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Carrowmore–Lacken
Ballina
Co Mayo
F26 KD7Y
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The Secretary
An Coimisiún Pleanála
64 Marlborough Street
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SUBMISSION TO AN COIMISIÚN PLEANÁLA

Planning Application for the Proposed Muingmore Wind Farm

Case reference: PAX16.324387

Submitted by the Lacken Ballycastle Community Landscape Protection Group

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Introduction

The Lacken Ballycastle Community Landscape Protection Group respectfully submits this observation to An Coimisiún Pleanála in relation to the proposed Muningmore Wind Farm development.

This submission has not been prepared to oppose renewable energy as a concept, nor does it seek to question Ireland's obligations to reduce greenhouse gas emissions or transition towards a lower carbon economy. Rather, it has been prepared because we believe the Board has a statutory obligation to determine whether this proposal, when considered in its full local, regional and national context, constitutes **proper planning and sustainable development**.

That statutory test requires considerably more than assessing the individual environmental effects identified within an Environmental Impact Assessment Report. It requires consideration of whether a proposal contributes positively to balanced regional development, protects the long-term interests of communities, safeguards Ireland's environmental and cultural heritage and achieves an equitable balance between competing public interests.

The Planning and Development Act 2024 reinforces the principle that planning decisions must be made in the interests of proper planning and sustainable

development. Sustainable development is not achieved simply because a project contributes towards national renewable energy targets. It requires environmental, social, cultural and economic considerations to be balanced in a manner that protects both present and future generations.

The Muningmore Wind Farm proposal represents a significant industrial development within a predominantly rural landscape. According to the applicant's own Environmental Impact Assessment Report (EIAR), the development comprises thirteen wind turbines with blade tip heights of between **179 and 180 metres**, a Battery Energy Storage System (BESS), a permanent 110kV onsite substation, two construction compounds, extensive internal access roads, underground electrical infrastructure, a permanent meteorological mast and associated forestry felling. The overall project also includes an approximately **25.5 kilometre Grid Connection Route**, which, although subject to a separate planning application, has been assessed within the EIAR as forming part of the overall project. Permission is sought for a construction period of up to **ten years**, followed by an operational lifespan of **thirty-five years**, meaning the development has the potential to remain an industrial feature of the landscape for approximately forty-five years before decommissioning is considered.

The applicant describes the development as contributing towards Ireland's Climate Action Plan targets and national renewable electricity objectives. Those objectives are important. However, national policy does not require renewable energy developments to be approved irrespective of their location or cumulative impacts. The National Planning Framework emphasises balanced regional development, protection of environmental assets, strengthening rural communities and achieving sustainable growth. These objectives must be considered together rather than in competition.

This submission is therefore principally concerned with whether the continuing concentration of industrial-scale renewable energy developments across rural western Ireland remains compatible with those wider planning objectives.

In recent years, communities across County Mayo have experienced an unprecedented increase in applications for large-scale wind farms, Battery Energy Storage Systems, substations, transmission infrastructure and associated development. While each application is assessed individually, the lived reality for rural communities is one of cumulative and accelerating industrialisation. The planning system currently evaluates the acceptability of individual projects but gives comparatively little consideration to the broader transformation of entire landscapes and communities that results from the approval of successive developments over time.

This raises an important planning question that extends beyond the boundaries of the Muingmore site itself.

At what point does the cumulative concentration of nationally significant energy infrastructure within one region cease to represent balanced regional development and instead become a disproportionate burden upon the communities expected to accommodate it?

This question is particularly important in western Ireland, where the landscapes now increasingly targeted for renewable energy development are the very landscapes that underpin Ireland's tourism economy, sustain internationally recognised biodiversity, preserve archaeological and cultural heritage, support traditional agricultural enterprises and provide the setting for some of Ireland's remaining strong rural communities.

The applicant's own EIAR recognises that the study area is characterised by a declining and ageing population, with lower population density than County Mayo or the State generally. It also identifies the surrounding area as one of predominantly rural character comprising blanket bog, commercial forestry, agricultural land and dispersed housing.

These characteristics should not simply be regarded as baseline conditions against which environmental effects are measured. They represent vulnerable communities and landscapes whose long-term sustainability should carry significant weight within the planning process.

It is respectfully submitted that proper planning requires the Board to consider not only the technical acceptability of this proposal, but also the cumulative effect that repeated approvals of similar developments are having upon rural Ireland as a whole.

This submission therefore addresses several broader planning issues which, in our respectful view, have not been adequately considered within the EIAR or within the wider national planning framework. These include the cumulative industrialisation of rural Ireland, the long-term sustainability of rural communities, impacts upon landscape and tourism, protection of Ireland's cultural identity and Gaeltacht communities, the emerging planning challenges associated with Battery Energy Storage Systems, the absence of a coherent national spatial strategy governing the concentration of renewable energy infrastructure and the principle of intergenerational fairness.

Taken together, these matters raise fundamental questions regarding whether this proposal satisfies the statutory test of proper planning and sustainable development.

Proper Planning and Sustainable Development

The principal question before An Coimisiún Pleanála is not whether Ireland requires additional renewable energy generation. Nor is it whether the proposed Muningmore Wind Farm can contribute towards national climate targets. Those matters are not disputed.

The question that the Board is required to determine is whether this particular development, in this particular location and within its wider cumulative context, represents **proper planning and sustainable development**.

This distinction is important.

The planning system was never intended to facilitate development solely because it contributes towards a national policy objective. Every development, regardless of its purpose, must satisfy the statutory requirements of proper planning and sustainable development. This requires the Board to balance a wide range of competing public interests including environmental protection, landscape conservation, biodiversity, cultural heritage, public safety, tourism, rural regeneration, community wellbeing and the long-term interests of future generations.

The Planning and Development Act 2024 continues this long-established principle by requiring planning authorities and An Coimisiún Pleanála to determine planning applications having regard to the proper planning and sustainable development of the area. That statutory obligation requires a balanced and objective assessment. It does not create a presumption that renewable energy developments should be approved regardless of their cumulative consequences.

Similarly, the **National Planning Framework (Project Ireland 2040)** seeks to achieve sustainable growth while simultaneously protecting Ireland's unique environmental and cultural assets. The Framework promotes compact growth, balanced regional development, protection of rural communities, enhancement of landscape character and the safeguarding of natural and built heritage. These objectives are intended to complement one another rather than compete.

The National Planning Framework also recognises that rural Ireland performs functions that extend far beyond energy production. Rural landscapes provide food production, biodiversity, tourism, recreation, ecosystem services, cultural identity, archaeological heritage and places in which communities have lived for generations. These multiple functions must all be considered when determining whether further industrial development remains appropriate.

The Climate Action Plan similarly establishes ambitious renewable energy targets but repeatedly acknowledges that delivery must occur through proper planning processes and in accordance with environmental legislation. National climate policy

therefore cannot be interpreted as overriding the Board's statutory responsibility to consider the broader public interest.

