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Coimisiún Pleanála Reference No.: 324387

Dear Sir/Madam,

I wish to make this observation and strong objection in relation to the proposed Muingmore Wind Farm and battery storage facility. I am asking that Coimisiún Pleanála give careful consideration to all of the relevant facts about the area and to give due consideration to the policies and objectives contained within the Mayo County Council's Renewable Energy Strategy (hereinafter the strategy).

The strategy is the result of extensive research, consultation and public engagement. It reflects years of work by planners, environmental experts, elected members and local communities to identify the most appropriate locations for development while safeguarding Mayo's unique natural landscape and heritage. It should not simply be viewed as a planning document, but as a vision for the future of the county that balances development, the need for renewable energy with the protection of our most sensitive and scenic landscapes and ecosystems.

The lands surrounding the proposed development contain protected environmental designations, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Natural Heritage Areas (NHAs). These designations exist because these habitats, peatlands, wildlife and bird populations are of national and European importance, protected by European Laws and the European Court of Justice. I attach for your information maps outlining the proximity of these protected areas to the proposed development and lined in orange on one map, details the watercourses leaving the site into Tullaghan Bay, Geesala strand and Tullaghan Bay Salmon Estuary forming part of Blacksod Bay/Broadhaven SPA and SAC and which is the direct channel for fish in to Carramore Lake, Owenmore and Owenduff rivers. These special areas were not created by chance, they exist because generations of local people have lived in harmony with these landscapes, farming them responsibly and respecting the delicate balance of nature that has allowed these habitats to survive.

The strategy recognises the importance of protecting these landscapes and directing development to appropriate locations. The scale and nature of this proposal is fundamentally at odds with the objectives and the environmental sensitivities that underpin the strategy.

The people of Erris have protected the lands and waters long before they received the deserved statutory protection. It is therefore deeply concerning that an industrial-scale development is proposed within such a sensitive and protected landscape, where we boast the home of the Great Yellow Bumblebee which is the rarest bee in Ireland and has been classified as endangered, the only sustainable population left in Ireland can be found here on the Erris Peninsula, see attached article for further information. It would be remiss of me not to mention the wonderful work done by the Corncrake LIFE Project. I was recently present at a presentation in Belmullet, where Christopher O'Sullivan, Minister at the Department of Housing, Local Government and Heritage with special responsibility for Nature, Heritage and Biodiversity, discussed the work of the Corncrake LIFE project and commended the assistance and collaboration of local farmers and land owners who adjusted their way of life to protect the almost extant Corncrake. Our community has worked diligently to increase the existence of the corncrake by 55% over the last five years. What an achievement for a small community. Here is the link to Minister O'Sullivan's comments <https://www.facebook.com/reel/952210061123904>. It should also be noted that the Erris coastline is considered one of the most important areas for wild fowl in the country and during the winter it is home to wild swans, geese and ducks with the presence of brent geese, whooper swans and long tailed ducks being particularly notable. The area is also home to the otter who can be frequently seen, including just this week, in the watercourse flowing from the proposed wind farm at Geesala, image attached. The otter is fully protected under the National Parks & Wildlife Acts and the EU Habitats Directive.

There is a clear inconsistency in how planning policy appears to affect local people compared with large-scale developers. Families seeking permission to build a home in this area have frequently been required to demonstrate a genuine housing need and establish strong family or social connections to the locality before permission can be granted. Local applicants have accepted these requirements as part of protecting the rural character and environmental integrity of the area. Yet a commercial developer, RWE, with absolutely no historic connection to the locality, who have most likely never slept a night in the locality, can seek permission to construct numerous, large turbines higher in height than the statue of liberty. I am sure you can appreciate it is difficult for local communities to reconcile these contrasting approaches to development.

I have also raised concerns directly with the head of the National Planning Authority, regarding what I consider to be the limited consideration afforded to local communities faced with proposals of this scale. Our small rural community is expected to absorb the significant time, cost and technical expertise required to engage with highly complex planning applications. It is particularly difficult to accept that companies spend years preparing a development of this magnitude, employing teams of consultants and specialists, while local residents are afforded an eight-week statutory period to review thousands of pages of documentation, seek expert advice, consult with neighbours and prepare meaningful observations. This places communities at a significant disadvantage and does not provide a fair balance between applicants and those most directly affected.

Development should not come at the expense of landscapes whose value has been recognised through decades of conservation and formal protection. It has to be noted it is not just the construction of the turbines that is a concern but also the huge environmental impact and inconvenience of excavating the R313 and N59 for the laying of cables from the proposed site to the grid at Bellacorrick. This is another reason why a wind farm should be developed in close proximity to grid access.

Where the application refers to the distances from the coastline and residents, it does not account for the fact that the measurement of the rotor diameter is from a minimum of 149m to a maximum of 163m, this downplays the proximity to the SPAs, SACs, NHAs, properties and scenery.

Let this not be another case like the Derrybrien, Galway development, wherein 70 wind turbines had to be removed due to a breach of EU law. Should something similar happen here, irreparable damage will be already done to our pristine environment and landscape. Peatlands require exceptional care. One of the main lessons from Derrybrien is that constructing of major infrastructure on deep peat and blanket bog carries inherent risks.

The European Court found that Ireland had failed to ensure compliance with the Environmental Impact Assessment Directive before development proceeded at Derrybrien. This principle remains applicable today. Coimisiún Pleanála must be satisfied that all conditions have been met such as;

- all likely significant environmental effects have been fully assessed;
- the assessment is based on adequate scientific evidence, not for example a “draft document” as provided by the RWE as part of their planning application that clearly states it should not be cited, see attachment for reference,
- cumulative impacts with existing and permitted wind farms to be properly considered;
- and the final condition is that the public has had a meaningful opportunity to participate in the decision-making process, which has not happened in the Muingmore area.

Derrybrien serves as a reminder that damage to peatland ecosystems can extend well beyond the footprint of individual turbines through changes caused to drainage, hydrology and erosion.

EU environmental law is based on the precautionary principle. There is scientific uncertainty about the potential for significant environmental harm with respect to the proposed wind farm and battery storage facility accordingly, decision-makers should proceed cautiously rather than assuming impacts can be mitigated later. I question why the battery facility is not proposed to be built where the need is greatest for electricity usage.

The Derrybrien Wind Farm case in County Galway stands as one of the most significant environmental planning cases in the history of the State. It highlighted the serious risks associated with large-scale development on peatlands and emphasised the necessity for full

compliance with the Environmental Impact Assessment requirements of European law before development is permitted. The peat slide at Derrybrien demonstrated the irreversible consequences of disturbing sensitive blanket bog habitats. Given the extensive peatland and designated environmental sites surrounding the proposed Muingmore Wind Farm, the lessons of Derrybrien have to be carefully considered. Coimisiún Pleanála must be fully satisfied that all potential impacts on peat stability, hydrology, biodiversity and protected habitats have been comprehensively assessed and that any scientific uncertainty is resolved before development consent is granted.

