

Doolough,
Geesala,
Ballina,
CO MAYO

F26 EY01

6th August 2026

Dear sir / madame,

please find attached my
submissions on the planning application
Number 324387. The fact that I live
locally has given me a lot of local knowledge
on which to base my submissions. I don't have
a lot of technical language to use, so this
submission is in plain English. I have kept
references to the various E.U. directives to
a minimum, I'm sure that other submissions
will cover them. I want to state that I'm not
against renewable energy, in any shape, make or
form, and I'm not a NIMBY, either. This
submission is being made because I believe
that this wind farm is wrong, on a lot

OF FRONTS, and i want to be able to say
that i did my best, to explain to the
people at an comisiún pleanála why this
was the case

Yours sincerely

Gerard Murphy

OBSERVATIONS ON PLANNING APPLICATION
NO. 324387, proposed wind Farm
Development at Muingmore and Doolough
Gaasala, Ballina COUNTY MAYO

I am making submissions under the following
Headings.

PHOTOMONTAGES

NATURAL ENVIRONMENT

LOCATION.

BALLYBOY VISITOR CENTER, WILD NEPHIN NATIONAL
PARK, and BALLYBOY Dark Skies PARK

TOURISM.

TRAFFIC.

PLANNING DRAWINGS.

WATER QUALITY.

PHOTOMONTAGES

The amount of documentation, and drawings and Maps in this application is significant as is to be expected with a project of this size. A lot of it beyond the understanding of a layman like myself.

I was immediately drawn to item no 6 in the Application Documents, Volume 4 photomontages.

There were 29 Viewing points Selected.

From each viewpoint there was a Baseline photograph taken, a cumulative wireline view created, a wireline Model, and then a photomontage, this was done to carry out a Landscape and Visual Impact Assessment (LVIA), all the images presented clearly.

"This planar projection Panorama has been captured, prepared and presented in accordance with the Guidance set out in the Scottish Natural Heritage 2017 guidance

"Visual Representation of Wind Farms"

After viewing the photomontages a few

times, I read the Visual Representation of Wind Forms document, it's 48 pages long and gives advice to applicants about the best practice on putting together the photomontages of windforms, to be included in the planning application.

I refer to the section on the selection of viewpoint, paragraphs 71, and 72 refer to "Interested members of the public, and in particular Community Councils, should also advise on sensitive local vantage points at public meetings and/or exhibitions held by the applicant"

There was never any consultation between the Applicant and any people re the selection of viewpoints, was there any consultation between an Commission planning on the selection of view points

Paragraphs 89 and 90 speak about the viewpoint being free of atypical local features, such as a single tree

IN the Foreground, which would cause the view of the windform to be misrepresented. Paragraph 90 states that view points should be free from any avoidable foreground objects and other obstructions such as fences, walls, gates roadways, road furniture, Summit Cairns and unnecessary foreground trees, shrubs, or foliage unless these are typical of the view

Paragraph 96 speaks about Visualisations whether they are hand drawn sketches, photographs, or photomontages can NEVER exactly match what is experienced in Reality, but states that "They should, however, provide a representation of the proposal that is accurate enough for the potential impacts to be fully understood."

There are some of the photomontages in this application that clearly breach this and I will refer to them on an individual basis later on in this

SUBMISSION

Paragraph 124 deals with how the blades are depicted in the photomontage, some people depict the all the turbines with the rotors set with one blade pointing straight up, this can produce a very "regimented" effect that appears less realistic.

Some people depict the blades at random angles, this helps to simulate more realistically the fact that the turbine blades will be moving, when this is done there is a risk of "losing" turbines behind the landform because the blade angle happens not to place a tip high enough in its arc to be seen.

Paragraph 155, states that all turbines should be numbered so that the individual turbines can be directly referred to a layout plan also showing the turbines numbered. None of the turbines in any of the photomontages, are numbered.

I will now refer to a number of viewpoints that I believe do not meet the standards that are set out in the "Visual Representation of Wind Farms" published by Scottish Natural Heritage in 2017. I will refer to each viewpoint by its reference number

Vp 1 L5285 at Belmullet

This photomontage contains, 4 street lights, 2 Roadside signs and a black vene stock. The presence of all these could have been avoided by taking the photograph from the opposite side of the road.

Vp 2 R314 at Atticonam

Sign Posts and street light obscure the view in this photomontage.

VP 3 GLENCASTLE CEMETERY

I wish to challenge the accuracy of the

depiction of the proposed Turbines on the photomontage submitted for this viewpoint. It is my opinion that the depiction of the proposed wind turbine is greatly diminished and inaccurate, given my local knowledge of the viewpoint, the site of the proposed windfarm, the proposed heights of the turbines and the contours of the landscape.

