

Submission Regarding Proposed Wind Energy Development

Case Reference: PAX16.324387

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Introduction

This submission is made in relation to the proposed wind energy development under case reference PAX16.324387.

The purpose of this submission is to object to the proposed wind farm development in Muingmore. Renewable energy has an important role to play in Ireland's future. However, renewable energy developments must also be located and designed in a way that protects areas of exceptional environmental value and this includes parts of Erris and especially the proposed site. It is my humble opinion that consideration has not been given to the resulting damage, trauma, disruption and scar on the human, wildlife, and natural environment in what is a unique location of peat along the Atlantic shore. This is an area that rightly is protected because of the immense fragility and beauty it offers to everyone and all life that can benefit from it.

In brief, the concern raised in this submission is whether this particular location is appropriate for a development of this scale, given the sensitivity of the surrounding landscape, the importance of the peatland environment, the biodiversity value of Erris and the potential cumulative impact of further industrial infrastructure in this area.

Erris is one of Ireland's most distinctive landscapes. Its Atlantic blanket bogs, open skies, dark skies, wildlife, coastal environment and sense of remoteness are among its greatest assets. These qualities are important not only from an ecological perspective, but also for the people who live here and for the many visitors who come to experience this landscape

Has the applicant provided sufficient evidence to demonstrate that this development can proceed without unacceptable impacts on the peatlands, water systems, wildlife, landscape character and environmental quality of Erris? And a reading from the application is absolutely not and therefore any submission requires rejection at this stage for to interfere with such an ecosystem is considered extremely harmful and dangerous without comprehensive data on the context. It took tens of thousands of years to create this environment and life has a fine balance within it. A hasty, unplanned decision to develop industrial power is potentially very threatening to all life in the environs and it would be reprehensible not to exhaust all means to assess potentially impacts.

Main Concerns in my paper

The main concerns raised in this submission are:

1. The sensitivity and fragility of Atlantic blanket bog in the proposed development area.
 2. Potential impacts on peatland hydrology and surrounding water systems.
 3. The need for a full assessment of biodiversity and protected species.
 4. The potential cumulative effect of additional wind energy development on the landscape and human character of Erris.
 5. Impacts on dark skies, tourism and the unique wilderness (of the Wild Atlantic Way) qualities of the area.
 6. The need for a transparent assessment of carbon impacts, including disturbance of peat.
 7. Whether reasonable alternatives have been properly considered.
 8. Whether the Environmental Impact Assessment provides sufficient information for a fully informed decision.
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1. Atlantic Blanket Bog and Peatland Environment

Erris contains some of the best remaining examples of Atlantic blanket bog in Europe.

These areas can not be viewed simply as undeveloped land available for infrastructure. Blanket bog is a highly developed system that provides important environmental functions, including:

- long-term carbon storage;
- water regulation;
- flood management;
- biodiversity support;
- landscape value.

Peatlands develop over thousands of years and once damaged they cannot be replaced without major time and resources.

Wind farm developments on peatland require care because the impacts extend beyond the immediate footprint of turbines.

The full development includes not only turbines, but also:

- access roads;
- drainage works;
- foundations;
- crane places;
- underground cabling;
- electrical infrastructure;
- construction compounds.

The applicant should clearly demonstrate:

- how much peat will be removed or disturbed;

- how much intact bog habitat will be affected;
- whether surrounding peatland could be indirectly damaged;
- how carbon losses have been calculated;
- whether restoration proposals are realistic.

The concern is not simply the land occupied by individual turbines. The concern is the effect of the entire development on a sensitive and protected peatland system that is in close proximity to human and animal life and has a very specific relationship with that life. This will be significantly altered with this sudden and dramatic and traumatic change proposed.

2. Hydrology and Water Protection

Blanket bog depends on a delicate balance between rainfall, water retention and vegetation.

Construction activities can alter this balance through, amongst others :

- drainage;
- road construction;
- excavation;
- changes in groundwater movement;
- increased runoff.

The effects of these changes will likely extend beyond the construction area.

The applicant should demonstrate that:

- natural water movement through the bog will be maintained;
- downstream water quality will not deteriorate;
- connected wetlands will not be adversely affected;
- drainage impacts have been fully assessed.

A key concern is whether the assessment treats the bog as a complete living system involving humans, animals, birds, insects and plants rather than looking only at individual turbine locations.

The planning body must be sure that:

The proposed development will not permanently alter the hydrological functioning of the wider peatland environment.

3. Peat Stability and Construction Risk

Building major infrastructure on a bog requires careful assessment.

