

Niamh Hickey

LOG-088798-26

From: Conor Allen <Conor.Allen@opw.ie>
Sent: Wednesday 24 June 2026 16:42
To: SIDS
Cc: Gretta Doyle; Anthony Read; Terri Sweeney Meade; Rebecca Mullin; Amy Reid
Subject: FW: OPW Letter of observation ACP PAX16.324258 Tirawley Windfarm
Attachments: Letter of observations ACP PAX16.324258 Tirawley Windfarm Published Joint Submission.pdf

Categories: Niamh

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A Chara,

Please see attached the OPW letter of observation on the Tirawley Windfarm Planning Application.

The An Coimisiún Pleanála case reference number is ACP PAX16.324258

This is being submitted as one submission for OPW to incorporate the comments made by Drainage Services on the 8th May 2026 (withdrawn to allow this joint application) and the comments made by Heritage Services on the 22nd June 2026.

I would be grateful if you could acknowledge receipt of this email.

Kind regards,

Conor

Conor Allen
Heritage Services: Heritage Policy & UNESCO World Heritage Unit

Oifig na nOibreacha Poiblí
Office of Public Works

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Conor Allen

Heritage Services: Heritage Policy & UNESCO World Heritage Unit

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Niamh Hickey

From: Rebecca Mullin <rebecca.mullin@opw.ie>
Sent: Thursday 25 June 2026 10:15
To: SIDS; Conor Allen
Cc: Gretta Doyle; Anthony Read; Terri Sweeney Meade
Subject: RE: OPW Letter of observation ACP PAX16.324258 Tirawley Windfarm

Categories: Niamh

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Dear Niamh,

Thanks for your assistance with this.

The letters sent by the OPW by post on 8th May 2026 and by email on 22nd June 2026 **should be withdrawn by ACP.**

The letter sent on 24th June 2026 by email is now the OPW submission on ACP PAX16.324258 Tirawley Windfarm.

We would be grateful if you could acknowledge receipt of the 24th June submission and confirm that it is a valid submission.

Kind regards,

Rebecca.

Rebecca Mullin MIPI MUBC
State/Principal Architect's Office

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Office of Public Works

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From: SIDS <sids@pleanala.ie>
Sent: Thursday 25 June 2026 10:09
To: Rebecca Mullin <rebecca.mullin@opw.ie>; Conor Allen <Conor.Allen@opw.ie>
Cc: Gretta Doyle <gretta.doyle@opw.ie>; Anthony Read <Anthony.Read@opw.ie>; Terri Sweeney Meade

<terri.sweeney@opw.ie>

Subject: RE: OPW Letter of observation ACP PAX16.324258 Tirawley Windfarm

Aire: Tháinig an ríomhphost seo ó lasmuigh den OPW. Ná cliceáil ar aon naisc nó ná hoscail ceangaltáin mura n-aithníonn tú an seoltóir. Má tá amhras ort, tuairiscigh an ríomhphost chuig an **Deasc Chabhrach TFC** agus déan teagmháil le **Cibearshlándáil**.

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Dear Rebecca,

Can you send an email confirming you wish to withdraw both submissions please.

Kind regards,
Niamh

From: Rebecca Mullin <rebecca.mullin@opw.ie>

Sent: Wednesday 24 June 2026 16:00

To: SIDS <sids@pleanala.ie>; Conor Allen <Conor.Allen@opw.ie>

Cc: Gretta Doyle <gretta.doyle@opw.ie>; Anthony Read <Anthony.Read@opw.ie>; Terri Sweeney Meade <terri.sweeney@opw.ie>

Subject: RE: OPW Letter of observation ACP PAX16.324258 Tirawley Windfarm

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Hi Niamh,

We are combining the comments from the 2 letters into one and going to resubmit as one overall letter.

It was not our intention that the 22nd June letter to be accepted – if you can rectify this please?

Kind regards,
Rebecca.