VP5

R 313 at Mullins

The address or location stated for this viewpoint is incorrect, the correct townland is Fawleers. Mullins is a townland a few miles away on the R314

VP8

R 313 at Goremore west of Munhin River

I don't believe that the depiction of the proposed turbines shown here is accurate, I ask you to refer to VP10, which is located along the R313, 2.7 kms closer to Ballygar-Ettis and view that photomontage.

VP 9. L 1205 at Mullingmore

This Telegraph Pole that's right in the middle of the photomontage could have been avoided by moving 10 or 15 Feet to the left or right.

VP 13 Local road at Doolough

This is the First View point, and there are a number of ~~others~~ where the cumulative wireline view and the wireline model are showing smaller Turbines, that i take to represent the Turbines in Bellacorrick. I'm PUZZLED by this as the Bellacorrick Turbines are not visible from this location, and i know this to be a Fact as i live less than 500 meters from this location

Vp 16A L 1205 at Doolough

This photomontage is in my view very misleading and goes nowhere near showing a true picture of what the Turbines will appear like in reality

Vp 17A Local road at Triska

This is the first photomontage that gives a realistic picture of the size of the proposed Turbines, however it only captures one of the Eleven houses. that are with 500 Meters of the view point

Vp 19 L 1206 at Triska

If this picture had been taken 150 meters closer to Geesala the trees on the right hand side of the picture, would not be Camouflaging a number of the windmills

VP 20a L 1205 Local road at Doolough

The presence of a Telegraph pole in this photomontage, and also in Vp 20 B could easily have been avoided by moving a few meters to the left or right

Vp 22 Local road at Gweesalia.

This photomontage has an ESB pole right

IN the middle of it, also it fails to give a true sense of the size of the village of Geesala and the number of dwelling houses in it, plus the school and church and the local pub. I feel that outside the Graveyard would have been a better location for this picture.

VP 24 Skarding Stones at An Fál Mór.

The inclusion of the Bellacorick windmills in the wireline model and cumulative wireline view, is inaccurate to say the least

VP 26 Doohoma Head

once more the cumulative wireline view includes the Bellacorick turbines

VP 27 N59 of Knockmoyleen

This is a realistic picture in my view, but it is difficult to see the turbines against the grey sky

Vp 28 Golden strand Dougert East

This also is a realistic picture, but once more I can't understand why the bellacarrick windmills are included in the wireline Model and Cumulative wireline view

What is of greatest concern to me is that the photomontages contain no photographs of how the Turbines might look at night with Aviation Lighting in place. This comes as a great surprise to me as it is clearly stated on all the planor projection panoramas "This planor projection panorama has been captured, prepared and presented in accordance with the Guidance set out in the Scottish Natural Heritage 2017 Document " Visual Representation of Wind Farms.

The question of Turbine Lighting is addressed in sections 174 to 177. I am going to quote sections 174 to 175 - For ease

OF REFERENCE, and as they apply to the proposed wind farm at Doolough/Mullingmore

SEC 175 " where an illustration of lighting is required a basic visualisation showing the existing view alongside an approximation of how the wind farm might look at night with Aviation lighting may be useful. This is only likely to be required in particular situations where the wind farm is likely to be regularly view at night... (e.g at night, from a settlement, transport route) or where there is a particular sensitivity to lighting, (e.g in or near a Dark sky park or wild land area). Not all view points will need to be illustrated in this way. The visualisation should use photographs taken in low light conditions, preferably with other artificial lighting (such as street lights and lights on buildings) on to show how the wind farm lighting will look compared to the existing baseline at night. It is only necessary to illustrate visible lighting

not INFRARED or other alternative lighting requirements."

I submit that as the proposed Turbines are IN EXCESS OF 150 meters high, and are likely to be viewed regularly at night From a Settlement (e.g. Geesala, Doo York, Triska, Doolough, Straigh, Muingmore, plus all of the Mullet peninsula, and Ballinacry, Tondraagee, and parts of Achill Island, and also that they can be viewed From a Transport Route, e.g. the N59, R313, and R314 that therefore a visualisation of they might look at night should have been included in the photomontages

The fact that these photomontages are not available to me in hard copy is also a concern.

NATURAL ENVIRONMENT

My next submission is based on chapter 10 OF the MAYO - COUNTY Development plan 2022-2028, IE5 titled NATURAL ENVIRONMENT.

