

**An Coimisiún Pleanála**

**Strategic Infrastructure Section**

**64 Marlborough Street, Dublin 1 (Submitted via Portal)**

**RE: PUBLIC SUBMISSION REGARDING STRATEGIC INFRASTRUCTURE APPLICATION  
PAX16.324387**

**Project: Proposed Muingmore Industrial Wind Farm, 110kV Substation & BESS Compound**

**OBSERVER DETAILS:**

Name: Ellen O'Donoghue

Address of Residence: Barnatra, Ballina, Mayo, F26Y3C8

Interest in Proceedings: Resident and family representative on the Barnatra transport corridor.

Dear Board Members,

I am lodging this observation on behalf of our family home in Barnatra, where my elderly mother resides. Our residence sits directly along the primary heavy transport corridor servicing the Erris peninsula, the route designated for all heavy haulage, concrete delivery, turbine component transit, substation transformers, and BESS container units.

We request that An Coimisiún Pleanála REFUSE PERMISSION for this project due to the unmitigated impacts detailed below:

**1. Heavy Haulage Impact & Severe Loss of Residential Amenity**

Transporting 13 turbine components (tip heights up to 200m), thousands of tonnes of concrete, 110kV substation transformers, and heavy BESS units along narrow rural roads through Barnatra will generate severe noise, ground vibration, and road safety hazards. This heavy construction traffic will severely disrupt living conditions, safety, and quiet enjoyment of our home, particularly for an elderly resident.

**2. Invalidation of EIAR Noise & Shadow Flicker Baseline Modeling**

The developer's EIAR fails to comply with EIA Directive 2014/52/EU. The noise and shadow flicker models rely on generic, copy-pasted building dimensions across local homes rather than site-verified measurements. Furthermore, the modeling omits the constant 24/7 low-frequency noise from the BESS cooling fans and substation transformers. The Board cannot grant permission when the baseline receptor data is unverified.

**3. Net Carbon Burden vs. Local Burden**

Our community is being asked to bear severe disruption and environmental damage for a project that creates an immediate carbon deficit through bog excavation. Where generated energy on a constrained grid is contracted to private corporate off-takers (such as data centers) rather than

lowering public energy costs or decarbonizing local infrastructure, the project creates an unfair local environmental burden without public benefit.

#### **4. Emergency Infrastructure Deficit for BESS Thermal Runaway**

Utility-scale lithium-ion BESS installations introduce major risks of thermal runaway fires and toxic gas releases (including hydrogen fluoride). The application contains no agreed emergency management protocol with local fire services. Given the geographic isolation of the Erris peninsula and limited local fire service capacity, this facility presents an unmitigated threat to public safety.

#### **CONCLUSION**

To safeguard residential amenity, public safety, and human health, I urge the Board to issue a refusal of planning permission for Case PAX16.324387.

Yours faithfully,

**Ellen O'Donoghue**

**Date: 7th August 2026**