Rebecca Mullin MIPI MUBC
State/Principal Architect's Office

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From: SIDS <sids@pleanala.ie>
Sent: Wednesday 24 June 2026 15:18
To: Conor Allen <Conor.Allen@opw.ie>
Cc: Gretta Doyle <gretta.doyle@opw.ie>; Anthony Read <Anthony.Read@opw.ie>; Terri Sweeney Meade <terri.sweeney@opw.ie>; Rebecca Mullin <rebecca.mullin@opw.ie>
Subject: RE: OPW Letter of observation ACP PAX16.324258 Tirawley Windfarm

Aire: Tháinig an ríomhphost seo ó lasmuigh den OPW. Ná cliceáil ar aon naisc nó ná hoscail ceangaltáin mura n-aithníonn tú an seoltóir. Má tá amhras ort, tuairiscigh an ríomhphost chuig an **Deasc Chabhrach TFC** agus déan teagmháil le **Cibearshlándáil**.

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Dear Conor,

I wish to acknowledge receipt of your email, the contents of which are noted.

You will receive an acknowledgement letter regarding your submission received on 22nd June in due course.

Kind regards,
Niamh

From: Conor Allen <Conor.Allen@opw.ie>
Sent: Wednesday 24 June 2026 11:58
To: SIDS <sids@pleanala.ie>
Cc: Gretta Doyle <gretta.doyle@opw.ie>; Anthony Read <Anthony.Read@opw.ie>; Terri Sweeney Meade <terri.sweeney@opw.ie>; Rebecca Mullin <rebecca.mullin@opw.ie>
Subject: RE: OPW Letter of observation ACP PAX16.324258 Tirawley Windfarm

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Hi Niamh,

After consultation with our colleagues in the Drainage Section in OPW, I can confirm that both our unit and Drainage Section request that the submission from the Drainage Section on the 8th May 2026 be withdrawn.

Kind regards,

Conor

Conor Allen
Heritage Services: Heritage Policy & UNESCO World Heritage Unit

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From: SIDS <sids@pleanala.ie>
Sent: Tuesday 23 June 2026 17:04
To: Conor Allen <Conor.Allen@opw.ie>
Cc: Gretta Doyle <gretta.doyle@opw.ie>; Anthony Read <Anthony.Read@opw.ie>; Terri Sweeney Meade <terri.sweeney@opw.ie>; Rebecca Mullin <rebecca.mullin@opw.ie>
Subject: RE: OPW Letter of observation ACP PAX16.324258 Tirawley Windfarm

Aire: Tháinig an ríomhphost seo ó lasmuigh den OPW. Ná cliceáil ar aon naisc nó ná hoscail ceangaltáin mura n-aithníonn tú an seoltóir. Má tá amhras ort, tuairiscigh an ríomhphost chuig an **Deasc Chabhrach TFC** agus déan teagmháil le **Cibearshlándáil**.

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Dear Conor,

I have been asked by the Commission to refer to your email dated 22nd June 2026, in which you intended on making an observation.

Article 217(4)(a) of the Planning and Development Regulations 2001, as amended, states that, without prejudice to Article 217(2)(b) a person who makes submissions or observations to the Commission in accordance with this section shall not be entitled to elaborate in writing upon the submissions or observations or make further submissions or observations in writing in relation to the application and any such elaboration, submissions or observations that is or are received by the Commission shall not be considered by it. In this regard, as an observation has already been received from you by the Commission in relation to the above case (received by post on 8th May 2026), it is regretted that your further submission cannot be accepted by the Commission.

If you wish to withdraw your original submission, can you please send in an email with a withdrawal request. Please note, the last date for a valid submission is 25th June 2026.

Kind regards,
Niamh

From: Conor Allen <Conor.Allen@opw.ie>
Sent: Monday 22 June 2026 12:52
To: SIDS <sids@pleanala.ie>
Cc: Gretta Doyle <gretta.doyle@opw.ie>; Conor Allen <Conor.Allen@opw.ie>; Anthony Read <Anthony.Read@opw.ie>; Terri Sweeney Meade <terri.sweeney@opw.ie>; Rebecca Mullin <rebecca.mullin@opw.ie>
Subject: RE: OPW Letter of observation ACP PAX16.324258 Tirawley Windfarm

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A Chara,

Please see attached the OPW letter of observation on the Tirawley Windfarm Planning Application.

The An Coimisiún Pleanála case reference number is ACP PAX16.324258

I would be grateful if you could acknowledge receipt of this email.

