

FORMAL OBJECTION TO PLANNING APPLICATION NO. 324387

Proposed Wind Farm Development at Muingmore, Doolough, Geesala, Ballina, County Mayo

To Whom It May Concern,

I wish to formally object to **Planning Application No. 324387**, relating to the proposed wind farm development at Muingmore, Doolough, Geesala, Ballina, County Mayo.

While I fully acknowledge the importance of renewable energy in achieving Ireland's climate commitments, such developments must comply with Irish planning legislation, the Mayo County Development Plan, and Ireland's obligations under European Union environmental law. The proposed development raises serious concerns regarding landscape protection, biodiversity, tourism, peatland conservation, dark skies, visual amenity, cumulative environmental impacts and the well-being of local communities.

This objection is based on land-use planning, environmental, ecological, visual and community considerations rather than opposition to renewable energy development in principle.

The following grounds form the basis of my objection.

1. Conflict with the Mayo County Development Plan

The Mayo County Development Plan seeks to balance renewable energy development with the protection of landscapes, biodiversity, tourism assets and the quality of life of rural communities.

The proposed industrial-scale development would permanently alter one of the most remote and visually distinctive landscapes in North Mayo through the construction of turbines, access roads, crane hardstands, substations and associated infrastructure.

This conflicts with the Development Plan's objectives to protect sensitive landscapes, preserve scenic quality and ensure that renewable energy developments are located where they do not cause unacceptable environmental harm.

This approach is consistent with the principles contained within the European Landscape Convention (Council of Europe, Florence, 2000), which Ireland has ratified. The Convention recognises landscape as an essential component of people's surroundings, cultural heritage and quality of life, requiring public authorities to protect landscapes of outstanding character from inappropriate development.

2. Impact on Tourism

Tourism represents one of Mayo's most valuable and sustainable industries.

The appeal of North-West Mayo derives from its undeveloped Atlantic landscapes, blanket bogs, mountains, coastline and opportunities for walking, wildlife observation, fishing, photography and nature-based recreation.

The introduction of large industrial turbines would fundamentally change this landscape and diminish the visitor experience.

The European Union's European Tourism Agenda 2030 promotes sustainable tourism that conserves natural and cultural heritage while supporting local communities. Developments that

undermine the very landscapes upon which rural tourism depends are inconsistent with these objectives.

The cumulative visual impact of the proposed development risks damaging the long-term attractiveness of this region as a destination for nature-based tourism.

3. Impact on Protected Scenic Landscapes

The proposed development would introduce structures exceeding 150 to 200 metres in height into a highly sensitive landscape visible across extensive areas of North Mayo.

The European Landscape Convention requires public authorities to recognise landscapes as an essential element of public well-being and to integrate landscape protection into planning policy.

The extensive network of access roads, turbine platforms, electrical infrastructure and ancillary development would permanently industrialise an area currently characterised by open blanket bog and uninterrupted natural vistas.

The proposal therefore conflicts with both the Mayo County Development Plan and Ireland's wider obligations to conserve landscapes of exceptional character.

4. Impact on Wildlife, Deer Habitat and Ecology

The ecological impacts of this proposal are of particular concern.

The proposed site supports blanket bog habitat, wild deer populations, breeding birds, raptors and numerous protected species associated with upland peatlands.

Ireland is legally obliged to protect biodiversity under:

- Directive 92/43/EEC (Habitats Directive);
- Directive 2009/147/EC (Birds Directive);
- Regulation (EU) 2024/1991 on Nature Restoration; and
- EU Biodiversity Strategy for 2030.

The Habitats Directive requires that developments avoid deterioration of protected habitats and significant disturbance of protected species.

The Birds Directive requires Member States to avoid habitat deterioration affecting wild bird populations.

Construction activities, including road construction, drainage, excavation and ongoing maintenance, would fragment habitat, increase disturbance and potentially alter wildlife movement corridors, including those used by wild red deer.

Blanket bogs represent one of Europe's rarest habitats and provide internationally significant biodiversity and carbon storage. Their disturbance should be regarded as a matter of national and European environmental importance.

Across the European Union, wind farm developments have been altered, relocated or refused where Appropriate Assessment under the Habitats Directive concluded that significant adverse effects on Natura 2000 sites or protected species could not be ruled out.

5. Construction Traffic and Road Infrastructure

The development would require substantial transportation of turbine components, concrete, steel, aggregates and heavy machinery over local rural roads.

The likely consequences include:

- Increased road safety risks;
- Damage to public infrastructure;
- Traffic congestion;
- Increased noise and dust;
- Disruption to farming activities; and
- Reduced accessibility for residents.

Under Directive 2011/92/EU on Environmental Impact Assessment, as amended by Directive 2014/52/EU, all significant environmental effects, including traffic, cumulative impacts and effects on human health, must be comprehensively assessed before consent is granted.