The precautionary principle is also relevant.

Where uncertainty exists regarding the long-term consequences of development, particularly where those consequences may be irreversible, planning authorities are expected to proceed cautiously. This principle has particular relevance where emerging technologies, cumulative environmental effects or long-term changes to landscape and community character are concerned.

The Muningmore proposal is not a minor development.

According to the applicant's own Environmental Impact Assessment Report, the proposal comprises thirteen wind turbines with blade tip heights of up to **180 metres**, together with a Battery Energy Storage System, a permanent onsite substation, extensive access roads, construction compounds, electrical infrastructure and associated forestry operations. The applicant seeks permission for a construction period of up to **ten years**, followed by an operational life of **thirty-five years**. The project is also intrinsically linked to a proposed **25.5 kilometre underground Grid Connection Route**, which has been assessed within the EIAR but will form part of a separate planning application.

This is therefore a substantial industrial development that will influence the surrounding area for several decades.

Its effects should not be assessed solely in terms of compliance with technical environmental standards. They should also be considered in terms of their contribution to the long-term transformation of the wider region.

An Environmental Impact Assessment is an essential component of the planning process, but it is not, in itself, determinative of whether the development should proceed. By its nature, an EIAR primarily assesses the impacts of the individual proposal before the decision-maker. Proper planning requires something broader. It requires consideration of whether approving the development advances or undermines the long-term planning objectives for the area and whether it contributes positively to sustainable regional development.

This distinction is particularly significant in relation to renewable energy developments.

Individual projects are generally designed to comply with established technical guidance relating to noise, shadow flicker, ecology, hydrology and traffic. Compliance with those standards is undoubtedly important. However, technical compliance alone cannot answer broader planning questions concerning landscape capacity, cumulative industrialisation, community resilience or regional equity.

Indeed, the EIAR itself recognises that the cumulative assessment forms part of the environmental assessment process and identifies numerous existing and proposed developments that have been considered in combination with the proposed project.

However, the cumulative assessment contained within the EIAR remains largely topic-specific. It considers cumulative visual effects, cumulative ecological impacts or cumulative traffic effects separately. What it does not adequately consider is the cumulative transformation of an entire rural region through the incremental approval of successive energy developments.

It is respectfully submitted that this wider planning issue falls squarely within the statutory role of An Coimisiún Pleanála.

The Board is uniquely placed to observe the cumulative pattern of renewable energy development emerging across County Mayo and the wider western region. Unlike the preparation of an individual EIAR, which is necessarily confined to a single proposal, the Board has visibility of successive applications, appeals and strategic infrastructure developments over many years.

For that reason, An Coimisiún Pleanála is particularly well positioned to consider whether the cumulative concentration of nationally significant energy infrastructure within one geographical region remains compatible with the principles of proper planning and sustainable development.

The Lacken Ballycastle Community Landscape Protection Group respectfully submits that this broader question now requires careful consideration.

The planning system should not permit the gradual industrialisation of rural Ireland simply because each individual proposal, viewed in isolation, appears capable of complying with technical guidance.

Proper planning requires more than technical compliance.

It requires judgement.

It requires balance.

Above all, it requires consideration of the cumulative legacy that today's planning decisions will leave for future generations.

The Cumulative Industrialisation of Rural Ireland

The proposed Muingmore Wind Farm cannot properly be considered in isolation from the wider pattern of renewable energy development that is emerging across County Mayo and the west of Ireland. While each planning application must be determined on its individual merits, the statutory requirement to consider proper

planning and sustainable development necessarily requires An Coimisiún Pleanála to examine the cumulative consequences of repeated approvals within the same geographical region. Planning decisions do not exist in a vacuum. Over time they establish patterns of development that fundamentally influence the future character of landscapes, communities and local economies.

The proposed development is itself substantial in scale. The applicant seeks permission for thirteen wind turbines with blade tip heights of between 179 and 180 metres together with a Battery Energy Storage System (BESS), a permanent 110kV onsite substation, two construction compounds, extensive internal road infrastructure, underground electrical cabling, a permanent meteorological mast and associated forestry felling. In addition, the overall project includes an approximately 25.5 kilometre underground Grid Connection Route, which, although the subject of a separate planning application, has been assessed within the Environmental Impact Assessment Report as forming part of the overall project. Permission is sought for a construction period of up to ten years followed by an operational lifespan of thirty-five years, meaning the development has the potential to influence the receiving environment for approximately forty-five years.

When viewed as a single development, the Muingmore Wind Farm may appear to represent another contribution towards Ireland's renewable energy objectives. However, when viewed alongside the growing number of existing, permitted and proposed wind farms, Battery Energy Storage Systems, substations and associated electricity infrastructure across County Mayo, it becomes part of a much broader pattern of industrial development. It is this wider pattern, rather than the effects of any one proposal in isolation, that increasingly raises questions regarding the long-term sustainability of development within rural western Ireland.

The Environmental Impact Assessment Report recognises the requirement to assess cumulative effects and considers cumulative impacts across a number of environmental topics including landscape, biodiversity, traffic and other technical disciplines. These assessments are important and form an essential part of the Environmental Impact Assessment process. However, by their nature they remain focused upon individual environmental receptors and the additional contribution made by this development to each specific topic. They do not fully address the broader planning question of how repeated approvals of large-scale renewable energy infrastructure are collectively transforming the character and function of rural landscapes over time.

This distinction is an important one. An

Environmental Impact Assessment is designed to evaluate the likely environmental effects of a particular proposal. Proper planning and sustainable development require a wider exercise of planning judgement. The Board must consider not only

whether this development complies with technical guidance relating to noise, ecology, hydrology or landscape, but also whether the cumulative concentration of similar developments remains appropriate within the wider region. The fact that each successive proposal individually complies with technical standards does not necessarily mean that the combined effect of numerous developments continues to represent balanced regional development.

Planning practice has long recognised that significant changes to landscapes frequently occur through incremental rather than dramatic change. Individual developments may each be considered acceptable when viewed independently, yet the cumulative consequence can be the gradual but fundamental alteration of the landscape itself. This principle is particularly relevant in relation to renewable energy development, where individual wind farms, substations and Battery Energy Storage Systems may each be assessed as giving rise to acceptable impacts, while collectively they result in the progressive industrialisation of large areas of rural countryside.

This is the wider issue that now confronts An Coimisiún Pleanála. The Board is uniquely placed to consider not simply the effects of this proposal, but the broader pattern of renewable energy development emerging across County Mayo and neighbouring counties. Unlike the preparation of an individual EIAR, which is necessarily confined to the assessment of a single project, the Board has visibility of successive applications, appeals and strategic infrastructure proposals over many years. It is therefore in a position to consider whether the cumulative concentration of nationally important energy infrastructure within one region remains consistent with the principles of proper planning and sustainable development.

