



Planning Ref: PAX16.324258

23 June 2026

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

Dear Sir/Madam

Re: PAX16.324258 - The proposed development consists of up to 16 no. wind turbines (Tirawley Wind Farm), 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 AT the townlands of Ballymurphy, Ballynaleck, Barnhill Lower and others, County Mayo

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

Overarching comment

The Heritage Council is increasingly aware of the number of schemes being submitted for wind and solar farms. Whilst this, in general terms, is welcome as part of our climate commitments, there is a growing concern that cumulatively there is greater potential for significant negative impacts on heritage features and sites, ranging from inherent landscape character, ecology and the setting of cultural heritage features.

At its core is the need to ensure a plan led system, whereby the least environmentally sensitive sites are chosen for renewables. Key to this, is a thoroughly informed constraints analysis whereby landscape, cultural heritage and ecological assets are identified and avoided.

Local authorities through their development plans are seeking to do this. In a Mayo County context, the current Renewable Energy Strategy dates from May 2011. It is therefore timely, that the local authority has recently completed its consultation on the [Proposed Draft Variation 2](#) of the County Development Plan 2022-2028 for an updated Renewable Energy Strategy.

Whilst the applicant must couch the planning application assessment within the context of adopted planning policy, it may be premature that this application has been submitted given the imminent adoption of a new Renewable Energy Strategy for County Mayo. It is likely, unless the variation is deemed unsound, that An Coimisiún Pleanála, during its determination of the application, will need

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Deirdre McDermott, Muiris Ó Céidigh, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie



to judge whether further information should be requested to amend the application to account for any newly adopted Renewable Energy Strategy, which is currently the basis for a variation to the adopted county development plan. We recommend to the Commission that it consider this carefully.

Aside from this overarching point, the Heritage Council places strong emphasis on the premise that underpins the assessments in the cultural heritage, landscape and ecological chapters; specifically in relation to the following:

- That key environmental/heritage receptors are identified
- That a proportionate and valid 'sensitivity' value has been assigned to each receptor
- And that the magnitude of impact is based on a sound judgement.

Understanding and determining significance in EIAR terms is highly dependent on these three points.

Finally, and mostly important, is the number of heritage sites being impacted to whatever degree. Should there be impacts on a relatively large number of heritage and environmental sites, irrespective of the scale of significance of that impact at an individual basis, then the location of the development needs to be questioned.

Landscape

From the outset, we do not agree with the method of assessment in the landscape chapter whereby the sensitivity of the relevant landscapes has been aggregated within a 5km central study area, resulting in an overall *medium* value sensitivity judgement.

The study area comprises two landscape character units:

- D – North Coast Plateaux
- G – North Mayo Drumlins

These two landscape character units then inform specific policy areas within the Landscape Appraisal for Mayo:

- Policy Area 1: Montane Coastal Zone
- Policy Area 4: Drumlins and Inland Lowlands

The development site straddles both policy areas. Within Policy Area 1 – Wind farm development is considered to have a *“high potential to create adverse impacts on the existing landscape character and having regard to the intrinsic physical and visual characteristics of the landscape area, it is unlikely that such impacts can be reduced to a widely acceptable level”*. Please see matrix in Appendix A. Regarding this matrix, wind farm development within this area is considered to have a high adverse potential impact.

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Deirdre McDermott, Muiris Ó Céidigh, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | **E** mail@heritagecouncil.ie

www.heritagecouncil.ie



It is unclear why the EIAR has grouped 'Wind Farms, Power Lines and Communication Masts' together on *high to medium* scale of potential impact. To remove ambiguity, it should be stated that the application is for a wind farm development, and it is considered to have a *high* potential of impact within Policy Area 1¹, as per Appendix A.

With regards to Policy Area 4 (within which the southern section of the site is located) we acknowledge that the matrix notes it has less potential for adverse impacts, based on the Landscape Appraisal for the county. However, we do refer to our previous points made in our overarching comment on the imminent new Renewable Energy Strategy for Mayo.

The relevant policies from the adopted Mayo County Development 2022-2028 in this regard are:

- **NEP 14** To protect, enhance and contribute to the physical, visual and scenic character of County Mayo and to preserve its unique landscape character.
- **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.

In summary we do not agree with the suggestion that the study area is a *medium* sensitivity landscape receptor. It should be segregated by the two landscape units and by association the two policy areas, as per the Landscape Appraisal cited under Policy NEO 27 of the adopted Mayo County Development Plan 2022-2028. Therefore, the premise of the conclusion is somewhat flawed.