RWE has already shown their complete disregard for our community and its safety. Their planning application relies on draft uncertified documents. RWE were compelled to restart the process because their incompetency in getting the dates correct, they have shown their complete disregard and care for our native language. They have shown their absolute disregard for the safety of our community by nailing their planning notice to an electrical pole directly below a sign that stated “Danger Keep Away”, on not just one occasion but twice. There was also the placement of notices on road traffic signs which were a distraction to drivers. If they cannot get these fundamental things correct, what chance has a community when construction begins? The lack of communication with RWE and our community is concerning, having an open day mid-week when people were working and stating that an appointment was necessary show their unwillingness to work with our community through open communication. Also note in their submissions they have omitted three Eircodes from their Population and Human Health Document, one being my own family home F26 E9W7, and the two adjacent houses F26P5P7 and F26 D3K5. Again a blatant disregard for community residents.

It is noteworthy that in 2016, an application for a similar, but even smaller wind farm just 6.2kms from this proposed development, was refused on the basis “it would seriously impact on the visual amenity and natural character of the landscape” further reasons, which are also relevant to this proposed development, were also provided and are detailed in the attached chart. Due to the precedence set out by the 2016 refusal, the same rules should be applied to the current proposed development, which in fact is closer to the coastline.

The Oweninny Wind Farm, Ireland’s largest onshore wind farm is situated approximately 20kms from this proposed wind farm. The government’s own figures for onshore wind farm production has set a target of 9000MW onshore renewable wind target for 2030. County Mayo with existing wind farms and what has already received planning, as of today, is in excess of 1000MW, surely a reasonable person would say that is enough, and Mayo has already done its bit.

Erris and Mayo have done enough. The protection of our area, landscapes, biodiversity, ecological, habitats and residents has to be to the fore of your decision making. I respectfully request that Coimisiún Pleanála give substantial weight to the objectives of the strategy, the exceptional environmental significance of this landscape, the extensive network of protected SAC, SPA and NHA lands in the area, and the legitimate concerns of the communities who have cared for and preserved these lands for generations.

Local concerned resident and County Councillor,

Gerry Coyle

Attachments:

1. Maps with markings
 - a. SPA map
 - b. SAC map
 - c. NHA map
 - d. SAC layout watercourses marked in orange
2. Article re Battle to save Mayo's Great Yellow Bumblebee
3. Department document re: Mullet/Blacksod Bay Complex SAC
4. Page 36 of Mayo County Council's Renewable Energy Strategy re Tourism Assets incl. WAW
5. Page 50 of Mayo County Council's Renewable Energy Strategy re map illustrating unsuitable area
6. Technical Appendix 5-3 Bat Survey Report "This is a draft document and should not be cited".
7. Image of otter on the shore at Geesala.
8. Notice from RWE to residents saying an appointment was needed to attend open day
9. Details of planning refused by Mayo County Council and Bord Pleanala for wind farm in 2016