Kind regards,

Conor

Conor Allen
Heritage Services: Heritage Policy & UNESCO World Heritage Unit

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Oifig na
nOibreacha Poiblí
Office of Public Works



An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

24th June 2026

**RE: Proposed Tirawley Windfarm Project, Strategic Infrastructure Development
Application to An Coimisiún Pleanála under Section 37(E) of the Planning and
Development Act 2000 (as amended)**

Dear Sir/Madam,

Please see attached joint submission from Drainage Services and Heritage Services in relation to Tirawley Wind Farm.

It has been agreed that Drainage Services would withdraw its original submission of the 8th May 2026 and their observations would be included in a joint submission with Heritage Services.

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Our Ref: 76-2023

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

**RE: Proposed Tirawley Windfarm Project, Strategic Infrastructure Development
Application to An Coimisiún Pleanála under Section 37(E) of the Planning and
Development Act 2000 (as amended)**

Dear Sir/ Madam,

Please see comments from regional engineer below.

The Office of Public Works, Moy Drainage have no maintainable channels in the area of the proposed Tirawley Wind Farm development located approximately 2.5km east of Ballycastle and 4.7km northeast of Killala, Co. Mayo. The potential cable route of the ESB transmission line is located north of OPW Moy drainage scheme channels. The cable route does intersect the Lough Dalla Drainage District - with maintainable channels that fall under the remit of the local authority to maintain. Further information on these locations can be found at https://www.floodinfo.ie/map/drainage_map/.

This office has no records of flooding or past flood events within the above townlands. An Coimisiun Pleanala can carry out a review of historical flood risk using floodinfo.ie using link provided <https://www.floodinfo.ie/map/floodmaps/>

This office would recommend that no flooding should occur during or after construction of the proposed wind farm.

Yours sincerely,

Amy Reid

Flood Project Management

06/05/2026

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Case Reference ACP PAX16.324258

Administrative Officer
Strategic Infrastructure Development Section,
An Coimisiún Pleanála,
64-67 Marlborough Street,
Dublin 1
D01 V90

22 June 2026

ACP- PAX16.324258: Proposed Development of the construction of Tirawley Windfarm consisting of 16 no. wind turbines, including a 110kV sub-station on site, an energy storage system in the form of a battery array located within container units and all associated infrastructure

A Chara,

1.0 INTRODUCTION

The Office of Public Works (OPW) is a central Government Office operating under the Minister for Public Expenditure, NDP Delivery and Reform with particular responsibility for Flood Risk and Estate Management, including Heritage.

The Office of Public Works (OPW) has responsibility for the care, operation and maintenance of all National Monuments in State care. Its principal objective is to protect, conserve, maintain and present these sites and to facilitate appropriate public access where possible. In this regard, the OPW works in partnership with the National Monuments Service at the Department of Housing, Local Government and Heritage (DHLGH).

The Neolithic landscape of 'Céide Fields' is presented to visitors in its entirety at the recently refurbished Céide Fields visitor centre and its associated grounds. The visitor is invited to enjoy and photograph the view from east to west 180 degrees to take in the whole landscape, unlimited by the boundaries of state-owned lands.

This submission outlines observations from the OPW on the Strategic Infrastructure Development application by Constant Energy Limited to An Coimisiún Pleanála for

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planning permission in respect of the construction of sixteen wind turbines within the townlands of Ballymurphy, Ballynaleck, Barnhill Lower, Barnhill Upper, Barroe, Billoos, Carn, Carrickanass, Carrowmore, Castlelackan Demesne, Castletown and others Co. Mayo

This submission is made specifically with regard to the Heritage Services portfolio. Further submissions on the project may be made by the OPW with regards to other areas of responsibility.

2.0 PROPOSED WORKS (ACP- PAX16.324258)

The proposed development will consist of the provision of the following:

- Erection of 16 wind turbines. The candidate wind turbines have a rotor diameter of 117m, a hub height of 76.5m and a tip height of 135m. No flexibility in terms of turbines dimensions is sought as part of the application for Planning Permission.
- Installation of battery arrays located within container units and associated electrical plant for grid stabilisation adjacent to the Onsite Substation building with surrounding palisade fence 2.65m in height.
- Construction of permanent turbine hardstands and turbine foundations.
- Change of use of a vacant residential dwelling to a permanent operations compound consisting of an operations office, storage area and staff parking, upgrade existing site utilities and replace existing septic tank with a wastewater treatment system.
- Construction of two temporary construction compounds with associated temporary site offices, parking areas and security fencing.
- Installation of one (35-year life cycle) meteorological mast with a height of 80m and a 4m lightning pole on top.
- Development of on-site spoil deposition areas.
- Development of an internal site drainage network and sediment control systems.
- Construction of 1 no. permanent 110 kV electrical substation including 1 no. control building with welfare facilities, all associated electrical plant and

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equipment, security fencing and gates, all associated underground cabling, wastewater holding tank, and all ancillary structures and works.