This conclusion suggests a *High-medium / Medium* magnitude impact on a **medium** sensitivity receptor, resulting in a Substantial-moderate / Negative / Long-term impact. **(our emphasis)**

As noted, we do not believe that a single medium sensitivity should be the basis of this conclusion on the significance of effect.

We recommend to the Commission that it segregate the study area as suggested here. It is likely that once this is done, the area within Policy Area 1 (Montane Coastal Zone) will encounter a more than substantial-moderate negative impact which would be significant in EIA terms. In this regard, the suitability of this northern section of the site needs to be questioned, as there is a concern regarding the consistency of the proposal with Policy NEO 27, and more generally Policy NEP 14, of the adopted Mayo County Development Plan 2022-2028.

Cultural Heritage

We have reviewed the assessment of individual cultural heritage receptors in this application. Aside from the potential for unknown archaeology on site, the primary consideration for the Heritage Council is the potential for indirect negative effects on the setting of several national monuments,

¹ We do note that the current renewable energy strategy identifies different tiers of suitability for wind energy potential. However, our emphasis is on the Landscape Appraisal and the associated policy areas discussed within it, with respect to Policy NEO 27.

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Deirdre McDermott, Muiris Ó Céidigh, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | **E** mail@heritagecouncil.ie

www.heritagecouncil.ie



archaeological complexes, as well as any effects on the setting of the internationally important Céide Fields complex.

The EIAR, particularly Chapter 12 (Landscape and Visual) and Chapter 14 (Cultural Heritage) have detailed an assessment of such impacts on the various receptors, using relevant EPA guidance for determining significance of effect. In general terms, we accept that the sensitivity assigned to the receptors is sound.

However, whilst individual isolated judgements on the magnitude of impact² can be debated, we are conscious that there is a negative effect of varying magnitude to several receptors.

With due regard to our previous points on landscape sensitivities and that the development site is partially within an area where wind energy is expected to have adverse landscape impacts, it is clear to the Heritage Council that the most sensitive of the cultural heritage receptors are in the aforementioned Policy Area 1 also. This includes the Céide Fields, Rathfrán Friary and Stone Circle, and the Rathlacken Archaeological Complex.

The relevant policies from the county development plan are:

- **BEP 1** - To support and promote the protection, appropriate management and sympathetic enhancement of the county's archaeological heritage within the Plan area, in particular by implementing the Planning and Development Act 2000 (as amended) and the National Monuments Act 1930
- **BEO 1**- 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 presence of a significant number of cultural heritage receptors including national monuments and many recorded monuments in Policy Area 1, further indicates again the unsuitability of wind farm development in this area. Whilst individually there are varying degrees of impact on each receptor, the quantity of receptors impacted is considerable, ranging from low to medium magnitude impact. In fact, it has been determined that two receptors will experience a significant negative indirect effect (Table 14.17), namely Castlelacken Folly (RPS 016) and Rathfrán Friary (National Monument 269). By association, we question the compliance of the proposal with the abovementioned policies.

Finally, we agree with the position in the EIAR that it is likely that sub-surface archaeological remains or features continue to survive with no visible surface trace in this area. It is therefore essential that the proposed archaeological mitigation be closely adhered to, and this needs to be agreed with the National Monument Service.

² Please note that when it comes to visual impacts, this should be based on distance to the nearest turbine and the number of turbines viewed from the relevant viewpoint.

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Deirdre McDermott, Muiris Ó Céidigh, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie



Biodiversity

We are satisfied that the relevant European sites have been identified. There is some concern however that the following proposed Natural Heritage Areas (pNHAs) have been considered as having no ecological connectivity:

- Downpatrick Head pNHA (site code: 00494)
- Creevagh Head pNHA (site code: 00482)

Site synopses are available for these pNHAs³. In terms of Downpatrick Head pNHA, it is noted that the site is chiefly noted for its seabird colony, which has a documented history going back to the 1890s. Key species include Fulmar, Kittiwake, and Guillemot as well as some other species. Whilst the site is also known for its geological features, it is its ornithological significance that is of ecological value. No description of the pNHA is provided, and given the relative proximity to the development site, there is a need to rule out impacts on the pNHA. Similarly, Creevagh Head pNHA is noted as having nationally important populations of Kittiwakes, Fulmars, Guillemots, as well as a breeding territory for peregrine falcon, an Annex I listed bird species.

