

Martin & Eithne Cosgrove

Muingmore

Bunnahowen

Ballina

Co Mayo

F26H282

06 August 2026

An Coimisiun Pleanála

Observation on Muingmore Windfarm - Case Reference: PAX16.324387

Re: Proposed Muingmore Wind Farm, County Mayo

Dear Sir/Madam,

I wish to make an observation in relation to the proposed Muingmore Wind Farm, Case Reference **PAX16.324387**, and respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed development.

I live in the local area within 2 kilometres of the proposed turbines and have lived here all my life. I was born and raised in this area, have farmed the local land for many years, and my family has grown up here. My connection to this place goes far beyond simply living nearby. It is my home, my livelihood, and the place to which my family has deep roots and strong ties.

Through a lifetime spent living and farming in this area, I have developed a deep appreciation for its landscape, wildlife, peatlands, waterways and rural character. I have witnessed firsthand the importance of protecting the natural environment and preserving the unique qualities that make this part of Erris a special place to live and work. As someone who has cared for and worked the land throughout my life, I have a direct and personal interest in how the area is managed and developed for future generations.

I therefore have serious concerns regarding the scale and location of the proposed development, its impact on residential amenity, landscape character, peatland, water and wildlife, construction traffic and roads, and, importantly, its compatibility with the current planning policy for County Mayo.

1. Current County Mayo Renewable Energy Strategy and Material Contravention

I wish to specifically draw An Coimisiún Pleanála's attention to a significant change in planning policy that occurred during the observation period for this application.

On **13 July 2026**, Mayo County Council formally adopted the **Renewable Energy Strategy for County Mayo as Variation No. 2 to the County Development Plan 2022-2028**.

This is now operative planning policy and is not simply a draft or proposed policy.

Of particular importance, the Muingmore site is designated **"Unsuitable" for wind energy development** under the Renewable Energy Strategy.

I consider this to be a fundamental planning consideration in determining this application.

It is particularly significant that the applicant's own planning documentation acknowledges the change in policy. In Chapter 10 of the EIAR, the applicant states:

"It should be noted that the site, and indeed the predominance of County Mayo, is now located within an area deemed 'Unsuitable' for wind energy development."

The applicant therefore acknowledges that the site is now located within an area designated **Unsuitable** for wind energy development.

The application was submitted prior to the adoption of Variation No. 2. However, the planning assessment must take account of the operative planning policy in force when the application is being determined, rather than treating the position that existed when the application was submitted as permanently determinative.

I therefore ask An Coimisiún Pleanála to give full and explicit consideration to the fact that the proposed development is now in material contravention of the current County Development Plan policy designation.

The County Development Plan, including Variation No. 2 and the Renewable Energy Strategy adopted on 13 July 2026, represents the democratically adopted statutory planning framework for County Mayo. The fact that the proposed development is now located within an area designated **"Unsuitable"** for wind energy development should be afforded substantial weight. The Board should not lightly depart from the current Development Plan and should clearly identify any exceptional circumstances that would justify granting permission for development on lands now considered unsuitable for wind energy development.

In this context, I specifically ask the Board to consider **Section 37(2)(b) of the Planning and Development Act** and whether the statutory requirements for permitting a development which materially contravenes the Development Plan have been properly satisfied.

I ask An Coimisiún Pleanála to identify clearly:

1. The relevant current Development Plan policy and the "**Unsuitable**" designation;
2. Whether the proposed development constitutes a **material contravention**;
3. What statutory basis exists for permitting the development notwithstanding that material contravention; and
4. What specific planning justification, if any, has been provided for proceeding with a development on a site that the current County Renewable Energy Strategy identifies as unsuitable for wind energy development.

I believe this issue deserves significant weight and should not be treated as a minor or technical planning matter.

2. Scale of the Proposed Development

The proposed development is far more than simply the construction of a few turbines.

It includes **13 large wind turbines** reaching approximately **180 metres in tip height**, together with:

- A 110kV electrical substation;
- A Battery Energy Storage System (BESS);
- Access tracks;
- Turbine hardstands;
- Underground cabling;
- Drainage infrastructure;
- Construction compounds;
- Fencing and associated infrastructure.

The scale of this development is completely out of keeping with the character of the surrounding rural landscape.

Located within 2 kilometres of my home, turbines of up to 180 metres in height would be a highly significant and permanent feature in my surroundings.

This would not be a distant change to the landscape. It would fundamentally alter the environment in which I live and the views and rural character that currently form part of everyday life.

3. Impact on My Home and Quality of Life

My principal concern is the impact that such a large development would have on my home and quality of life.

