

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

DATE: 14 July 2026

RE: Strategic Infrastructure Development (SID) Planning Application under Section 37E

Planning Reference: PAX16.324387

Proposed Development: Muingmore Wind Farm (13 No. Wind Turbine Generators, 110 kV Onsite Substation, Battery Energy Storage System (BESS) Compound, and Associated Infrastructure).

Location: Townlands of Muingmore and Doolough, County Mayo.

Applicant: RWE Renewables Ireland Limited.

OBJECTOR DETAILS:

- **Name:** Catherine Howard
- **Address:** Wardley, Monterey Road, Greystones, County Wicklow

Dear Sir/Madam,

I wish to make a formal submission/observation in relation to the above-referenced Strategic Infrastructure Development (SID) application. While I fully recognise the statutory mandate of An Coimisiún Pleanála to assess and facilitate key national infrastructure, and the broader societal necessity of transitioning to renewable energy, such developments must be governed by a modern, robust, and legally sound planning framework.

I strongly object to the proposed development on the grounds that the current regulatory environment is highly deficient, characterised by systemic policy failure and an absence of up-to-date statutory planning guidelines. I submit that granting permission for this development under the present conditions is premature, contrary to the principles of proper planning and sustainable development, and highly prejudicial to the local community.

My specific grounds of objection are detailed below:

1. Application of Outdated 2006 Standards to Modern Industrial Technology

The proposed development is being assessed under the **Wind Energy Development Guidelines (2006)**. These guidelines are now two decades old and were designed for turbine technologies that have since been completely superseded. Modern turbines, such as those proposed in this application, routinely exceed tip heights of 150 to 200 metres—more than double the scale of turbines envisioned when the 2006 guidelines were drafted.

By failing to finalise the Draft Wind Energy Development Guidelines (which have languished in draft form since 2019), the State is forcing An Coimisiún Pleanála to assess massive, modern industrial infrastructure using obsolete standards for setback distances, shadow flicker, and noise limits. The application of such outdated criteria to turbines of this scale fails to protect the residential amenity of local homes and represents a fundamental failure of proper planning oversight.

2. Prematurity Pending the Publication of Updated Guidelines

Due to the Government's protracted delay in publishing finalised, updated guidelines, the wind energy sector is operating in a state of regulatory limbo. Granting planning permission for a large-scale Strategic Infrastructure Development in the absence of a finalised national framework is highly premature.

Proceeding on an ad-hoc basis under a regulatory "slow-walk" deprives all stakeholders—including the Board, developers, and local communities—of a consistent, transparent rulebook regarding critical factors like community dividends, noise limits, and minimum safe separation distances. It is unreasonable and unjust to lock in long-term SID permissions using a framework that the government itself has acknowledged is unfit for purpose and in urgent need of overhaul.

3. Placing an Unreasonable Burden of Interpretation on An Coimisiún Pleanála

The absence of a clear, modernised national planning framework forces the Board to make highly subjective, ad-hoc interpretations of suitability. This regulatory void leads to inconsistent decision-making across county boundaries and places an unfair administrative and legal burden on the Board's inspectors.

Without uniform, updated national rules, permissions granted under these conditions are highly vulnerable to protracted judicial reviews and legal challenges. This ultimately destabilises the planning system, clogs the courts, and causes unnecessary community division—directly undermining the efficiency that the SID process was designed to achieve.

4. Severe Erosion of Community Trust and Visual/Acoustic Protections

A core objective of any robust planning system is to foster community buy-in and protect local residential amenity. The failure to finalise and formalise updated, legally binding guidelines on noise levels, visual saturation, and guaranteed community benefits has severely damaged public trust.

Local residents are being asked to accept a massive industrial development in their locality without the benefit of modern, statutory protections. The 2006 guidelines do not sufficiently address the low-frequency noise and visual dominant impacts associated with modern, mega-scale turbines. To permit this development under these obsolete parameters represents a direct threat to the health, well-being, and property values of the local community.

5. Systematic Policy Failure and Undermining of Proper Planning

While the applicant will undoubtedly argue that immediate approval is necessary to meet the State's 2030 climate and renewable energy targets, the bottleneck is not local community resistance, but rather the State's failure to provide a stable, modern planning system.

The sluggish pace of policy updates acts as a self-inflicted wound to Ireland's green transition. Attempting to force through large-scale developments under defective, twenty-year-old guidelines does not support sustainable climate action; instead, it undermines the integrity of the planning process. Sustainable planning and the protection of local communities cannot be bypassed in the name of expediency.

Conclusion

For the reasons outlined above, I submit that the proposed development, by virtue of its scale and the obsolete regulatory framework under which it is being assessed, is entirely contrary to the proper planning and sustainable development of the area.

I respectfully request that An Coimisiún Pleanála refuse permission for this development, or, at a minimum, defer any decision until such a time as the Government has finalised and formally enacted the updated Wind Energy Development Guidelines.

Please find enclosed the statutory fee of **€50** for a submission/observation on an SID application. I look forward to receiving written acknowledgment of this submission and being kept informed of the Board's decision in due course.

Yours sincerely,

Catherine Howard

Greystones, Co. Wicklow