The cumulative effects of this pattern of development are experienced not by individual planning applications but by the communities who live and work within these landscapes. Residents experience successive periods of construction activity, increasing volumes of heavy construction traffic, repeated forestry clearance, the introduction of new electricity infrastructure and continuing uncertainty regarding future proposals. Local businesses, tourism operators and farmers must make long-term decisions within an environment that is subject to ongoing industrial change. These wider social and economic consequences cannot easily be measured within individual chapters of an Environmental Impact Assessment Report, yet they are highly relevant when assessing the sustainability of continued development within a particular area.

The applicant describes the receiving environment as a predominantly rural landscape characterised by blanket bog, commercial forestry, agricultural land, dispersed housing and small watercourses, with a relatively low population density and an ageing population. These characteristics should not be interpreted as indicators of a landscape with unlimited capacity to absorb industrial development.

On the contrary, they are the very characteristics that define the environmental, cultural and economic value of this part of County Mayo. The open landscapes, peatlands, traditional farming patterns and scattered rural communities form an important part of Ireland's natural heritage and contribute significantly to tourism, biodiversity, agriculture and the identity of the west of Ireland.

The concept of landscape capacity is therefore particularly relevant. Capacity is not determined simply by the availability of undeveloped land or favourable wind conditions. It also depends upon the ability of a landscape to accommodate change without undermining the qualities that make it distinctive or diminishing the social, environmental and economic functions that it already performs. Once that capacity has been exceeded, additional development cannot be regarded as sustainable merely because each individual proposal complies with technical environmental standards.

The Lacken Ballycastle Community Landscape Protection Group respectfully submits that this application should therefore be assessed not only on its individual merits but also within the wider context of cumulative renewable energy development across rural western Ireland. The Board should carefully consider whether the continuing concentration of wind farms, Battery Energy Storage Systems and associated electricity infrastructure within the same region remains compatible with balanced regional development and the statutory requirement to achieve proper planning and sustainable development.

Rural Communities and Balanced Regional Development

One of the central objectives of the Irish planning system is to promote balanced regional development while protecting the long-term sustainability of rural communities. This objective is reflected throughout the National Planning Framework, which recognises that rural Ireland plays a vital role in the social, economic, environmental and cultural life of the country. Rural communities are not simply locations where development can occur; they are places in which people live, work, farm, establish businesses, raise families and preserve traditions that have shaped the identity of Ireland for generations.

Against this policy background, it is important to consider the characteristics of the receiving environment identified by the applicant. The Environmental Impact Assessment Report notes that the study area has experienced a decline in population, has a significantly lower population density than both County Mayo and the State as a whole, and contains a higher proportion of older residents than the national average. It also records comparatively higher levels of unemployment within the surrounding Electoral Divisions.

These demographic characteristics should not simply be treated as statistical background information. They are highly relevant planning considerations because they describe communities that are already experiencing significant demographic and economic challenges. In such circumstances, planning decisions should seek to strengthen the long-term resilience of rural areas rather than introducing additional pressures that may make them less attractive places in which to live and invest.

The applicant places considerable emphasis on the temporary employment that would arise during construction together with the proposed Community Benefit Fund. These measures undoubtedly provide some economic benefit and should be recognised. However, they should also be viewed in their proper context. Construction employment is, by its nature, temporary and reduces significantly once the project becomes operational. Similarly, community benefit funding, while valuable, cannot be regarded as a substitute for sustainable long-term economic development or as compensation for permanent changes to the landscape and character of an area.

The long-term sustainability of rural communities depends upon a much broader range of factors than short-term economic investment. It depends upon maintaining attractive places in which people choose to live, establishing confidence for local businesses, supporting agriculture and tourism, encouraging younger generations to remain within rural areas and ensuring that communities continue to grow rather than decline. These objectives are reflected throughout national planning policy and should form part of the assessment of any major development proposal.

Large-scale renewable energy developments inevitably alter the character of the areas in which they are located. This change extends beyond the physical presence of turbines and associated infrastructure. Construction activity may continue for several years, involving substantial movements of heavy goods vehicles, extensive engineering works, forestry clearance and the installation of permanent electricity infrastructure. Even after construction has been completed, the industrial character of the development remains part of the landscape for decades. In the case of the proposed Muningmore Wind Farm, permission is sought for an operational period of thirty-five years following a construction period of up to ten years. The practical consequence is that the development may influence the character of the area for approximately forty-five years.

Planning decisions should therefore consider not only whether the immediate environmental impacts can be mitigated but also whether the long-term direction of development is consistent with the future that national planning policy seeks to achieve for rural Ireland. A pattern of repeated industrial development within areas already experiencing demographic decline may inadvertently undermine wider Government objectives relating to rural regeneration, balanced regional development and the retention of population within rural communities.

This issue becomes particularly significant when developments are considered cumulatively. Individual wind farms may each conclude that their contribution to demographic change is negligible. However, communities experience these developments collectively. Successive planning applications, prolonged construction activity, increasing concentrations of electricity infrastructure and the gradual transformation of rural landscapes inevitably influence public confidence in the future of an area. While these effects may not always be capable of precise measurement, they remain genuine planning considerations that should not be overlooked.

The National Planning Framework seeks to ensure that all regions of Ireland develop in a balanced and sustainable manner. Balanced development requires more than distributing economic investment across the country. It also requires that the burdens associated with nationally important infrastructure are shared fairly between regions. Rural communities should not find themselves carrying a disproportionate share of the physical, environmental and social impacts of the national energy transition simply because they possess suitable wind resources or relatively low population density.

The Lacken Ballycastle Community Landscape Protection Group respectfully submits that this application should therefore be assessed in the context of the wider future of rural western Ireland. Planning decisions should reinforce the long-term vitality of rural communities and support balanced regional development. Where there is evidence that a region is already experiencing demographic decline and increasing concentrations of industrial-scale infrastructure, the Board should exercise particular care before permitting further developments that may contribute to that pattern.

Landscape, Visual Amenity and Ireland's Tourism Economy

Landscape is one of Ireland's most valuable natural assets. It provides far more than scenic views. Landscapes support biodiversity, agriculture, recreation, tourism, cultural heritage and the overall quality of life enjoyed by those who live, work and visit rural Ireland. They contribute directly to local economies while also forming an important part of Ireland's international identity. For this reason, landscape protection has long been recognised as an essential component of proper planning and sustainable development.

The **European Landscape Convention**, which Ireland has ratified, recognises landscape as an essential component of people's surroundings, an expression of the diversity of their shared cultural and natural heritage, and a foundation of individual and social well-being. The Convention requires that landscape be recognised in law as an important element of the public interest and that its protection, management and planning form part of wider public policy. This reflects the principle that

landscapes belong not only to those who own land but to society as a whole, and that planning authorities have an important responsibility to safeguard them for present and future generations.

