

Planning Observation

Planning Observation in respect of the Proposed RWE Renewables Ireland Wind Farm Development at the Townlands of Muingmore (An Mhoing Mhór) and Doolough (Dumha Locha), North of Gweesalia and West of Bangor Erris, County Mayo

We wish to make this submission in relation to the above planning application.

At the outset, we wish to make it absolutely clear that this observation should not be interpreted as opposition to renewable energy. On the contrary, we fully support Ireland's transition to a low-carbon economy and recognise the urgent need to reduce greenhouse gas emissions and increase the proportion of electricity generated from renewable sources.

My household has invested personally in renewable technologies, and we drive an electric vehicle as part of our commitment to reducing our own environmental impact. We therefore recognise both the importance and necessity of renewable energy infrastructure.

However, support for renewable energy should not mean that every proposal is automatically regarded as appropriate, regardless of its location or cumulative impact. Renewable energy developments must be carefully planned so that they achieve climate objectives while also protecting landscapes, biodiversity, local communities and sustainable rural economies.

Our principal concern is that County Mayo, and the Erris region in particular, has already made a very significant contribution towards Ireland's renewable energy generation. That contribution is substantially greater than that made by many other counties. The burden of accommodating large-scale wind energy developments should be shared more equitably throughout the country rather than resulting in an over-concentration of industrial wind energy infrastructure within one of Ireland's most distinctive and environmentally sensitive landscapes.

The planning system must balance renewable energy objectives with the equally important objectives of protecting landscape character, biodiversity, tourism, community wellbeing and rural sustainability. We feel strongly that this proposal fails to achieve that balance.

Unsuitable Location and Cumulative Impact

The proposed development cannot be considered in isolation. The Erris region has experienced a continuing expansion of wind energy developments over many years, resulting in an increasing industrialisation of what has historically been one of Ireland's most remote, scenic and environmentally significant landscapes.

While each individual proposal may appear acceptable when assessed in isolation, the cumulative effect of repeated developments is the gradual transformation of an outstanding natural landscape into one increasingly dominated by wind turbines.

Planning decisions must recognise that cumulative visual and environmental impacts are often substantially greater than the sum of individual developments. In this instance, we as local residents feel that the cumulative impact has now reached an unacceptable level.

Adverse Visual Impact

The proposed development would introduce a series of exceptionally large industrial structures into an open blanket bog landscape that is characterised by expansive horizons, undeveloped skylines and exceptional scenic quality. The proposed wind farm would not fit in the famous Paul Henry paintings, which have made these Mayo skylines so famous.

The landscape surrounding Doolough, Muingmore, Blacksod Bay and the wider Erris Peninsula is widely recognised as one of County Mayo's defining natural assets. These qualities are not just notional, they are fundamental to both the area's identity and its tourism economy.

The proposed structures are of a scale rarely encountered outside major urban centres.

For context:

- Liberty Hall in Dublin is approximately 59 metres in height.
- The Gherkin in London stands approximately 180 metres high.
- The proposed turbines are understood to be approximately 200 metres to blade tip

Accordingly, these turbines would stand at more than three times the height of Liberty Hall and would exceed the height of one of London's best-known skyscrapers. They will overlook our homes with the obvious visual, noise and light flicker impacts.

Such structures are entirely out of character with the surrounding landscape and would become dominant visual features over an extensive area. Their scale would fundamentally alter the character of this traditional rural landscape and diminish the scenic qualities upon which both residents and the tourism industry depend.

Impact on Tourism

The Erris Peninsula is an internationally recognised tourism destination, attracting visitors seeking dramatic coastal scenery, unspoilt landscapes, outdoor recreation and the unique experience offered by the Wild Atlantic Way. Erris was decimated by emigration in our living memory, our family was forced to leave, for many years, due to a total lack of opportunity, the vast majority of jobs in the area are now tourism

related. It is one of our surviving industries and this project puts that in jeopardy, which is very worrying for future generations who might hope to live and work where they were born.

Visitors are drawn to the area for its:

- spectacular coastal scenery
- blanket bog landscapes
- walking and hiking
- fishing
- birdwatching
- photography
- dark skies
- sense of wilderness and tranquillity

The introduction of multiple turbines of this scale would inevitably alter the visual character that attracts visitors in the first place. The night skies will be further proliferated with red beacons. The scale of this project within highly sensitive scenic landscapes risks undermining one of the area's greatest economic assets.

Ecology/Hydrology

The proposed development is located within an extensive blanket bog landscape of recognised ecological importance.

Blanket bogs are internationally significant habitats and perform vital ecological functions, including:

- long-term carbon storage
- water regulation
- biodiversity conservation
- flood attenuation

Construction within peatland environments inevitably requires excavation, drainage, road construction and extensive concrete foundations. These activities have the potential to disturb peat, release stored carbon and fragment sensitive habitats.

