

7th July 2026
The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Mrs. Christina Barrett
River View
Mount Jubilee
Bangor Erris
Ballina, Co Mayo

Re: Resident Observation to the proposed Muingmore Wind Farm
An Coimisiún Pleanála Case Reference: PAX16.324387
Site: Muingmore, Doolough, Tristia, Moneynierin and Bangor, County Mayo

Dear Sir/Madam,

I wish to make this observation regarding the above Strategic Infrastructure Development application. While I recognise the importance of renewable energy in meeting national climate and energy objectives, I respectfully submit that this application raises a number of fundamental planning concerns which extend beyond the technical assessment of individual environmental disciplines.

Planning Policy Context

A significant change has occurred since the preparation of the application documentation. Under the Draft Mayo County Development Plan, the Muingmore area is no longer identified as a preferred location for future wind energy development. Although the Draft Development Plan has not yet replaced the current statutory plan, it represents the most recent expression of the planning authority's strategic assessment of where large-scale wind energy development should be directed. The removal of this area from the preferred wind energy designation suggests that the planning authority has reassessed the suitability of the location in light of updated environmental, landscape and planning considerations.

This is a material planning consideration which should be afforded appropriate weight by the Commission. Where a proposal is no longer consistent with the emerging spatial strategy for renewable energy development, it is incumbent upon the applicant to demonstrate why permission should nevertheless be granted. In my respectful submission, that burden has not been fully discharged.

Incomplete Assessment of Essential Grid Infrastructure

A more fundamental concern relates to the proposed grid connection. The application acknowledges that the electrical connection to the national grid is an essential component of the project. Without that connection, the wind farm cannot operate or contribute electricity to the national network. However, the final grid connection is not before the Commission for determination and is intended to proceed through a separate planning application.

While the EIAR contains an assessment of an indicative connection corridor, the final route has not yet secured planning permission and remains capable of change.

This gives rise to an important planning question. How can the Commission be satisfied that the likely significant environmental effects of the overall development have been fully identified and assessed where an essential element of the project has yet to obtain consent and may ultimately require a materially different alignment?

The un-designed grid connection has the potential to affect:

- peatland and hydrology;
- watercourses;
- protected habitats and species;
- archaeology and cultural heritage;
- public roads and traffic;
- private landholdings;
- cumulative environmental effects.

If the final route differs from those factors of the EIAR presently assessed, those impacts may also differ. Accordingly, it is impossible to conclude that the environmental assessment of the project as a whole is complete, therefore I respectfully propose that this application is refused until these necessary requirements have been considered fully.

Risk of Sequential Decision-Making

The separation of the wind farm application from the essential grid infrastructure (future application) also raises concerns regarding sequential planning.

If permission is granted for the wind farm in advance of the grid connection, the Commission will later be required to determine an application for infrastructure which exists solely to facilitate an already-permitted Strategic Infrastructure Development.

Although each application must be determined independently and on its own merits, there is an obvious practical risk that the existence of a permitted wind farm will become a significant factor in considering the subsequent grid connection. This has the potential to create pressure to facilitate infrastructure that might otherwise have attracted a different planning assessment had the complete project been considered together.

The Commission should therefore consider whether determining the principal development in advance of obtaining consent for its essential enabling infrastructure is consistent with the objective of assessing the overall environmental effects of the project in an integrated and transparent manner. I would have anticipated and would consider it proper planning that the enabling infrastructure namely grid connection application, should have been applied for in advance of this current application.

Reliance on Future Design and Mitigation

This concern is compounded by the broader approach adopted throughout the application.

The EIAR repeatedly concludes that potentially significant environmental effects can be reduced to acceptable levels through future mitigation measures, adaptive management, post-construction monitoring and design refinements.

Similarly, key aspects of the Battery Energy Storage System, ecological management and operational controls remain to be finalised following the grant of permission.

When considered alongside the unresolved grid connection, this results in a project where a number of important environmental components remain dependent upon future approvals, future design decisions and future management measures.

In my respectful submission, this raises legitimate questions as to whether the Commission presently has sufficient certainty to conclude that all likely significant environmental effects of the overall development have been fully assessed.

Conclusion

This observation is not intended to question the importance of renewable energy development. Rather, it seeks to ensure that the statutory requirements of the planning system and the Environmental Impact Assessment process are fully satisfied before a permission is granted.

For the reasons outlined above, I respectfully request that the Commission give particular consideration to:

- the removal of the site from the preferred wind energy area in the emerging Mayo County Development Plan;
- whether the application adequately demonstrates that this remains an appropriate location for development;
- whether the environmental assessment can properly be regarded as complete while the essential grid connection remains subject to a separate consent process;
- whether the current approach results in an impermissible fragmentation of the assessment of the overall project; and
- whether sufficient certainty exists to conclude that all likely significant environmental effects have been identified and properly assessed.

In light of these matters, I respectfully request that the Commission carefully consider whether the statutory tests for the grant of permission have been satisfied on the basis of the information currently before it.

Yours faithfully,



Christina Barrett