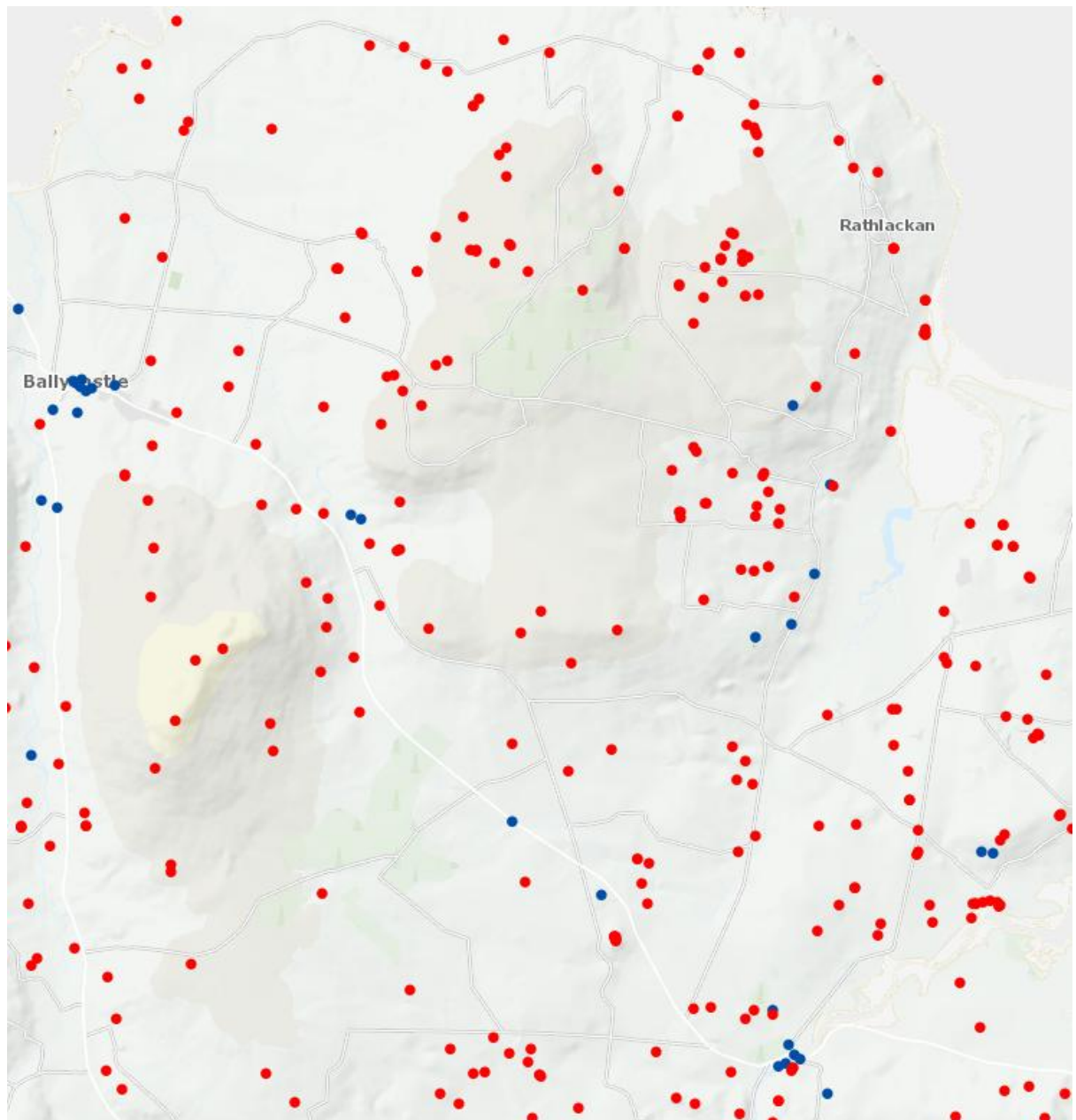
- Early Christian ecclesiastical sites.
- Prehistoric megalithic tombs and court cairns.
- Ogham stones and other inscribed monuments.
- A landscape of continuous human habitation and ritual use from the Neolithic through medieval times.
- A large concentration of court tombs, court wedges, standing stones, stone circles, fulachtaí fia, ringforts, lisheens, cilins, holy wells, early church foundations and cross slabs, etc

These monuments demonstrate that this region was a major centre of early family and ritual life, dating from around 3700- 3200 BC. They help map the spread of Neolithic Settlement along the north Mayo coast and link to wider megalithic traditions across Ireland. The later prehistoric features show that the region remained inhabited and farmed continuously for millennia. The area is one of the richest archaeological landscapes in Ireland. It contains

thousands of years of cultural heritage which could be sabotaged by a large, industrial scale wind farm.

3.Prehistoric Megalithic Monuments

There is a very dense concentration of recorded National Monuments in the vicinity of the proposed development. There is an equally large number of unrecorded monuments. There is a rich archaeological vein running through the whole area. Please see below the archaeological map for the recorded monuments in the Lacken area.



- Rathlackan court cairn (near the proposed wind site) is an extremely well-preserved court-cairn set within field walls, dating from the Neolithic period.
- Carbad More (south Lacken) is a double court tomb (Neolithic) and a National Monument.
- Breastagh Ogham Stone (Breastaigh 2k from proposed wind farm) is an Ogham-inscribed standing stone with a nearly medieval inscription and National Monument.
- Rathfran Wedge Tomb was built c. 2500-2000 BC in the Bronze Age. A stone circle stood close to this tomb.