The planning authority needs to know that:

- peat depth investigations are comprehensive;
- ground conditions have been properly assessed;
- slope stability has been examined;
- construction methods are appropriate;
- extreme rainfall events linked to climate change have been considered.

Peat instability events, although uncommon, can have serious consequences.

Potential consequences include:

- damage to habitats;
- pollution of watercourses;
- risks to infrastructure;
- impacts on local communities.

The issue is not whether peat failure is likely, but whether the risks have been properly understood and managed.

4. Carbon Balance and Climate Considerations

Renewable energy projects provide important benefits for all of us. However, peatlands themselves are precious assets because they store significant amounts of carbon.

Disturbance of peat will release stored carbon.

A proper assessment must take into consideration:

Carbon losses from:

- peat excavation;
- drainage;
- habitat disturbance;
- construction materials;
- transport;
- infrastructure.

Carbon benefits from:

- renewable electricity generation;
- reduced fossil fuel use;
- operational carbon savings.

The applicant should provide a full, transparent and comprehensive carbon assessment.

The question should not simply be:

“How much renewable electricity will be produced?”

The question should be:

Does the development provide a genuine overall climate benefit when all impacts are included?

5. Biodiversity, Protected Species and Ecological Impacts

Erris supports a wide range of habitats and species associated with Atlantic coastal and peatland environments.

Any large-scale development in this landscape requires a thorough assessment of potential effects on:

- birds;
- mammals;
- peatland species;
- wetland habitats;
- ecological connections between habitats.

The assessment should be based on reliable and up-to-date surveys.

The applicant should demonstrate that surveys have properly considered:

- breeding seasons;
- wintering periods;
- migration periods;
- flight activity;
- collision risk;
- disturbance effects.

It is important that the assessment considers not only species found directly on the development site, but also the wider ecological role of the landscape.

6. Appropriate Assessment and Protected European Sites

Where a development has the potential to affect European protected sites, the assessment must be based on scientific evidence.

The key question is whether potential adverse effects have been properly examined and ruled out.

The planning authority must know that:

- all relevant protected sites have been identified;
- possible pathways of impact have been assessed;
- hydrological connections have been examined;
- protected species have been properly considered;
- cumulative effects have been addressed.

Where uncertainty remains, further information may be required before a decision can responsibly be made.

7. Landscape Character of Erris

The human, social and living landscape of Erris is one of Ireland's most distinctive, unique and precious remaining Atlantic landscapes.

Its character is defined by:

- wide open spaces;
- Atlantic horizons;
- peatland landscapes;
- limited development;
- a strong sense of remoteness and wilderness.
- Inspiring and safe landscape for a wide diversity of life

Will this development permanently change the character and identity of this landscape?

Large-scale wind energy infrastructure introduces a new industrial element through:

- turbine height;
- movement of blades;
- access roads;
- substations;
- hardstanding areas;
- lighting.

These elements can have an impact even where mitigation measures are proposed.

8. *Cumulative Impact of Wind Energy Development*

Erris has already experienced significant wind energy development.

The planning authority needs to be sure in relation to:

- existing wind farms;
- permitted developments;
- proposed developments;
- associated infrastructure.

The question then becomes:

At what point does the accumulation of developments fundamentally alter the character of north-west Mayo?

9. Dark Skies and Night-Time Impacts

The wider Erris region is internationally recognised for its exceptionally dark skies.

This is due to:

- low population density;
- limited artificial lighting;
- extensive open landscapes;
- distance from urban areas.

Dark skies are a hugely important natural resource and contribute to our understanding of life and nature itself, tourism and the quality of life of local communities.

The assessment should consider:

- aviation warning lights;
- night-time visibility;
- cumulative lighting effects;
- impacts on astronomy;
- effects on nocturnal wildlife.

A landscape that has traditionally experienced natural darkness will be significantly changed by permanent industrial lighting.

10. Tourism and Recreation

Erris is valued for its:

- Wild Atlantic Way experience;
- walking routes;
- beaches;
- fishing;
- birdwatching;
- wildlife;
- wilderness character.

Tourism in this region depends not only on individual attractions, but on the overall quality and character of the landscape.

The issue is not whether tourism would completely stop. The issue is whether the development would reduce the quality of the visitor experience or affect activities that depend on an undeveloped landscape.

The applicant should provide an objective assessment rather than simply concluding that impacts will be minimal.

11. Construction Impacts

The construction phase requires consideration because of :

- heavy vehicle movements;
- road upgrades;
- excavation;
- drainage;
- noise;
- dust;
- disturbance to residents and wildlife.

