

J Thorpe
Bangor Erris
Ballina
Co. Mayo
1st August 2026

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

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

Dear Sir/Madam

I, Jan Thorpe, 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 of my objections are as follows:

LACK OF PUBLIC CONSULTATION

- There has been little opportunity afforded to local residents to engage or voice their concerns over the proposed plans. The liaison officer called to my house only once, (in 2023) & I received only one hand posted letter. Other neighbours have had no contact from RWE!
- Incorrect translation into Irish on the original planning notices, which discriminated against the Irish speakers within our community. These had to be withdrawn & new planning lodged, this was not conveyed to the local community, except via newspaper, many of us do not read newspapers.
- Many of the planning notices that have been erected are in unsafe areas, especially along the N59, where it would be highly dangerous to stop & view said notices.
- RWE held one 'Information Clinic,' earlier this year, to which people had to make an appointment & attend in groups of 4 or less. This was arranged at very short notice & very few residents were aware of this 'Clinic', let alone the wider community. The Clinic was not held at the local community centre or hotel, but further afield. An information clinic is not consultation. RWE state in their own documents (pg 40) that they have had 'extensive consultation since 2023' I would strongly dispute this. There has been negligible engagement & poor transparency in how this project has been presented to the community. There has been no feedback from the so-called community consultation.
- RWE have been disingenuous in that they have not applied, within this application, planning for the Grid Route Connection. This will impact not alone the minor roads but also the busy N59, which is the main access into the Erris Peninsula. I worry about traffic delays & indeed access for emergency services to the Erris region, given the volume of HGVs required during construction & then the large machinery that would be required to lay the ducting. The N59 is a dangerous road in itself & many spots are quite narrow for 2 lanes as it is.

ENVIRONMENTAL IMPACTS

Loss of flora, fauna & wildlife.

- Irish hare (*Lepus Timidus Hibernicus*) & Otters (*Lutra Lutra*) who use the proposed site as their homes are protected by the Wildlife Act (1996), Wildlife (Amended) Act 200 & the Berne Convention EC Habitats Directive (92/43/EEC). It is a criminal offense to deliberately damage or destroy otter breeding or resting places.
- There are also European Eel, Bees, birds of prey, bats, badgers, butterflies (Marsh Fritillary, listed on the Irish Red list) moths & dragonflies, Irish Bryophytes, hornworts, liverworts & mosses all of which are endangered species & legally protected.
- 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).
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- **Doolough Gneiss** is a site of international importance, dating back to the Mesoproterozoic era (ITM co-ordinates 472330E - 823800N)
- **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 this

ornithological 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 Groundwater Contamination** a number of potential pollution sources during construction include
 - Fuel and oil spills from construction machinery.
 - 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 connection**

SAFETY

- The local L roads are highly unsuitable for the large industrial volume & weight of the on-going traffic required to complete the project. The L roads are merely a layer of bitumen on peat & we already have problems with the road sinking on the L1206 (Bangor to Geesala & beyond), despite numerous repairs.
- The road to the proposed site is a quiet single country lane for the majority, & again not built to withstand ongoing, heavy flow of construction traffic.

- 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.**
 - **School children** walk the L53252 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 (mainly quarry trucks) will commence at 7am. Given the road is basically single lane, with poor visibility in places & ditches running along the side there would be no where 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 L1206 & Muingmore Road (L5252) are part of the **Mount Jubilee Loop Walk, as advertised on Mayo County Council website.** This 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.
 - **SAR 118**, whose low flight path is almost directly over the proposed wind development on its approach to its refuelling site at Blacksod lighthouse. Unfortunately, this route is well used by SAR 118, it is unclear if RWE have taken this into consideration.
 - **Fire hazard**, turbine blades regularly malfunction & become a fire hazard. In an area of bogland, with nearby residential properties this could be catastrophic.
- Also the BESS facility with its huge lithium batteries is a huge fire/explosion risk. There is no effective strategy in place to deal with such a critical, potentially life-threatening incident. Given the geographic position of the suggested site, the area would have limited resources to deal with such an occurrence.
- **Flooding**, with the removal of huge quantities of peat the risk of flooding is alarmingly increased. Infact the Muingmore road(L5252) flooded last autumn following heavy rainfall.
 - If the peat extraction had been performed I fear that nearby residential properties & indeed Geesala could be at risk. RWE do not fully address this matter.

