

Formal Submission of Planning Objection

An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 20th July 2026

Re: Formal Planning Objection / Observation

Planning Reference: PAX16.324387

Proposed Development: Muingmore Windfarm (13 No. Wind Turbine Generators, 110 kV Onsite Substation, Battery Energy Storage System (BESS) Compound, and Associated Infrastructure.)

Location: Townlands of Muingmore and Doolough, Co. Mayo.

Applicant: RWE Renewables Ireland Limited

Objector Details:

Name: John Vaughan

Address: 17 Silvergrove, Ballybeg, Ennis, Co. Clare. V95RX2A

Planning Objection to the Proposed Wind Farm Development

Dear Sir / Madam

I wish to make a formal submission in respect of the above-referenced Strategic Infrastructure Development (SID) application. While I acknowledge the important role of An Coimisiún Pleanála in determining applications for nationally significant infrastructure, and I recognise the need to increase Ireland's renewable energy capacity as part of the transition to a low-carbon future, it is essential that such developments are assessed within a comprehensive, up-to-date and legally robust planning framework.

I object to the proposed development on the basis that the current regulatory framework remains inadequate, with significant deficiencies in national planning policy and the continued absence of updated statutory planning guidance for wind energy developments. In these circumstances, I submit that granting permission for this application would be premature and inconsistent with the principles of proper planning and sustainable

development. Furthermore, it would fail to provide appropriate protection for the residential amenity, environmental interests and legitimate rights of those living in close proximity to the proposed development.

Environmental and Ecological Mitigation Discrepancies

I am concerned that the proposed development does not demonstrate that its environmental and ecological mitigation measures are sufficiently robust, evidence-based or capable of fully avoiding or reducing adverse impacts. Where significant environmental effects have been identified, the proposed mitigation appears, in many instances, to rely on future management measures, monitoring programmes or post-consent commitments rather than clearly defined, enforceable and fully assessed mitigation at the application stage.

The Environmental Impact Assessment Report (EIAR) should demonstrate not only that potential impacts have been identified, but that the proposed mitigation measures are specific, effective, proportionate and capable of implementation throughout the lifetime of the development. Where mitigation lacks sufficient detail or certainty, there is a risk that significant environmental effects have been underestimated.

Particular attention should be given to the potential impacts on habitats, protected species, biodiversity, watercourses, peatlands (where applicable), and ecological connectivity. Construction activities, turbine foundations, access roads, drainage works and cable installation all have the potential to cause habitat loss, habitat fragmentation and disturbance if not adequately assessed and mitigated.

Where mitigation relies on habitat restoration or compensatory measures, it should be clearly demonstrated that such measures are achievable, measurable and capable of delivering equivalent ecological value within an appropriate timeframe. Mitigation should not be assumed to be successful without supporting scientific evidence.

In addition, where surveys informing the ecological assessment are incomplete, limited in duration or no longer representative of current site conditions, the conclusions of the assessment may no longer be reliable. Any uncertainty should be resolved before a decision is made rather than deferred to planning conditions or post-consent surveys.

Given the scale of the proposed development, the Planning Authority must be satisfied beyond reasonable scientific doubt that all likely significant environmental effects have been fully assessed and that the proposed mitigation measures are capable of protecting biodiversity and the receiving environment throughout the construction, operational and decommissioning phases. In the absence of this certainty, granting permission would be contrary to the precautionary principle and the principles of proper planning and sustainable development.

Lack of a Socio-Linguistic Assessment

I am concerned that the application fails to adequately assess the potential socio-linguistic impacts of the proposed development on the surrounding community. While the Environmental Impact Assessment Report considers a range of environmental and socio-economic factors, it does not appear to include a comprehensive assessment of how the development may affect the linguistic, cultural and social identity of the area, where relevant.

The planning process should recognise that communities are defined not only by their physical environment but also by their social, cultural and linguistic characteristics. Large-scale infrastructure developments have the potential to alter population patterns, increase transient workforces during construction, and change the character of rural communities. Where an area has a recognised linguistic or cultural heritage, these impacts should be assessed in a systematic and evidence-based manner.

