

From: [Yvonne Jackson](#)
To: [SIDS](#)
Subject: Fáilte Ireland Submission-Case Ref PAX16.324387
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Attachments: [image.png](#)
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Dear Secretary,

Fáilte Ireland would like to take the opportunity to make a submission to **Case Ref PAX16.324387** re the proposed development consists of 13 wind turbines, a 110kV substation, battery energy storage system (BESS) and all associated infrastructure.

The attached submission has been prepared by Fáilte Ireland, the National Tourism Development Authority.

I would be grateful if you could send a reply email acknowledging receipt of submission.

Regards,

Yvonne

Yvonne Jackson

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An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1

7th August 2026

ACP. Ref.: PAX16.324387

Applicant: Constant Energy Limited

Re: Submission in relation to Section 37E (REDIII) application for Muingmore Wind Farm comprising:

A 10-year planning permission for the erection of 13 wind turbines, a 110kV substation, battery energy storage system (BESS) and all associated infrastructure, and associated site development works, within the townlands of Muingmore (An Mhoing Mhór), Doolough (Dumha Locha), Tristia (Troiste), Moneynierin (Moing an Iarainn) and Bangor (Baingear) in northwest County Mayo.

To whom it may concern,

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to an application for the erection of 13 wind turbines with an overall ground to tip height of between 179m to 180m and associated wind farm infrastructure development. The Site is located c.8km west of Bangor Erris and c.0.5km north of Gweesalia in the coastal region of northwest Co. Mayo. The Wind Farm site, which has an anticipated output of between 74.1 and 91MW, has a total area of c.454.0 hectares.

A 10-year planning permission and 35-year operational life from the date of commissioning of the entire Wind Farm is being sought.

An EIAR and NIS has been submitted with the application.

We understand that a separate planning application for a 110kV underground grid connection and all associated works, from the proposed onsite Substation to the Bellacorick Substation (within the townlands of Doolough, Tristia, Goolamore, Drumanaffrin, Kilteany, Srahmore, Bangor, Srahanarry,

Briska, Largan More, Largan Beg, Tawnaghmore, Kilsallagh, Bellacorick), will be lodged to An Coimisiún Pleanála.

1.0 Introduction

As a prescribed body in the planning process, one of the main objectives of Fáilte Ireland is to advocate for the protection of key tourism assets and amenities. The Irish landscape is one of the primary assets for tourism in the country and has been the cornerstone of international tourism marketing campaigns for decades. International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore, as the Irish landscape is one of the primary reasons for visiting the country, it is essential that the quality, character and distinctiveness of this valuable resource is protected.

Equally Fáilte Ireland recognises the importance of developing the State's renewable energy sector. In this regard Fáilte Ireland has been supportive of and contributes to the preparation and adoption of the Wind & Renewable Energy Strategies for counties across the Country. These Strategies have provided invaluable guidance to Applicants, Shareholders and Planning Authorities alike in identifying potential sites and in assessing the potential for development of appropriately located renewable energy infrastructure. Within the hierarchy of plans, these Strategies have ensured that the development of renewable energy infrastructure, such as wind farms, is plan-led and can be located to avoid, or minimise disproportionate negative impacts on other land uses, including tourism-related uses and the receiving environment.

2.0 Mayo Tourism

In 2024 Mayo welcomed over 212,000 overseas visitors who in turn generated €138m in revenue with an average stay of 5.6 nights. 809,000 domestic visitors visited Mayo in 2024 generating €222m in revenue with an average stay of 2.9 nights. As highlighted in the Mayo County Development Plan the tourism sector is the largest indigenous industry in the county and provides income and employment to all areas of the county, including urban, rural and coastal. Mayo has a lot to offer as a tourism destination and has great potential to further develop its tourism industry as a key economic sector for the county.

Fáilte Ireland prepares and implements a Destination and Experience Development Plan (DEDP) for each destination. A DEDP sets out the challenges and opportunities for tourism in a destination and presents an action plan for the sustainable development of tourism over 5 years.