These show that the area has very early ritual/burial landscapes (Neolithic) evolving through later prehistoric/early historic periods.

4. Early Christian and Medieval Ecclesiastical sites.

Rathfran Dominican Friary overlooking the Palmerstown River. Founded in 1274 Well preserved with many notable features.

St Cuimins Church and Holy Well, Kilcummin. The church and graveyard date to prior 700AD. There are two tall Christian standing stones and a sun dial located here.

The holy well is an ancient pilgrimage site which attracted thousands of visitors from as far away as the Erris region each year. Mass and prayer rituals are practised to the present day.

St Patricks Statue and Holy Well at Foghill. Most patrician academic scholars are now satisfied that St Patrick spent his youth here in Foghill, The Wood of Focult. This has been a place of pilgrimage for generations.

The Druids Chair at Mullagh na Croise . This place was believed to be the centre of Druidry in Connacht. The location has panoramic views in all four directions. (Just 2k from nearest proposed turbine.) These attest to the long-standing Christian and pre-Christian occupation and its importance in ecclesiastical networks in the Lacken area.

The Old Lacken Hill Church. This is one of the oldest ecclesiastical centres in the area located on elevated ground overlooking Lacken Strand and Bay. It is considered to be of great antiquity and predated the nearby Kilogeary Church which is a significant structure in its own right. The new Lacken cemetery is located across the road. Both are within metres of the proposed windfarm.

5. Landscape and historic context

Saint Patrick described his captivity in the “Wood of Foclut” at Foghill. This is the only place in Ireland that Saint Patrick actually named in his writings. St Cuimin’s Church and Grave at Kilcummin and St Gabriels Well at Beltra and the Druids Chair gives the area a mythic and historic resonance. Foghill in Lacken is a renowned sacred landscape. Beside the well stands Leac Balbeni, a bronze age standing stone, a significant landmark. (This is less than 2k from the windfarm site).

- The combination of coastal, bog, and upland terrain means that ancient field systems, tombs and ritual places are well preserved. For example, the Neolithic field system of Céide Fields extends into Rathlacken, Gallows Hill and the area of the proposed windfarm site.
- Because of this layering of prehistoric, early and late medieval history, the area provides exceptional continuity of human use and archaeological depth. This is rare in Ireland.
- The Lacken “Gazebo” is one of the most unusual and distinctive landmarks to be found in county Mayo. Forming a double arch of rough stones, the structure stands on the summit of Lacken Hill at the back of Castlelacken. It was erected in 1794 by Sir John Palmer and is believed to have “masonic “connections. There are remarkable views from this site. On a clear day you can see the mountains of Donegal, Ben Bulbin and south to Croagh Patrick. A view handed down through the generations ids that it may be astrologically aligned with other local structures such as the Ogham Stone at Breastaigh , The Druids Chair at Mullagh and the Stone Circle/Wedge tomb at Rathfran Park. The concept of two large turbines being erected on both sided of the Gazebo is

unfathomable and an insult to anyone with a modicum of concern for our cultural heritage.

- Beneath the Gazebo stands of the ruins of Castlelacken House. The site originally contained an older castle which stood on the lands of the MacEgan family and was thought to be a medieval fortress. The Gazebo and the Castlelacken were designed as part of the same landscape. Important artefacts have been discovered in the Castlelacken area. The Castle ruins are within stones throw of the proposed windfarm.
- Summerhill House, an architecturally substantial Georgian house with magnificent views over the Rathfrán Estuary and Killala Bay stands near the ruins of Rathfrán Abbey. It was an mid- eighteenth-century country house and was the seat of the Palmer family.
- Lissadrone House. This was an old eighteenth century country house, the seat of the Pugh family with an estate of two thousand years. It was a notable estate house in its time. Its demesne walls and old trees are still visible. Several wind turbines are proposed to within 600 metres of this site.
- Kilogeary Church of Ireland. This old church is visible from the main road set beside an ancient graveyard. Samuel Lewis in 1837 described the church as “a small ancient building “. Earlier ecclesiastical buildings are believed to have existed here for centuries. This church building is located less than 1km from the windfarm site.

Castlenageeha (Castlemagee). This was an old coastal castle overlooking Killala Bay with one of the most dramatic viewpoints in the county. It was built in a strategic position to observe the bay and prevent seaborne attacks. It is believed to be several centuries old.

- St Cuimins Church. This was an eight century Christian church founded by St Cuimin a revered local saint thought to have lived in the seventh century. Close to the church are two tall early Christian cross pillars, a sun dial and a holy well. It is an old pilgrimage site which in olden times was visited by thousands of pilgrims many coming from the Erris region on foot. Nearby is Kilcummin Harbour where the historic landing of French forces under General Humbert took place in August 1798.
- Kilbride Church (just 2km west of the wind farm site) is an ancient ecclesiastical site beside the old Kilbride graveyard. It was a penal era church which closed circa 1808. Closeby stands an early Christian standing stone dating back to the 7th century.
- Leac Balbeni is a tall imposing standing stone beautifully located at Foghill near Lacken strand. Nearby is a souterrain with a large underground chamber.
- Greenhill Mound. At Beltra, is located a large circular mound close to the seashore. Erosion in the 1950's revealed numerous human bones that had been buried in long stone cists thought to be from the early medieval times
- Rathfrán Stone Circle. This is located close to Summerhill House and Rathfrán Abbey. Archaeologists have recorded two related stone circles here. They are dated to 2,500 BC, the late neolithic period.
- Rathfránpark Wedge Tomb dates to 2500 Bc and comprises of a megalithic burial monument built from enormous boulders, standing on elevated ground overlooking the Rathfrán estuary and Killala Bay. It is very impressive prehistoric monument important and archaeologically very significant.
- Carbad Mor Court Tomb is a double court cairn dating to 4000Bc. It is unique because it contains two burial courts at opposite ends. It is thought to have been a communal burial place and a ritual gathering place. It is a national monument of considerable archaeological merit.

