



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Keith & Aine Barrett

(b) Observer's postal address

Coolaba, Geesala, Ballina, Mayo F26 H1 W9

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

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The agent at the postal address in Part 2

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Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Coimisiún Pleanála case number for the current application (if available)**

(for example: 300000)

PAX16.324387

- (b) **Name or description of proposed development**

The proposed development consists of 13 wind turbines, a 110kV substation, battery energy storage system (BESS) and all associated infrastructure

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Located within the townlands of Muingmore (An Mhoing Mhór), Doolough (Dumha Locha), Tristia (Troiste), Moneynierin (Moing an Iarainn) and Bangor (Baingear) County Mayo.

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

Having reviewed the planning application, Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), and associated documents, I have serious concerns regarding the suitability of the site, impacts on protected habitats and species, visual and landscape effects, residential amenity, tourism, peatland disturbance, hydrology, traffic impacts, and the omission of the grid connection from the application.

This is an industrial-scale development that will have long-term impacts on our environment and local community for decades.

Sensitive Environmental Setting

The proposed development is located within a highly sensitive landscape containing:

- Atlantic coastline views.
- Upland landscapes.
- Blanket bog habitat.
- Conifer forests.
- Peatlands.
- Archaeological monuments.
- Protected ecological sites.

The site is located close to several designated conservation areas including:

- Trista Bog Natural Heritage Area (NHA).
- Mullet/Blacksod Bay Complex SAC (000470) located directly adjacent to the western boundary of the main wind farm site.
- Bellacorick Bog Complex SAC (001922), adjacent to some overrun areas.
- Owenduff/Nephrin Complex SAC (000534), located in close proximity to the proposed development.

The proximity of the development to these environmentally sensitive locations raises serious concerns regarding habitat disturbance, hydrology, biodiversity, and cumulative impacts.

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Conflict with Mayo County Council Renewable Energy Strategy

The new Renewable Energy Strategy for County Mayo which was adopted by Mayo County Council on 16th July identifies the proposed area as unsuitable for wind energy development.

This is a significant planning consideration.

Mayo County Council has recognised the sensitivity of this landscape and determined that it is not an appropriate location for wind energy development.

This application therefore appears contrary to the strategic planning direction established by the local authority.

Landscape and Visual Impact

The proposed site lies along the route of the Wild Atlantic Way, one of Ireland's most important tourism assets.

The landscape currently derives its value from:

- Its undeveloped coastal character.
- Scenic vistas.
- Peatland landscapes.
- Dark skies.
- Cultural heritage.
- Sense of remoteness and wilderness.

The photomontages submitted as part of the application demonstrate the extensive visual impact that the turbines will have upon the area.

The proposed turbines, approximately 180 metres in height, will become dominant features within the landscape and will fundamentally alter the character of the area.

Chapter 10 of the EIAR concludes:

"It is considered that the proposed project will result in a marked degree of change within its immediate surrounding context with regard to both landscape and visual receptors."

The EIAR identifies visual effects ranging from:

- Substantial.
- Moderate.

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- Slight.
- Imperceptible.

The fact that substantial impacts have been identified demonstrates the scale of the visual change being proposed.

Impact on Wild Nephin National Park and Dark Sky Areas

The turbines will be visible from:

- Wild Nephin National Park.
- The Bangor Trail.
- The wider Mayo Dark Sky region.

These areas are recognised for their natural beauty and wilderness qualities.

The introduction of 13 x 180-metre turbines into views from these locations will significantly alter the experience of visitors and local residents.

Impact on Tourism

Tourism is a critical component of the local economy.

Visitors come to this area because of:

- Its natural beauty.
- Atlantic coastal landscapes.
- Wildlife.
- Walking routes.
- Dark sky experiences.
- Wild Atlantic Way attractions.

The proposed development risks transforming a natural landscape into an industrial landscape.

I do not believe that the EIAR has adequately assessed:

- The impact on tourism.
- Potential loss of visitors.
- Impacts on tourism businesses.
- The long-term economic consequences for the area.

The protection of Mayo's natural landscape should remain a priority.

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Grid Connection Not Included

A significant concern is that the grid connection has not been included within the planning application, despite being an essential component of the proposed wind farm

During the initial consultation process it was indicated that the grid connection may form part of the overall application. However, this essential infrastructure is now absent. A wind farm cannot operate without a connection to the national electricity grid. The grid connection is therefore not a separate or optional element of the project, but a fundamental part of the overall development.