Given the nearby European designated sites for ornithological interests i.e. Kilala Bay and Moy Estuary SPA, there may be dispersal/movement/and foraging between the pNHAs noted here and other sites, along the coastal areas in this part of Mayo.

The Ornithological Chapter submitted has noted however that no cliff breeding birds were observed during the vantage point surveys, therefore this may be satisfactory justification for not discussing these pNHAs further. We ask 'the Commission' to confirm this to ensure compliance with the following policies.

The relevant policies in this regard:

- **NEP1** of the Mayo County Development Plan seeks to *support the protection, conservation and enhancement of the natural heritage and biodiversity of County Mayo including the protection of the integrity of European sites, that form part of the Natura 200 network, the protection of Natural Heritage Areas, proposed Natural Heritage Areas Ramsar Sites*
- **NEP 4** that seeks to *conserve and enhance the county's biodiversity and ecological connectivity.*

Furthermore, the Heritage Council's fundamental position on nature conservation and restoration is that the loss of existing important habitats is preferable to replacement. The integrity of future nature restoration efforts will lack credibility should parallel losses of important habitats occur through consenting regimes.

Within this context, we would question the benefits of locating Turbine AT13 within an area of Blanket Bog. The carbon savings from doing this is highly questionable, given the intimate

³ Please note we would seek clarification that the Assessment is aware of the availability of the site synopses for pNHAs.

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Deirdre McDermott, Muirís Ó Céidigh, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | **E** mail@heritagecouncil.ie

www.heritagecouncil.ie



relationships between hydrological and biochemical regimes in peatlands. In addition, this area provides suitable habitat for breeding meadow pipit (Red-listed) and skylark and provides foraging habitat for species such as kestrel and hen harrier⁴.

Conclusion

The Heritage Council is committed to a plan led system. In addition, our position is that environmental constraints analysis should inform the location of development, renewables or otherwise. In this case, there appears to be some inconsideration to the provisions of the Landscape Appraisal for County Mayo, whereby wind farms are unlikely to be able to avoid adverse effects on landscape character (in Policy Area 1).

Equally, it is clear to the Heritage Council that many of the heritage assets are located in this area, including the many sensitive cultural heritage features discussed in Chapter 14, the European Natura 2000 designations, and the landscape character unit of the North Coastal Plateaux. When considered in combination, we question the suitability of wind farm development in this area.

Against existing policy, consideration may be given to some turbines in the southern section of the site, however, any turbines proposed in Policy Area 1 cannot be supported. Although we would refer the Commission to our initial point in our introduction comment on the future Renewable Energy Strategy for Mayo in this regard.

Finally, the Heritage Council's preferred energy source is renewable energy development. Yet, such developments can and do have impacts on heritage designations. Accordingly, to ensure a sound plan led system, we wish to ensure that environmental constraints inform the location of renewables. The Heritage Council do not believe this has been demonstrated fully for this application.

I trust this submission will aid the Commission in its determination of the application.

Yours sincerely

Virginia Teehan

Chief Executive Officer⁹

⁴ The assessment has noted that the study area should be rated as county importance for hen harrier (winter), kestrel (all year) and snipe (breeding).

Bail na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Deirdre McDermott, Muiris Ó Céidigh, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | **E** mail@heritagecouncil.ie

www.heritagecouncil.ie



Appendix A

Development Impact - Landscape Sensitivity Matrix								
	Wind farms	Power lines	Quarrying/ Extraction	Forestry	Commun- -ication Masts	Industrial/ Commercial	Rural Dwellings	Road Projects
Policy Area 1								
Policy Area 2								
Policy Area 3								
Policy Area 4								

Key

- = High potential to create adverse impacts on the existing landscape character. Having regard to the intrinsic physical and visual characteristics of the landscape area, it is unlikely that such impacts can be reduced to a widely acceptable level.
- = Medium potential to create adverse impacts on the existing landscape character. Such developments are likely to be clearly discernible and distinctive, however with careful siting and good design, the significance and extent of impacts can be minimised to an acceptable level.
- = Low potential to create adverse impacts on the existing landscape character. Such development is likely to be widely conceived as normal and appropriate unless siting and design are poor.

ig

Figure 1: Landscape Sensitivity Matrix Mayo County Development Plan 2022-2028

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Deirdre McDermott, Muiris Ó Céidigh, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie

www.heritagecouncil.ie