

FORMAL SUBMISSION / OBSERVATION

MUINGMORE WIND FARM

An Coimisiún Pleanála Case Ref. 324387

Person making submission	Ciaran Leneghan
Address for correspondence	Muingmore Bunnahowen Ballina Co. Mayo F26 YN24
Affected dwelling / Eircode	F26 YN24
Applicant	RWE Renewables Ireland Limited
Development	Muingmore Wind Farm, County Mayo

To: An Coimisiún Pleanála

Re: Submission/Observation objecting to the proposed Muingmore Wind Farm, Case Ref. 324387

1. Introduction and nature of objection

I wish to make a formal submission/observation objecting to the proposed Muingmore Wind Farm. I am a resident of the dwelling identified by Eircode F26 YN24, situated in the vicinity of the proposed development.

My objection is not an objection to renewable energy in principle. It concerns the suitability, scale, layout and environmental effects of this particular development in this particular receiving environment, and the adequacy of the assessment and proposed mitigation insofar as they affect my home, residential amenity and the surrounding community.

I respectfully request that the Commission refuse permission. In the alternative, if the Commission is minded to grant permission, I request substantial amendments to the layout and stringent, independently enforceable conditions protecting nearby dwellings.

2. Scale and duration of the proposed development

The application is for 13 wind turbines with overall blade-tip heights of approximately 179-180 metres, rotor diameters of 149-163 metres and hub heights of 98.5-105 metres. It also includes a battery energy storage system (BESS), 110 kV substation, internal cabling, crane hardstands, access tracks, temporary construction compounds, site entrances, forestry felling and a 100 metre meteorological mast.

The applicant seeks a 10-year permission/construction window and a 35-year operational life following commissioning, while the substation is intended to remain permanently. This is therefore not a short-lived or minor intervention in the landscape; it represents a major and long-term transformation of a rural coastal environment.

3. Proximity to established homes and residential amenity

The applicant's Non-Technical Summary records that 109 residential properties are within 1 km of the Main Wind Farm Development Site and that the nearest residential property is approximately 740 metres from turbine T10.

The Commission should assess the effect on existing homes as a central planning consideration. For my dwelling at F26 YN24, I request that the Commission identify the corresponding noise-sensitive receptor and shadow-flicker receptor in the EIAR and expressly assess: (a) distance to each relevant turbine; (b) turbine bearing and orientation; (c) predicted operational noise by wind speed and direction; (d) predicted shadow flicker; (e) visibility and cumulative visibility; and (f) the combined effect of these impacts on residential amenity.

I object to any approach which treats compliance with individual technical thresholds as automatically establishing that the overall effect on a dwelling is acceptable. The combined and long-term effect on the living environment must be considered.

4. Landscape and visual impact

The applicant's own assessment contains findings which demonstrate the seriousness of the visual change. It states that the proposed development would result in a considerable increase in the intensity of built development and would become one of the most prominent forms of built development in the local landscape. Within the central study area, the magnitude of operational landscape effect is assessed as High-Medium.

More importantly for residents, the EIAR acknowledges that at the nearest surrounding local roads and properties turbines will often be viewed at a prominent scale and will have a dominant visual presence. It identifies a high-to-medium visual change and a substantial-to-moderate negative effect at the closest receptors.

I submit that the conclusion that these effects are nevertheless 'not significant' in EIA terms should not obscure the underlying finding: residents closest to the scheme may experience a dominant, long-term industrial-scale visual presence. The Commission should independently assess whether this is compatible with the protection of residential amenity and the character of this rural coastal landscape.

5. Scale of turbines and visual setback

The proposed turbines are approximately 180 metres to blade tip. The 2019 Draft Revised Wind Energy Development Guidelines proposed, for visual amenity purposes, a setback of four times tip height subject to a minimum of 500 metres. Four times a 180 metre tip height is approximately 720 metres.

I recognise that the 2019 document is draft guidance rather than the operative statutory guideline. I therefore do not rely upon 720 metres as a mandatory legal setback. However, it is a relevant indication of the scale of visual-amenity concern associated with modern turbines of this height. The Commission should carefully scrutinise any dwelling situated close to that order of distance, particularly where several turbines may be visible simultaneously.

6. Operational noise

The EIAR acknowledges that rotating blades generate operational noise, sometimes perceived as a regular 'swish', and that turbine noise varies with wind speed. Baseline monitoring was undertaken and the applicant concludes that predicted levels comply with applicable guidance.