The receiving environment for the proposed Muingmore Wind Farm is characterised by open peatland, commercial forestry, agricultural land, dispersed rural housing and extensive views towards the Atlantic coastline. The applicant's own description of the site acknowledges its predominantly rural character and its proximity to internationally important coastal habitats and landscapes.

The proposed development introduces thirteen turbines with blade tip heights of up to 180 metres together with a Battery Energy Storage System, a permanent electricity substation, associated buildings, internal road infrastructure, construction compounds and extensive engineering works. These structures represent a significant industrial intervention within an otherwise predominantly rural landscape. By any objective assessment, infrastructure of this scale will become one of the defining physical features of the surrounding area for many decades.

The Environmental Impact Assessment Report acknowledges that the proposed development will give rise to landscape and visual effects and includes an assessment of cumulative landscape impacts with other renewable energy developments. While such assessments are an important part of the Environmental Impact Assessment process, they inevitably focus upon the significance of visual effects measured against recognised assessment criteria. They do not fully capture the broader value of landscape as a social, economic and cultural resource, nor do they adequately consider the cumulative erosion of landscape character that can occur through successive developments over time.

The importance of landscape extends well beyond visual amenity. Throughout County Mayo, the landscape is itself an economic asset. Visitors are drawn to the county because of its dramatic Atlantic coastline, extensive peatlands, mountains, archaeological monuments, dark skies and traditional rural character. These features collectively underpin a tourism industry that supports accommodation providers, restaurants, cafés, outdoor activity businesses, retailers, local producers and many other small enterprises. Unlike many forms of industrial development, tourism depends upon the continued protection of the very qualities that attract visitors in the first place.

This is particularly relevant in the west of Ireland, where tourism is closely linked to the authenticity of the landscape. Visitors do not travel to County Mayo simply to observe individual scenic locations. They travel to experience an entire landscape that remains relatively undeveloped and retains a strong sense of place. The cumulative introduction of increasingly large industrial structures into these

landscapes has the potential to alter that experience in ways that are difficult to quantify but nevertheless highly significant.

The planning system must also recognise that landscape has value for those who live within it every day. Rural landscapes contribute to community identity, health and well-being, recreation and a sense of belonging. They influence where people choose to live, invest and establish businesses. For farming families, the landscape is both a workplace and a home. For local communities, it represents an inheritance that has been shaped over generations. These values cannot easily be measured within a visual impact assessment, yet they are fundamental to sustainable planning.

The issue before the Board is therefore not whether the proposed turbines will be visible. Infrastructure of almost 180 metres in height will inevitably become a dominant feature within the surrounding landscape. The more important question is whether the cumulative introduction of developments of this scale remains compatible with the long-term protection of the landscape resource upon which so much of the environmental, cultural and economic value of County Mayo depends.

It is also important to consider the longevity of these effects. Permission is sought for an operational period of thirty-five years following a construction period of up to ten years. Even following decommissioning, certain elements of the development, including access infrastructure and turbine foundations, may remain in place where their removal would itself result in greater environmental disturbance. The planning decision made today therefore has implications that extend well beyond a single generation.

The Lacken Ballycastle Community Landscape Protection Group respectfully submits that landscape should not be viewed as an undeveloped resource awaiting industrial use, but as a nationally important asset that performs multiple environmental, economic, cultural and social functions simultaneously. Once the character of such landscapes is fundamentally altered, restoration to their previous condition is rarely possible within any meaningful planning timeframe.

For these reasons, it is respectfully submitted that An Coimisiún Pleanála should give substantial weight to the long-term cumulative effects of this proposal on the landscape resource of County Mayo. Protecting landscape is not inconsistent with Ireland's climate objectives; rather, it is an essential component of sustainable development. The challenge for the planning system is not to choose between renewable energy and landscape protection, but to ensure that both are achieved in a balanced and proportionate manner.

Landscape, Tourism and Cultural Identity

County Mayo has developed an international reputation as one of Ireland's premier tourism destinations. This reputation has not been created through large visitor attractions or major urban centres, but through the quality, authenticity and diversity of its natural landscapes, coastline, archaeological heritage and traditional rural character. Visitors are attracted by the Atlantic coastline, extensive peatlands, mountains, walking routes, dark skies, beaches, wildlife and the unique sense of place that continues to distinguish the west of Ireland from many other parts of Europe.

Tourism has become one of the principal economic activities within County Mayo, supporting hotels, guesthouses, restaurants, cafés, retail businesses, outdoor activity providers, transport services, local food producers and countless small family businesses. Many of these enterprises depend directly upon the continued attractiveness of the surrounding landscape. Unlike many other industries, tourism cannot easily relocate once the qualities upon which it depends have been diminished.

The proposed Muningmore Wind Farm introduces infrastructure of a scale rarely found within traditional rural landscapes. The applicant proposes thirteen turbines with blade tip heights approaching 180 metres together with a Battery Energy Storage System, an electricity substation, extensive access roads and associated engineering works. These structures are designed to remain operational for at least thirty-five years following a construction period that may extend for ten years. Consequently, the visual and physical influence of the development has the potential to extend over almost half a century.

The applicant's Environmental Impact Assessment recognises that the proposed development will give rise to landscape and visual effects and includes an assessment of cumulative visual impacts. While these assessments provide an important technical evaluation of visual change, they cannot fully measure the broader consequences for tourism, place identity and the reputation of the region as a destination renowned for its natural landscapes.

This distinction is important because tourism is not based solely upon individual viewpoints or designated scenic routes. Visitors experience an entire landscape. Their impression of County Mayo is formed through the cumulative experience of travelling its roads, visiting its villages, exploring its beaches and boglands, walking its hills and interacting with communities whose identity remains closely connected with the surrounding environment. The value of this experience lies in its authenticity. It is the combination of natural scenery, cultural heritage and traditional rural character that distinguishes the west of Ireland from other destinations.

Planning policy has long recognised that landscape possesses both intrinsic and economic value. A high-quality landscape supports employment, attracts investment

and contributes to the overall competitiveness of rural regions. Once that landscape becomes increasingly characterised by industrial infrastructure, there is a risk that the qualities upon which tourism depends will be gradually diminished. This process rarely occurs because of one development alone. Rather, it results from the cumulative effect of successive developments that individually appear acceptable but collectively alter the perception and character of an entire region.

The significance of this issue extends beyond tourism alone. Landscape is closely linked to cultural identity and community wellbeing. The distinctive appearance of County Mayo reflects centuries of interaction between people and the natural environment. Traditional farming patterns, peatlands, stone walls, dispersed settlements and coastal scenery together create landscapes that are immediately recognisable as part of Ireland's cultural inheritance. These landscapes are valued not only by visitors but by those who live within them. They contribute to a sense of belonging, community identity and pride of place that cannot readily be recreated once lost.