The Wild Mayo Destination and Experience Development Plan (DEDP) was launched in May 2026 and is a five-year plan that sets out a strategic framework to position North Mayo as a world class destination for wilderness, culture, and immersive outdoor experiences. The plan highlights the region's dramatic coastlines, rugged boglands, vibrant communities, and deep-rooted heritage - anchored by the Irish language as a core cultural asset. Wild Mayo DEDP seeks to inspire creativity and exploration through authentic storytelling, well developed trails, and meaningful engagement with landscape and tradition. The plan aligns with the National Tourism Policy Statement and the Wild Atlantic Way Regional Tourism Strategy (2023-2027) and focuses on strengthening existing attractions, creating new year-round experiences, and developing towns and villages as lively, well serviced visitor hubs. Key objectives include celebrating North Mayo's natural and cultural legacy, advancing sustainable and slow tourism models, and elevating the Gaeltacht as a cornerstone of identity. The plan also prioritises enhanced tourism infrastructure and services to meet the needs of visitors and local communities.



3.0 Tourism Context of the Proposed Development

The Site is located in the northwest coastal landscape of County Mayo. The attractiveness of this area for tourism is directly dependent on the remote unspoilt natural character of the exposed coastal landscape surrounding Blacksod Bay – characteristics which are highlighted in the internationally promoted **Wild Atlantic Way** and the presence of **10 Discovery Points** in the landscape setting of the proposed wind farm.

The internationally promoted **Wild Atlantic Way** (WAW) follows the local coastal roads around the Mullet Peninsula and along the coast by Claggan, Doolough, Gweesalia, Doohoma, Ballycroy (Wild

Nephin Ballycroy National Park) and Achill Island. The Wild Atlantic Way passes immediately west of the main development site and the proposed wind turbines will be visible across the majority of the c.170km long section of the WAW which promotes the area to the national and international tourists critical to supporting the tourist industry and associated services in this area.

This section of the WAW links the **Signature Discovery Point** of Downpatrick Head on the north coast of Mayo to the **Signature Discovery Points** of Keem Bay on Achill and Killary Harbour on the west coast of Mayo. While there are 25 Discovery Points between these Signature Points, the following 10 Discovery Points, which fully encompass the coastal landscape surrounding Blacksod Bay, are close to and within the visual context of the proposed wind farm at Muingmore:

- Dún na mBó (Mullet Peninsula)
- Annagh Head (Mullet Peninsula)
- Elly Beach (Mullet Peninsula)
- Falmore (Mullet Peninsula)
- Blacksod Harbour (Mullet Peninsula)
- Claggan Island
- Doohoma Head
- Inishbiggle Island
- Claggan Mountain Coastal Trail
- Dugort Beach (Achill Island)

In addition, while the Wild Atlantic Way is an Independent Travellers Route, the proposed wind farm also directly adjoins identified **Scenic Driving Sections** – Refer to **Figure 1: Proposed Wind Farm in the Context of the Wild Atlantic Way**.

Likewise, the promoted Tír Sáile (Sculpture Trail), includes the following sites close to the site:

- *Acknowledgements* (Claggan Island)
- *Temple of the Tides* (Belmullet Harbour)
- *The Thin Places* (Dún na mBó, Mullet Peninsula)
- *Deirbhleís Twist* (Blacksod Bay)



Figure 1: Proposed Wind Farm in the Context of the Wild Atlantic Way (Location of proposed wind farm and turbines identified by pink outline and blue dots)

The **Landscape Appraisal for County Mayo** (described in further detail below) describes this landscape as a complex arrangement of islands and peninsulas where a disproportionate length of coastline is visible over a comparatively small area and where uninterrupted vistas across the water of bays and channels to opposing shorelines are a defining feature. Development can have a disproportionate visual impact in such terrain, due to an inherent inability to be absorbed, physically or visually and concerns for natural linear features such as these coast-lines and ridgelines is to avoid penetration by development that will interrupt and reduce the integrity of such elements.

Tourism and Recreation Policy TR11 of the **Mayo County Development Plan 2022-2028** sets out:

“To promote Mayo as a premier walking / cycling destination in the Country and support the further development of walking routes and trails within the county and the integration and linkage of these with other existing / proposed routes and trails both within and outside of County Mayo, in accordance with national walking strategy guidance and in conjunction with the Tourism Section of Mayo County Council, Fáilte Ireland and other relevant stakeholders. Opportunities to enhance ecological connectivity should be integrated as part of any linking of routes to strengthen and support green infrastructure.”