- The Breastagh Ogham Stone is one of the most important ever medieval inscribed stones in Ireland. It comprises of a large, tall standing stone carved in ornate ogham script. It is particularly significant because it preserves a long royal genealogy in primitive Gaelic. Moreover, it anchors the early medieval landscape of Tirawley all around it. This area of Rathfran/Summerhill is of supreme importance in cultural heritage terms as the entire area constitutes a major ceremonial and burial landscape for prehistoric communities five thousand years ago. It is within 2.5km of the proposed development.

6. Reasons for its Archaeological Importance.

- **Rarity and preservation:** Some of the monuments (court cairns, double court tombs, standing stones and Ogham stones) survive well in this area and are renowned for their uniqueness and originality. The area contains one of the highest densities of Neolithic court tombs in Ireland. This was confirmed by de Valera and O Nuallain in their seminal work “Survey of the Megalithic Tombs of Ireland.
- **Chronological sweep:** From Neolithic (c. 4000–2500 BC) through Bronze/Iron Age, early Christian, to medieval times, unbroken occupation. The area contains a rich, multi-period landscape that tells the story of Mayo’s human history from the first farmers to modern times.
- **Landscape integration:** The monuments are not isolated; they are part of a vast neolithic field system, settlement patterns, and the natural environment (bogs, coast, uplands).
- **Cultural significance:** Sites like the Round Tower in Killala and Rathfran Abbey, St Cuimins Church, and the Church of Ireland building at Killogearry link to early bishoprics and ecclesiastical history; the strong connection to St. Patrick and St Cuimin adds legendary value. The area is a major centre of pre and early Christianity. Killala and surrounding areas were an important centre of freemasonry in the eighteenth and nineteenth centuries.
- **Important Artefacts:** Many artefacts have been found locally, are now in the National Museum many of these in the Lissadrone area which is earmarked by the applicant for several turbines. These artefacts suggest continuity of occupation and evolving social structures.

Some of the most notable Bronze Age artefacts are replicated in the Céide Fields visitor centre. Including the Bronze halberd with oak handle from Carn (N.M.I. 1939:146), the gold torc from Lissadrone (N.M.I. 1888:14) and the copper flat axehead from Castletown (N.M.I. 1929:1338).



1.

- **Tourism & heritage:** The region is recognized for its archaeological heritage and features in heritage literature and visitor guides. the area around Lacken is of very high importance in terms of archaeological monuments.
- The area is more than locally important; it contributes significantly to global prehistoric and early medieval heritage. If you are studying archaeology, heritage , church history or interested in ancient landscapes, this region is a key area.

7.Ceide Fields

The Céide Fields complex in County Mayo, Ireland, is one of the most archaeologically significant prehistoric landscapes in Europe and is world renowned. Its significance lies in its age, preservation, and the insights it provides into Neolithic life and land use. We set out below its key features

- The Céide Fields Complex date to around 5,700–5,500 years ago (c. 3700–3500 BCE), placing them firmly in the Neolithic period.
- This makes the site older than the Egyptian pyramids and among the earliest known examples of a planned agricultural landscape anywhere in the world.
- The complex preserves a large-scale network of stone walls, field boundaries, enclosures and dwelling sites.

- These are buried beneath a blanket of peat up to 4 metres deep, which has protected the original Neolithic landscape almost perfectly.
- The field system covers Belderrig to Lacken suggesting a well-organized farming community with clear land division and long-term settlement planning.
- The fields were used for cattle grazing and mixed farming, indicating a stable, sedentary agricultural economy rather than transient or shifting cultivation.
- The organization of the fields reflects communal planning and cooperation-evidence of social complexity among Neolithic farmers.
- Artefacts and pollen analyses show that woodlands were cleared for agriculture, giving us a vivid picture of early environmental management.
- The overlying peat growth tells a story of climate change and landscape transformation.
- The shift from fertile farmland to blanket bog around 3000 BCE likely reflects cooler, wetter conditions that made farming unsustainable linking the site to wider patterns of environmental change in prehistoric Europe.
- The Céide Fields are often cited as the world's oldest known field system. It is older than the pyramids and Stonehenge.
- Together with the Bogs of North and West Mayo, it was, until recently, a UNESCO World Heritage Site nominee (on Ireland's Tentative List) and was central to discussions of Neolithic land division and early farming communities in northwestern Europe.
- Excavations and surveys by archaeologist Professor Seamus Caulfield and his team from the 1970s onward transformed our understanding of Ireland's prehistory.
- The on-site Céide Fields Visitor Centre interprets the landscape through archaeology, ecology, and climatology, making it an educational resource as well as a heritage monument.

The Céide Fields are archaeologically significant because they represent one of the earliest and best-preserved examples of a planned farming landscape in the world. They provide a rare, holistic view of how early agricultural societies lived, organized their land, and responded to environmental change. Given that the Céide Fields system extends into Lacken, any windfarm here would seriously compromise this archaeological gem.