I request that the Commission examine the assessment at my specific dwelling rather than relying only on the scheme-wide conclusion. Particular attention should be paid to evening and night-time amenity, wind direction, uncertainty in candidate turbine selection, cumulative turbine contribution, tonal characteristics, amplitude modulation and any circumstances in which background sound is low while turbine sound remains perceptible.

If permission is granted, I request enforceable noise limits, pre-commissioning verification, independent post-commissioning monitoring, a clear complaint investigation protocol, access to monitoring data for affected residents and enforceable curtailment/shutdown requirements where limits or unacceptable characteristics are demonstrated.

7. Shadow flicker

Shadow flicker is a material concern because of the height and rotor diameter of the proposed turbines and the number of nearby dwellings. The applicant assessed up to 92 receptors within ten rotor diameters.

The applicant's own modelling predicts theoretical exceedance of 30 minutes per day at 37, 41 or 49 receptors depending on turbine scenario, and theoretical exceedance of 30 hours per year at 31, 33 or 38 receptors. Even after applying a 'likely' sunshine correction, 6 to 8 receptors are predicted to exceed 30 hours per year. The proposed response is an active shadow-flicker control system and shutdown protocol.

This means that acceptable operation for some homes is dependent on mitigation functioning correctly throughout the operational life of the project. I request that my dwelling be expressly identified in the shadow-flicker assessment and that the Commission establish the predicted maximum theoretical and likely exposure.

If permission is granted, I request a zero-shadow-flicker condition at existing dwellings, automatic turbine shutdown, commissioning tests, annual verification and a rapid complaint/rectification procedure. The burden should not fall on residents to prove repeated nuisance after operation commences.

8. Peat, ground conditions and stability

The site is predominantly underlain by blanket peat. Ground investigation reported variable peat thicknesses overlying till deposits of approximately 1 to 5.6 metres. Construction will require excavation for turbines, hardstands, tracks, the BESS, substation and other infrastructure.

Although the applicant concludes that proposed turbine locations have low landslide susceptibility and relies on a Peat Landslide Hazard Risk Assessment and Peat Management Plan, the scale of excavation, drainage intervention and heavy construction on peat warrants particularly careful scrutiny.

I request that the Commission satisfy itself that the peat management assumptions, storage/reuse locations, drainage design and construction sequencing are robust under extreme rainfall conditions and throughout the full construction programme, and that monitoring and stop-work thresholds are enforceable.

9. Hydrology, water quality and downstream designated sites

The development contains and is crossed by local streams and drainage features. The applicant identifies hydrological connectivity with protected coastal sites, including the Mullet/Blacksod Bay Complex and Blacksod Bay/Broad Haven, approximately 1.1 km downstream in the NTS.

The EIAR identifies risks including sediment release, accidental fuel/oil leakage, cement contamination and drainage networks acting as pathways for rapid transport of silty or contaminated water. These are important matters in a peatland environment where construction may alter existing drainage behaviour.

I request strict scrutiny of the proposed CEMP, drainage, settlement and attenuation measures, water-quality monitoring locations and emergency response arrangements. If permission is granted, baseline

and construction-phase monitoring should be independently auditable, with defined trigger levels and authority to halt works where deterioration is detected.

10. Biodiversity and protected species

The applicant records bird species of conservation concern using the site, including breeding Common snipe and Eurasian woodcock, and collision-vulnerable species including Curlew and Lapwing. Several bat species are also identified, and the NTS recognises collision/barotrauma as a potential operational effect for bats.

The assessment also acknowledges potentially significant effects on non-priority Annex I blanket bog in the absence of mitigation. I request that the Commission critically examine whether avoidance has been maximised before reliance is placed on restoration, management, monitoring and later curtailment.

Where mitigation depends on post-construction monitoring followed by possible feathering or curtailment, conditions should specify objective trigger criteria and enforceable response measures rather than leaving material mitigation to future discretion.

11. Construction traffic and local road safety

The construction phase is anticipated to last approximately 18-24 months. The applicant records the L5252 as carrying only about 61 vehicles per day at baseline. At peak construction the project could generate up to 311 HGV movements and 51 light-vehicle movements per day, with 234 abnormal indivisible load movements projected for turbine deliveries.

The applicant itself identifies Moderate/Significant effects on the N59, L1206 and L5252 before mitigation. For residents accustomed to very low traffic volumes, the change in heavy vehicle activity is substantial even if temporary in planning terms.