By excluding the grid connection from the application, it is not possible to fully assess the impacts of the project, including:

- Traffic impacts arising from excavation and road works.
- Disruption to local and regional roads.
- Visual impacts from substations, overhead lines or underground cabling.
- Ecological impacts on habitats, watercourses and protected species.
- Potential impacts on residential properties located along the route.
- Construction-related noise, dust and disturbance.

This creates significant uncertainty for affected communities.

Without a detailed grid connection proposal, neither the public or An Comisiún Pleanála can properly assess the true scale of the development or understand its full environmental and community impacts.

There is also concern that the EIAR and Natura Impact Statement may underestimate the full impacts of the project if the grid connection infrastructure is assessed separately at a later stage.

An Comisiún Pleanála should be satisfied that the environmental effects of the entire project, including its grid connection, have been fully assessed before any decision is made.

Any future grid connection works will result in additional disruption along local and regional roads and should be assessed as part of the overall project.

Battery Energy Storage System (BESS)

The application includes a significant battery storage facility.

The proposed compound measures approximately:

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156 metres x 99 metres and includes:

- Security fencing.
- Lighting.
- Battery storage units.
- Electrical infrastructure.

For a development consisting of only 13 turbines, the scale of this facility appears excessive.

At the first consultation meeting, battery storage was not discussed until raised by the An Comisiun Pleanála

RWE indicated that storage capacity would not exceed the output of the wind farm; however, concerns remain regarding:

- The scale of the facility.
- Future expansion potential.
- Long-term development intentions.
- The relationship between the BESS and future grid infrastructure.

Birds and Protected Species

The site supports numerous Birds of Conservation Concern in Ireland.

Confirmed Red List Species include:

- Kestrel.
- Meadow Pipit.
- Other Red List species recorded during surveys.

Hen Harriers were also observed from all four survey vantage points.

Survey Results during Breeding Season

Year	Red List	Amber List
2021	3	9
2022	3	7
2023	3	10

Survey Results during Non-Breeding Season

Year	Red List	Amber List
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2021/22	4	3
2022/23	5	6
2023/24	6	3

The removal of vegetation and habitat has the potential to result in:

- Habitat loss.
- Disturbance.
- Displacement.
- Reduced foraging opportunities.

These impacts are particularly concerning given the conservation importance of these species.

Bat Survey Concerns

The bat surveys were not completed in full due to:

- Adverse weather conditions.
- Equipment failure.

This creates uncertainty regarding the accuracy of the baseline ecological assessment and whether all bat activity within the area has been adequately recorded.

Peat Excavation and Hydrology

The development will require excavation of over:

100,000 cubic metres of peat

Key concerns include:

- Where excavated peat will be deposited.
- Effects on drainage patterns.
- Watercourse disruption.
- Sediment runoff.
- Peat instability.
- Flood risk.

Concerns arise regarding the potential impact on:

- Blacksod Bay.
- Broad Haven Bay.

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- The Owenmore catchment.

Questions also remain regarding responsibility for remediation should problems arise during or after construction.

Fisheries and Water Quality

There are concerns regarding impacts on:

- Salmon spawning areas.
- Trout nursery and hatching habitats.
- Water quality.
- Protected aquatic ecosystems.

Construction activities and substantial concrete transportation have the potential to alter sensitive natural habitats permanently.

Otters and Aquatic Ecology

The watercourses draining from the site are connected to:

- Blacksod Bay/Broad Haven Bay SPA.
- Mullet/Blacksod Bay Complex SAC.

The Appropriate Assessment identifies potential impacts on otters including:

- Disturbance.
- Displacement.
- Reduced foraging opportunities.

Records indicate that otters are widespread within the Owenmore River catchment.

Local residents, including my own household, regularly observe otters in proximity to the proposed development area.

Furthermore:

- More than half of surveyed watercourses were considered of local ecological importance.
- Three sites were considered of county importance.
- Two sites were considered of international importance due to their association with SAC-designated river systems.

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Crayfish Plague

Although White-Clawed Crayfish were not recorded during field surveys, invasive crayfish plague was identified through eDNA sampling at three locations close to the site boundary.

Crayfish plague is recognised as one of the world's most damaging invasive species.