Inishglora and
Inishkeeragh SPA

Inishkea Islands SPA

R313

Bay/Broad Haven
SPA

Faulmore

Duvillaun Islands SPA

Atticonau

Barnatra

240 m

230 m

R313

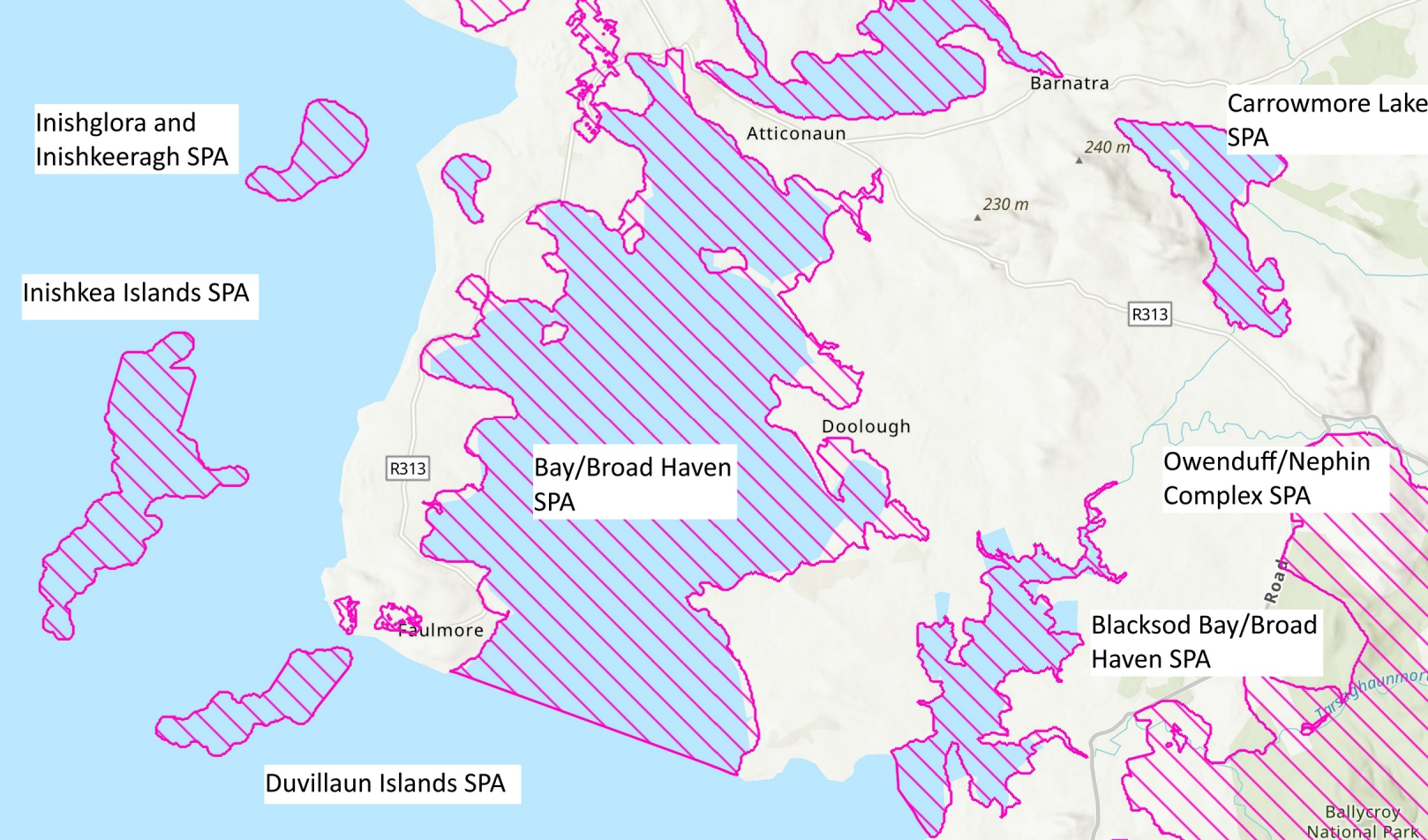
Doolough

Owenduff/Nephin
Complex SPA

Blacksod Bay/Broad
Haven SPA

Carrowmore Lake
SPA

Ballycroy
National Park



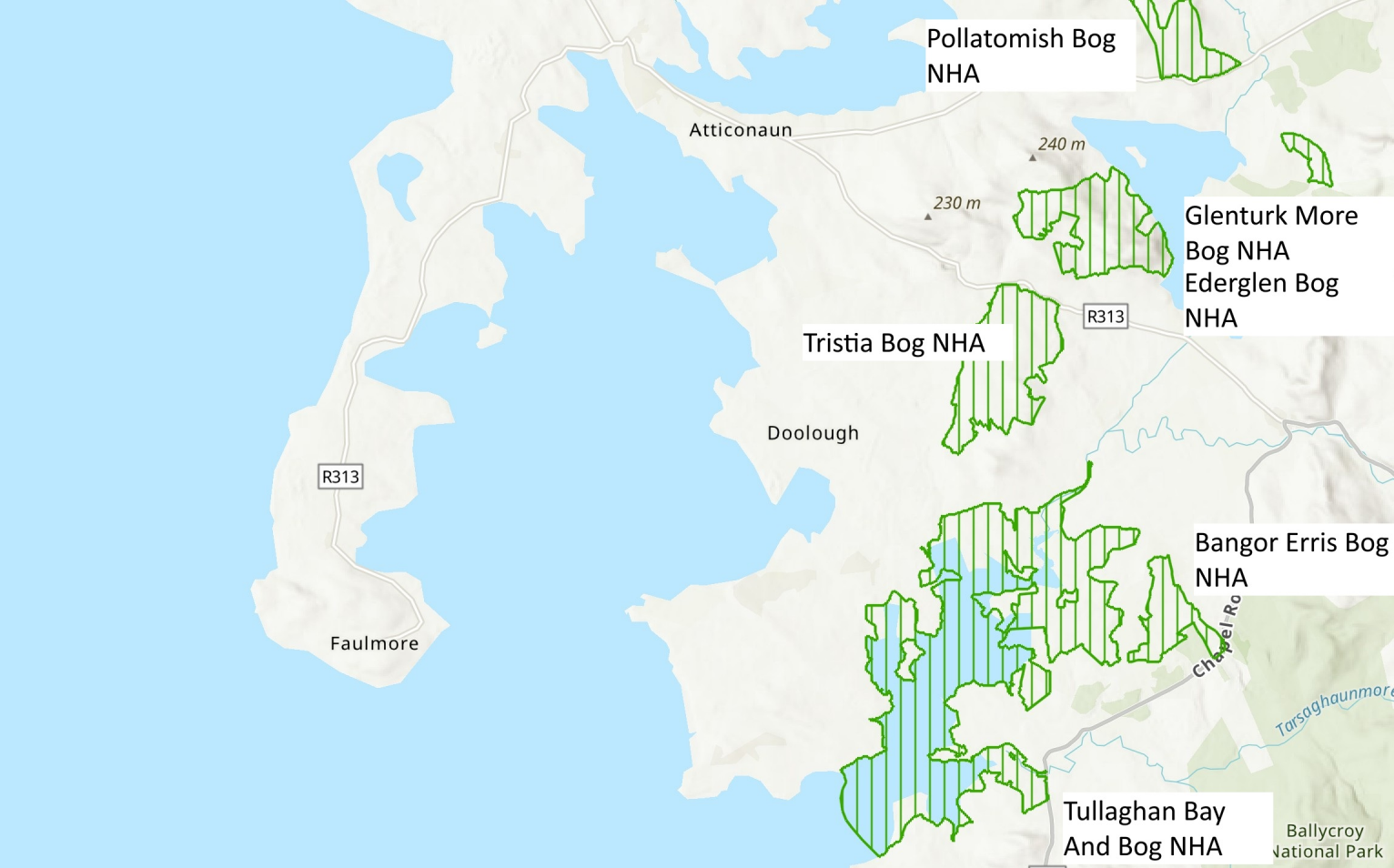


West Connacht
Coast SAC

Mullet/Blacksod
Bay Complex SAC

Carrowmore Lake
Complex SAC

Owenduff/Nephin
Complex SAC



Pollatomish Bog
NHA

Atticonau

240 m

230 m

Glenturk More
Bog NHA
Ederglen Bog
NHA

R313

Tristia Bog NHA

Doolough

R313

Faulmore

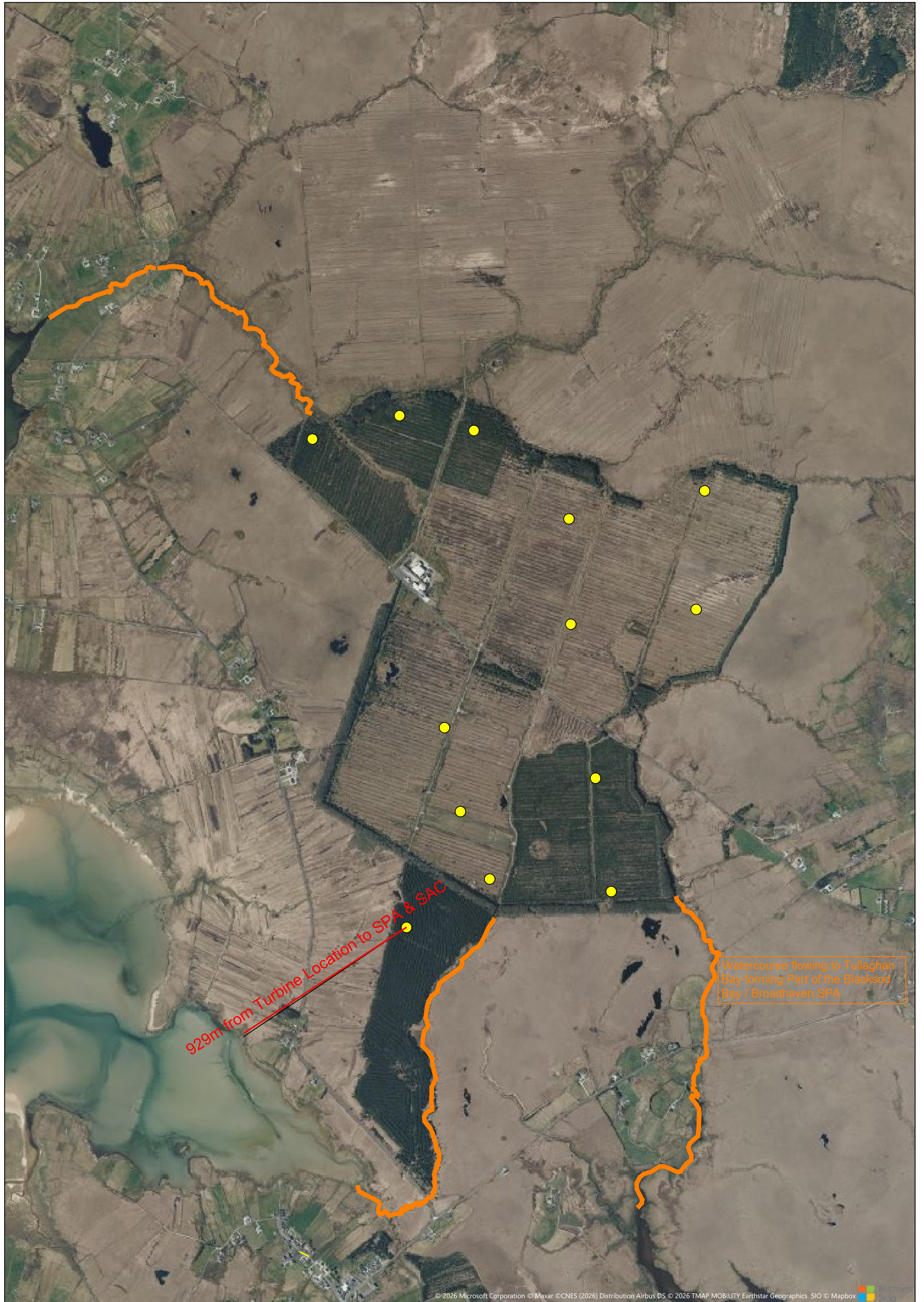
Bangor Erris Bog
NHA

Chapel Rd

Tullaghan Bay
And Bog NHA

Ballycroy
National Park

Tarsaghaunmore





Battle to save Mayo's Great Yellow bumblebee continues



Published: Wed 9 Oct 2019, 1:44 PM

Last updated: Wed 9 Oct 2019, 2:46 PM

The Great Yellow bumblebee is the rarest bee in Ireland and has been classified as endangered.

Currently the only sustainable population left in Ireland can be found on the Mullet Peninsula in north Mayo, having for

Ireland.

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Agriculture and Food Science at University College Dublin are all working together to ensure the Great Yellow Bumblebee has a future.

Recently the Belmullet Tidy Towns were awarded a regional Pollinator Award which recognises all that has been done by the town to help pollinating insects such as the Great Yellow Bumblebee.

Mayo County Council also received an Excellence in Public Service Award for their work in addressing the decline of the Great Yellow Bee.

Parks Superintendent with Mayo County Council, Peter Gill, has said: "We all depend on pollinators and the important service they provide. Unfortunately, our pollinators are in decline.

"Of the 99 different types of bees on the island of Ireland, nearly one third are threatened with extinction. The All-Ireland Pollinator Plan is a strategy that addresses this problem.

"An important part of the pollinator plan is to research and collect data to inform pollinator conservation. There are some particular research gaps around some of our rarer pollinators, and what we need to do to conserve them."

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The biggest project currently being undertaken by Mayo County Council is a study of The Great Yellow Bumblebee. It is a large blonde bumblebee with a black stripe and has a characteristically low buzz in comparison to some other species.

Niamh Phelan, an MSc in Wildlife Conservation and Management student from University College Dublin, has spent much of 2019 carrying out research on this bumblebee and it's general ecology on the peninsula, supervised by Dr. Dara Stanley, at UCD. Niamh has been closely liaising with Belmullet Tidy Towns, Mayo County Council and the National Biodiversity Data Centre during her research.

Potential reasons for the decline of the Great Yellow are attributed to the intensification of agriculture, that it is a late emerging species, and it's long tongue which has created a specialised food preference.

There have been no published studies to date in Ireland on the Great Yellow, and little is known about its ecology in an Irish situation.

The aim of the study is to investigate the habitats the Great Yellow prefers on the Mullet Peninsula, as well as what plants it favours to try and build a better picture of the species in Ireland.

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and common knapweed.