The planning system should therefore recognise that landscape is a finite resource. While it is capable of accommodating appropriate development, its capacity is not unlimited. Every significant intervention changes the receiving environment to some degree. As renewable energy developments become larger in scale and more numerous in distribution, careful consideration must be given to whether the cumulative change remains compatible with the long-term protection of landscape character and the economic activities that depend upon it.

The applicant has understandably focused upon the contribution that the proposed development would make towards renewable electricity generation. That is a legitimate planning consideration. However, proper planning requires all public interests to be weighed together. The economic contribution made by renewable energy should not be assessed in isolation from the economic contribution already made by tourism, agriculture and other rural enterprises that depend upon the continued protection of landscape quality.

Irish Culture, Heritage and the Future of Rural Communities

One of the defining characteristics of rural western Ireland is that its cultural heritage remains a living part of everyday life. Unlike many parts of Europe where cultural heritage is largely confined to protected monuments and museums, the heritage of County Mayo continues to exist within its communities, its farming traditions, its language, its landscapes and the close relationship that exists between people and place. It is this living heritage that distinguishes the region and contributes significantly to its identity, resilience and attractiveness as both a place to live and a place to visit.

The planning system has an important role in protecting this wider cultural landscape. Cultural heritage extends beyond the preservation of archaeological sites or historic buildings. It includes the protection of those communities that continue to maintain traditional rural practices, preserve local history, sustain voluntary organisations, support local schools and churches, and pass knowledge, traditions and customs from one generation to the next. Sustainable development therefore requires consideration not only of the physical environment but also of the social and cultural fabric that gives rural Ireland its distinctive character.

National planning policy recognises the importance of supporting strong and sustainable rural communities. The National Planning Framework identifies rural regeneration, balanced regional development and the continued vitality of rural settlements as key national objectives. These policies recognise that vibrant communities are essential to maintaining public services, sustaining local businesses and preserving the cultural identity of rural Ireland. Planning decisions should therefore contribute positively to these objectives wherever possible.

The applicant's own Environmental Impact Assessment Report identifies a receiving environment characterised by a relatively low population density, an ageing demographic profile and evidence of population decline. These characteristics demonstrate that the surrounding communities already face significant demographic challenges. Rather than viewing these characteristics as indicating greater capacity to absorb industrial development, it is respectfully submitted that they should encourage a greater degree of planning sensitivity. Communities experiencing demographic decline require policies that enhance their long-term attractiveness and resilience rather than introducing additional factors that may discourage future investment or residential growth.

The west of Ireland has long been recognised as an area where landscape, culture and community are closely interconnected. Traditional farming practices have shaped the landscape over centuries, while local communities have maintained a rich heritage of music, folklore, craftsmanship, language and historical association. The value of this heritage cannot be measured solely in economic terms. It represents an irreplaceable part of Ireland's national identity and contributes significantly to the country's international reputation.

This issue assumes even greater importance in areas that are within, or closely associated with, Gaeltacht communities. The Irish language does not survive because of statutory designation alone. It survives because communities remain vibrant, economically sustainable and attractive places in which families choose to live. Schools, sporting organisations, voluntary groups, local businesses and farming communities all contribute to maintaining the social environment in which the language and associated traditions continue to flourish.

While this submission does not suggest that any single development will determine the future of these communities, planning authorities should nevertheless consider whether the cumulative concentration of industrial-scale infrastructure within rural western Ireland is consistent with wider Government objectives to strengthen rural communities and protect Ireland's cultural heritage. Sustainable planning should seek to avoid incremental decisions that, when viewed collectively over time, risk undermining those objectives.

The cumulative impact of successive large-scale infrastructure projects extends beyond their physical footprint. Such developments influence how communities perceive the future of their locality. They may affect decisions regarding investment, housing, tourism, agriculture and business development. Although these effects are not always capable of precise quantification, they are nonetheless legitimate planning considerations because they relate directly to the long-term sustainability of rural communities.

Cultural heritage should also be considered in the context of landscape. The distinctive character of County Mayo arises from the interaction between its natural environment and the communities that have occupied it for generations. Stone walls, traditional field patterns, peatlands, coastal settlements, archaeological monuments and dispersed farmsteads together form a cultural landscape that is recognised both nationally and internationally. The value of this landscape lies not simply in its appearance but in the continuity of human activity that has shaped it over centuries.

Planning decisions therefore carry responsibilities that extend beyond the immediate effects of an individual development. Permission for infrastructure with an operational lifespan of thirty-five years, following a construction period of up to ten years, has implications that extend across several generations. The Board is therefore required to consider not only the benefits of renewable energy generation but also the longer-term consequences for the communities and cultural landscapes that will continue to exist alongside such developments.

The Lacken Ballycastle Community Landscape Protection Group respectfully submits that the protection of Ireland's cultural heritage should be understood in its broadest sense. It requires the preservation of living rural communities as well as archaeological monuments, the protection of traditional landscapes as well as individual scenic views, and the maintenance of conditions that enable future generations to continue living, working and participating in the cultural life of rural Ireland. These objectives are entirely consistent with the principles of proper planning and sustainable development and deserve significant weight in the Board's consideration of the proposed Muningmore Wind Farm.

Battery Energy Storage Systems and the Precautionary Principle

A significant component of the proposed Muingmore Wind Farm is the inclusion of a Battery Energy Storage System (BESS) within the overall development. The applicant describes the BESS as an integral part of the project, to be located alongside the wind farm and associated electricity infrastructure within the northern cluster of the development. The proposal includes the battery storage compound together with associated control buildings, electrical equipment, security infrastructure and ancillary works.

The inclusion of a Battery Energy Storage System represents an important evolution in renewable energy developments. Unlike wind turbines, which primarily generate electricity, Battery Energy Storage Systems are designed to store and discharge significant quantities of electrical energy in order to improve grid stability, assist with balancing electricity supply and demand and support the wider integration of renewable energy. These functions are increasingly recognised as an important part of Ireland's future electricity network.

However, Battery Energy Storage Systems also introduce planning considerations that differ fundamentally from those traditionally associated with wind farms.

The environmental assessment of Battery Energy Storage Systems cannot simply be regarded as an extension of wind energy assessment. They involve different technologies, different operational characteristics, different maintenance requirements and different emergency response considerations. Consequently, they require careful and independent consideration within the planning process.

The applicant's EIAR includes the Battery Energy Storage System as part of the proposed development and identifies it as an element of the permanent operational infrastructure. While the EIAR addresses the development as a whole, it is respectfully submitted that the rapid expansion of Battery Energy Storage Systems throughout Ireland raises wider planning issues that extend beyond the technical assessment of an individual proposal.

Battery storage technology continues to develop rapidly across Europe and internationally. During this period of technological development, regulators, fire authorities, environmental agencies and electricity operators have continued to refine standards governing battery design, operation, monitoring and emergency response. This is a rapidly evolving area of infrastructure planning.

It is therefore appropriate that planning authorities exercise particular care when considering proposals involving large-scale Battery Energy Storage Systems.