I object unless the Commission is satisfied that road safety, residential access, emergency access, school/community movements, road condition, mud/dust, noise and construction hours can be adequately protected. Any permission should require a binding Construction Traffic Management Plan, agreed haul routes, restrictions on delivery hours, road-condition surveys before/during/after construction, prompt repair obligations, wheel washing, traffic marshals where required, and a resident liaison/complaint procedure.

12. Cumulative effects and landscape saturation

The assessment refers to other energy developments, including Oweninny Phase 3 Wind Farm, Sheskin South Wind Farm and the Mayo Green Hydrogen Plant in the traffic context. The Commission should ensure that cumulative assessment is not reduced to whether another development crosses a technical significance threshold.

For residents, cumulative effects can arise through sequential views, increased industrialisation of the wider landscape, additional traffic, infrastructure and an erosion of the area's rural and coastal character. The Commission should assess the combined experience of the development from homes, local roads and community routes.

13. Grid connection and project-wide assessment

The proposed 110 kV underground grid connection to Bellacorick is approximately 25.5 km and is intended to be the subject of a separate planning application, although it has been assessed within the EIAR.

I request that the Commission ensure that the environmental effects of the wind farm and its necessary grid connection are considered as one overall project for EIA purposes, and that no construction of the wind-farm element is permitted to commence unless all necessary grid-consent and environmental assessment requirements have been completed.

14. BESS and major accident / emergency considerations

The development includes a Battery Energy Storage System compound in addition to the turbines and electrical substation. The Commission should ensure that the final battery technology, capacity, fire strategy, separation distances, emergency access, containment of contaminated firefighting water and emergency-response arrangements are sufficiently defined and assessed before permission is implemented.

Where material details remain dependent on final technology selection, conditions should not defer matters that are necessary to establish the environmental acceptability and safety of the development.

15. Reliance on mitigation and monitoring

A recurring feature of the application is reliance on mitigation, management plans, monitoring and operational controls to reduce predicted effects. Examples include shadow-flicker shutdown, bat buffers and possible turbine curtailment, peat management, water controls and construction traffic management.

I request that the Commission distinguish between mitigation that is certain, specific and enforceable and measures that depend upon future agreement or discretionary action. Where the acceptability of the project depends upon mitigation, that mitigation should be incorporated into precise planning conditions with measurable standards, monitoring requirements, reporting obligations and enforcement mechanisms.

16. Requested decision

For the reasons set out above, I respectfully request that An Coimisiún Pleanála REFUSE permission for the proposed Muingmore Wind Farm.

In particular, I ask the Commission to give substantial weight to:

- the exceptional scale of turbines up to approximately 180 metres in a low-lying rural coastal landscape;
- the proximity of established homes;
- the applicant's own finding of dominant visual presence and substantial-to-moderate negative effects at the closest receptors;
- the predicted shadow-flicker exceedances before mitigation;
- potential noise effects at individual dwellings;
- extensive construction and drainage intervention on blanket peat;
- hydrological connectivity and downstream environmental sensitivity;
- major increases in HGV traffic on lightly trafficked rural roads; and
- cumulative and combined effects on residential amenity.

If the Commission is not minded to refuse permission, I request that it consider omission or relocation of turbines producing the greatest residential impacts and impose robust conditions including zero shadow flicker at existing dwellings, enforceable noise controls and independent monitoring, turbine curtailment/shutdown mechanisms, strict construction traffic controls, independent water/peat monitoring and a transparent resident complaint and enforcement protocol.

17. Request for property-specific assessment

Before determining the application, I specifically request that the Commission identify dwelling F26 YN24 within the applicant's receptor datasets and record in its assessment the distance and bearing from that dwelling to the relevant turbines, the predicted noise levels, shadow-flicker results and visual effects. If the information submitted does not permit this to be established with confidence, I request that further information be sought rather than uncertainty being resolved against the interests of an existing resident.

18. Documents and policy referred to

- RWE Renewables Ireland Limited, Muingmore Wind Farm EIAR, Volume 1 - Non-Technical Summary, May 2026.
- An Coimisiún Pleanála, Case Ref. 324387 (current Muingmore Wind Farm RED III application, lodged 19 June 2026).
- Department of Housing, Local Government and Heritage, Wind Energy Development Guidelines (2006) - current national guidelines.
- Department of Housing, Local Government and Heritage, Draft Revised Wind Energy Development Guidelines (2019) - referred to only as draft policy context, not as operative statutory guidance.

Signed: _____



Ciaran Leneghan

Date: 7 August 2026