Combined with data from Dave Suddaby, who walks a bumblebee monitoring scheme transect on some of the Birdwatch Ireland reserves frequented by the Great Yellow bumblebee, this data will help build up a picture of the requirements of this rare bumblebee to help implement conservation measures in the future.

Limited data describing the distribution of a species can lead to misinformed decisions about management and the misuse of resources leading to the potential failure of a conservation programme.

For conservation of rare species, it is crucial to examine how habitat fragmentation and ecological barriers affects connectivity between populations.

Future studies on the Great Yellow should include a full habitat study of the peninsula to determine the area needed to support population growth of this species.

The Ballycroy area in Mayo contains machair which could potentially support a population of the Great Yellow. Future studies should expand outside of the Mullet area to survey other potential suitable areas.

To conserve this species, it needs a suitable area and nearby suitable nesting sites.

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Mr. Gill added: "This is the last sustainable population of the Great Yellow Bumblebee in Ireland. If the bees in Belmullet are not protected, then they will soon be gone forever. Dr. Dara Stanley from UCD describe the Belmullet Bee as the 'Beautiful Blonde Bombshell from Belmullet'.

"We are on the right track but more needs to be done to protect the species. Farmers are the custodians of the land and the machair in the area. We would urge as many as possible to get involved with the results based agri-environment scheme which could prove the saving of the Great Yellow Bumblebee."

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Site Name: Mullet/Blacksod Bay Complex SAC

Site Code: 000470

This large coastal site, located in north-west Co. Mayo, comprises much of the Mullet Peninsula, the sheltered waters of Blacksod Bay and the low-lying sandy coastline from Belmullet to Kinrovar. The character of the site is strongly influenced by the Atlantic Ocean and the exposed location of much of the site results in a terrestrial landscape dominated by blown sand and largely devoid of trees. The underlying bedrock is principally metamorphic schist and gneiss. The site displays an excellent range of coastal and marine habitats.

The site is a Special Area of Conservation (SAC) selected for the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive (* = priority; numbers in brackets are Natura 2000 codes):

- [1140] Tidal Mudflats and Sandflats
- [1160] Large Shallow Inlets and Bays
- [1170] Reefs
- [1310] *Salicornia* Mud
- [2120] Marram Dunes (White Dunes)
- [2130] Fixed Dunes (Grey Dunes)*
- [2150] Decalcified Dune Heath*
- [21A0] Machairs*
- [3150] Natural Eutrophic Lakes
- [7230] Alkaline Fens

- [1355] Otter (*Lutra lutra*)
- [1395] Petalwort (*Petalophyllum ralfsii*)

Blacksod Bay is 16 km in length and 8 km wide at the mouth. It is a shallow bay, reaching a maximum depth of 19 m and with weak tidal streams. The bay has a good range of representative littoral and sublittoral sediment communities, and also infralittoral reefs.

The littoral sediments of the bay consist of areas that are moderately exposed to, or very sheltered from, wave action. Characteristically, exposed to moderately exposed sediment communities are composed of coarse to fine sand and have a polychaete fauna with crustaceans. Species richness increases as conditions become more sheltered. Talitrid amphipods occur in decomposing seaweed on the strand line. Polychaete worms (*Arenicola marina*), bivalves (*Cerastoderma edule*) and crustaceans

such as *Urothoe brevicornis*, *Ampelisca brevicornis* and *Bathyporeia pilosa*, are common in the middle shore.