TOURISM

- We are a socio-economically deprived area & rely heavily on tourism for the maintenance & creation of new jobs. With the advent of the Wild Atlantic Way this is beginning to flourish. The siting of these huge turbines works against the objectives set out in the **Wild Mayo Destination & Experience development plan for North Mayo & Erris**, a sustainable tourism strategy for North Mayo & Erris, launched earlier this year.

The Erris region is synonymous with a sense of wilderness, blanket bog, stunning coastline & views, dark skies, peace & tranquillity. This is what draws the tourists here. I feel it would be foolhardy & highly irresponsible to destroy, on an industrial scale, the serenity & wonder nature has created.

- The Muingmore area is visible from many parts of the Wild Atlantic Way, including Achill Island, Blacksod Lighthouse & Wild Nephin National Park, which incorporates the **Dark Sky Park, which is awarded the rare Gold Standard International status.** The introduction of artificial lighting from the BESS amenity & the red lights from the turbines could impact on this.
- Certainly, given by RWEs own photomontages the spectacular views from most of the beaches & places of interest will be spoilt by the sight of these turbines.

- The traffic disruption the ongoing works at the site will cause will be significant & not favourable to tourism. Access to the whole of the Erris peninsula will be affected by the volume of HGVs required to complete the works. The loss of the peaceful, beautiful surrounding & the light pollution will be devastating.
- The visual impact on this unique coastal & rural area is wholly unacceptable & inappropriate. **It contravenes the Mayo County Development plan which deems the Muingmore area to be unsuitable**

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 49+ properties could be affected by flicker, several over the 30hour limit. The draft revised Wind energy guidelines state that modern turbine technology can eradicate shadow flicker & it supports this approach.
- The EIAR breaches multiple planning and legal obligations, including:
Directive 2014/52/EU – particularly Article 3, Article 5, and Annex IV – which require that human health be robustly assessed using up-to-date scientific knowledge.
 - Annex III(g) of the same Directive, which specifically mandates consideration of risks to human health from environmental impacts such as noise.
 - National Planning Framework (NPF) Objective 94 (April 2025) - replaces the former Objective 65 (2018) and now mandates the “proactive management of noise where it is likely to have significant adverse impacts on health and quality of life,” and further supports alignment with the Environmental Noise Regulations through the use of “Strategic Noise Maps, Noise Action Plans, and national planning guidance”. The revised Objective reflects the Government’s commitment to integrating environmental health into spatial planning. **The EIAR fails to meet this obligation.** It does not model or assess health-relevant noise indicators, nor does it address chronic sleep disturbance or cumulative exposure in rural, low-background-noise environments.
 - Deliberate sleep deprivation is prohibited under international humanitarian law, including the [Geneva Conventions](#) and the [UN Convention Against Torture](#), as a form of cruel, inhuman, or degrading treatment or torture.

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

In conclusion, the decimation & irreversible damage to the community, landscape, wildlife, flora & fauna is incalculable & totally unacceptable, contravening the EU protection of Peatlands & wildlife habitats.

Given that the health impacts have not been fully evaluated, the lack of proximity to the grid & the huge ecological importance in Europe of Blacksod Bay & its surrounds & the Doolough Gneiss (part of the Annagh Gneiss complex) formed at approximately 1,177 ± 4 million years (Ma) during the late Mesoproterozoic era, I respectfully submit the proposed wind farm project is highly inappropriate for this location.

I strongly urge An Comisiun Pleanála to refuse permission for this development.

Thank you for considering my submission.

Yours faithfully,

J Thorpe.