

FORMAL PLANNING OBSERVATION

Planning Application PAX16.324387

Proposed Wind Farm Development in Erris

Submitted to:

An Coimisiún Pleanála

Submitted by:

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1. Introduction

I wish to make this formal observation objecting to Planning Application PAX16.324387

concerning the proposed wind farm development in the Erris region.

I recognise that Ireland has committed to increasing renewable energy generation and reducing greenhouse gas emissions. Renewable energy is an essential part of achieving national and international climate objectives. However, renewable energy developments must be carefully planned and appropriately located so that they do not cause unacceptable harm to landscapes, biodiversity, residential amenity, cultural heritage or the long-term sustainability of rural communities.

Planning decisions require a careful balancing exercise between national policy objectives and the protection of the natural and human environment. It is my view that this proposal does not achieve that balance.

For the reasons outlined in this submission, I respectfully request that An Coimisiún Pleanála refuses permission for the proposed development.

2. Personal Statement

I have a strong personal connection to the Erris area and care deeply about preserving its exceptional landscape, wildlife, heritage and rural character for future generations.

My observations are submitted in good faith and arise from a genuine concern for the long-term wellbeing of the local community rather than opposition to renewable energy itself. I fully support renewable energy where it is appropriately located and where environmental impacts can be satisfactorily addressed.

Erris is recognised throughout Ireland and internationally for its dramatic Atlantic coastline, blanket bogs, mountains, dark skies, wildlife and peaceful rural environment. These qualities cannot easily be recreated once altered.

The planning system has an important responsibility to protect these unique characteristics while ensuring that development proceeds in a sustainable and proportionate manner.

3. Planning Context

Every planning application should be assessed on its own merits while taking account of environmental protection, proper planning, sustainable development and the public interest.

In my view, this proposal raises significant concerns in several important planning areas, including:

- Landscape protection
- Residential amenity
- Biodiversity conservation
- Protection of peatlands and water resources
- Tourism and the local economy
- Traffic and road safety
- Heritage and cultural identity
- Cumulative impacts
- Sustainable rural development

1. Residential Amenity
2. Noise and Shadow Flicker
3. Wildlife and Biodiversity
4. Peatlands, Climate and Water Protection
5. Traffic, Road Safety and Construction
6. Heritage and Local Character
7. Cumulative Impact
8. Sustainable Rural Development and Community Viability
9. Community Benefit
10. Wider Sustainability Concerns

While each of these issues is important individually, their combined effect is particularly significant.

The cumulative impact of multiple environmental pressures should be considered when determining whether a development is appropriate in such a sensitive landscape.

4. Landscape and Visual Impact

Landscape is one of Erris's greatest assets.

The region is characterised by extensive open bogland, rugged mountains, Atlantic coastline, lakes and uninterrupted panoramic views that have remained largely unchanged for generations.

The proposed turbines would introduce structures of an industrial scale into this landscape. Due to their height and prominence, they would become dominant visual features across a wide geographical area.

Unlike many other forms of development, wind turbines remain highly visible throughout their operational life.

Once constructed, the visual impact would be permanent for decades.

Residents, visitors and future generations would experience an altered landscape that could never be returned to its present condition.

Landscape is not simply scenery; it forms part of the identity, heritage and cultural value of an area.

The unique character of Erris contributes significantly to residents' quality of life and to Ireland's natural heritage.

Planning decisions should therefore give considerable weight to preserving landscapes of exceptional quality where irreversible change would occur.

5. Residential Amenity

People who choose to live in rural areas make that decision partly because of the peace, openness and natural surroundings that such areas provide.

The introduction of industrial-scale wind turbines has the potential to alter that living environment significantly.

Although technical assessments may conclude that noise limits can be achieved, the overall experience of living near a large wind energy development extends beyond measurable sound levels.

Visual dominance, aviation lighting, turbine movement, shadow flicker and changes to the character of the surrounding landscape can all influence residential amenity.

Even where individual impacts are considered acceptable in isolation, the combined effect may substantially change the experience of living in a rural community.

Planning decisions should recognise that protecting residential amenity includes preserving the overall quality of the living environment and not merely ensuring compliance with technical standards.

6. Tourism and the Local Economy

Tourism plays an important role in the economy of the Erris region.

Visitors travel to the area because of its outstanding scenery, tranquillity, dark skies, wildlife, walking routes, fishing, beaches and opportunities to experience an unspoilt Atlantic landscape.

Accommodation providers, cafés, restaurants, shops, activity operators and many small businesses depend directly or indirectly upon this natural environment.

There is understandable concern that the industrialisation of prominent landscapes could reduce the area's attractiveness to visitors seeking a traditional rural and coastal experience.