The proposed windfarm at Doolough/Muingmore is located in policy Area 2, OF the Landscape protection policy areas, as set out in MAP 10.1 page 186 MAYO COUNTY development plan 2022-2028. This results in it being red-Flagged on the Development Impact-Landscape Sensitivity Matrix (Figure 10.1 County development plan) projects that show a red Flag on this Matrix are classed as having "High potential to create adverse impacts on the existing landscape character, having regard to the intrinsic physical and visual characteristics OF the landscape area, It is unlikely that such impacts can be reduced to a widely acceptable level.

Therefore I submit that it is in contravention OF NEO 27 OF the MAYO COUNTY Development plan

Map 10.2 Scenic Routes and Views, page

187 of the county development plan contains a number of scenic routes, and scenic routes with designated views that will be adversely impacted by the proposed wind farm if it goes ahead. They are set out as follows

1. The N59 from Ballyvaughan to Bonga - Erris
2. The L5284 at Gortmore Bonga - Erris
3. The R314 at Derrycorrib
4. The R313 at Abbeycunmore
5. The R313 will be adversely impacted from the townland of Emixbeg South, all the way to Blacksod and round by Falmore and Glash from where the proposed wind farm will be clearly visible.
6. The majority of the Breesala, Tullaghan, Doxork Loop Road (L1206) will also be impacted

NEP 14 of the county development plan
would be contravened if this project was
to be granted planning permission

LOCATION

1 It is my opinion that the proper location for any further wind farms in North Mayo is on the Bord na Mona lands at Bellacorick. The Renewable Energy Strategy for County Mayo 2011-2020, states that "County Mayo has one of the best wind regimes in Europe" but goes on to say that "Mayo relies on its natural beauty which is the backbone of the attractiveness of the County as a place to live, work, invest and visit and of its tourism market - an important income for the County."

Therefore it is imperative that the provision of energy requirements through renewables takes place in a sustainable manner. Given the large area 5,560 sq km and diverse character of Mayo a key aspect of this strategy is recognising that different areas within the County will require different strategic approaches.

Bord na Mona opened Ireland's first commercial wind farm in 1992 at Oweniny close

to Bellacorick. It consisted of 21 Turbines which stretched to heights of between 46 and 53 meters. The last of these windmills was dismantled in January of this year.

Today there are 60 Wind Turbines, standing at Bellacorick, developed in 2 separate phases, they have a tip height of 176 meters and a capacity to produce 192 Megawatts of electricity - enough to power 140,000 homes and businesses.

There is a new 18 Turbine windfarm due to be built on the site of the 1992 windfarm, this will bring to 78 the number of Turbines in Bellacorick.

When the Renewable energy strategy for County Mayo 2011-2020 was published there was planning permission sought for 180 Windmills in Bellacorick, with the completion of phase 3 this will bring the number up to 78, or 43% of what was envisaged in 2011.

The strategy in the on-shore Wind Energy Map shows Bellacorick to be in Tier 1

preferred (Large wind Farms) are areas in which the potential for large wind Farms is greatest.

I submit that Seeking to develop any more wind Farms west of the Oweninny wind Farm in bellacorick, is simply putting the cart in front of the horse. There is approximately 2,400 hectares of land in the Oweninny complex, this parcel of land runs along the eastern side of sliabh Fyagh and north of the N59 Road. It runs northwards ~~to~~ through the townlands of sheskin, shrameen, towards shralaghy and Altderrig, there are almost no inhabited dwellings in this area.

In my view distances of over 4 kms from wind Turbines to the nearest dwellings are easily achievable if this parcel of land was to be developed to its full potential.

The development of the Bellacorick wind Farm to its full potential would alleviate the necessity of building a 110 kVA power line past Bellacorick towards Belmullett

The Oweniny / Bellacorrick Facility is surrounded by planted forests this helps somewhat the windform to assimilate into the host landscape / environment. The proposed Muirmore development does not benefit from any natural screening as there are no native trees or very little afforestation to that area to shield the visual impact.

BALLYCROY VISITOR CENTRE and WILD NEPHIN NATIONAL PARK

The Wild Nephin National park covers 15,000 hectares of blanket bog and the Nephin Beg Mountain range. It is one of the largest active pristine bog systems left in western Europe. The park is home to Ireland's first international Dark sky park showcasing some of the darkest, most pristine skies in the world. The dark sky park extends across an area of 150 km². It comes as no great surprise then that it is mentioned in Chapter 10 of the Mayo County Development plan, Natural Environment.

It's mentioned in NEO 3; Natural Environment objective number 3. "To ensure the unique ecological, scenic, recreational, and environmental character of the Wild Nephin Ballycroy National park is protected and enhanced and developed appropriately"

There are three viewing points for the park

Skies park, and the two in Ballycroy will be severely impacted by light pollution from this wind farm if it goes ahead.