- All associated underground electrical and communications cabling connecting the wind turbines to the wind farm substation and battery arrays.
- Ancillary forestry felling to facilitate construction of the development.
- All works associated with the permanent connection of the wind farm to the national electricity grid comprising a 110 kV underground cable in permanent cable ducts from the proposed permanent on-site substation, commencing in the townland of Barroe and continuing onto the townlands of Carn, Rathbaun, Doonamona, Castlereagh, Rathcash, Rathowen East, Rathowen West, Killala, Magherabrack, Farragh, Cloonawillin, Mullafarry, Lisglennon and Tawnaghmore Upper to the existing Tawnaghmore 110 kV Substation in the townland of Tawnaghmore Upper.
- All associated site development works including berms, landscaping, and soil excavation.
- Construction of new permanent internal site access tracks and all associated drainage infrastructure.
- Improvement of nine existing entrances off local roads, one off L-5173, one off L-5179, two off the local road L5187-47, two off the local L-5187-22 and three off the L21147-0, all to include localised widening of the road and creation of a splayed entrance to facilitate the delivery of abnormal loads and turbine component deliveries.
- Construction of five new site entrances off local roads, one off the L-31143, one off the L-51791-23, one off the L31142-0, two off the L-31142-0, and one off the L-5179- 22, all to include localised widening of the road and creation of a splayed entrance to facilitate the delivery of abnormal loads and turbine component deliveries.
- Upgrade works on the turbine delivery route to include the following:
 - o Localised widening along the L-5187-47, L-31142-0, L5187-22-0, L-5187-47, L21147-0, and roads to a width of 4.5m and the widening of junctions at the crossroads R314 and L-51731 crossroads in the townland of Billoos.

This application is seeking a ten-year permission and a 35-year operational period from the date of overall commissioning of the entire wind farm.

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3.0 OBSERVATION

The OPW has considerable concerns about the potential impact of the proposed development on the Neolithic archaeological landscape known as the 'Céide Fields' and the visitor's experience of it. In addition, the OPW is concerned about the visual impact on five National Monuments located immediately to the southeast of the proposed windfarm and two others within 8km of the windfarm.

3.1 Overview of Céide Fields

The Céide Fields are an intact Neolithic landscape consisting of megalithic burial monuments, dwelling houses and enclosures within an integrated system of stone walls defining fields, which are spread over 12 kilometres of North Mayo. The walls are preserved intact beneath blanket peat that is over 4m deep in places.

'The significance of the Céide Fields lies in the fact that along with their associated megalithic monuments and dwelling structures they provide a unique farmed landscape from Neolithic times. Not only are they "an outstanding example" but they are *the* outstanding example of human settlement, land-use and interaction with environment in Neolithic times..... Nowhere else is there such extensive physical remains of a Neolithic farmed landscape surviving from this significant period in prehistory.'¹

The field layout indicates that the walls were designed and built in a single cohesive operation, necessarily involving large-scale community co-operation and organisation by a stable, settled society.

Summary accounts of archaeological evidence from excavations and surveys of the Céide Fields, including maps of the overall field walls, have been published by two researchers - Caulfield² and Warren³. The archaeological research has been

¹ Former World Heritage Tentative List description: original emphasis.

² Caulfield S. (2018) Céide Fields and Belderrig Valley: Eighty-Four Years of Research. In Boschiero, P. and Latini, L. *The Céide Fields, Ireland International Carlo Scarpa Prize for Gardens 2018*, Fondazione Benetton Studi Ricerche, Treviso, pp 54 – 73.

³ Warren G. (2018) 'The Prehistoric Archaeology of North Mayo', in Boschiero, P. and Latini, L. *The Céide Fields, Ireland International Carlo Scarpa Prize for Gardens 2018*, Fondazione Benetton Studi Ricerche, Treviso, pp 92 – 107.



supplemented and confirmed by a programme of radiocarbon dating pine stumps preserved in the peat throughout North Mayo⁴ and also by extensive palaeoecological research⁵. The latter has reaffirmed the Neolithic dating of the field systems.