While renewable energy developments can generate economic activity during construction, tourism provides long-term, sustainable employment that is closely linked to protecting the natural environment.

Planning decisions should therefore carefully balance any projected economic benefits of the proposal against the potential long-term consequences for tourism and the wider local economy.

7. Wildlife and Biodiversity

The Erris region supports a rich diversity of habitats and species that contribute significantly to Ireland's natural heritage. Blanket bogs, wetlands, coastal habitats, rivers and upland areas provide important ecological networks that support birds, mammals, insects and plant life.

The construction and operation of a wind farm of this scale has the potential to affect biodiversity in several ways, including habitat loss, habitat fragmentation, disturbance during construction, increased traffic, changes to hydrology and the risk of bird or bat collisions with turbine blades.

Even where mitigation measures are proposed, there is often uncertainty regarding the long-term effectiveness of those measures. Ecological systems are complex, and the cumulative effects of habitat disturbance may not become fully apparent for many years.

Ireland has national and international obligations to conserve biodiversity and protect designated habitats and species. Where uncertainty exists regarding environmental impacts, I respectfully submit that the precautionary principle should be applied.

Protecting biodiversity should remain a central consideration in determining whether this proposal represents sustainable development.

8. Peatlands, Climate and Water Protection

One of the defining characteristics of the Erris landscape is its extensive peatland.

Peatlands are internationally recognised as important carbon stores and provide essential environmental functions, including water regulation, flood mitigation and habitat for specialised wildlife.

Construction activities involving excavation, access roads, foundations, drainage works and cable installation have the potential to disturb peatlands and alter natural drainage patterns.

Such disturbance can release stored carbon into the atmosphere, reduce the carbon storage capacity of peatlands and affect surrounding watercourses.

Changes to drainage patterns may also influence downstream water quality, aquatic habitats and private water supplies.

Particular attention should be paid to:

- Peat stability.
- Drainage management.
- Sedimentation of rivers and streams.
- Protection of groundwater.
- Prevention of pollution during construction.
- Long-term restoration of disturbed peat.

Given the environmental importance of peatlands within Ireland, any uncertainty regarding these impacts should be approached with considerable caution.

It is essential that the long-term environmental costs associated with disturbing peatland ecosystems are fully considered when weighing the overall benefits of the development.

9. Traffic, Road Safety and Construction Impacts

The construction of a wind farm of this scale would require the transportation of exceptionally large turbine components together with a substantial volume of heavy construction traffic.

Many of the roads serving the Erris area are rural roads originally designed for local traffic rather than sustained industrial use.

Construction traffic has the potential to result in:

- Increased road safety risks.
- Temporary road closures.
- Delays for local residents.
- Disruption to farming activities.
- Increased wear and deterioration of local roads.
- Greater inconvenience for emergency services where roads are temporarily restricted.

The transportation of turbine blades, tower sections and heavy machinery may require alterations to junctions, road widening or vegetation removal in certain locations.

Even if these impacts are temporary, they may continue for an extended construction period and affect the daily lives of local residents.

The cumulative effects of construction traffic should therefore be carefully assessed before any permission is granted.

10. Heritage, Culture and Sense of Place

Erris possesses a unique cultural identity that extends beyond its physical landscape.

Its history, archaeological sites, traditional farming practices, coastal communities, Irish language heritage and long-standing relationship between people and landscape contribute to its distinctive character.

The area's identity has evolved over generations and forms part of Ireland's cultural heritage.

Planning decisions should seek not only to protect individual monuments or archaeological features but also the wider cultural landscape within which they exist.

The introduction of large industrial structures into such a landscape has the potential to alter the area's character permanently.

Protecting heritage involves preserving the qualities that make a place unique.

Once those qualities are significantly altered, they cannot easily be restored.

11. Cumulative Impact

One of the most significant planning considerations is the cumulative impact of renewable energy developments.

While an individual wind farm may be considered acceptable when viewed in isolation, the combined effect of multiple existing, permitted and proposed developments can fundamentally alter an entire region.

This cumulative effect should include consideration of:

- Existing wind farms.
- Approved developments not yet constructed.
- Proposed developments currently within the planning system.
- Associated infrastructure including substations, overhead lines and access roads.

Incremental industrialisation can occur gradually over time.

Each individual proposal may appear relatively modest when considered separately, yet collectively they may transform the landscape beyond recognition.

The planning system should therefore consider not only the immediate impacts of this proposal but also the precedent it may establish for future development within the wider Erris region.

Once the cumulative threshold has been exceeded, it is extremely difficult to reverse the overall change to the landscape.