The cumulative impacts upon local transport infrastructure should therefore receive careful scrutiny.

6. Extensive Land Clearance, Peatlands and Carbon Loss

The proposed development requires extensive excavation, vegetation clearance, road construction, drainage and turbine foundations across sensitive peatland habitats.

Ireland has committed to protecting and restoring peatlands through:

- The EU Biodiversity Strategy for 2030;
- The EU Nature Restoration Regulation (EU) 2024/1991;
- The European Green Deal; and
- The EU Climate Law (Regulation (EU) 2021/1119).

Blanket bogs are recognised as significant long-term carbon sinks.

Disturbance of deep peat can release substantial quantities of stored carbon while reducing future carbon sequestration capacity.

The environmental costs of peatland degradation should therefore be fully balanced against any projected climate benefits arising from renewable energy generation.

Construction activities within blanket bog environments may alter natural drainage patterns and increase the risk of sediment release into nearby watercourses.

The integrity of local rivers, streams and aquatic habitats should be protected in accordance with the Water Framework Directive (2000/60/EC), which requires Member States to prevent deterioration in the status of water bodies.

Any risk of changes to hydrology, erosion, siltation or water quality should be comprehensively assessed before permission is considered.

7. Impact on Local Communities

The proposed development would permanently alter the rural environment experienced by residents.

Likely impacts include:

- Visual dominance;
- Noise;
- Shadow flicker;
- Construction disturbance;
- Heavy traffic;
- Reduced rural amenity;
- Ongoing maintenance activity; and
- Potential effects upon residential enjoyment and property.

The Aarhus Convention, implemented throughout the European Union, recognises the public's right to participate meaningfully in environmental decision-making.

Local communities should not bear disproportionate environmental burdens arising from developments whose impacts extend over several decades.

8. Impact on Mayo's Dark Skies

North Mayo possesses some of the darkest remaining skies in Western Europe.

The installation of aviation warning lights on multiple turbines would introduce permanent artificial lighting into an area currently characterised by exceptionally low levels of light pollution.

Dark skies contribute to:

- Biodiversity;
- Human well-being;
- Scientific observation;
- Astrophotography;
- Tourism; and
- Landscape quality.

The increasing recognition of dark skies as an environmental resource is reflected in European environmental policy promoting protection of natural heritage and reduction of unnecessary environmental disturbance.

The permanent loss of naturally dark landscapes should therefore be considered a significant environmental impact.

9. Cumulative Environmental Effects

The Environmental Impact Assessment Directive requires cumulative effects to be assessed rather than considering each impact individually.

Particular regard should be given to the cumulative landscape, ecological and visual impacts arising from existing, permitted and proposed wind energy developments within the wider North Mayo region. The assessment should demonstrate not only the effects of the proposed development in isolation but also the combined effects with other existing and planned infrastructure.

The cumulative impacts include:

- Landscape alteration;
- Habitat fragmentation;
- Peatland disturbance;
- Carbon release;
- Increased traffic;
- Visual intrusion;
- Aviation lighting;
- Wildlife disturbance;
- Loss of tourism amenity; and
- Community impacts.

When considered collectively, these effects represent a substantial and irreversible transformation of a landscape of recognised environmental importance.

10. Concerns Regarding the Accuracy and Representativeness of Visual Impact Assessment Material

A particular concern relates to the photomontages, wirelines and visual representations submitted in support of the application.

Visualisations are intended to assist the Planning Authority, statutory consultees and members of the public in understanding the likely landscape and visual effects of a proposed development. It is therefore essential that viewpoint selection, camera positioning and cumulative impact assessments provide a fair, accurate and representative depiction of the development's likely effects.

Having reviewed a number of the submitted visualisations and having extensive familiarity with the local area, I am concerned that certain viewpoints may not adequately represent the extent of the visual impacts that would be experienced by local residents and road users.

VP17A – Local Road at Trista

While the photomontage itself appears technically realistic, the selected viewpoint does not appear to adequately represent the number of residential receptors within the surrounding area.

In particular, the visualisation fails to reflect the presence of approximately eleven residential dwellings within this locality. As a result, the viewpoint may understate the extent to which local residents would experience visual effects arising from the proposed development.

The omission of a broader residential context limits the usefulness of the visualisation in assessing the true impact on nearby dwellings and local amenity.

VP19 – L1206 at Trista

The viewpoint selected for VP19 also raises concerns regarding representativeness.

A viewpoint located approximately 150 metres further along the road would present a materially different perspective. From such a location, it would be considerably more apparent that existing tree cover does not effectively screen a number of the proposed turbines.