The Neolithic landscape preserved beneath the blanket bogs, generally known as the 'Céide Fields', extends over significant areas of North Mayo and particularly between Belderrig, 7 kms west of the Céide Fields Visitor Centre and Lacken, 12 kms east of the centre.

Figure 1 is a satellite image of this area with all of the pre-bog field boundaries superimposed in red lines. All of those in the areas bounded by the Ballinglen river in the west to Lacken Bay in the East were originally located and mapped in the 1980s⁶ and a shorter account has been published in 2018⁷. What is generally known as the 'Céide Fields' is a smaller area that includes Céide Hill where the OPW Visitor Centre is located and Sralagagh Hill to the east with the intervening Glenulra valley.

⁴ Caulfield S., O'Donnell R. G., Mitchell P. I. (1998) ¹⁴C Dating of a Neolithic Fields System at Céide Fields, County Mayo, Ireland. *Radiocarbon* 40, 629-640.

⁵ O'Connell, M., Molloy, K., and Jennings, E. (2020) Long-term human impact and environmental change in mid-western Ireland, with particular reference to Céide Fields – an overview, *E&G Quaternary Sci. J.*, 69, 1–32. Available at: <https://doi.org/10.5194/egqsj-69-1-2020>.

⁶ Byrne, M.J.B. (Gretta) (1986) "The Pre-Bog Archaeology of the Ballycastle-Palmerstown Area of North Mayo", Volumes 1 & 2. Unpublished MA Thesis, UCD.

⁷ Byrne G. (2018) Glimpses into the Past. Some Natural and Human Imprints Visible in the North Mayo Landscape. In Boschiero, P. and Latini, L. *The Céide Fields, Ireland International Carlo Scarpa Prize for Gardens 2018*, Fondazione Benetton Studi Ricerche, Treviso, pp 74 – 91.

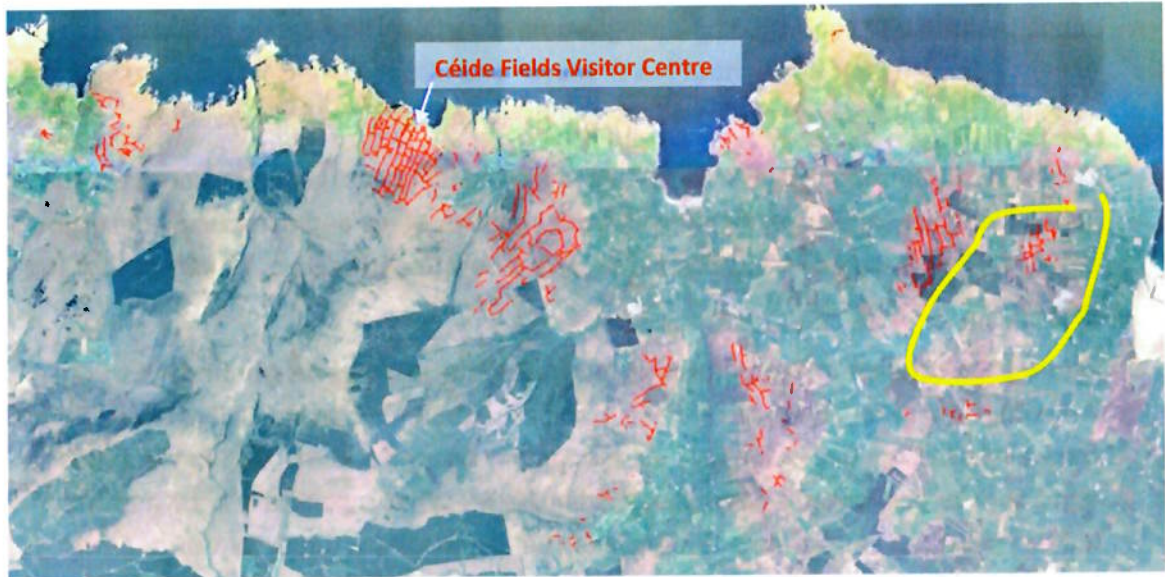


Fig. 1. Pre-bog walls Belderrig – Lacken, with known Neolithic field system marked in red, approximate location of Tirawley WF in yellow. This map is on display at the Visitor Centre.