A socio-linguistic assessment would provide an opportunity to examine whether the proposed development could have direct or indirect effects on community cohesion, local identity, cultural heritage, language use and the sustainability of existing communities. In the absence of such an assessment, it is difficult to conclude that all significant effects on the human environment have been fully identified and evaluated.

Furthermore, the absence of a socio-linguistic assessment raises concerns regarding the completeness of the Environmental Impact Assessment, particularly where the development may influence long-term settlement patterns, community interaction or the preservation of local cultural identity. These matters form part of the wider human environment and should not be overlooked when assessing developments of this scale.

Accordingly, I submit that the application does not provide a sufficiently comprehensive assessment of all relevant effects on the human environment. The Planning Authority should not grant permission until it is satisfied that all potential socio-cultural and socio-linguistic impacts have been properly examined, assessed and, where necessary, mitigated.

Impact on Tourism and the Wild Atlantic Way

I am concerned that the proposed development would have a significant adverse impact on tourism, one of the region's most important economic sectors, and on the landscape qualities that attract visitors to the area. The proposed 13 turbines, each reaching approximately 180 metres in height, would become dominant industrial features within a landscape that is currently valued for its natural beauty, tranquillity and scenic character.

The area forms part of the wider setting of the Wild Atlantic Way, a tourism initiative that is internationally recognised for its outstanding coastal landscapes, panoramic views and authentic rural character. Visitors are drawn to the region because of its unspoilt scenery, sense of place and opportunities to experience nature. A development of this scale has the potential to fundamentally alter those qualities and diminish the visitor experience.

The visual effects of turbines of this height, together with associated infrastructure including access roads, substations, compounds and overhead or underground electrical connections, would industrialise the landscape and reduce its attractiveness as a tourism destination. These effects should not be considered in isolation but cumulatively, particularly where existing or permitted wind energy developments are already present within the wider landscape.

Tourism supports local businesses, accommodation providers, restaurants, activity operators, retailers and many families who depend on visitors choosing the area for its scenic and environmental qualities. Any decline in the attractiveness of the landscape has the potential to result in wider economic consequences for the local community.

While renewable energy development is an important national objective, it should not come at the unnecessary expense of other nationally significant assets. The Wild Atlantic Way represents a major investment in Ireland's tourism product and brand, and developments that have the potential to undermine its scenic appeal should be subject to the highest level of scrutiny.

I respectfully submit that the applicant has not demonstrated that the likely impacts on tourism, landscape character and the experience of visitors to the Wild Atlantic Way have been fully assessed or that these impacts can be satisfactorily mitigated. In the absence of such evidence, granting permission would be contrary to the principles of proper planning and sustainable development.

Conclusion

I fully recognise that climate change is one of the greatest challenges facing society and that Ireland has a clear obligation to reduce greenhouse gas emissions and transition towards a low-carbon economy. Renewable energy, including wind energy, will play a vital role in achieving these national and international climate objectives, and I support the responsible development of renewable energy infrastructure in appropriate locations.

However, the urgency of climate action cannot justify the approval of developments that are not supported by a robust, transparent and legally compliant planning process. National climate targets must be achieved in a manner that also protects communities, biodiversity, landscape, cultural heritage and the rights of those most directly affected. The principles of proper planning and sustainable development require that these objectives be balanced rather than allowing one to override all others.

For the reasons set out in this submission, I respectfully submit that the applicant has not demonstrated that the proposed development can proceed without unacceptable impacts on residential amenity, the environment, biodiversity, landscape character, tourism and the wider community. Furthermore, important deficiencies remain in the assessment of key environmental, ecological and planning matters.

Ireland can and must achieve its renewable energy ambitions, but this should be through developments that are appropriately located, comprehensively assessed and capable of delivering genuine sustainability without imposing disproportionate impacts on local communities. It is neither necessary nor appropriate to compromise the integrity of the planning system in pursuit of climate objectives.

Accordingly, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed Strategic Infrastructure Development, or alternatively require the applicant to address the significant deficiencies identified in this submission before any determination is made.

Sincerely,

John Vaughan

Ennis, Co. Clare