Particular concern arises regarding the hydrology of the site. The proposed development area drains through numerous muings, drains and natural watercourses before ultimately discharging into Blacksod Bay. Any alteration to drainage patterns or increases in suspended sediments during construction could have downstream consequences for water quality, estuarine habitats, fisheries and coastal ecosystems. As users of the water, this is a significant concern.

Given the ecological sensitivity of the environment, it is impossible to predict accurately the impact of the proposed development. Our bogs, one of which we own, have been there for thousands of years, unearthing them to produce energy for export to the grid is concerning.

The application and decision makers should consider that turf cutting is being restricted in the area, yet a massive industrial complex which involves tens of thousands of tonnes of stone, steel and concrete is being proposed for the same lands. In the immediate vicinity a Complex Special Area of Conservation has been designated under the EU Habitats Directive to protect vital upland, blanket bog. The designation restricts the use of lands, rightly, this application cannot be considered in isolation to this reality.

Construction Traffic and Road Infrastructure

The planning application indicates that construction will generate a substantial volume of Heavy Goods Vehicle movements together with abnormal loads transporting turbine components, cranes, concrete and construction materials.

The number of daily vehicle movements during the construction period is considerable and will place significant pressure on a rural road network that was never designed to accommodate sustained industrial traffic of this magnitude.

The likely consequences include:

- increased road safety risks
- accelerated deterioration of road surfaces
- congestion
- disruption to local residents
- delays for agricultural traffic
- inconvenience for visitors, cyclists and local businesses.

These impacts will not be temporary inconveniences alone but may result in long-term deterioration of local infrastructure. The state has invested millions in making Mayo a cycling destination, the roll out of greenways has led to thousands of people cycling onwards to Erris. The vista of hundreds of trucks trundling along small roads daily will surely be a discouragement to tourists and put their safety at risk, not to mention the impact economically of losing that tourism.

Emergency Services and Local Communities

The rural communities of Erris are highly dependent upon the local road network. The journey from our home in Doolough to Mayo General Hospital in Castlebar is 1hr 15mins on a good day. Adding road closures and diversions to that journey is not only an inconvenience, but a genuine concern for people travelling for routine appointments, but also an emergency dash to the hospital. Which every family has experienced, the application does not address this.

Residents rely upon these roads for:

- emergency medical access
- ambulance services

- fire and rescue services
- Garda response
- school transport
- hospital appointments
- essential daily travel

We do not feel that the application addresses these issues adequately, the works have the potential to delay emergency response times and create additional risks for vulnerable residents, particularly older people and those living in isolated rural areas.

Aviation Safety Concerns

Particular concern also arises regarding the Aviation Assessment accompanying the planning application. It is understood that RWE's own aviation consultant assessed only eleven of the proposed thirteen turbines, with two turbines omitted from the assessment.

If correct, this raises significant questions regarding the completeness and reliability of the aviation assessment. Furthermore, the assessment appears not to refer to the Irish Coast Guard Search and Rescue refuelling station located at Blacksod Lighthouse, which is a vital resource to people in the area, in particular members of the fishing community.

Before any planning decision is made, the aviation assessment should be reviewed to ensure that all turbines have been assessed and that all relevant aviation operations have been fully considered.

Mayo County Council's Position

It is noteworthy that during pre-planning engagement, Mayo County Council expressed reservations regarding the proposal. According to the documentation, the Council advised RWE that it was:

"Not happy with the application. Not in favour from a visual point of view."

This comment reflects the significant visual planning concerns associated with the proposal from the local authority. Regardless of national policy, the input of the local council should be considered in the interest of democracy and input from the local community. The correspondence from the County Council is an indication that our concerns are not confined to local residents but were also recognised by the planning authority during the pre-application process.

Conclusion

Ireland requires increased renewable energy infrastructure to meet targets. County Mayo has already contributed significantly to achieving national climate and energy objectives.

However, renewable energy development must remain consistent with good planning practice and should not result in the irreversible industrialisation of landscapes of exceptional scenic, ecological and cultural importance.

This proposal would introduce structures taller than many of the worlds iconic urban buildings into one of Ireland's most distinctive rural landscapes. The proposed wind generation plant, is not a "farm", it is a vast industrial complex which it is proposed would be inserted into a landscape which is virtually untouched for thousands of years.

In our view it would create significant visual impacts, place additional pressure upon sensitive blanket bog habitats and downstream hydrology and generate substantial construction traffic on unsuitable rural roads. Given failings in the application it also raises unresolved aviation concerns.

Most crucially the proposed project would contribute further to the cumulative concentration of wind energy developments within the Erris region.

Given RWE's significant experience in off shore wind energy, perhaps additional investment off the coasts of Mayo and other countries would be better served to meet our renewable energy targets, without damaging the natural environment and impacting peoples homes and lives. Albeit a more expensive proposal for the highly profitable industry.

For these reasons, it is respectfully submitted that the proposed development would not represent suitable development in this location and that planning permission should be refused.

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