8.The Broader Neolithic Field System

The Ceide Fields system of integrated stone walls, houses, enclosures, etc extends into the Lacken area and, as a result, the proposed wind farm site forms part of the Ceide Fields complex. Some of the proposed wind turbines are earmarked to be erected on top of the Ceide Fields complex. Others are in very close proximity to it and risk disturbing unmapped prehistoric field systems. There are 85 recording national monuments in the immediate area. The proposed development is, therefore, contrary to the Built Environment Objectives 1,2,3,4,5 and 6 of the Mayo County Development Plan 2022-2028 as follows:

BEO1. “To protect the archaeological heritage and sites identified in the record of Monuments and Places, National Monuments in the ownership or guardianship of the state in addition to National Monuments that are the subject of Preservation Orders and to safeguard the integrity of the archaeological sites in their setting”.

The field network mapped under parts of the proposed development has survived undisturbed for six thousand years. The construction of a windfarm here would irreparably damage the prehistoric field -wall system.

BEO 2 of the County Development plan reads “

“To protect the tentative World Heritage Site in Mayo on the UNESCO Tentative List, the Ceide Fields, from inappropriate development and support its nomination to World Heritage Status”

BEO 4 states: “To ensure that development in the vicinity of a Recorded Monument or Zone of Archaeological Protection is sited and designed in a sensitive manner, avoiding adverse effects on landscape setting and context of monument. “

BEO 5 “To protect all sites and features of archaeological interest discovered subsequent to the publication of the Record of Monuments and Places.

BEO 6 “ To protect archaeological sites, monuments, and archaeological objects in their setting, which are listed on the Record of Monuments and Places of County Mayo.”

There can be no compatibility whatsoever in protecting these monuments in close proximity to the windfarm site and the construction and operation of several large wind turbines. Large wind turbines will not be capable of being installed in a sensitive manner, the landscape setting will be utterly transformed, and the ongoing function and operation will adversely impact on the landscape setting and context.

Archaeologists particularly Professor Seamus Caulfield of UCD and Martin Downes Professor of Biology at Maynooth who carried out environmental research were involved from the outset. Gretta Byrne, archaeologist surveyed and found the field walls from Ballycastle to Lacken. Byrne, M.J.B. (G.) 1986, “The Pre-Bog Archaeology of the Ballycastle-Palmerstown Area of North Mayo”, Volumes 1 & 2. Unpublished MA Thesis, UCD.

She discovered that the same type of buried stone wall patterns continues far beyond the Ceide plateau. According to Seamus Caulfield. “The Ceide Fields system is not an isolated phenomenon but part of a much more extensive farming landscape stretching from Belderrig

to the west to beyond Ballycastle and into the lowlands towards Rathlacken and Killala. (- Archaeology Ireland, Vol 6, No 1, 19922).

Later surveys by the National Monuments Service and the OPW for the UNESCO Tentative List include “the Ballycastle – Rathlacken sector “as part of the Buffer Zone for the Ceide Fields and North Mayo Boglands nomination.

Gretta Byrne also discovered significant traces of the Ceide integrated system of neolithic stone walls in Rathlacken near the Rathlacken Court Tomb which is just metres from the proposed windfarm site.

In a National Geographic article in September 2022, Gabriel Cooney (Professor Emeritus of Celtic Archaeology states: “in terms of early farm landscapes, Ceide Fields is an outstanding example at a global level. It provides us with evidence of the interaction of people with their environment. It’s critical to our understanding of farming and how it happened and the context in which it happened across the globe “

The applicant describes the Ceide Fields as being 9km distant from the windfarm site. This is untrue. The Ceide Fields complex and landscape is not confined to a single site but spans tens of kilometres across north Mayo – a vast Neolithic farming landscape preserved almost intact beneath peat. It’s the largest and most complete Stone Age field system yet discovered anywhere, stretching at least 25 km along the coast and covering over 100 km² of upland terrain – an extraordinary window into early agriculture. In archaeological terms it’s a veritable treasure trove, a jewel in the crown of neolithic finds. The proposed windfarm at Lacken which will involve huge amounts of excavation of peat and soil which, in all likelihood, will destroy irreversibly and in perpetuity, the underlying archaeology.

In is totally unrealistic to think that with the size and scale of the earth moving machinery that is used by wind farm developers that any archaeological remnants of the Ceide Fields system could be preserved. With the continual evolution of archaeological techniques, it is probable that soon there will be methodologies available to explore underground without excavation. Any such techniques could potentially open up a new exploratory vista for areas like Lacken.

We contend that the proposed wind farm development at Lacken has the potential to cause serious detriment to the precious, ancient archaeology of this area.

In its report, the applicant confirms that the Ceide Fields surveyed field walls measure merely 1km to the east of the nearest proposed turbine. The applicant confirms that the Ceide Fields is such that further walls could potentially be uncovered during construction activities associated with the proposed development. There is a clear acknowledgement that previous, unrecorded archaeological finds/ features are located within the site and that these could be impacted by construction phase activity.

9. UNESCO World Heritage Site

It is acknowledged worldwide that beneath the boglands of this area of North Mayo lies a system of fields, dwelling areas and megalithic tombs which together make up the most extensive stone age monument in the world. The stone walled fields, extending over hundreds of hectares, are the oldest known globally, older than the Pyramids and Stonehenge. The site has been described as the most extensive Neolithic site in Ireland. For good reason the site was

placed on the UNESCO's Worlds Heritage Tentative List. The intricate remains of our ancestors prehistoric farming lives, fields, cattle byres and burial tombs lie perfectly cosseted in peat around thousands of acres (not just the existing Ceide Fields Visitor Centre site) from Rathlacken in the east to Glenamoy in the west. This area also incorporates Ballinglen Hills including Suifinn/ Annaghmore, Ballykinlettragh and Gunnane adjacent to Glenora and extend south to Blanemore Forest in Moygownagh. This clearly demonstrates the extent of this unique archaeology which is recognised by expert archaeologists as part of the Ceide Fields complex. The buried landscapes of North Mayo are iconic for Irish and European archaeology and an obvious candidate for World Heritage Site Status.

