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07/08/2026

Observation on Muingmore Wind Farm

Planning Case Number: PAX16.324387

Dear Sir/ Madam,

I wish to make the following observation in respect of the proposed Muingmore Wind Farm development, in accordance with Section 37E of the Planning and Development Act 2000 (as amended) and Article 217 of the Planning and Development Regulations 2001 (as amended).

Having reviewed a substantial proportion of the planning application, including the Environmental Impact Assessment Report (EIAR), Planning Statement and associated technical documentation, I acknowledge the importance of renewable energy in meeting Ireland's climate and energy objectives. However, I respectfully submit that a number of material planning and environmental issues remain insufficiently resolved and warrant careful consideration by the Commission before any determination is made.

The proposal is a significant Strategic Infrastructure Development with the potential to alter a sensitive peatland landscape for a prolonged operational period. While the application contains an extensive body of technical information, the adequacy of an EIAR must ultimately be judged not by its volume but by whether it provides sufficient certainty to enable the Commission to fully assess the likely significant environmental effects of the proposed development.

From my review of the submitted documentation, a number of recurring themes emerge.

Firstly, the assessment of reasonable alternatives does not clearly demonstrate why the Muingmore site 'represents the environmentally preferable option. While the applicant describes a broad strategic site-selection process, the EIAR does not transparently compare this location with other realistic alternatives on environmental grounds. Instead, environmental constraints appear largely to have been addressed after the site had been selected rather than informing the selection itself. This is particularly relevant given the acknowledged presence of deep peat, Annex I blanket bog habitat, sensitive bird populations and hydrologically connected watercourses.

Secondly, the project relies extensively on future mitigation and adaptive management to reduce potentially significant effects to acceptable levels. This is particularly evident in relation to biodiversity, where the conclusions regarding birds, bats and peatland habitats depend on habitat restoration, operational turbine curtailment, post-construction monitoring and future refinement of mitigation measures. While adaptive management has an important role, it should not replace clearly defined mitigation at application stage where that mitigation is necessary to conclude that significant adverse effects will not arise.

The ecological assessment itself confirms the presence of important habitats and species, including Annex I blanket bog and species of conservation concern such as Curlew, Golden Plover and bats. The EIAR also acknowledges that some restoration objectives, particularly the re-establishment of peat-forming vegetation such as Sphagnum, may be uncertain. This raises legitimate questions as to whether long-term habitat enhancement can be relied upon to offset permanent habitat loss and whether the proposed restoration measures are sufficiently certain to support the conclusions reached.

The proposed Battery Energy Storage System also raises matters requiring further scrutiny. The application indicates that key elements of the battery technology, operational design and aspects of the safety management framework remain to be finalised following the grant of permission. Given the scale of the proposed installation, I respectfully submit that the Commission should be satisfied that the environmental assessment has considered a clearly defined worst-case design envelope and that emergency response, fire safety and environmental protection measures are sufficiently detailed before any permission is granted.

Similarly, the assessment of population, human health and tourism appears to rely heavily on conclusions drawn from other specialist chapters. While the EIAR concludes that significant adverse effects are unlikely, the detailed assessment acknowledges moderate long-term effects on a number of valued landscape and recreational receptors, including Wild Nephin National Park and surrounding tourism assets. These acknowledged effects should form part of the overall planning balance.

Finally, I note that a number of conclusions throughout the EIAR depend on measures to be agreed, refined or updated following consent. These include operational curtailment regimes, habitat management, ecological monitoring, restoration strategies and aspects of the Battery Safety Management Plan. While such measures may ultimately prove effective, I respectfully submit that the Commission should carefully consider whether the current application provides sufficient certainty to conclude that all likely significant environmental effects have been fully identified and appropriately assessed.

In making this observation, I do not seek to diminish the importance of renewable energy development. Rather, I respectfully request that the Commission ensure that the proposed development complies fully with the requirements of the Planning and Development Acts, the Environmental Impact Assessment Directive and the Habitats Directive. Where material uncertainties remain regarding the environmental assessment or the effectiveness of mitigation, I respectfully request that the Commission having reviewed the application find that the statutory tests have not been met and proceed to refuse permission on this application.

I trust that the above observations will assist the Commission in its assessment of this important application.

Yours faithfully,



Brian Barrett
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