The sublittoral sediment towards the entrance of the bay is comprised of rather barren medium sand, with the occasional bivalve molluscs *Glycymeris glycymeris* and *Ensis* spp. Much of the sediment in the centre of the bay is composed of firm, muddy sand with the brittle stars *Amphiura* spp. and the razor shells *Ensis* spp. Towards the head of the bay the sediment is composed of muddy sand with *Turritella communis*, *Amphiura brachiata* and *Philine aperta*, and soft sandy mud with *Anthopleura balli* and decaying algae. In some areas Eelgrass (*Zostera marina*) and the reef-forming polychaete *Serpula vermiculata* are frequent. Notable species included Oyster (*Ostrea edulis*), which occurs at head of the bay, and the sea anemone *Phellia gausapata*, which is present in the middle of the bay.

Infralittoral reefs within Blacksod Bay are sheltered or very sheltered from wave action and subject to weak or moderate tidal streams. In sheltered areas that are composed of bedrock, occasional *Saccorhiza polyschides* overlie a rich assemblage of red algal species such as *Dudresnaya verticillata*, *Heterosiphonia plumosa* and *Chondria tenuissima*. Very sheltered bedrock reef communities are also characterized by foliose red algae. The sea anemone, *Metridium senile*, is abundant on the tops of the reefs and *Antedon bifida* on the steeper surfaces. Much of the infralittoral reef in Blacksod Bay is composed of boulders, cobbles and pebbles. The red algae in these areas are sand-tolerant species such as *Chondria dasphylla* and *Gracilaria gracilis*. Characterizing faunal species are the anthozoans *Metridium senile* and *Alcyonium digitatum*, the hydroid *Nemertesia ramosa* and the sponge *Dysidea fragilis*. The purple sea urchin, *Paracentrotus lividus*, occurs at two sites at the head of the bay.

Large areas of machair, a priority habitat on Annex I of the E.U. Habitats Directive, are found within this extensive coastal site. On the Mullet peninsula the habitat is best developed to the west of Termoncarragh lake, Tonamace/Macecrump and to the west of Cross Lough. On the eastern shores of Blacksod Bay, extensive areas of machair occur at Doolough, Srah and Dooyork. The vegetation of the habitat is dominated by plant species of dry dune grassland which include Red Fescue (*Festuca rubra*), Wild Thyme (*Thymus praecox*), Daisy (*Bellis perennis*), Ribwort Plantain (*Plantago lanceolata*), Selfheal (*Prunella vulgaris*), Sand Sedge (*Carex arenaria*) and Lady's Bedstraw (*Galium verum*). The main moss species are *Brachythecium albicans*, *Calliergonella cuspidata* and *Bryum* species. In damper areas of machair the vegetation is transitional to fen and contains, in addition to the typical dry machair species, such species as Fairy Flax (*Linum catharticum*), Cuckooflower (*Cardamine pratensis*) and Grass-of-parnassus (*Parnassia palustris*).

Fixed dunes with herbaceous vegetation, another Annex I priority habitat, have an extensive distribution throughout the site and are particularly well developed in the middle and south of the Mullet peninsula, e.g. at Emlybeg, Newtown and Agleam. Areas of fixed dunes are typically at their highest approximately 500 m back from the sea, and at Emlybeg and Newtown they attain a height of approximately 33 m. The fixed dune areas present within the site often form a complex mosaic with other

dune habitats such as shifting dunes and machair. Frequent plant species recorded in the habitat include Marram (*Ammophila arenaria*), Smooth Meadow-grass (*Poa pratensis*), Wild Carrot (*Daucus carota*), Common Bird's-foot-trefoil (*Lotus corniculatus*), Harebell (*Campanula rotundifolia*) and Kidney Vetch (*Anthyllis vulneraria*). The moss cover is well developed and includes the species *Rhytidiadelphus squarrosus*, *Hypnum cupressiforme*, *Tortula ruralis* and *Homalothecium lutescens*. The conspicuous lichen *Peltigera canina* is also occasionally encountered in the vegetation. At Nakil, on the southern tip of the peninsula, there is a fine example of decalcified fixed dunes. In this habitat, there is a range of heath species such as Heather (*Calluna vulgaris*), Bell Heather (*Erica cinerea*), Sheep's-fescue (*Festuca ovina*), Tormential (*Potentilla erecta*) and Devil's-bit Scabious (*Succisa pratensis*), along with dune species such as Sand Sedge, Lady's Bedstraw and Wild Thyme.

Smaller areas of shifting dunes with Marram are found in most of the dune areas within the site and typically occur along the most exposed ridges of sand dune systems. The vegetation is species-poor and generally sparse. Along with Marram, typical plant species include Sea Mayweed (*Matricaria maritima*), Sea-holly (*Eryngium maritimum*), Colt's-foot (*Tussilago farfara*) and the locally rare Sea Bindweed (*Calystegia soldanella*).

Saltmarshes occur in a number of places, notably at Elly Bay, Salteen Harbour, Bunnahowen, Doolough and Gweesalia. Typical species include Thrift (*Armeria maritima*), Common Saltmarsh-grass (*Puccinellia maritima*), Sea Aster (*Aster trifolium*), Sea Milkwort (*Glaux maritima*), Sea Rush (*Juncus maritimus*) and Saltmarsh Rush (*Juncus gerardi*). At the lower levels of the marshes, and in places extending onto the open sandflats, Glasswort (*Salicornia europaea* agg.) and Annual Sea-blite (*Suaeda maritima*) occur.

The site also includes shallow freshwater lakes, Termoncarragh Lough, Cross Lough and Leam Lough. Cross Lough is a good example of a naturally eutrophic lake. The water of the lake appears to have a permanent turbid, yellow-brown colour and is unusual in that the phytoplankton is dominated by *Spirulina* spp. and other unusual cyanobacteria. The waters of the lake have a high chloride content (118 mg/l) and a relatively high calcium content (16 mg/l). The western shore of the lake is sandy and tends to be dominated by the stonewort *Chara aspera*, with some Shoreweed (*Littorella uniflora*). Other aquatic plant species which have been recorded from the lake include Spiked Water-milfoil (*Myriophyllum spicatum*), Long-stalked Pondweed (*Potamogeton praelongus*), Slender-leaved Pondweed (*Potamogeton filiformis*) and Fennel Pondweed (*Potamogeton pectinatus*).

Marsh and swamp vegetation is well developed around Termoncarragh Lough, and of particular note is a fine example of alkaline fen. This is species-rich, with such fen plants as Jointed Rush (*Juncus articulatus*), Glaucous Sedge (*Carex flacca*), Grass-of-parnassus, Knotted Pearlwort (*Sagina nodosa*), Marsh Arrowgrass (*Triglochin palustris*), Common Butterwort (*Pinguicula vulgaris*) and Lesser Clubmoss (*Selaginella selaginoides*). The scarce Marsh Helleborine (*Epipactis palustris*) also occurs here. A feature of the fen is a strong maritime influence, with the presence of a number of

saltmarsh species such as Sea Milkwort, Buck's-horn Plantain (*Plantago coronopus*), and Sea Arrowgrass (*Triglochin maritima*).