The Ceide Fields has earned massive international respect as an area of great cultural and archaeological significance; described by the New York Times as "A Pompeii in Slow Motion", by Seamus Heaney as a "landscape fossilized" by Professor Richard Bradley of the University of Reading as "deserving the widest national and international acclaim "expressing his astonishment at the unparalleled sheer scale of the Ceide Fields".

The highly acclaimed English architect, Francis Pryor, best known for his discovery of the famous Flag Fen archaeological site near Peterborough and author of several books on archaeology summed up the Ceide Fields as follows, "it has always struck me as both odd and ironic that one of the earliest field systems in northern Europe was found at the extreme edge of the continent at the point where the last feeble ripples of the Neolithic wave of advance merged with the rolling swell of the Atlantic Ocean. The fields in question were discovered in Co. Mayo... What makes these fields so remarkable is their great antiquity; they have their origins in the fourth millennium BC and were used throughout the third. Can we match that in England? I only wish we could." (*Francis Pryor, Farmers in prehistoric Britain, (Stroud, Gloucestershire, 2006), p.73*)

Given the above outstanding recognition by esteemed archaeologists, it is our strong contention that it would be unconscionable and constitute cultural and archaeological sacrilege to grant planning permission for a large windfarm in the Ceide Fields which could destroy its incalculable and priceless heritage. The proposed development will clearly have a detrimental impact on the archaeological and cultural heritage of the area and therefore would not be in accordance with proper planning and sustainable development of the area.

The North Mayo Boglands constitute an open-air laboratory with a unique, natural human history archive contained within them. This ancient, pristine, unadulterated treasure trove of monuments in an area of great cultural heritage significance is well worthy of World Heritage Status and demands to be protected by the appropriate organs of the state.

It is our belief that in any other jurisdiction other than Ireland absolutely no large wind farm would be countenanced in such close proximity to such a culturally significant heritage site.

The archaeological monuments of North Mayo in this location represent a living manuscript of changes over a period in excess of six thousand years of human habitation covering all periods from the Mesolithic Age to the current times. Past generations of its inhabitants have bequeathed a rich and rare heritage, and this and future generations can pass on no greater legacy to posterity than to leave untouched the many fine archaeological treasures including those still lying dormant under our precious boglands that adorn the areas landscape.

It is our contention that the applicant had a duty of care to have arranged proper archaeological excavations to have been carried out before making this strategic infrastructure application especially in circumstances wherein they concede that it is probable that the site location could contain significant archaeology. Construction activity on such an industrial scale would not be tolerated in other jurisdictions on sites of this importance and the wording used by the developer is a matter of concern to this group. Furthermore, we believe it contravenes all European regulations and directives regarding the identification and protection of our national monuments and the responsibilities placed on member states to ensure the safeguarding of our national heritage. The unique archaeology of the Ceide Fields complex must be explored and surveyed by expert archaeologists only and is deserving of a similar status to Pompeii; thus, ensuring all works are carried out by the subject experts as a work in progress for generations to come. This group contends that the sites identification and their surrounds should be preserved in their current state so as to ensure no further damage occurs to our rich and unique heritage.

10. Rathlacken Court Tomb

The applicants report on cultural history is significantly flawed in that it fails to highlight the importance of the archaeological find of the Rathlacken Court tomb, which adjoins the wind farm site and in fact downplays it substantially.

- Between 1990 and the late 1990's, the archaeologist Gretta Byrne was centrally involved in this discovery. The work was undertaken as an independent research project. and with permission from Coillte (the landowner), the team excavated a site at Rathlacken that includes a well-preserved megalithic court tomb and an attached stone-walled enclosure in addition to a small house site.
- The tomb consists of a "three compartment chamber" formed of massive upright stones, plus a court in front, and is dated to around 5,300 years ago (i.e. Neolithic).
- The excavation revealed the junction between the cairn (tomb) and the D-shaped enclosure wall, and detailed features such as a drystone kerb around the cairn and the enclosure's wall construction.
- Artefacts and indications of use: although no full skeletal remains survived, there were probable burnt/cremation deposits found in one of the chambers, together with pottery of different styles and stone tools.
- The site also forms part of a wider prehistoric landscape: Byrne's work documented that the tomb and house/enclosure lie within a field-wall system of stone walls preserved beneath blanket bog - similar in nature to the better known Ceide Fields site nearby but an integral part of the same integrated system
- The combined tomb, dwelling/enclosure and field-wall system demonstrate a complex, integrated Neolithic landscape, not just an isolated tomb. The excavation work helped show how ritual/burial zones, domestic occupation, and agricultural field systems were spatially inter-linked.

- The preservation under blanket bog means many of the stone-wall systems (normally lost) survive in good condition – Rathlacken contributes to understanding how early farming communities organised land, enclosed it, and tied it to ritual/communal monuments.
- This gives additional insight into the scale and organisation of Neolithic farming in north Mayo, underscoring that these communities were operating with significant social/engineering capacity: building large stone chambers, enclosures, and walls that required labour and planning.

This discovery of the Rathlacken court tomb was of major significance in the archaeological world. The applicant fails to recognize its importance and seeks to construct a wind turbine metres away. There are four other monuments discovered close to the court tomb including the galleries of other court tombs together with a collection of huge limestone flags. (www.carrowkeel.com). This further emphasizes the importance of this area.