Consequently, the selected viewpoint may overstate the screening effect provided by vegetation and may not fully represent the visual impact that would be experienced by residents and road users travelling through the area.

VP13 – Local Road at Doolough

As a resident familiar with the Doolough landscape and its existing views toward the Bellacorick area, I am concerned that the cumulative wireline and cumulative visualisations associated with VP13 may not accurately represent the existing and proposed turbine relationship within the view.

The cumulative wireline appears to depict a noticeably smaller turbine understood to represent the existing Bellacorick Wind Farm. Based on my knowledge of the landscape, I do not believe this accurately reflects the prominence, scale or visual relationship of the Bellacorick turbines as experienced from this location.

This raises concerns regarding whether the cumulative assessment fully and accurately represents the combined visual impacts of existing and proposed wind energy developments within the wider landscape.

VP16A – L1205 at Doolough

I have significant concerns regarding the representativeness of photomontage VP16A.

Based on local knowledge of the landscape, the location of the proposed wind farm, the proposed turbine heights and the surrounding topography, the visualisation appears to substantially understate the prominence and visual scale of the proposed turbines.

In my view, the photomontage does not provide a realistic representation of the likely visual impact that would be experienced from this location and may therefore underrepresent the true landscape and visual effects of the development.

Need for Independent Review

Given the importance of visual impact assessment in determining the acceptability of a development of this scale, I respectfully request that the Planning Authority critically assess the methodology used in selecting viewpoints and preparing photomontages and wirelines.

Where doubt exists regarding the representativeness of the submitted visualisations, independent verification should be sought, and additional viewpoints should be required to ensure that the full extent of visual and cumulative impacts is properly assessed.

Accurate visual representations are fundamental to a fair assessment of landscape and visual impacts. Where photomontages, wirelines or viewpoint selections underrepresent the visibility, scale or cumulative impact of proposed structures, there is a risk that decision-makers and members of the public may not be presented with a complete understanding of the likely effects of the development.

In light of the concerns identified above, I respectfully submit that the Planning Authority should require further verification of the visual assessment methodology and, where necessary, additional viewpoints to ensure that the likely impacts upon residents, visitors and the wider landscape are fully and accurately assessed.

The concerns outlined above should not be viewed in isolation. Rather, they represent a series of interconnected environmental, landscape, ecological and community impacts arising from a large-scale industrial development proposed within one of the most remote and environmentally sensitive landscapes in County Mayo. Taken together, these impacts warrant a cautious and precautionary approach to the assessment of this application.

Conclusion

Renewable energy is essential to addressing climate change and achieving Ireland's national and European climate objectives. However, both Irish planning policy and European environmental law are clear that the transition to renewable energy must proceed in a manner that protects biodiversity, sensitive habitats, peatlands, landscapes, cultural and natural heritage, and the well-being of local communities.

Having regard to the significant concerns outlined above relating to landscape character, biodiversity, protected habitats, peatland conservation, tourism, dark skies, traffic impacts, residential amenity, visual impact assessment concerns and cumulative environmental effects, I submit that the proposed development would result in unacceptable and irreversible impacts on a highly sensitive rural environment of considerable ecological, scenic and recreational value.

Furthermore, serious questions remain regarding the potential for habitat fragmentation, peatland degradation, carbon release, impacts on wildlife and protected species, visual intrusion across an extensive area of North Mayo, and the long-term effects on the character of a landscape that is widely valued by residents and visitors alike.

The proposed development raises serious concerns regarding compliance with:

- The Mayo County Development Plan;
- The Habitats Directive (92/43/EEC);
- The Birds Directive (2009/147/EC);
- The Environmental Impact Assessment Directive (2011/92/EU as amended);
- The Nature Restoration Regulation (EU) 2024/1991);
- The European Landscape Convention;

- The Aarhus Convention; and
- The EU Biodiversity Strategy for 2030.

Given the scale, sensitivity and cumulative nature of the potential impacts identified, I respectfully submit that the precautionary principle should apply. Where there is reasonable scientific doubt regarding the extent of environmental harm, particularly in relation to protected habitats, peatlands, biodiversity, landscape impacts and ecological integrity, permission should not be granted unless it can be demonstrated beyond reasonable scientific doubt that no significant adverse effects will arise.

When considered collectively, the likely impacts on landscape, ecology, peatland habitats, wildlife, dark skies, tourism, local infrastructure and community amenity represent a substantial and permanent transformation of a landscape of recognised environmental importance. The concerns regarding the accuracy and representativeness of certain visual assessment materials further compound uncertainty regarding the full extent of those impacts.

Accordingly, for the reasons outlined above, I respectfully request that **Planning Application No. 324387** for the proposed wind farm development at Muingmore, Doolough, Geesala, Ballina, County Mayo be refused.

Yours faithfully,

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