

J Mangan
Bangor Erris
Ballina
Co. Mayo
2nd August 2026

The Secretary
An Comisiun Pleanala
64, Marlborough Street
Dublin 1
D01 V902

FORMAL OBJECTION LETTER ... RE PLANNING APPLICATION, MUINGMORE, REFERENCE 324387

Dear Sir/Madam

I, James Mangan, formally object to the proposed planning located within the townlands of Muingmore (An Mhoing Mhór), Doolough (Dumha Locha), Tristia (Troiste), Moneynierin (Moing an Iarainn) and Bangor (Baingear) County Mayo, planning reference PAX16.324387 of a development consisting of 13 wind turbines, a 110kV substation, battery energy storage system (BESS) and all associated infrastructure & infrastructure (both temporary & permanent) by RWE.

The basis for my objections are

MAYO COUNTY DEVELOPMENT PLAN

- The MCDP has designated the area of Muingmore as unsuitable for wind energy development (variation No. 2, County Development plan 2022-2028)
- RWE's own EIAR admits the area is located within an area classed as unsuitable.

The planned development is now in material contravention of the MCDP. Section 37 (2) (b) of planning states An Comisiun Pleanala cannot grant permission when it contravenes a County Development Plan without specific justification.

RWE have not provided specific justification

SAFETY

- The local roads are unsuitable for the large industrial volume & weight of the on-going traffic required to complete the project.
- The road to the proposed site is a mostly singletrack country lane, & not built to withstand ongoing, heavy flow of construction traffic.
- School children, including my daughter, walk the L5252 road to gain access to & from the school bus. This activity would be totally unsafe given that RWE has stated all traffic connected to the site (HGVs) will commence at 7am. Given the road is basically single lane, with poor visibility in places & ditches running along the side there would be nowhere for the children to wait safely until the HVG vehicles pass. As RWE note (section 14.64) there are no pedestrian footways. ***This is a major concern.***
- The Mount Jubilee Loop Walk, as advertised on Mayo County Council website is a popular route with tourist & locals alike. RWE states in table 14-11, link 2 & 3, 'the sensitivity level is negligible, as dwellings are sparsely located & adequate footway provision is not provided'. RWE deems this link to be 'unlikely to be used by residents as pedestrians as they are likely to drive'. We, the locals, do use these routes as pedestrians for leisure & to access local link bus services. Tourists also frequently use these routes either on foot following the verified Loop Walk, as cyclists or motorbikes. And if RWE had consulted with the residents, they would be fully aware of this. The L1206 & Muingmore Road (L5252) form a large part of this walk.
- Bridges ... there are numerous bridges along the route, which are suitable for only light traffic. ***Any works around these would have a detrimental effect on the streams & water quality, the majority of which feed into Blacksod Bay.***

- SAR 118, the approach to land at its refuelling base Blacksod is almost directly over the proposed site. This route is used regularly on its search & rescue missions. It is unclear if RWE have taken this into consideration.
- *Flooding*, with the removal of huge quantities of peat the risk of flooding is alarmingly increased. Such extraction cannot be underestimated. An example of landslide due to peat extraction is Meenbog, near Ballybofey, Co. Donegal in November 2020. As the Muingmore site sits high above residential properties & Geesala itself, I feel RWE have not fully addressed this matter.
- *Fire hazard*, between the possible malfunctioning of turbine blades & the BESS facility, the risk of fire hazard has to be taken seriously. Recent media coverage of how fires burn underground in peatland areas & spread with ease this is a huge concern. Residential properties are within close radius of the site nearby residential properties this could be catastrophic. What is the Critical strategic plan for such an incident, given we are some considerable distance from adequate resources to deal with a major incident.

HEALTH

- The proposal for the Muingmore windfarm is working to outdated regulations from 2006, when turbines were significantly smaller. These 2006 regulations are not in line with the current World Health guidelines re setback & noise pollution. By RWE's own calculations
- The Draft Revised Wind energy guidelines state that modern turbine technology can eradicate shadow flicker & it supports this approach.
- Noise & artificial lighting are also added factors promoting sleep insomnia, which has been proven to be detrimental to both physical & psychological health. Will RWE monitor noise pollution ongoing & act accordingly to rectify it?

ENVIRONMENT

- Many animals including the Irish hare & Otters frequent/reside/breed in the Muingmore area. They are protected by the Wildlife Act (1996), Wildlife (Amended) Act 200 & the Berne Convention EC Habitats Directive (92/43/EEC).
- There are so many flora, fauna, birds, insects & mammals within the proposed site which have not been properly evaluated, including eels, Birds of Prey, bats, badgers, butterflies moths & dragonflies, bees, liverworts & mosses many of which are endangered species & legally protected. Environmental Impact assessment reports are not provided neutrally, but at the behest of the applicant.
- Irish peatland diversity is protected under the EU Habitats Directive, EU birds Directive & the Irish wildlife Act 2000.
- 49% of all endangered birds in Ireland have been recorded on peatland, mostly as breeding species.
- 23 of 35 butterfly species in Ireland are found in peatlands (Irish Peatland Conservation Council).
- **Doolough Gneiss** is a site of international importance, dating back to the Mesoproterozoic era
- **Blacksod Bay** is an area of **Special Area of Conservation (SAC) & a Special Protection Area (SPA) for birds (as designated under the EU Birds Directive)**. Given the conservation status of the

over-wintering birds acknowledged within the study area, I do not believe adequate scientific certainty has been provided to demonstrate the proposed development will not adversely affect the bird population. Blacksod Bay itself is of huge ecological importance in Europe.

- Ireland has been facing fines over peat extraction. The scale of industrial extraction required for the proposed wind development would be irreversible & catastrophic for such a stunning area along the Wild Atlantic Way.

RISK OF GROUND WATER CONTAMINATION there are numerous scenarios which could occur resulting in pollution & contamination

- Fuel and oil spills from construction machinery.
- Oil leakage from the wind turbine itself.
- Wastewater generated during construction and operation.
- Sediment runoff from excavation works.
- Cementitious materials associated with construction activities.
- Accidental releases of hydrocarbons and hazardous substances.

Whilst mitigation measures are proposed, these measures cannot eliminate the risk of accidental pollution events. Even a single incident could contaminate Blacksod Bay, **Special Area of Conservation (SAC) & a Special Protection Area (SPA)**

LACK OF PROXIMITY TO THE GRID

RWE has not provided details within this planning application for the GRC. The GRC will require extensive works along the roads for approx. 30kms. This is going to cause excessive disruption to traffic to & from the Erris region, including people travelling to & from work, to & from hospital appointments, tourists & emergency services

LACK OF PUBLIC CONSULTATION

There has been no active public consultation with the local community. They have not taken into account the views of the locals into the design of the proposals, nor demonstrated the effect that process of engagement has had, because there has been no interaction. They held one 'Information Clinic', which I attended & had no feedback from & it could not be considered as consultation. They have shown nothing but disrespect & total disregard for the community. Many locals from nearby, surrounding areas, who will be impacted by the proposed development, are unaware of the proposed development.

In conclusion, I am strongly against the proposed development & urge An Comisiún Pleanála to *refuse* permission for this planning (reference PAX16.324387)

I thank you for considering my submission.

Yours faithfully

J Mangan