At a number of areas, the applicant's archaeology report states that no UNESCO World Heritage Site or those on the Tentative List are located in or in close proximity to the proposed development and that the nearest such site is 55km away at Carrowkeel in Sligo. Astonishingly, the report fails to highlight the great significance of the fact that the very site in question, the Lacken and Rathlacken area as part of the Boglands of North and West Mayo/Ceide Fields was on the UNESCO Tentative List between 2010 and 2022.

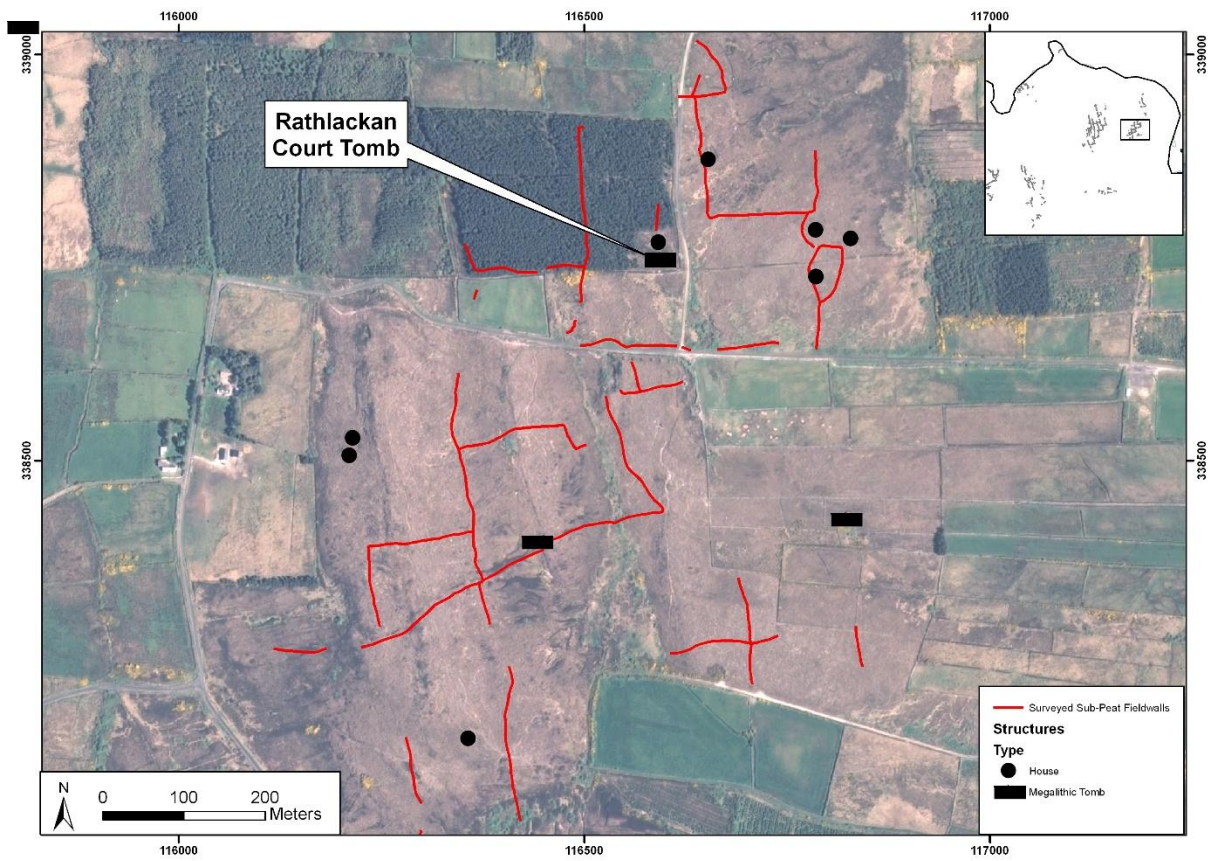
In its County Development Plans 2014 to 2020 and 2022 to 2028 and, Mayo County Council sets out as one of its core objectives to:

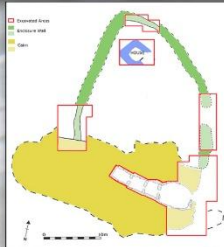
“Built Environment Objective 2: Protect the tentative World Heritage Site in Mayo on the UNESCO Tentative List – Ireland 2010, The Ceide Fields and Boglands of North and West Mayo from inappropriate development and support its nomination to World Heritage Status.”

This proposed development does not support the nomination of this site to the UNESCO list and is an affront to Build Environment Objective 2 of Mayo's County Development Plan.

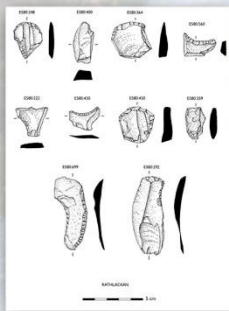
We have clearly set out in this submission the areas inestimable and incalculable cultural and heritage value. In that capacity and in the context of the Wild Atlantic Way tourism promotion, it features regularly in local, national and international tourism promotion. With its proximity to Downpatrick Head and at a pivotal position on the Wild Atlantic Way, it is nothing short of sacrilegious and cynical to consider that the status of the Ceide Fields and the surrounding areas could be so flippantly ignored and ceded, in order to facilitate the development of an industrial scale wind farm in an unsuitable area.