The Landscape Appraisal For County Mayo (Volume 4 of Mayo County Development Plan 2022-2028)

The **Landscape Appraisal for County Mayo**, indicates that the proposed wind farm spans Landscape Character Area (LCA) B: ‘**North West Coastal Moorland**’, and Landscape Character Area (LCA) C: ‘**North West Coastal Bog**’

Nine to 10 of the turbines are located within **LCA B: North West Coastal Moorland** which is described (Section 2.3.1 of the *Landscape Appraisal*) as follows:

This area occupies the north-western extremity of the County, north of Achill Island and includes the Bellmullet peninsula. It can be generally described as a complex of low-lying islands and peninsulas with varying topographical and land cover characteristics but unified by its proximity to the coast. The southern and eastern extents of this unit have a uniform bog/moorland appearance, which gradually changes to more diversified land cover and topography toward the north-west. The terrain is generally smooth and bog/moor type grasses are the dominant vegetation in this exposed area. However, the Bellmullet peninsula at the very north-west of the County has significant areas of pasture with dunes along the western coast.

The **Critical Landscape Factors** for this LCA (Section 2.3.4 of the *Landscape Appraisal*) include:

Coastal Vistas

Being a complex arrangement of islands and peninsulas, there is a disproportionate length of coastline visible over this comparatively small area. Uninterrupted vistas across the water of bays and channels to opposing shorelines are abundant from areas of the public realm. The main concern for natural linear features such as coastlines and ridge lines is to avoid penetration by development that will interrupt and reduce the integrity of such elements.

Smooth Terrain

Smooth terrain, as is characteristic of this unit, allows vistas over long distances against a planar surface without breaking up fore and middle ground. In such terrain, distances can appear shorter and development closer or larger. As a result development can have a disproportionate visual impact in such terrain, due to an inherent inability to be absorbed, physically or visually.

Low Vegetation

Low vegetation as represented in this unit by moorland and bog type grasses has similar characteristics to smooth terrain in landscape terms, and the two are often interrelated due to soil attributes. Grassland vegetation is generally uniform in appearance, failing to break

up vistas, and allowing long distance visibility. It is this inability to absorb development that identifies low vegetation as a critical landscape factor.

Prominent Ridge Lines

These occur as either primary ridgelines (visible only against the sky from any prospect) or secondary ridgelines (visible at least from some prospects below a distant primary ridge line). In this low lying and open environment, even low ridgelines are primary due to their isolation and setting.

Ridge lines perform the important roles of providing an area with its identity, acting as dominant landscape focal points, and defining the extent of visual catchments.

As with other natural linear features such as shorelines it is important that development does not interrupt the integrity of primary ridgelines. Due to the dominating influence of ridgelines, in instances where penetration does occur, development can appear insubordinate to the landscape in which it sits.

The remaining 3 to 4 turbines are located within **LCA C: North West Coastal Bog** which is described (Section 2.4.1 of the *Landscape Appraisal*) as follows:

This area is the low-lying bog strip located between the western coastline and the Beg Range to the east. It has a homogenous, exposed, moorland appearance throughout. The topography is smoothly contoured with bog/moor type grasses being the predominant vegetation. Included in this area are the seaward foothills of the Beg Range.

The **Critical Landscape Factors** for the LCA (Section 2.4.4 of the *Landscape Appraisal*) include:

Smooth Terrain

Smooth terrain, as is characteristic of this unit, allows vistas over long distances against a planar surface without breaking up fore and middle ground. In such terrain, distances can appear shorter and development closer or larger. As a result, development can have a disproportionate visual impact in such terrain, due to an inherent inability to be absorbed, physically or visually.

Low Vegetation

Low vegetation as represented in this unit by moorland and bog type grasses has similar characteristics to smooth terrain in landscape terms, and the two are often interrelated due to soil attributes. Grassland vegetation is generally uniform in appearance, failing to break up vistas, and allowing long distance visibility. This inability to absorb development identifies low vegetation as a critical landscape factor.

In terms of **Scenic Evaluation**, the entire coastal landscape to the west and south of the wind farm site, including the Mullet Peninsula, the Claggan Island / Gweesalia / Doohooma coast, and Achill Island, are highlighted as ‘**Vulnerable Features**’, as are the corridors of coastal inlets, rivers surrounding the site and elevated summits / ridges / slopes to the east of the site.

In terms of **Scenic Routes and Protected Views**, the coastal routes from Belmullet south across the Mullet Peninsula to Blacksod; the loop via Gweesalia – Doohooma – Gweesalia (directly south of the proposed wind farm); and the north Achill coast drive, are identified as Scenic Routes with Protected Views at Fallmore, Blacksod Lighthouse and Muingdoran amongst others.