Although some impacts may be temporary, construction could last for a significant period and may have lasting environmental consequences.

The assessment should clearly explain:

- expected traffic volumes;
- construction duration;
- effects on local roads;
- impacts on residents;
- measures to protect the environment.

12. Alternatives

A key part of environmental assessment is consideration of reasonable alternatives.

The applicant should explain:

- Why was this location selected?
- Were less environmentally sensitive locations considered?
- Could the layout be changed to reduce peat disturbance?
- Could the environmental impact be reduced through alternative designs?

Where a location contains highly sensitive habitats, alternatives become particularly important

Was this the most appropriate location when environmental impacts were properly considered?

13. Quality and Adequacy of Environmental Assessment

A planning decision can only be as good as the information on which it is based.

For a development of this scale, the Environmental Impact Assessment Report (EIAR) must provide clear, reliable and complete information.

The planning authority should carefully examine whether:

- ecological surveys are sufficiently recent;
- survey methods are appropriate;
- all seasons have been covered where necessary;
- peat investigations are comprehensive;
- hydrological assessments are detailed enough;
- landscape assessments represent important viewpoints;
- cumulative impacts have been properly considered.

Where information is incomplete, the decision-maker should seek clarification rather than assume that impacts can be managed later.

14. The Importance of the Precautionary Approach

Environmental decisions involving sensitive habitats must recognise that uncertainty itself can be significant.

This is particularly relevant where there are concerns regarding:

- peatland systems;
- protected habitats;
- bird populations;
- water movement;
- cumulative landscape change.

Where there is a lack of clear evidence, it is not appropriate to assume that impacts will be insignificant.

A cautious approach is especially important in areas such as Erris where environmental qualities have national and international importance.

15. Compliance with Planning Policy

The applicant should demonstrate clearly how the proposal complies with relevant planning policies relating to:

- protection of natural heritage;
- landscape protection;
- biodiversity;
- sustainable development;
- appropriate siting of infrastructure;
- protection of sensitive landscapes.

It is not sufficient simply to state that renewable energy is supported by national policy.

The planning system requires a balance between renewable energy objectives and protection of important environmental resources.

Others will no doubt be better versed on existing policies both international, national and local and the degree to which this proposal is consistent with them. Indications suggest it is not and this is a serious concern.

Is this the right development in this particular location?

16. Questions That Should Be Addressed by the Applicant

The following questions should be answered clearly before a decision is made:

Peatland

1. How much peat will be removed or permanently altered?
2. What area of bog habitat will be affected directly and indirectly?
3. How has peat-related carbon loss been calculated?
4. Are restoration proposals realistic and achievable?

Hydrology

5. Have all drainage pathways been identified?
6. Could construction alter groundwater or surface water movement?
7. Could nearby wetlands or water bodies be affected?

Biodiversity

8. Have all relevant species been properly surveyed?
9. Are bird surveys sufficient in duration and seasonal coverage?
10. Have cumulative impacts on wildlife been assessed?

Landscape

11. Has the impact on the character of Erris been fully assessed?
12. Have all existing and proposed wind developments been included in cumulative assessment?
13. Have realistic viewpoints been used in visual assessments?

Climate

14. Does the carbon assessment include peat disturbance and construction emissions?
15. What is the genuine whole-life climate benefit of the project?

Alternatives

16. Were less sensitive locations considered?
 17. Were alternative layouts considered to reduce environmental impacts?
 18. Was wave power considered and how does this proposal weigh up against that system
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17. Overall Conclusion

This submission acknowledges the importance of renewable energy and the need for climate action.

However, climate action must also protect the natural systems that help regulate the climate and support biodiversity.

Erris is a landscape of exceptional value. Its Atlantic blanket bogs, wildlife, dark skies and sense of wilderness are important assets that cannot easily be replaced once damaged.

The concerns raised in this submission relate not to renewable energy itself, but to whether this particular development is appropriate in this particular location

The planning authority must be satisfied that:

- peatland impacts have been fully understood;
- hydrological risks have been properly assessed;
- protected habitats and species will not be adversely affected;
- cumulative landscape impacts are acceptable;
- the development represents sustainable development in this location.

Where significant uncertainty remains, the appropriate course is to refuse permission.

Request to the Planning Authority

I respectfully request that the planning authority give careful consideration to the environmental sensitivity of the proposed location and ensure that all requirements of planning policy and environmental law have been fully met. Insofar as they are not met, which seems arguable, then I submit that this proposal is rejected.