Please see map below showing detail of the walls, associated house sites and three court tombs including the main Rathlacken Court Tomb. The redlines throughout the map below shows the areas of archaeological studies by Gretta Byrne in the Lacken area indicating where the Ceide Fields system of stones walls exists.





Top: Back chamber after excavation
Above: Plan of excavation site
Below: Drawings of finds found on site



FINDS

Artefacts discovered during the excavation include 205 pottery sherds from nine vessels in total. A total of 837 stone pieces were found, of which 88 were artefacts including a broken shale stone axe, the remainder being waste products of tool making. Most numerous of the artefacts were chert scrapers with a shallow concave edge. Analysis of soil samples gave some hint of possible foods eaten by the Neolithic people, including crab apple, hazelnuts, bramble seeds and common sorrel.



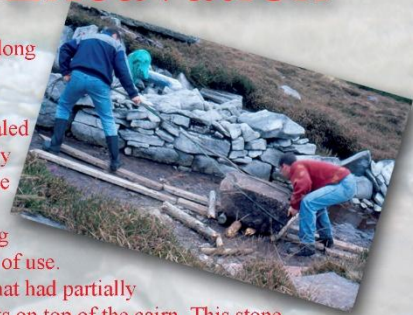
Above: Hearthstone found in the house
Below: The house during excavation



Rathlackan Excavation

BEFORE excavation all that was visible was a long cairn, aligned east – west with a very large flat stone slab protruding from the eastern end.

Excavations in the 1990s by Gretta Byrne revealed the circular court and three chambers completely filled with stones. The blocks of stone around the perimeter of the field are those that were re-moved. These may have been a deliberate filling and sealing of the tomb after it finally went out of use. The protruding slab was a displaced capstone that had partially collapsed into the front chamber and it now rests on top of the cairn. This stone was removed using Neolithic techniques with only ropes and wooden poles and the muscle power of seven people.



Above: Shifting stones during excavation
Below: Lifting the capstone

DATING

Evidence from radiocarbon dates and artefacts show that the tomb was constructed and being used sometime around five and a half thousand years ago. There is further evidence for a major phase of activity both in the chambers and court around seven hundred years later but whether the surrounding area was continually inhabited and farmed throughout the intervening time is not clear. The associated house structure and probably also the enclosure wall were built during this later phase. Later again around four thousand years ago in the earlier Bronze Age a pottery urn was placed in the front chamber and a second urn in the back chamber above the floor levels. These would undoubtedly have accompanied burials indicating that the monument was accessible and still held a sacred significance a millennium and a half after being built.



Above: House enclosure wall and cairn after excavation
Below: Lifting the capstone

House & Enclosure

BUILT onto the northern side of the tomb was a semicircular shaped stonewalled enclosure. Portions of the wall were excavated and at the western end it was clearly built up against the retaining kerb of the tomb prior to any collapse from the cairn and prior to peat growth. Within the enclosure was a stone house structure - just inside the northern section of excavated wall, although not visible now as it was re-covered after excavation for protection. It was a roughly square-shaped structure, barely 3m across, with a clear entrance with an upright threshold stone, paving stones approaching the entrance and a cracked oval hearth stone in the centre which was completely covered by charcoal. The function of this structure was not clear. It was quite small to be a regular dwelling house, although hut sites of comparable size are known from Neolithic sites. No artefacts were found within it but it had very definite remains of a substantial fire on the hearthstone so perhaps it was used for cooking. It may have been used more in relation to activities associated with the tomb rather than domestic living.

Right: Enclosure wall and cairn before excavation



Court Tombs

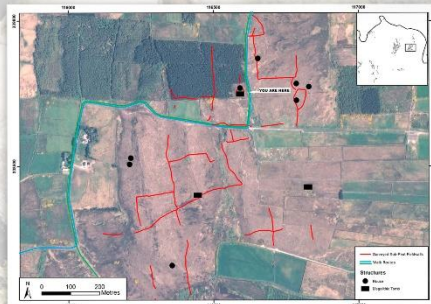


Above: The tomb's cairn prior to excavation. The protruding slab is the tomb's displaced capstone

DATING

Many types of megalithic or 'large stone' monuments are to be found in Western Europe and in most parts of Ireland. Traditionally they were regarded as having been built throughout the Neolithic period, when farming was practiced but before any metal was known, a timespan of one and a half millennia from about 4,000 – 2,500 BC. However, recent research coupled with more refined carbon dating methods suggests the timespan of actual construction of Court Tombs may have been much narrower, lasting perhaps only a couple of centuries from around 3,700 – 3,550 BC.

Below: Aerial view of Lackan's Neolithic walls



PURPOSE

Although the term 'tomb' is used for these monuments they undoubtedly served many different purposes: religious, ritual, spiritual, social and political. Clearly they were intended to be a permanent mark on the landscape, being perhaps an eternal repository for the spirits of the ancestors. Funeral deposits were placed in the chambers, often cremations but also unburnt bones, and accompanying artefacts. Occasionally there is evidence for deposition of bones without flesh, perhaps removed from elsewhere or removed to be used in ceremonies and replaced. While some tombs were used over several centuries, either intermittently or continuously, clearly only a selected few were ever buried in them from the numbers of remains found, even allowing for the vagaries of survival and disturbance. They also reflected ideas of continuity and belonging to the land as well as community or tribal identity and social cohesion. Probably frequent social and ceremonial gatherings took place here.