The Annex II liverwort species *Petalophyllum ralfsii* has been recorded from damp areas of machair at Doolough and Dooyork. The Red Data Book plant species Narrow-leaved Marsh-orchid (*Dactylorhiza traunsteineri*) also occurs. Otter, a species also listed under Annex II of the Habitats Directive, is well distributed throughout the site.

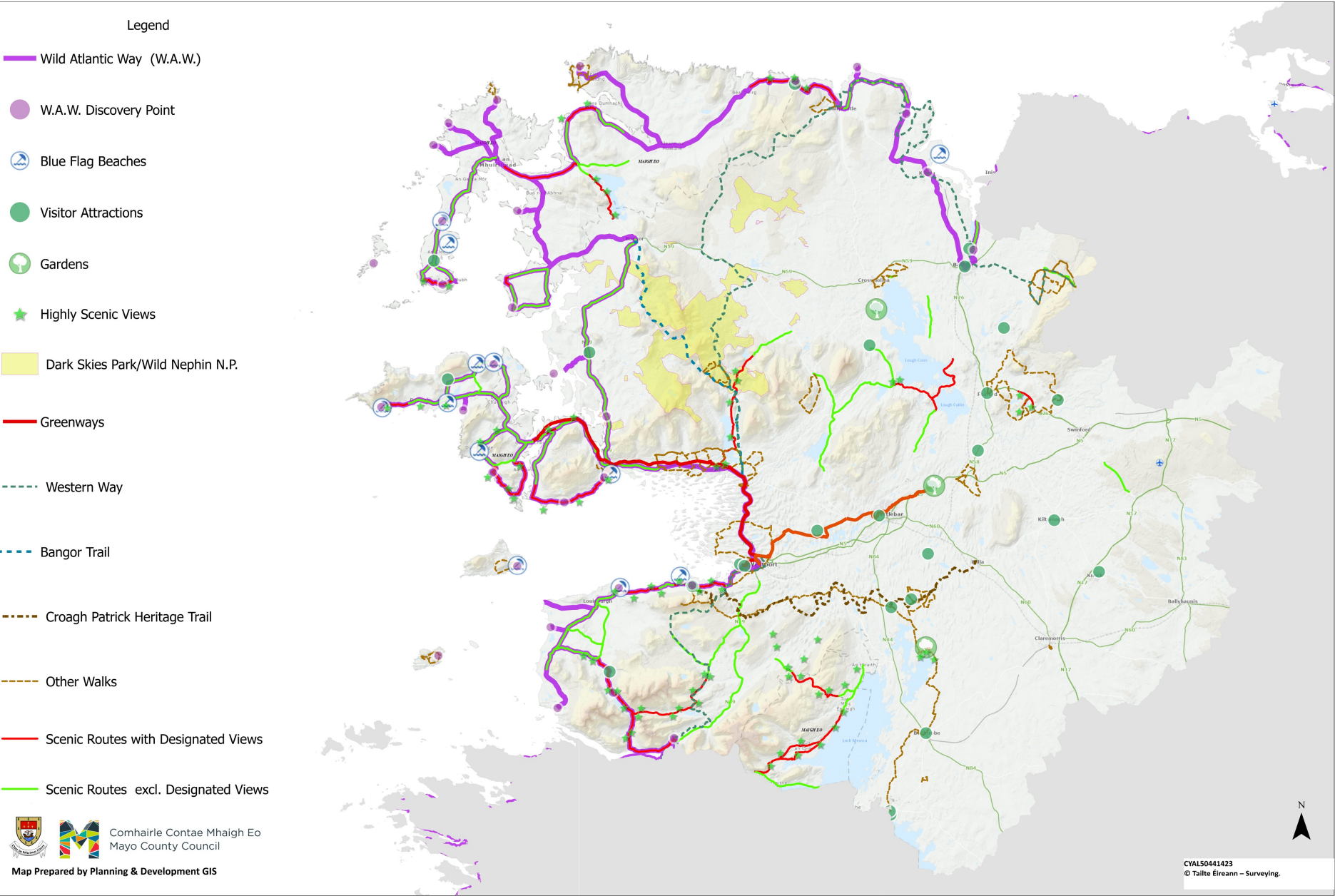
This site has high ornithological importance, with seven Annex I E.U. Birds Directive species occurring regularly in winter, and a further two as rare breeders. Blacksod Bay provides ideal habitat for divers (all given counts are average maxima over the three winters 1994/95 to 1996/97), with Great Northern Diver (64) occurring in numbers of international importance and Red-throated Divers (45) in significant numbers. The site is an important wintering area for an internationally important population of Barnacle Goose (400-500), and also populations of Greenland White-fronted Goose (56) and Whooper Swans (95). Golden Plover are regular in small numbers (c. 700), while a nationally important population of Bar-tailed Godwits (552) occur. Little Tern has bred in small numbers in the past, while the site is well-known for one of Ireland's rarest breeding birds, the Red-necked Phalarope. Unfortunately this species may now be extinct as a breeding species.

A wide range of other wintering birds occur. Of particular note are Brent Goose (212) and Ringed Plover (524), both of which have internationally important populations. A further six species have populations of national importance: Common Scoter (642), Red-breasted Merganser (50), Grey Plover (60), Knot (342), Sanderling (58) and Dunlin (2,601). The site is also notable for its breeding waders, with very important concentrations of Dunlin (26 pairs in 1996) and Lapwing (43 pairs in 1996), and significant numbers of Snipe (12 pairs) and Ringed Plover (5 pairs).

High levels of grazing and associated agricultural practices, e.g. feeding of stock and fertilisation, have resulted in locally severe damage to areas of dune and machair. The damage has been intensified by the division of dune and machair commonage, which is particularly evident on the Mullet. These agricultural activities remain serious threats. Benthic communities are very vulnerable to bottom-fishing gear such as that used for fishing oysters, and this is thought to be the most damaging activity in the marine area. Bait digging is potentially damaging to littoral sediment communities if the areas are over-fished.

This site is of high importance for the range of marine and coastal habitats, many of which are listed on Annex I of the E.U. Habitats Directive, three having priority status. The Annex II species *Petalophyllum ralfsii* and Otter also occur. The site is also of particular ornithological importance, having four wintering species with internationally important populations and also important concentrations of breeding waders.

Map 5.11 Tourism Assets In County Mayo



Tourism Assets In County Mayo

Existing and Potential UNESCO Sites

Céide Fields: The Céide Fields in North Mayo are the world’s oldest known field system, offering exceptional insight into Neolithic farming, society, and land use. Preserved beneath blanket bogs, the site holds global significance for its archaeological and cultural value. The site was previously nominated to be included on the tentative UNESCO list, a future nomination would highlight Ireland’s dedication to heritage preservation and could foster sustainable tourism and education, supported by growing public awareness and community engagement. Protecting the Céide Fields is a stated objective (BEO 2) of the Mayo County Development Plan 2022–2028. This includes safeguarding the site as contained on the UNESCO Tentative List (Ireland, 2010), supporting its nomination for World Heritage status, and ensuring it is protected from inappropriate development.