For this reason, cumulative impacts deserve significant weight in determining this.

12. Sustainable Rural Development and Community Viability

One of the fundamental objectives of the planning system is to promote sustainable development while supporting the long-term viability of rural communities.

Erris is a unique rural area whose future depends upon maintaining an attractive environment in which people wish to live, work, raise families and establish businesses.

The area's natural beauty is one of its greatest strengths. It supports tourism, outdoor recreation, agriculture, local enterprise and the overall wellbeing of those who live there.

While individual planning applications are often assessed on their own merits, it is also important to consider the long-term direction in which development is taking a rural community.

If industrial-scale developments become an increasingly dominant feature of the landscape, there is a risk that the qualities which attract residents, visitors and investment could gradually be diminished.

Planning decisions should therefore seek to ensure that rural development strengthens communities rather than unintentionally weakening them over time.

Although property values are not generally a determining planning consideration, the long-term attractiveness, vitality and sustainability of a rural area are legitimate planning matters.

Development should leave future generations with communities that remain desirable places in which to live.

13. Community Benefit and the Interests of Local Residents

Planning decisions should carefully consider whether those communities most directly affected by major infrastructure developments receive genuine and lasting benefits.

I understand that the applicant is a German company with investment from outside Ireland. My concern is not the nationality of the company itself, but whether the economic benefits generated by this project will be retained within the local area or within Ireland to any meaningful

extent.

At the same time, it is the people of Erris who would experience the permanent visual, environmental and construction impacts associated with the development.

In my view, planning authorities should carefully consider whether developments of this nature provide lasting benefits for the communities that live alongside them for decades.

I am also concerned that local communities often feel their views carry less weight than broader commercial or national interests.

Public confidence in the planning system depends upon local observations being genuinely considered and weighed carefully alongside national policy objectives.

It is essential that communities directly affected by major developments feel their voices have been heard and that their concerns have been given meaningful consideration.

14. Wider Sustainability and Whole-Life Environmental Considerations

Renewable energy undoubtedly has an important role in reducing greenhouse gas emissions.

However, sustainability should be considered across the entire life cycle of a development.

I respectfully ask that consideration also be given to the environmental impacts associated with:

- Manufacturing turbine components.
- Extraction of raw materials.
- International transportation.
- Construction activities.
- Long-term maintenance.
- Eventual decommissioning.
- Disposal or recycling of turbine blades and associated infrastructure.

Although some of these matters extend beyond the immediate planning assessment, they contribute to the overall environmental footprint of large-scale wind energy developments.

A balanced assessment of sustainability should consider both operational carbon savings and the wider environmental impacts over the lifetime of the project.

15. Overall Planning Balance

Planning decisions require a careful balancing exercise.

I fully acknowledge Ireland's need to increase renewable energy generation and reduce dependence on fossil fuels.

However, national policy also seeks to protect landscapes of exceptional value, conserve biodiversity, safeguard residential amenity and promote sustainable rural communities.

In my respectful opinion, this proposal would result in permanent changes to one of Ireland's most distinctive landscapes.

When the landscape impacts, biodiversity concerns, peatland issues, construction impacts, cumulative effects and implications for tourism and community wellbeing are considered together, I believe the adverse effects outweigh the benefits of the proposal in this location.

Renewable energy should continue to be supported, but only where developments can proceed without causing unacceptable and irreversible impacts on landscapes and communities of exceptional value.

16. Conclusion

For the reasons outlined throughout this submission, I respectfully request that An Coimisiún Pleanála refuses permission for Planning Application PAX16.324387.

My observations are made in support of responsible planning, environmental protection and the long-term interests of the people of Erris.

I support renewable energy where it is appropriately located and where it can be developed in a manner that respects the environment, biodiversity, heritage and residential amenity.

However, I do not believe this proposal represents the right development in the right location.

Erris is one of Ireland's most remarkable landscapes. Its natural beauty, ecological importance, cultural heritage and peaceful rural character are assets that belong not only to those who live there today but also to future generations.

Once such landscapes are fundamentally altered through industrial-scale development, they cannot be restored to their original condition.

For these reasons, I respectfully ask that permission for this development be refused.

I would also like to add a charge of €50 to raise a submission is an unacceptable amount and may deter individuals from submitting concerns.

Closing Statement

Thank you for considering my observations.

I trust that An Coimisiún Pleanála will carefully evaluate all environmental, social, economic and planning considerations before reaching a decision.

I respectfully request that the protection of the unique landscape, biodiversity, heritage and communities of Erris is afforded significant weight throughout that decision-making process.

Yours faithfully,

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