The principle of precaution has long formed part of environmental decision-making. Where the potential consequences of development may be significant and where knowledge or regulatory practice continues to evolve, decision-makers should exercise caution until there is sufficient confidence that appropriate safeguards exist.

This submission does not suggest that Battery Energy Storage Systems should not be permitted in Ireland.

Rather, it respectfully submits that their increasing deployment should be accompanied by a regulatory framework that provides confidence to planning authorities, local communities and emergency services that every aspect of their operation has been fully considered.

Particular attention should be given to issues including emergency response planning, fire prevention and suppression, thermal management systems, environmental monitoring, containment of contaminated firewater where relevant, long-term operational monitoring, decommissioning procedures and the management of batteries at the end of their operational life. These are matters that extend beyond the normal planning considerations associated with wind turbines and reflect the distinctive characteristics of battery storage technology.

The applicant seeks permission for infrastructure that may remain operational for thirty-five years. During such a period, battery technology is likely to evolve considerably. The planning system should therefore ensure that sufficient flexibility exists to accommodate future improvements in safety standards, environmental protection measures and operational best practice throughout the lifetime of the development.

Consideration should also be given to the cumulative implications of Battery Energy Storage Systems. Increasingly, these facilities are being developed alongside wind farms, solar farms and major electricity substations. Individually, each proposal may appear relatively modest. Collectively, however, they represent a significant expansion of permanent industrial electricity infrastructure within rural landscapes. This cumulative trend should be recognised as part of the broader assessment of proper planning and sustainable development.

The Lacken Ballycastle Community Landscape Protection Group is also concerned that the planning system is evolving more quickly than the policy framework governing Battery Energy Storage Systems. While planning applications increasingly include battery storage as an integral component of renewable energy developments, national planning guidance dealing specifically with the siting, cumulative assessment and long-term integration of large-scale Battery Energy Storage Systems remains comparatively limited. This places an even greater responsibility upon An Coimisiún Pleanála to ensure that the precautionary principle is appropriately applied where uncertainty exists.

The Board has consistently recognised that renewable energy infrastructure must be assessed having regard not only to its immediate benefits but also to its long-term implications for the receiving environment and surrounding communities. That same approach should apply to Battery Energy Storage Systems. Their inclusion within

renewable energy developments should not diminish the level of scrutiny applied simply because they support national electricity objectives.

The Lacken Ballycastle Community Landscape Protection Group therefore respectfully submits that the Battery Energy Storage System proposed as part of the Muningmore Wind Farm should be considered not merely as ancillary infrastructure but as a substantial element of the development in its own right. The Board should be satisfied that appropriate regulatory safeguards, emergency planning arrangements and environmental protections exist throughout the full operational life of the development and that the cumulative implications of increasingly widespread Battery Energy Storage Systems have been fully considered before permission is granted.

The Public Interest and the Role of An Coimisiún Pleanála

The determination of this application extends beyond the interests of the applicant or those residents living closest to the proposed development. The responsibility of An Coimisiún Pleanála is to determine whether the proposal serves the wider public interest and whether it satisfies the statutory requirement of proper planning and sustainable development. In exercising that function, the Board is required to balance a range of legitimate public interests that are often complementary but can sometimes compete.

There is no dispute that the generation of renewable electricity is an important national objective. Ireland faces significant obligations to reduce greenhouse gas emissions, strengthen energy security and transition towards a lower-carbon economy. Renewable energy infrastructure is therefore an important component of national policy. However, these objectives do not exist in isolation. The planning system is also required to protect the environment, conserve biodiversity, safeguard landscape character, preserve cultural heritage, promote balanced regional development and support the long-term sustainability of communities throughout the State.

The role of the Board is not to prioritise one of these objectives to the exclusion of all others. Rather, it is to ensure that they are appropriately balanced so that progress in one area is not achieved through unnecessary or disproportionate harm in another. This balancing exercise lies at the very heart of proper planning and sustainable development.

The present application illustrates why this balance is so important. The proposed development offers a contribution towards Ireland's renewable electricity targets. At the same time, it introduces substantial permanent infrastructure into a rural landscape that performs many other functions of national importance. The receiving

environment supports agriculture, tourism, biodiversity, recreation, cultural heritage and established rural communities. It also forms part of the wider landscape that contributes to the identity and attractiveness of County Mayo.

These wider public interests deserve careful consideration because they are not readily replaced once lost. Electricity generation infrastructure can be located in many different parts of the country over time. By contrast, landscapes that have evolved over centuries, communities that have developed through generations of settlement and cultural traditions that remain rooted within particular places cannot easily be recreated once they have been fundamentally altered.

The Board should also recognise that public confidence in the planning system depends upon decisions being seen to be fair, transparent and proportionate. Communities are more likely to support Ireland's transition to renewable energy where they can see that planning decisions genuinely balance national objectives with local circumstances, and where no particular region is perceived to be carrying a disproportionate share of nationally important infrastructure. Conversely, if communities believe that certain rural areas have become the default location for successive developments because they possess favourable wind conditions or lower population densities, confidence in both the planning system and the wider energy transition may be undermined.

The planning process should therefore seek not only to achieve renewable energy targets but also to maintain public trust that those targets are being delivered fairly. Fairness is itself an important component of sustainable development. It requires that the benefits and responsibilities associated with national infrastructure are shared in a balanced manner and that planning decisions continue to respect the distinctive environmental, social and cultural characteristics of different regions.

In the case of the proposed Muningmore Wind Farm, the Board is presented with an opportunity to consider not only the individual merits of this proposal but also the broader public interest in ensuring that the transition to renewable energy proceeds in a manner that commands public confidence, protects nationally important landscapes and strengthens rather than weakens rural communities.

The Lacken Ballycastle Community Landscape Protection Group respectfully submits that this broader public interest should carry significant weight in the Board's assessment. A planning decision that carefully balances Ireland's climate ambitions with the protection of its landscapes, communities and cultural heritage will strengthen both the planning system and the long-term success of the renewable energy transition. In our respectful submission, that balance has not been achieved in the present application.

The Need for a National Spatial Strategy for Renewable Energy Development

The proposed Muningmore Wind Farm highlights a broader planning issue that extends well beyond the boundaries of the application site. While this submission is concerned with the merits of the proposed development, it also raises the question of whether Ireland's current approach to delivering renewable energy infrastructure is achieving the balanced and sustainable pattern of development envisaged by national planning policy.

Ireland has committed to ambitious renewable energy targets as part of its response to climate change and its obligations under national and European legislation. Those commitments are both necessary and appropriate. Equally, however, the planning system has a statutory responsibility to ensure that the delivery of those objectives takes place in a manner that is consistent with proper planning and sustainable development. National policy does not require renewable energy infrastructure to be concentrated within particular regions simply because they possess favourable wind resources. Instead, it requires a balanced approach that considers environmental protection, regional development, community wellbeing and the long-term management of Ireland's natural resources.