Joyce Country and Western Lakes Geopark: The Joyce Country and Western Lakes Geopark, which spans Counties Mayo and Galway, is a designated UNESCO Global Geopark. It features over 700 million years of geological history, including glacial valleys, limestone landscapes, and Killary Fjord. Rich in biodiversity and Gaeltacht culture, the area supports sustainable tourism, outdoor recreation, and community-led heritage preservation. The geopark promotes education and environmental stewardship while celebrating its unique natural and cultural heritage. Objective NEO 12 of the Mayo County Development Plan 2022–2028 supports the aims of the Joyce Country and Western Lakes Geopark, including the establishment of a new UNESCO Global Geopark in South Mayo / North Connemara. UNESCO Global Geopark status was formally granted in September 2025 at the 10th UNESCO Global Geoparks Council meeting in Temuco, Chile.

Together, the Céide Fields and the Joyce Country and Western Lakes Geopark represent two of Ireland’s most culturally, archaeologically, and geologically significant landscapes. Both are supported by the Mayo County Development Plan 2022–2028 for UNESCO designation, reflecting their exceptional value in terms of heritage conservation, education, and sustainable tourism. In order to preserve the integrity, authenticity, and setting of these sites, it is essential that their landscapes are protected from inappropriate development, particularly large-scale wind energy infrastructure.

It is the strategic objective of this strategy to:

- protect the integrity and authenticity of the unique unspoilt coastal landscapes, scenic routes and designated view of the County that form the essential context and backdrop for the Wild Atlantic Way which has become major tourism and economic asset for the county.
- ensure that the unique heritage & tourism assets of County Mayo, including the Wild Atlantic Way (Route & Discovery points), Mayo Dark Sky Park, Wild Nephin Ballycroy National Park, Spiritual Trails and Coastal Trails are protected from development that would negatively impact the integrity of their setting.
- ensure that the integrity of landscapes at the Céide Fields which holds potential as a UNESCO sites, and the landscapes of the UNESCO Joyce Country and Western Geopark are safeguarded and protected from inappropriate development particularly large-scale wind energy development and related infrastructure.
- preserve a 15km zone from wind turbine development in both directions from the ends of the runway at Ireland West Airport, to ensure unimpeded flight paths associated with Ireland West Airport is maintained.
- ensure that, at a minimum, wind turbines shall be set-back a distance of 150m from national roads and railway lines (used, disused & abandoned), set back from other roads will be site specific and determined at application stage.

Assessment of constrains and analysis conclusion

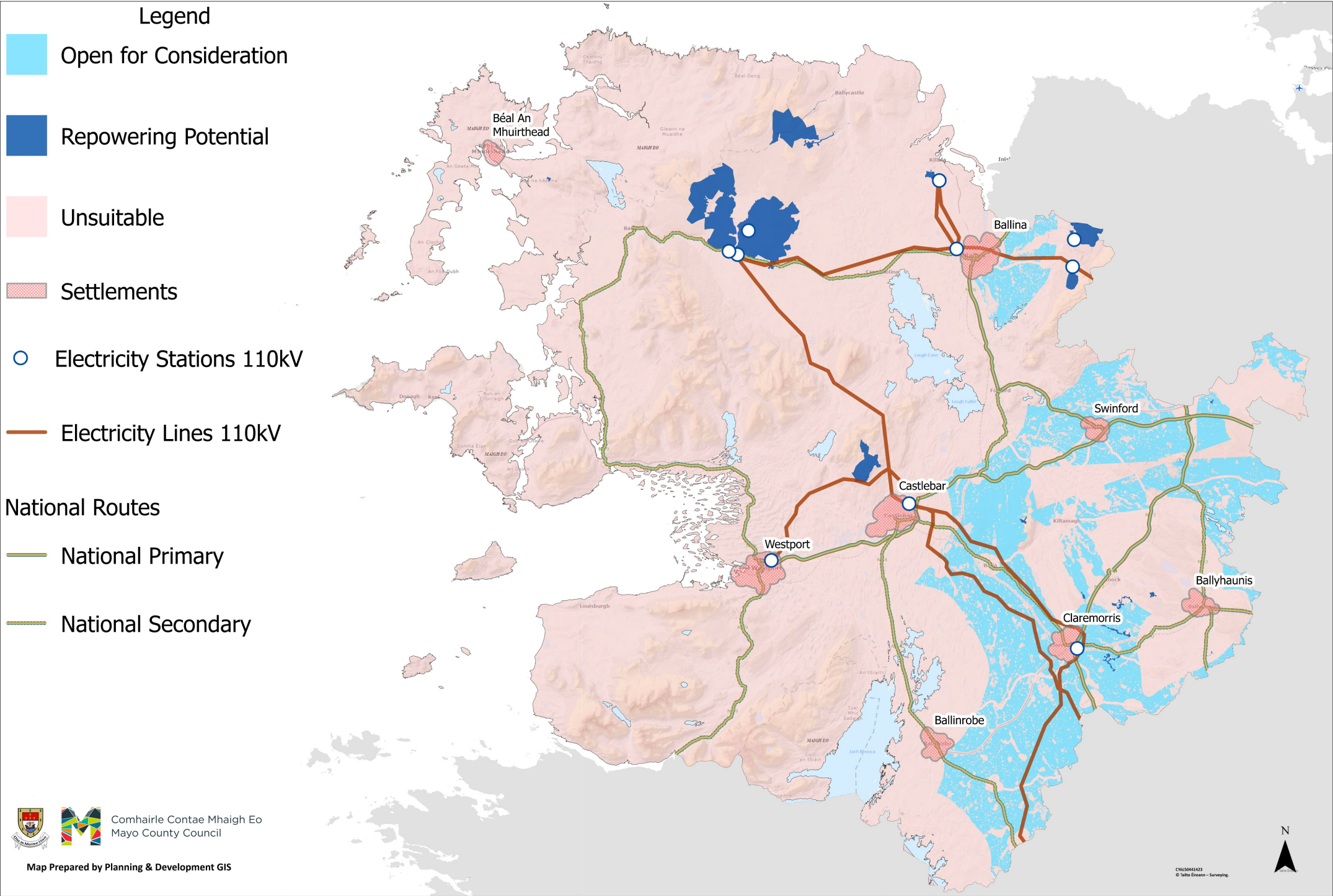
In Mayo, particularly the western coastal portion of the county, there are many designations as well as sensitivities, both physical and environmental constraints. The impact of large scale Wind energy development on the unique Mayo landscapes and receiving environment was given due consideration. Based on the outcome of this analysis and assessment, areas that are Areas Open to Consideration for wind energy developments have been identified, see Map 6.14. Applications for utility scale wind farms in these areas will be assessed on a case-by-case basis, subject to viable wind speeds, environmental resources and constraints and cumulative impacts in compliance with Article 6 of the Habitats and EIA Directives.