The risk of spreading this disease through watercourse disturbance should be carefully assessed.

Blanket Bog Habitat

Part of the site consists of Annex I Blanket Bog habitat.

The Habitat Condition Assessment concluded that some areas retain high restoration potential.

However:

- Surveys were undertaken during a sub-optimal period.
- Some areas were assessed remotely.
- Full condition assessments could not be completed in all cases.

This raises concerns regarding the reliability of the conclusions reached.

If surveys had been carried out during the optimal survey period, additional areas may have qualified for higher protection status.

The Irish Peatland Conservation Council has expressed concerns regarding wind farm development on blanket bog habitats due to impacts on:

- Hydrology.
- Habitat restoration.
- Biodiversity conservation.

Concerns also remain regarding whether threatened wader bird populations can recover within such landscapes following development.

Archaeological Heritage

The site contains important archaeological resources including:

- One recorded monument within the study area.

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- Seven monuments within the surrounding area.
- Two recorded crannogs within the study area.
- A further crannog within the surrounding study boundary.

These heritage assets should be afforded appropriate protection.

Residential Amenity

The application documentation indicates:

- 109 residential properties located within 1 kilometre of the wind farm.
- The nearest dwelling located approximately 740 metres from a turbine.
- Approximately 282 residential properties located along the proposed grid connection route.

Residents will be impacted by:

- Visual intrusion.
- Noise.
- Construction activity.
- Traffic.
- Loss of landscape amenity.
- Shadow flicker.

It is also a concern that RWE have confirmed that they do not intend to develop any amenities for the local community if they proceed with this development.

Shadow Flicker and Health Concerns

The planning documents identify potential shadow flicker impacts in:

- Muingmore.
- Mount Jubilee.
- Shraigh.
- Doolough.
- Geesala.

No family should be expected to experience repeated shadow flicker within their homes or gardens over the lifetime of the project.

Local residents living near existing wind farms have raised concerns regarding:

- Sleep disturbance.
- Stress.
- Headaches.

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- Tinnitus.
- Ongoing noise impacts.

These concerns should be given serious consideration, particularly given the proximity of the proposed turbines to residential properties.

Aviation Concerns

The aviation assessment for this project missed two turbines. It is also concerning that the Irish Coast Guard SAR refuelling station at Blacksod is not mentioned anywhere in the assessment.

Community Consultation

There has been limited engagement with the local community.

Outside of leaflet drops, there appears to have been little direct communication with residents.

My understanding is that information clinics were expected to be held in Belmullet prior to submission of the planning application. To my knowledge these did not proceed, or if they did, they were not sufficiently advertised.

This has resulted in a lack of confidence within the community regarding future engagement commitments.

Construction Traffic and Road Safety

Construction is proposed during the following hours:

- 7:00am to 7:00pm Monday to Friday.
- 7:00am to 1:00pm Saturday.
- Additional works potentially taking place on Sundays.

There will be substantial increases in:

- Heavy goods vehicles.
- Concrete deliveries.
- Peat transport.
- Construction traffic.

The local road network is largely made up of small rural roads that are unsuitable for sustained heavy construction traffic.

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This creates concerns regarding:

- Road safety.
- Damage to local roads.
- Pedestrian safety.
- Cyclist safety.
- Safety of children travelling to school.
- Disturbance to families and elderly residents.

Outdated Wind Energy Guidelines

A further concern is that Ireland's current wind energy guidelines are now over 20 years old.

Communities are being asked to accommodate:

- Larger turbines.
- Battery storage facilities.
- Substations.
- Grid infrastructure.
- Industrial-scale renewable energy developments.

Yet many of the planning standards used to assess these projects are based on guidance that predates modern turbine technology.

This raises concerns regarding whether the current assessment framework is adequate to protect local communities.

The proposed development is located in a highly sensitive landscape containing internationally important habitats, protected species, designated conservation sites, important archaeological features, and established residential communities. The development would introduce industrial-scale infrastructure into a region that is heavily dependent on tourism and valued for its natural beauty.

For the reasons outlined above, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development. At a minimum, further assessment should be required regarding the grid connection, biodiversity impacts, peatland disturbance, hydrology, tourism impacts, and effects on local communities before any decision is made.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to request the Coimisiún to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

☐

No, I do not wish to request an oral hearing

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Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes