

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

Date: 14th July 2026

RE: Formal Planning Objection / Observation

- **Planning Reference:** PAX16.324387
- **Proposed Development:** 13 wind turbines (180-metre tip height each), 110kV substation, Battery Energy Storage System (BESS), and associated infrastructure at Muingmore, Doolough, and Tristia townlands, Co. Mayo.
- **Developer:** RWE Renewables Ireland Limited
- **Objector:** Aoife Howard, Wardley, Monterey Road, Greystones, Co. Wicklow & Muingmore, Co. Mayo

A Chara,

I am writing to submit a formal objection regarding the proposed Muingmore Wind Farm development (PAX16.324387).

This submission is raised specifically on the grounds of **Procedural Fairness, Statutory Non-Compliance, and Material Discrepancies** within the bilingual public consultation documents. Specifically, there are severe, legally flawed translation errors between the English master documents and the Irish *Achoimre Neamh-Theicniúil* (Non-Technical Summary—NTS).

These linguistic discrepancies significantly dilute the developer's environmental commitments and technical parameters, meaning the Irish-speaking public has been presented with a materially different, watered-down project description compared to the English-speaking public. This represents a fundamental failure to facilitate lawful, transparent public participation under Strategic Infrastructure Development (SID) protocols and Irish planning law.

1. Technical Grid Interconnection & Capacity Phrasing Discrepancies

Within the NTS, highly specific electrical engineering concepts and strict grid limitations have been reduced to vague, descriptive Irish phrases. This masks critical grid capacity issues and undermines the technical integrity of the application.

A. The "Grid/Network" Ambiguity

- **English Text:** *"The electricity grid infrastructure and transmission capacity..."*

- **Irish Translation (NTS):** "...an bonneagar sreafa leictreachais..."
- **Planning & Legal Flaw:** The use of *sreabhadh* (flow/throughput) instead of *líonra* (network) or *greille* (grid) fundamentally misrepresents the scope of the infrastructure. *Sreabhadh* merely describes the physical movement of electricity. The English master document refers directly to the structural, legally binding capacity allocations managed by EirGrid. By failing to translate this as *Líonra Náisiúnta* (National Grid) or *Córas Tiomána* (Transmission System), the Irish text shields the developer from legal accountability regarding strict grid capacity constraints.

B. "Curtailement" vs. "Constraint" Softening

- **English Text:** "Output may be subject to grid curtailment and operational constraints..."
- **Irish Translation (NTS):** "...d'fhéadfadh go laghdófaí an t-aschur de bharr teorainneacha oibríochta..."
- **Planning & Legal Flaw:** Translating "curtailment" as a generic reduction (*laghdú*) and "constraint" as a simple limit (*teorainn*) hides the operational reality of non-firm corporate power purchase agreements (PPAs). Under Irish planning law, the exact technical mechanisms of *ciorruithe* (curtailments) and *srianta* (constraints) must be translated precisely. The Irish-speaking public has been deprived of the opportunity to understand how often these 180-metre turbines will sit idle due to local grid bottlenecks.

2. Environmental & Ecological Mitigation Discrepancies

The proposed development is located on sensitive blanket bog topography across Muingmore, Doolough, and Tristia. On such vulnerable terrain, the precise wording of environmental safeguards dictates the developer's legal exposure in the event of an engineering or hydrological failure.

A. "Mitigate" vs. "Minimize" (The Legal Gulf)

- **English Text:** "Measures designed to mitigate the long-term hydrological impacts on the blanket bog..."
- **Irish Translation (NTS):** "...bearta atá deartha chun cur isteach hidreolaíoch ar an bportach a laghdú oiread is féidir..."
- **Planning & Legal Flaw:** The English text establishes an active, binding obligation to *mitigate* (*maolú* or *leasú*)—to actively neutralize, correct, or substitute an environmental injury. Conversely, the Irish NTS loops back to *laghdú oiread is féidir* (minimize as much as possible). In planning enforcement, "minimizing" allows a developer to cause severe ecological damage to the blanket bog as long

as they argue they "tried their best" to keep it small. "Mitigating" requires a proven, functional remedy. The Irish text fails to hold the developer to this mandatory legal threshold.

B. "Avoidance" vs. "Management" of Watercourses

- **English Text:** *"All structural infrastructure will strictly avoid known archaeological assets and natural watercourses..."*
- **Irish Translation (NTS):** *"...déanfar bainistiú ar bhonneagar gar do chúrsaí uisce..."*
- **Planning & Legal Flaw:** The English text establishes a definitive, strict barrier of avoidance (*seachaint iomlán*), such as the mandatory 50-metre watercourse buffer zone. The Irish text dilutes this to a clause of management (*bainistiú*) or general protection (*cosaint ghinearálta*). This linguistic loophole permits the developer to alter buffer zones under a revised Construction Environmental Management Plan (CEMP) without technically triggering a violation of the Irish statutory text.

3. Lack of Socio-Linguistic Assessment

Given that the proposed 13-turbine development is situated within a Gaeltacht Language Planning Area, the developer has failed to provide a Language Impact Assessment (LIA) to evaluate how the influx of construction workers, operational staff, and long-term physical changes will affect the daily use of the Irish language in the local community. Combined with the defective bilingual translations in the NTS, this demonstrates a total disregard for the linguistic protections mandated under the Planning and Development Act and the Mayo County Development Plan.

Conclusion & Request for Refusal

Under the **Planning and Development Act**, the provision of statutory planning and environmental notices in the first official language is not a cosmetic exercise; it is a strict legal requirement.

Because the *Achoimre Neamh-Theicniúil* contains watered-down environmental commitments (*laghdú* vs. *maolú*) and inaccurate technical frameworks (*sreabhadh* vs. *líonra*), the public notices are fundamentally defective. The Irish-speaking community has been denied their right to consult on the same rigorous technical and ecological commitments offered to English speakers.

Consequently, the public participation process for this Strategic Infrastructure Development has been compromised and is legally invalid.

I respectfully request that An Coimisiún Pleanála **refuse planning permission** for this development, or declare the application invalid, until such time as a legally accurate, fully compliant bilingual Environmental Impact Assessment Report (EIAR) and Non-Technical Summary are prepared and re-advertised.

Is mise le meas,

Aoife Howard

Muingmore, Co. Mayo / Greystones, Co. Wicklow