The Neolithic field boundaries clearly extend through the area of the proposed Tirawley wind farm. The red lines in the map in Figure 1 show walls that have been located and originally mapped in great detail at a scale of 1:2,500. There are certainly many more walls that have not been found and mapped. Those that have been located were found by intensive surveying of field walking and detailed probing in the 1980s and 1990s. Areas of bog on the maps that do not show red lines are not evidence of absence of walls, but are simply areas that have not been surveyed. It was impossible to find walls in areas of forestry, visible as dark green on the satellite images. Some areas of forestry in the east of the area towards Lacken do have some mapped walls, which were located and mapped in 1984 and 1985, prior to the planting of the forestry a few years later.

In addition to the field boundaries shown on the map there are also a number of associated individual house structures and megalithic tombs, which together make this an integrated archaeological landscape of dwelling houses, and ritual structures within their contemporary fields. By its nature, it is the entire landscape that is the monument and not a collection of individual monuments scattered within a modern landscape.

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3.2 Concerns about Assessment of the Environmental Impact – Céide Fields

It is the opinion of the OPW that the proposed Tirawley Windfarm and its associated infrastructure, including underground electric cabling will have a considerable adverse effect on this unique archaeological landscape.

A lack of understanding of the uniquely preserved archaeological landscape

- In EIAR Figure 14.1, only the individual structures of houses and tombs are shown and no indication of the integrated field systems is shown.
- In EIAR 14.3.2.1, the significance of the integrated archaeological landscape is ignored with the only mention of the field boundaries being: “The investigations revealed a number of house structures, as well as enclosures and field boundaries, within its environs”.
- EIAR 14.3.2.5 again reveals a lack of understanding of the significance of this pre-bog archaeology. In EIAR 14.3.2.6 Céide Fields, it is stated, “This prehistoric archaeological complex (Céide Fields) is located c. 9.5 km from the northern portion of the Proposed Development.” This is misleading in that it gives the impression the Céide Fields are merely the environs of the OPW Visitor Centre.
- Further, it is stated: “The prehistoric agrarian complex does not in and of itself retain inherent attributes connected to landscape setting considerations in terms of visual astronomical and landscape alignments”. Again, this displays a lack of understanding of the significance of the archaeological landscape. The fields and associated monuments in fact demonstrate how the Neolithic people approached their entire landscape and how they farmed and lived their lives in addition to their ritual constructions. The landscape is the monument.



Insufficient regard to the many recorded monuments and as yet undiscovered monuments

Although extensive field boundaries have been mapped, there are certainly many more walls that have not yet been mapped. Areas of bog on the maps that do not show red lines are not evidence of absence of walls, but are simply areas that have not been surveyed. There is a very high probability that there are undiscovered archaeological remains within the boundaries of the proposed wind farm.

Locations for visual impact assessment for visitors to the Céide Fields Visitor Centre

In EIAR Chapter 12 Landscape and Visual Amenity, page 11, it is recognised that among the visual receptors that are most susceptible to change are “visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience.” For visitors to Céide Fields Visitor Centre, the view and understanding of the landscape is the essential part of the visitor experience.

In Table 12.9 the Céide Fields was selected as view point VP4. The photographs used for the Landscape and Visual Impact Amenity Viewpoint Photomontage Booklet Book 1 images were taken from just outside the Visitor Centre building on the lowest level of the boardwalk guided tour route. In practice, the best location to view the surrounding landscape from the guided tour route is at the highest upslope part of the route (marked X1 on Figure 2 below) where the guides will point out the extent of the Neolithic field systems from Belderrig to Lacken. Lacken is directly beyond where the turbines would be in view. The visual impact from the turbines would also be greater from this location. Similarly, more visitors would admire and photograph the views from the rooftop viewing platform of the Visitor Centre) than from where the photographs were taken. This location is considerably higher than the level of the photograph with a greater visual impact from the turbines. Perhaps the most photographed view from Céide Fields is from the cliff edge viewing platform Discovery Point on the Wild Atlantic Way (marked 3 on map) looking eastwards across the sea. This takes in the dramatic Signature Discovery Point of Downpatrick Head and also the skyline with the proposed turbines. The view from the platform includes a wider section of the hill on the eastern horizon than the photograph in VP4 where it is more



obscured by the foreground Sralagagh Hill. At least one further turbine will be visible on the skyline.

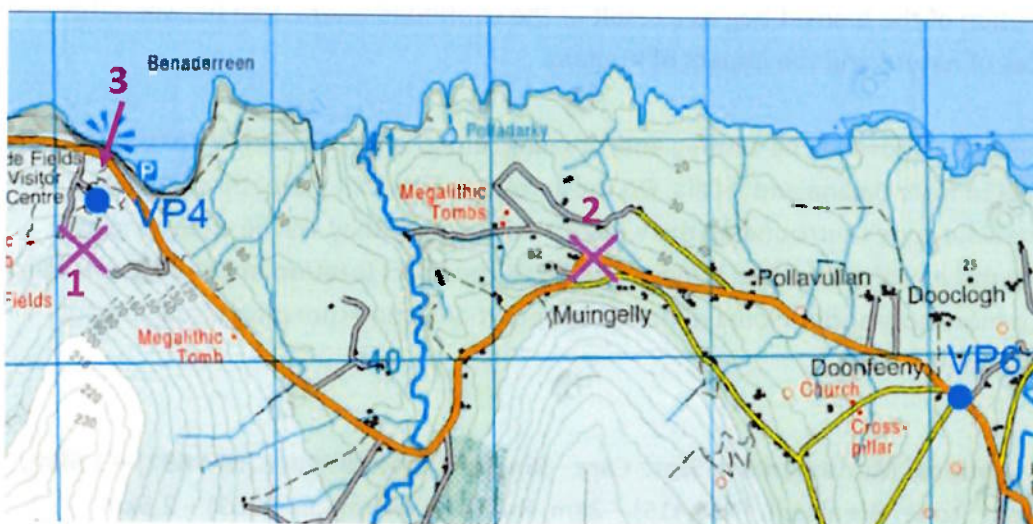


Fig. 2 Recommended locations marked X in purple for additional visual impact assessments. The OPW also request a Visual Impact Assessment from the rooftop viewing platform

Critique of the Impact Assessments

VP4 is classified with a Very High visual receptor sensitivity but with a Low-negligible magnitude of visual impact and a visual impact significance of Slight / Negative / Long Term. The OPW disagree with these assessments of impacts. On page 57, it is stated, *"two turbine nacelles and partial views of the blade sets of up to four further turbines will be visible, rotating along the skyline ridge. Nonetheless, the turbines are viewed as small-scale background features and are well offset from the more susceptible coastal context viewed further to the north. As a result, the residual significance of effect was deemed Slight, which is principally influenced by the sensitivity of the visual receptor as opposed to any notable magnitude of visual effect."* The most significant view from the Céide Fields is the view of the entire sweep of prehistoric field systems under blanket bog that extend from Belderrig in the west to Lacken in the east. This is what consistently overawes visitors and it is the only way to appreciate the sheer scale of the archaeological landscape. These turbines will be visible on the horizon exactly over the eastern limit to the visible area of bog-covered prehistoric landscape. They will also