In terms of **Landscape Policy**, the stated policy regarding areas designated as **vulnerable** (section 3.1(b) of the *Landscape Appraisal for County Mayo*) is that:

“These areas or features designated as vulnerable represent the principal features which create and sustain the character and distinctiveness of the surrounding landscape. To be considered for permission, development in the environs of these vulnerable areas must be shown not to impinge in any significant way upon its character, integrity or uniformity when viewed from the surroundings. Particular attention should be given to the preservation of the character and distinctiveness of these areas as viewed from scenic routes and the environs of archaeological and historic sites.”

In terms of **Principle Policy Areas**, the proposed wind farm is located in **Policy Area 2 – ‘Lowland Coastal Zone’**, which is described (Section 4.1.2. of the *Landscape Appraisal*) as follows:

This area, despite the mildly variant terrain and land cover, has as a principle landscape factor a visual association with the coastline. The lowland coast is considered a separate core policy area, in relation to the other steeper coastal area, as it has significantly different landscape attributes, sensitivities and robustness.

The relevant landscape and visual policy considerations include:

Policy 10

Recognise that in this low-lying open environment, tall and bulky development can have a disproportionate impact against the landscape when viewed from the low-lying areas of the public realm.

Policy 11

Encourage development that will not have a disproportionate effect on the existing character of the landscape in terms of location, design, and visual prominence.

It is noted that policies 4, 5, 6 and 7 from Policy Area 1 also apply to Policy Area 2...

Policy 4

Consider development that does not significantly interfere or detract from scenic coastal vistas, as identified in the Development Plan, when viewed from areas of the public realm.

Policy 5

Encourage development that will not interrupt or penetrate distinct linear sections of primary ridge lines and coastlines when viewed from areas of the public realm.

Policy 6

Preserve any areas that have not been subject to recent or prior development and have retained a dominantly undisturbed coastal character.

Policy 7

Consider development on steep slopes, ensuring that it will not have a disproportionate or dominating visual impact on the surrounding environment as seen from areas of the public realm.

Section 5 **The Development Impact - Landscape Sensitivity Matrix** of the Landscape Appraisal notes that wind farms in Policy Area 2 have:

“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.”

THE RENEWABLE ENERGY STRATEGY FOR COUNTY MAYO (Adopted 13 July 2026)

The Renewable Energy Strategy for County Mayo, identifies the area of the proposed wind farm and surrounding context as **‘Unsuitable’** for wind farm development.

The previous version (in Volume 4 of County Development Plan) identified the site a ‘Tier 1 Preferred Area’ – below the ‘Priority Areas’, however this version dated back to 2011 and the updated version has taken account of current context which includes the ‘clustering’ effect of major wind turbine development in the most suitable areas (e.g. at Bellacorick) and the consideration of a better appreciation for sensitive natural landscapes and the value of its promotion including by initiatives such as the Wild Atlantic Way.

4.0 Review of Assessment of Tourism in the EIAR submitted with the Application

An EIAR has been submitted with the proposed development. Tourism, and impact on tourism, is addressed in Chapter 4: Population and Human Health and also referenced in Chapter 10: Landscape and Visual Impact Assessment of the EIAR.

It is considered that the existing tourism context is poorly addressed and then only at a high level under Recreation, Amenity and Tourism of the EIAR. Reference is provided to some of the key tourist assets, including the Wild Atlantic Way, and while Table 4-9 outlines the 'Approximate Distance of Tourism Sites to Main Wind Farm Development Site', including to 5 Wild Atlantic Way Discovery Points, it omits at least 5 further Discovery Points which are within the visual setting of the proposed wind farm.

No mapping of tourist destinations, facilities or sites is provided and critically there is no description of the basis, characteristics or sensitivities of the tourism product in the area.

The impact of the proposed development on tourism relies heavily on the landscape and visual impact assessment (Chapter 10 of the EIAR), noting in many instances that the proposed development will result in at most 'moderate and long-term effects' for tourism / tourism sites.

While reference to cumulative effects is provided in the chapter there is assessment of cumulative effects of proposed development on tourism.

In every instance where impacts are assessed in the EIAR, including throughout the assessment for impacts on Tourism and for Landscape and Visual impacts, it is noted that the assessment is followed by a statement in brackets '(Not Significant in EIA terms)'. The basis for this statement is unknown and critically, it would appear to qualify, if not undermine, the assessment of impacts in the EIAR.