The National Planning Framework promotes balanced regional development and recognises that each region of Ireland possesses distinctive environmental, cultural and economic characteristics that should be protected while accommodating appropriate development. It also recognises the importance of strengthening rural communities and ensuring that development contributes positively to the long-term sustainability of those areas. These objectives are not secondary considerations but form part of the overall framework within which planning decisions must be made.

At present, however, there appears to be no comprehensive national spatial strategy that addresses the cumulative concentration of renewable energy infrastructure. Individual planning applications are assessed on their own merits, supported by Environmental Impact Assessment Reports that consider the impacts of each proposal and its interaction with other identified developments. While this approach is appropriate for assessing individual projects, it does not necessarily provide a mechanism for determining when the overall concentration of wind farms, Battery Energy Storage Systems, substations and associated infrastructure within a particular region has reached a level that may no longer be compatible with balanced regional development.

This distinction is important because the cumulative effects experienced by rural communities are not confined to the impacts of one development. Communities experience successive planning applications, prolonged construction activity, increasing concentrations of electricity infrastructure and continuing changes to the surrounding landscape over many years. Although each development may

individually conclude that its contribution to cumulative effects is limited, the combined effect of multiple developments can fundamentally alter the character and function of an area. This broader pattern of development cannot easily be assessed through the Environmental Impact Assessment process for any single project and therefore requires careful consideration by the planning authority.

The proposed Muingmore Wind Farm illustrates this issue. The application is not simply for thirteen wind turbines. It also includes a Battery Energy Storage System, a permanent onsite electricity substation, extensive internal road infrastructure, construction compounds, underground collector cabling and associated engineering works. In addition, the wider project incorporates an approximately 25.5 kilometre underground Grid Connection Route that has been assessed as part of the overall project, notwithstanding that it will be the subject of a separate planning application. Collectively, these elements represent a substantial piece of permanent industrial infrastructure that will remain within the landscape for many decades.

Developments of this nature are becoming increasingly common as Ireland's electricity system evolves. Modern renewable energy projects now extend well beyond wind turbines themselves and increasingly include Battery Energy Storage Systems, substations and complex electricity infrastructure designed to support the stability of the national grid. While these developments undoubtedly contribute to national energy policy, they also increase the overall industrial footprint within rural landscapes. This changing pattern of development reinforces the need for a planning framework that considers not only the acceptability of individual projects but also the cumulative distribution of such infrastructure throughout the country.

County Mayo possesses many of the characteristics that make it attractive for renewable energy development, including favourable wind conditions, extensive upland areas and relatively dispersed settlement patterns. These same characteristics, however, are also fundamental to the county's environmental quality, tourism economy, agricultural activity and cultural identity. The planning system should therefore avoid assuming that technical suitability for renewable energy automatically equates to unlimited capacity for successive infrastructure projects. Every landscape has a finite capacity to absorb change while retaining the qualities that make it valuable to those who live, work and invest within it.

In our respectful submission, balanced regional development requires consideration not only of where renewable energy can technically be developed but also of how the responsibilities associated with delivering national climate objectives are shared across the country. The benefits of renewable electricity generation accrued nationally through improved energy security and reduced greenhouse gas emissions. By contrast, the visual, environmental and social effects of large-scale infrastructure are experienced primarily by the communities within which that infrastructure is located. It is therefore appropriate that the planning system should

seek to ensure an equitable distribution of both the benefits and the burdens associated with the transition to renewable energy.

An Coimisiún Pleanála occupies a unique position within the Irish planning system. Unlike individual applicants or local planning authorities, the Board considers Strategic Infrastructure Development applications and major planning appeals from across the State. It is therefore uniquely placed to observe the cumulative pattern of renewable energy development emerging over time and to consider whether that pattern remains consistent with the principles of proper planning and sustainable development.

The Lacken Ballycastle Community Landscape Protection Group respectfully submits that the proposed Muingmore Wind Farm should be considered within this wider national context. The issue before the Board is not simply whether this individual proposal is acceptable, but whether the continued concentration of large-scale renewable energy infrastructure within particular rural regions remains consistent with balanced regional development, the protection of Ireland's landscapes and the long-term sustainability of rural communities. Addressing that question will help ensure that Ireland's transition to renewable energy proceeds in a manner that is environmentally responsible, socially equitable and fully aligned with the principles of proper planning and sustainable development.

Intergenerational Fairness and the Legacy of Today's Planning Decisions

One of the defining principles of sustainable development is that planning decisions should meet the needs of the present without compromising the ability of future generations to meet their own needs. This principle has become firmly established within international environmental policy and has been incorporated into Irish planning legislation, national planning policy and environmental assessment. It requires decision-makers to look beyond the immediate benefits of individual developments and to consider the long-term legacy that today's planning decisions will leave for those who inherit the landscape in future decades.

The proposed Muingmore Wind Farm is a development with an exceptionally long planning horizon. The applicant seeks permission for a construction period of up to ten years followed by an operational lifespan of thirty-five years. Even after the operational phase has ended, elements of the infrastructure, including access roads, underground cabling and turbine foundations, may remain in place where their removal would itself give rise to additional environmental impacts. The practical consequence is that the planning decision made today has the potential to influence the landscape and surrounding communities for several generations.

This long-term perspective is particularly important because landscapes evolve gradually. The changes introduced by major infrastructure projects are rarely temporary. They become part of the physical character of an area and influence future planning decisions, future investment and future patterns of land use. Every significant development therefore contributes to the landscape that future generations will inherit.

In considering this proposal, it is respectfully submitted that future generations should not be viewed solely as future beneficiaries of renewable electricity generation. They are also the future custodians of Ireland's landscapes, biodiversity, cultural heritage and rural communities. Sustainable development requires that these interests are considered together rather than in isolation.

Ireland's natural landscapes represent a finite national resource. They support biodiversity, agriculture, tourism, recreation, cultural identity and community wellbeing. They also provide ecosystem services that are increasingly recognised as essential components of environmental resilience. While landscapes are capable of accommodating change, they cannot be regarded as unlimited resources whose cumulative alteration carries no long-term consequences. Once the character of a landscape has fundamentally changed through successive industrial developments, restoration to its previous condition may not be achievable within any meaningful planning timeframe.

The same principle applies to rural communities. Communities are not static. Their long-term vitality depends upon the decisions that are made today regarding housing, employment, infrastructure, environmental quality and landscape protection. Planning decisions should therefore strengthen the capacity of rural communities to remain attractive places in which future generations choose to live, work and establish families. Where communities are already experiencing demographic challenges, as identified within the applicant's own Environmental Impact Assessment Report, particular care should be taken to ensure that future planning decisions contribute positively to their long-term resilience.