Areas located outside of ‘Areas Open to Consideration’ with the exception of the established clustered wind farm areas are not deemed suitable for commercial wind farm development because of their overall sensitivity arising from landscape, ecological, recreational and or cultural and built heritage resources.

It is a strategic objective of this strategy to:

- consider new wind energy developments in Co. Mayo in the areas identified as open for consideration. All wind energy proposals will be subject to normal planning considerations and compliance with the policies and objectives outlined in the Mayo County Development Plan 2022-2028 in general.
- ensure applicants/developers engaged in wind farm developments in Mayo go through a formal pre-planning consultations under section 90. Of the Planning and Development Act 2024 (as amended). Such consultations will identify potential constraints, community concerns.

Map 6.14 Wind Strategy Map (Wind Potential Lands)



Client: RWE

Project reference: P00012301

Date of issue: 13/03/2026

Project Director: Michael McMullan

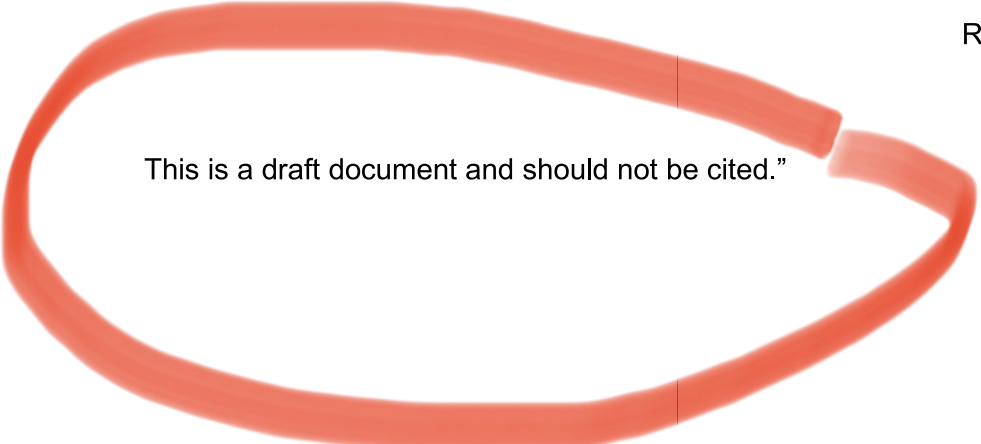
Project Manager: Róisín O'Connell

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This is a draft document and should not be cited."





January 2026

Re: Proposed Muingmore Wind Farm – Engagement / Drop in Clinic

Dear Resident,

I would like to thank all of you who have been in touch with us and to those that we have met since we started our first consultation back in June 2023. We are grateful for the feedback provided by the community to date and look forward to assisting with any further queries that arise as the proposed project progresses.

In our last correspondence, we informed you that we had carried out a constraints assessment of the study area in and around Muingmore which enabled us to prepare and share with you an indicative turbine layout at that time. We are working through the Environmental Impact Assessment Report (EIAR) and before we submit our planning application, we would like to engage with you again to hear your thoughts on the project. At the Clinic we will have proposed locations for all infrastructure on site and a proposed access route and turbine delivery route.

We will be holding a Drop in Clinic in the Broadhaven Bay Hotel, Belmullet, on Wednesday 28th January starting at 8am and running to 8pm. The Clinic will be by appointment and we ask those who wish to meet with the team to contact me on my mobile 087 151 9219 or by email at muingmore@rwe.com so that we can arrange a suitable time to brief you. We are happy to accommodate either one to ones or small groups of residents at a time. We would suggest that a maximum group of up to 6 people could be accommodated to allow us give each individual or group, time to discuss the project and the specific areas that they each want to discuss.

In the event that you cannot attend the Clinic, please feel free to email, text, or call me so that we can endeavour to facilitate an appointment at a time that better suits you to update you on the project.

Kind regards

Kieran

Kieran O'Byrne
Stakeholder Engagement / Communications – (Wind, Solar & Storage) Ireland
RWE Renewables Ireland Limited

- **Event** Clinic re Proposed Muingmore Wind Farm
- **Venue** Broadhaven Bay Hotel Belmullet
- **Day / Date** Wednesday 28th January 2026
- **Time** 8am to 8pm – by appointment– please book a suitable time.

www.rwe.com/muingmore

14/666 (MCC) Pl.16. 2453533 (ABP)	Permission to erect 8 no. wind turbines, overall height of up to 127meters, crane hardstands, 1 no. meteorological mast up to 80 m in height with wind measuring equipment attached, access road, electrical cabling, electrical substation compound, substation equipment.	Located c.6.2 km s/east of Muingmore WF site. Tawnanasool/ Croaghaun/ Tullaghaunnashammer/ Bangor Erris	Refused by MCC and Refused on Appeal to An Bord Pleanála	14/666: 3 x Reason(s) for Refusal 1. The proposed development, due to its nature and extent in this flat open and exposed landscape, in close proximity to several amenity and heritage features; would seriously impact on the visual amenity and natural character of the landscape (which it is necessary to preserve); when viewed both from the immediate vicinity of the site and from designated scenic routes beyond. The proposed development therefore would be contrary to the proper planning and sustainable development of the area. 2. The proposed development, by reasons of its nature and location in Policy Area 2 of the Landscape Protection Policy Areas and the Development Impact-Landscape Sensitivity Matrix of the Mayo County Development Plan 2014-20; would contravene policy/objective LP-01 of the development plan, which seeks to recognise and facilitate appropriate development in a manner that has regard to the character and sensitivity of the landscape and to ensure that development will not have a disproportionate effect on the existing and future character of a landscape in terms of location, design and visual prominence. The development would therefore seriously impact on the visual amenity and natural character of the landscape at this location which it is necessary to preserve and be contrary to the proper planning and sustainable development of the area. 3. Access the development is proposed via a direct access off the N59 National Secondary Route and the development therefore would contravene the Department of the Environment, Community and Local Government's 2012 Spatial Planning and National Roads Guidelines for Planning Authorities and policy/objective 38.1.2 of the Mayo County Development Plan 2014-2020 which restricts new non-residential accesses onto National Roads outside the 60 km/hr speed limit. The proposed development would therefore create an adverse impact on the national route at a point where the maximum speed limit applies and would endanger public safety by reason of traffic hazard. The proposed
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				development is therefore contrary to the proper planning and sustainable development of the area. Pl.16.245355: 1 x Reason(s) for Refusal 1. Having regard to the flat and exposed coastal landscape in which the proposed development is location, to the location of the proposal close to designated scenic routes and to the Wild Atlantic Way, and having regard to policy LP-01 of the Mayo County Development Plan which states that it is an objective of the plan to facilitate appropriate development in a manner that has regard to the character and sensitivity of the landscape, the Board considered that the proposal would interfere with views and prospects which are listed for protection in the current Mayo County Development Plan and would have a disproportionate effect on the character of the landscape. The proposal would, therefore, seriously injure the visual amenities of the area and would be in accordance with the proper planning and sustainable development of the area.
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