Having regard to Chapter 10: Landscape and Visual Impact Assessment, and in contrast to Chapter 4 we would acknowledge that the baseline environment, including its characteristics and sensitivities, and tourism considerations, is described in detail.

However, a fundamental weakness in the assessment of impacts lies in the approach to under-rating the sensitivity of the baseline environment and to downplaying the magnitude of change derived from the proposed development. The overall effect of this approach is inadequate assessment of impacts and a notable under-representation of major changes and significant effects for the landscape, visual and tourism resource.

By way of example, Table 10-2 defines the Landscape Sensitivity and Value of landscape resources noting that 'Very High' is applied to:

“Areas where the landscape character exhibits a very low capacity for change in the form of development. Examples of which are high value landscapes, protected at an international or national level (World Heritage Site/National Park), where the principal management objectives are likely to be protection of the existing character.”

Likewise, Table 10-3 defines the Magnitude of Change arising from the proposed development, noting that for ‘High’ is:

“Change that would be more limited in extent and scale with the loss of important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to a considerable change of the landscape in terms of character, value and quality.”

Having regard to Table 10-5 Significance Matrix, a combination of High Magnitude of Change for a receptor with Very High Sensitivity the resultant impact assessment would be ‘Profound-Substantial’

However, the assessment presented in the chapter generalises the application of ‘sensitivity and value’ to ‘High-Medium’, despite the presence of the internationally significant Wild Atlantic Way, a National Park (Wild Nephin – Ballycroy), multiple scenic routes protected views, and a general acceptance – including in the description of the baseline in Chapter 10 – of the noted significance of the landscape. A similar generalised approach is applied to ‘magnitude of effect,’ using ‘High-Medium’ within 5km of the wind farm site and ‘Low-Negligible’ at increasing distance.

As such, the use of a generalised ratings ‘High-Medium’ does not equate to the definitions provided in Table 10-2, which would bestow a sensitivity of at least ‘High’, if not ‘Very High’, on much of the landscape setting of the proposed wind farm and Table 10-3 which would bestow a rating of ‘High’, if not ‘Very High’, on the magnitude of change arising from the proposed wind farm.

We believe that if the correct approach was applied to sensitivity/value to the magnitude of change, then the impact assessments of ‘Substantial-moderate’ would have been more correctly assessed as being ‘Profound-substantial’. If these assessments had been applied in Chapter 10 of the EIAR, then a more appropriate assessment of the impact of the proposed wind farm on tourism would also have been presented in Chapter 4 of the EIAR.

5.0 Conclusion

It is considered that the proposed development has the potential to impact on the local and wider tourism amenities of the area– a resource of acknowledged significance.

The suitability of the site for wind farm development should be considered by the planning authority having regard to the number of landscape sensitives identified in the Landscape Appraisal for County Mayo and general unsuitability of the land for wind farms as identified in the Renewable Energy Strategy for County Mayo.

It is considered that the EIAR for the proposed development has not provided an appropriate or suitably detailed assessment of the significant impacts that the proposed wind farm development will have on tourist assets and resources of international, national, regional and local significance.

We believe that the proposed wind farm development has the potential to be in direct conflict with the Strategic Aim for Tourism Development as expressed in Section 2.3 of the Mayo County Development Plan 2022-2028:

“To develop Mayo as a leading tourism destination through continued sustainable expansion of the tourism sector, with a focus on creating high-quality visitor services and the continued development and enhancement of visitor attractions and activities, capitalising on our natural and cultural heritage assets, whilst safeguarding these resources for future generations.”

In addition, the proposed development has the potential to be in direct conflict with a number of sustainable tourism-related policies and objectives of Chapter 5: Tourism and Recreation in the Mayo County Development Plan, and with the initiatives of Fáilte Ireland, Ireland’s National Tourism Development Authority, for the Northwest Mayo region.

Therefore, we would ask that An Coimisiún Pleanála in their assessment gives full and adequate consideration to the likely significant impacts that Muingmore Wind Farm would have on the high quality cultural, natural and landscape environment, which is critical to the tourism resource underpinning the value and quality of the Wild Atlantic Way and the wider Blacksod Bay setting.

Yours Sincerely,



Shane Dineen-Planning & Environment Manager