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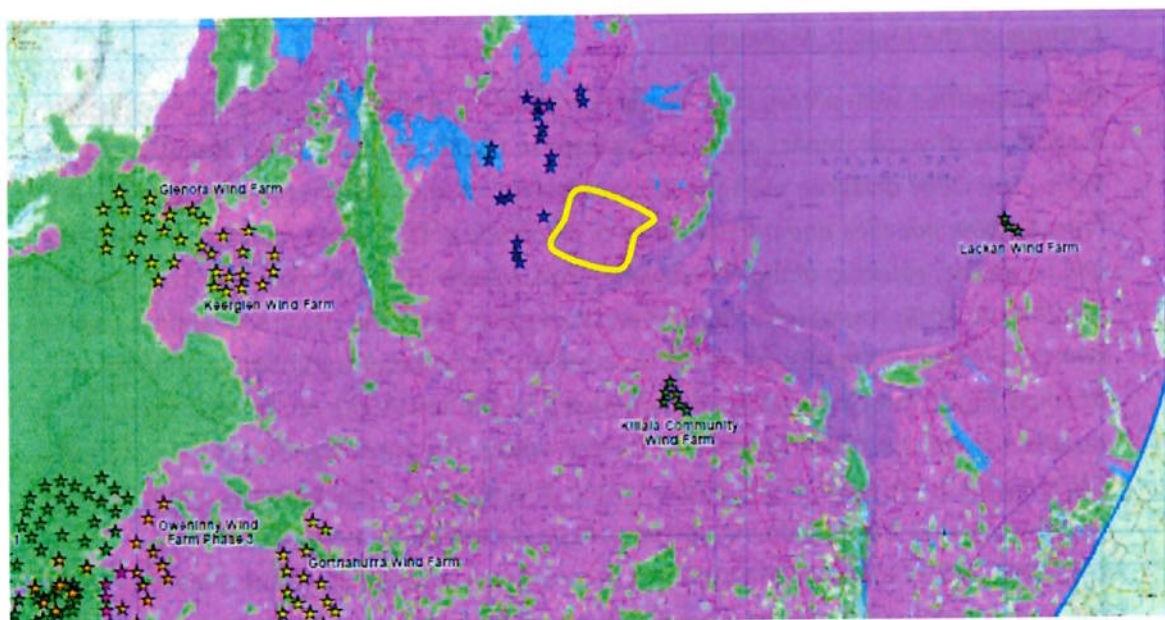
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detract from the appreciation of the subtle changes in the natural landscape from the complete blanket of peat to the west and south and the gradual decrease in coverage of peat towards the east. The fundamental story of Céide Fields is the prehistoric evolution of the blanket bog as a result of the continued interaction between the forces of nature and the impact of humans.

Almost all visitors will be coming and/or going, either along the WAW coastal road or the R314 from Ballina and Killala. On these routes, they will travel through the immediate zones surrounding the wind turbines where they will be experiencing a much more profound visual impact. The OPW considers location marked X 2 on Figure 2 is a more appropriate location for a Viewpoint and corresponding Visual Impact Assessment.

3.3 National Monuments in State Care - Ringfort, Carbad More (NM 631) – 1.5km, Ogham Stone, Breastagh (NM 415) – 2km, Rathfran Abbey (NM 269) – 2.5km, Megalithic Tomb, Carrowcastle (NM 293) – 2.5km, Stone Circle, Mound, Ringfort, Souterrain, Enclosure, Rathfran (NM 389) - 3.5km, Killala Round Tower (NM 105)- 5.5km, Moyne Abbey (NM 103) - 8km away.



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Fig. 4. Cumulative ZTV map depicting mostly full theoretical visibility of Tirawley and the other windfarms. Five national monuments are located in the area marked yellow. Note the proximity of the existing Killua Community windfarm to the south.

The LVIA states that there is predicted indirect *significant* effect at operational stage on Rathfran Abbey (National Monument Ref. 269). In an apparent reference to the other four National Monuments in this location, it states that ‘these sites... are located at prominent elevated or riverine positions within the landscape. There are no mitigation measures to ameliorate these indirect operational stage effects on setting.’ The OPW interprets this statement as meaning that all of the five National Monuments located 1.5km-4.5km from the windfarm have full visibility of all of the turbines. The OPW notes that the Killala Community Windfarm is already in existence.

VPs 24 and 25 are the closest approximate locations of the above referenced National Monuments. The lack of photomontages from these heritage receptors makes it difficult to assess the impact. The planning documentation asserts that apart from Rathfran Abbey all of the other sites are inaccessible. This is not correct.

The documentation says that the exterior of Killala Round Tower (NM 105) is accessible, but it does not provide a photomontage or visual impact assessment from this heritage receptor. The turbines are clearly visible from Killala cemetery.

No verifiable visual impact assessment has been carried out for views from Moyne Abbey (NM 103), which is accessible to the public.

4.0 OPW REQUESTS IN RELATION TO HERITAGE RECEPTORS

In EIAR Chapter 12, Landscape and Visual Amenity 12.7 Summary of Significant Effects, it is stated *“It is not considered that there will be any significant effects on landscape and visual amenity arising from the proposed Tirawley Wind Farm.”* The OPW considers that this statement is not supported by the evidence. Furthermore, the OPW considers that the assessment is incomplete.

The OPW requests that ACP request the applicants to provide three additional photomontages and visual impact assessment relating to the Céide Fields visitor experience (reference Fig. 2).

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