The fact that the applicants failed to include in the photomontages or visualisation of what the turbines might look like shows how much consideration they are giving to the local environment.

TOURISM

In the MAYO COUNTY development plan, on page 187 Section 10.4.7 Landscape is written about, it states that "MAYO has a varied and unique Landscape Each landscape type also has varying capacity to absorb development relative to its overall sensitivity. The landscape IN COUNTY MAYO contains views and prospects worthy of protection. I agree Fully with this statement. The Erris area has long been spoken about for its unspoilt scenery and in recent years its inclusion ~~into~~ INTO the wild Atlantic way has attracted a lot of visitors.

The construction of this windfarm would have a significant negative impact on ^{the} visual amenity, ~~and the landscape~~ of the entire barony of Erris, because of the relative flat nature of the landscape, this wind farm can be seen from belmullet, to blackshod, across to Ballymoy, down to banger Erris and up to achill. The fact that it is visible for

10212101
a lot of the Coastal Zone in the ETIS and
achill area, only Amplifies the negative
impact it will have. While Tourism is spoken
about a lot, the literary heritage of the Geesala
and Doolough areas is rarely mentioned.

The playboy of the western world is considered
to be a centerpiece of the Irish Literary Revival
movement, Synge's location of the play in Geesala
is evident by his use of 15 local place names
throughout the play. On his journey from
Belmullet to Geesala he crossed over Doolough
Strand, where the horse racing and sports
mentioned in the play are believed to have
taken place, and to this day the horse
racing still takes place to today

IN Doolough Seán O Ruadháin, was born and
reared, and based his Autobiographical Irish
language book Pádhraic Mháire Bhán

TRAFFIC

This project will involve the movement of Heavy goods vehicles, and Large construction Machinery on the N59, and the L1206 Dangan to Geesala road, and the L1205 Geesala to Doolough roads, Apart from the N59 the other two roads are narrow local roads that were never designed or built to sustain such high volumes of traffic. The fact that these roads are built on blanket bog will lead to them being damaged by the heavy loads of concrete, steel, and gravel and stone that will have to be transported over them during the duration of the project.

Regardless of what traffic Management measures are put in place by the developer, the risk of a collision taking place between a pedestrian, a cyclist, and ~~a~~ or a motorist with some of this construction traffic is significantly raised.

My greatest concern is, For the access of emergency services to the area, when some of this construction traffic

IS ONE the MOVE. I REFER TO THE DELIVERY OF THE, Turbine blades, the towers, and the motors.

These are delivered by specialist Contractors, using larger Trucks and Semi-trailers that usual, involving them to travel at lower speeds, and use Additional Technology the likes of rear steering on semi-trailers.

The absence OF ANY LAY-BYS ON THE N 59, and the L1205, and L1206 where these vehicles could pull IN to allow an emergency vehicle to get by an ambulance, or FIRE-brigade IS a Cause OF great concern to me.

PLANNING DRAWINGS

while i cannot claim any great skill in reading drawings, i am struck by how houses in the vicinity of the proposed wind farm, seem to be omitted from some of the drawings submitted.

I refer to a drawing that's numbered as follows 501-065301.00001.D as proposed turbine and overrun areas, it shows 4 house on the right hand side of the L1205 as you travel from Geesala to Doolough. It has neglected to show the first four houses on the left hand side of the road, despite the fact that they are all adjacent to the road. There is a house omitted from the left hand side of the road opposite the four that are shown, and the next 5 houses on the right have also been omitted.

IF one did not know better you would think there was only 4 houses along the road from Geesala to Doolough

WATER QUALITY

The proposed windfarm is adjacent to the Doolough stream, known locally as the "Muing", it runs into the sea between Doolough and Muingmore. The stream contains fish, and the applicant has tested the quality of the water at this location, and found it to ~~be~~ have a status of "At Risk" with a water quality status of poor. This stream drains into the Mullet/Blacksod Bay complex drains into the Mullet/Blacksod Bay complex SAC (ID 000470). Another stream drains into the Tullaghan Bay and Bog NHA (ID 001567), There is a third unnamed stream that discharges into the Blacksod Bay/Broadhaven SPA (ID 0004037). With the heavy rain in the ETIS area, and the possibility of oil spills, and other chemical spills associated with the construction work, and the construction traffic, I fear that the water courses and water quality will be negatively affected, and Directive 92/43 EEC (Habitats Directive)

Directive 2009/147/EC (Birds Directive),
will be breached. Along with this Regulation
(EU) 2024/1991 on Nature Restoration, and
EU Biodiversity Strategy 2030 will be
breached

The release of carbon from the excavation of
the peatlands is also of concern to me