LOCATION

Other tombs such as Passage Tombs can be located so as to be visible from huge distances and therefore be a reminder to people over a wide area, such as Maeve's Cairn on Knocknaree in Sligo, visible on the horizon to the east. One such monument is the high round cairn visible on the crest of the hill to the west of here, just right of the telephone mast. The Court Tombs are located within the everyday landscape of the people who used them. Here in north Mayo they are found within the fields, so we can imagine cattle grazing close by and children and dogs running around. They are not set in a place apart but are a normal presence in daily life.

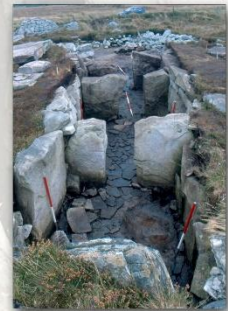
Neolithic Landscape

The Rathlacken Court Tomb is part of an integrated Neolithic farmed landscape of stone walled fields, houses and megalithic tombs sealed beneath a blanket of peat and extending almost continuously from here to Belderrig in the west. The remains in the immediate vicinity of here are shown on the aerial photograph. Some of the field walls were exposed during turf cutting and the remainder were located by probing with iron rods.

A remarkable concentration of houses and tombs are associated with the walls. In this small area alone there are three Court Tombs and eight house structures. There is a huge variety in the type of house in both shape and size with square, rectangular and pear shaped examples as well as round houses from 3m to 9m in diameter. They possibly served a variety of functions.

As well as three Court Tombs in the immediate vicinity there are also Wedge Tombs and round cairns. Visible on the horizon of the hill west of here (just to the right of forestry and a telephone mast) is a large round cairn, possibly a Passage Tomb, in Knockboha which is also part of a very complex Neolithic landscape. Like the similar cairn on top of Suifinn, visible to the south west, it seems to have been deliberately sited to be highly visible from particular areas only. This is in noted contrast to Rathlacken and the other Court Tombs which are not situated in particularly prominent locations. Further on, the walk reaches its highest point on top of the hill at Conagher. From an archaeological perspective this offers a fine view of the extent of the Neolithic pre-bog landscape from Cúide hill behind Doonconny and Sralagagh to the west of Ballycastle, to Suifinn to Rathlacken. Some appreciation of the sheer scale of this unique landscape can be got at this vantage point.

Below: View of excavated chambers from the back



11. Ballinglen Arts Foundation

It is incomprehensible that in the cultural heritage section, the applicant makes no mention whatsoever of the Ballinglen Arts Foundation. This is one of the most important cultural institutions in the West of Ireland. It was created to bring Irish and International artists to live and work in the village of Ballycastle and to savour the unique atmosphere of the place. Hundreds of artists from across the globe have completed residencies there. It is an internationally recognised centre for artistic creation while remaining deeply rooted in the local community. It has transformed what seems like an unlikely location into a thriving arts destination. Artists are attracted by the spectacular and dramatic cliffs, strands, boglands, hills, expansive skies, changing weather and the quality of the light in the Ballycastle, Lackan and Belderrig areas. Well-known artists who have resided include; Donald Teskey, Martin Gale, Richard Gorman, Hughie O Donoghue, Mick O Dea, Diana Copperwhite and Elizabeth Magill. The actress Michelle Pfeiffer visited and described the area as "perhaps the most beautiful place on earth."

The failure to mention this centre of excellence by the applicant underscores its complete lack of knowledge and appreciation for the cultural heritage of the area. The proposed windfarm would lead to the degradation of the environment, the pastoral landscape, the skylines, and the aesthetics of the area. This would seriously impact on the work of artists at Ballinglen and violate Ireland's obligations under national heritage policy and international cultural protection frameworks. ACP has an obligation to seriously consider the applicant's abject failure to consider many highly pertinent and relevant issues relating to cultural heritage including the manifold omissions, exclusions, and negligence in the compilation of this section of the application.

Conclusion

The proposed development should not be considered in isolation. The cumulative effect of existing, permitted and proposed renewable energy projects in the wider North Mayo region must be fully assessed especially in the context of the prior UNESCO tentative list status of the area, which is soon to be revived. I am concerned that the combined impact of multiple projects in the Lacken/ Ballycastle/ Killala area could fundamentally alter the character of the highly scenic coastal landscape and its archaeological and cultural heritage context. The Lacken area possesses a strong cultural identity, historical and spiritual significance and longstanding community connection to the landscape. The introduction of industrial scale wind energy infrastructure risks undermining the unique and unspoilt character and heritage value of the area and may result in a permanent alteration of its sense of place.

In summary, the main grounds for objection to the proposed windfarm as regards cultural heritage and archaeology are as follows:

- 1) The industrialisation of a vulnerable and fragile archaeological landscape.
- 2) The excessive risk of damage and destruction to undiscovered subsurface archaeological material and ecclesiastical remains.
- 3) The serious adverse visual and setting impacts on national monuments and protected structures.
- 4) The incompatibility of the project with the neolithic and historical landscape character of the wider area.
- 5) The inconsistency of the development with stated heritage protection objectives in the Mayo County Development Plan 2022 to 2028.
- 6) The negative adverse impacts on the intangible cultural, and spiritual heritage.
- 7) The annihilation of the archaeological context and interpretive value of the area.

This proposed development represents an industrialization of a highly scenic and cherished landscape in an area of incalculable heritage value as I have demonstrated in this submission. Once constructed the loss of the rich archaeology and rare cultural heritage would be permanent and irreversible. The loss of this precious resource together with the degradation and despoilation of the landscape character, the severe, adverse effects on the tourism of the area and the quality of life of its residents would far outweigh any benefit to be gained. Therefore, I exhort ACP to reject this application.

Yours faithfully.

Sean Kelly.