Intergenerational fairness also requires consideration of Ireland's cultural inheritance. The west of Ireland contains landscapes that have evolved over centuries through the interaction of farming, settlement and the natural environment. These landscapes are more than physical settings; they are part of the country's shared history and continue to support traditions, local identity and cultural practices that remain an important element of national life. Future generations are entitled to inherit not only archaeological monuments and protected structures but also living rural landscapes that continue to reflect this long historical relationship between people and place.

This submission fully acknowledges that future generations will benefit from a successful transition to low-carbon energy. Reducing greenhouse gas emissions and

improving energy security are essential public objectives that deserve significant weight within the planning process. However, these objectives should not be pursued at the expense of other equally important responsibilities. Sustainable development requires careful balance. The challenge facing the planning system is not whether renewable energy should be developed, but how that development can proceed while continuing to protect the landscapes, communities and cultural heritage that future generations are equally entitled to enjoy.

In considering the proposed Muingmore Wind Farm, An Coimisiún Pleanála is therefore required to exercise a broader planning judgement than simply assessing compliance with technical environmental standards. The Board is asked to consider the cumulative legacy that successive developments of this nature will leave across rural western Ireland and whether that legacy remains consistent with the principles of proper planning and sustainable development.

The Lacken Ballycastle Community Landscape Protection Group respectfully submits that intergenerational fairness requires a planning approach that balances Ireland's climate ambitions with an equally strong commitment to protecting the environmental, cultural and social assets that define rural Ireland. The transition to renewable energy should not require future generations to inherit landscapes that have become progressively industrialised without a clear demonstration that such cumulative change was both necessary and proportionate. A truly sustainable planning system should ensure that Ireland passes to future generations not only a cleaner energy system, but also thriving rural communities, resilient ecosystems and landscapes whose distinctive character remains an enduring part of the nation's identity.

Conclusion

The Lacken Ballycastle Community Landscape Protection Group respectfully submits that the proposed Muingmore Wind Farm should be considered within its full planning context rather than solely as an individual renewable energy project. While the proposed development undoubtedly seeks to contribute towards Ireland's renewable electricity targets, this objective alone cannot determine the outcome of the planning process. The statutory responsibility of An Coimisiún Pleanála is to determine whether the development constitutes proper planning and sustainable development having regard to all relevant environmental, social, cultural and economic considerations.

Throughout this submission we have sought to demonstrate that the principal planning issue extends beyond the individual environmental effects of the proposed development. The proposal must also be considered in light of the cumulative concentration of renewable energy infrastructure across rural western Ireland and

the long-term consequences that this pattern of development may have for landscapes, communities, tourism, cultural heritage and balanced regional development.

The applicant's Environmental Impact Assessment Report provides a comprehensive technical assessment of the proposed development and identifies a range of mitigation measures intended to reduce environmental impacts. Those assessments perform an important statutory function and have been carefully considered. However, compliance with technical guidance and the implementation of mitigation measures do not, in themselves, establish that a development satisfies the broader statutory requirement of proper planning and sustainable development. Planning requires the exercise of judgement, balancing competing public interests and considering the cumulative implications of development over time.

This submission has identified a number of broader planning issues which, in our respectful opinion, have not been adequately addressed.

The first concerns the cumulative industrialisation of rural Ireland. The planning system continues to assess renewable energy developments primarily on an application-by-application basis, yet the lived experience of rural communities is one of successive developments, increasing concentrations of electricity infrastructure and the gradual transformation of traditional landscapes. The Board is uniquely placed to consider this wider pattern of development and to determine whether its cumulative effects remain compatible with balanced regional development.

Secondly, we submit that the receiving environment possesses significant environmental, cultural and economic value that extends well beyond its suitability for renewable energy generation. County Mayo's landscapes support agriculture, tourism, biodiversity, recreation and community life while contributing to Ireland's national identity and international reputation. These landscapes should not be regarded simply as locations capable of accommodating additional infrastructure, but as finite national assets whose long-term protection is itself a matter of public interest.

Thirdly, this submission has highlighted the importance of sustaining rural communities. The applicant's own demographic assessment identifies an area characterised by declining population, lower population density and an ageing demographic profile. These characteristics call for planning decisions that reinforce the resilience and attractiveness of rural communities rather than contributing to the cumulative pressures already experienced by many parts of western Ireland. Balanced regional development requires more than the distribution of infrastructure; it requires policies that strengthen the long-term sustainability of the communities expected to accommodate that infrastructure.

The submission has also drawn attention to the evolving role of Battery Energy Storage Systems within renewable energy developments. While recognising the importance of energy storage in supporting Ireland's electricity network, we respectfully submit that developments incorporating Battery Energy Storage Systems require particularly careful scrutiny given the pace at which the technology and associated regulatory frameworks continue to evolve. The precautionary principle remains an important consideration where infrastructure with long operational lifespans is proposed.

Finally, we have submitted that the absence of a comprehensive national spatial strategy governing the cumulative concentration of renewable energy infrastructure presents an increasingly significant planning challenge. The planning system should not permit the progressive industrialisation of particular rural regions through a succession of individually acceptable developments without considering the broader pattern of change that emerges over time. Sustainable development requires not only the achievement of climate objectives but also the equitable distribution of the responsibilities associated with achieving those objectives.

The principle of intergenerational fairness reinforces this conclusion. The decisions made today will shape the landscapes and communities inherited by future generations. Those generations are entitled to benefit from a cleaner and more sustainable energy system. They are equally entitled to inherit thriving rural communities, resilient ecosystems, landscapes of exceptional quality and a cultural heritage that continues to reflect the unique character of rural Ireland. These objectives are complementary rather than competing, and the planning system has a responsibility to ensure that progress in one area is not achieved through irreversible losses in another.

The Lacken Ballycastle Community Landscape Protection Group respectfully submits that the proposed Muningmore Wind Farm has not demonstrated that this balance has been achieved. While the development may contribute towards national renewable energy targets, we are not satisfied that it has adequately addressed the broader cumulative planning implications arising from the continued concentration of industrial-scale renewable energy infrastructure within rural western Ireland. In particular, we consider that insufficient weight has been given to the cumulative impacts on landscape character, rural communities, tourism, cultural identity and balanced regional development.

For these reasons, and having regard to the Planning and Development Act 2024, the National Planning Framework, the principles of sustainable development, the European Landscape Convention and the wider public interest, the Lacken Ballycastle Community Landscape Protection Group respectfully requests that **An Coimisiún Pleanála refuse planning permission for the proposed Muningmore Wind Farm**.

Such a decision would not represent opposition to Ireland's renewable energy ambitions. Rather, it would affirm the principle that the transition to a low-carbon economy must proceed in a manner that is fair, balanced and consistent with proper planning and sustainable development. It would recognise that Ireland's response to climate change should protect not only the atmosphere but also the landscapes, communities, cultural heritage and natural environment that define the country and which future generations have every right to inherit.

Yours faithfully

Teresa Fagan

Chairperson

Lacken Ballycastle Community Landscape Protection Group