Living within 2 kilometres of the proposed turbines means that the development has the potential to be highly visible and prominent from my property and the surrounding area.

As a resident living within 2 kilometres of the proposed turbines, I will experience the effects of this development daily throughout its operational lifetime. The impacts on visual amenity, landscape character, lighting, noise, tranquillity and enjoyment of my home are not theoretical concerns but matters that directly affect my quality of life and the residential amenity of my property.

I am concerned about:

- Turbine noise, particularly at night;
- Potential low-frequency noise;
- Shadow flicker;
- Aviation warning lights;
- Visual dominance;
- Loss of tranquillity;
- Disruption to the enjoyment of my home; and
- The cumulative effect of these impacts over the lifetime of the development.

The existing environment is characterised by peace, open space and a rural setting. The introduction of 13 turbines of this scale, together with the associated industrial infrastructure, would permanently change that environment.

4. Landscape and Rural Character

The landscape of Erris is one of its greatest assets.

The area is characterised by open bogland, expansive views, dark skies, rural roads, wildlife and a strong sense of remoteness and natural character.

The proposed development would introduce a major industrial element into this landscape.

The impact would not be limited to the turbines themselves. The access roads, turbine bases, hardstands, substation, BESS, fencing, cabling, lighting and other infrastructure would collectively create a substantial industrial footprint.

I am particularly concerned about the cumulative impact of this development alongside existing and proposed wind farms and energy infrastructure across North Mayo and Erris.

The landscape should not be considered as a series of isolated development sites. The combined effect of multiple large-scale energy developments must be considered when assessing whether this area can continue to retain its rural and natural character.

5. Peatland, Water and Environmental Impact

I have serious concerns regarding the potential impact on peatland and water quality.

The planning material refers to **Annex I Habitat 7130 - Blanket Bogs**. This is particularly significant given the wet Atlantic peatland environment in which the development is proposed.

I ask that the potential consequences of disturbing peatland are fully considered, including:

- Peat excavation;
- Peat stability;
- Peat slippage;
- Changes to natural drainage;
- Carbon loss;
- Increased runoff;
- Siltation;
- Pollution; and
- Impacts on streams and watercourses.

This is a wet Atlantic environment where periods of heavy rainfall can create significant runoff and drainage challenges.

The area contains streams, drains and water pathways, including **Doolough Stream / An Mhoing Mhor** and **Tristia Stream**, with wider hydrological connections towards **Blacksod Bay** and **Tullaghan Bay**.

I am concerned that construction activities and drainage works could have impacts extending beyond the immediate footprint of the turbines and associated infrastructure.

6. Protected Habitats and Wildlife

There are important European and national nature conservation sites in the wider area, including:

- Blacksod Bay/Broad Haven SPA (004037);
- Mullet/Blacksod Bay Complex SAC (000470);
- Bellacorick Bog Complex SAC (001922);
- Owenduff/Nephrin Complex SAC;
- Owenduff/Nephrin Complex SPA;
- Tristia Bog NHA (001566); and
- Tullaghan Bay and Bog NHA (001567).

These sites demonstrate the significant ecological importance of the wider area.

The landscape around Muingmore should not be regarded as an empty area with little ecological value. It forms part of a wider network of peatland, wetland, coastal and terrestrial habitats.

I am concerned about potential impacts arising from peat disturbance, drainage, construction activity, runoff, sediment, pollution, noise and long-term operation.

7. Birds and Bats

I am concerned about the potential effects of the proposed turbines on birds.

Important bird species associated with the wider area include Red-throated Diver, Great Northern Diver, Slavonian Grebe, Light-bellied Brent Goose, Common Scoter, Red-breasted Merganser, Ringed Plover, Sanderling, Dunlin, Bar-tailed Godwit, Curlew and Sandwich Tern.

Other sensitive species include Corncrake, Chough, Merlin, Golden Plover, Lapwing, Whooper Swan, Barnacle Goose and Greenland White-fronted Goose.

The potential for collision, displacement and disturbance must be fully considered, including:

- Flight paths;
- Breeding areas;
- Feeding areas;
- Wintering birds;
- Construction disturbance;
- Turbine collision risk;
- Displacement; and
- Cumulative effects with other wind farms.

I am also concerned about potential impacts on bats, including Leisler's Bat, Soprano Pipistrelle, Common Pipistrelle, Nathusius' Pipistrelle and Brown Long-eared Bat.

8. Battery Energy Storage System (BESS)

The proposed **Battery Energy Storage System (BESS)** is an additional major concern.

The planning documentation describes a BESS incorporating **120 battery containers and 15 inverter/power conversion containers** within a substantial compound.

This is significant infrastructure in its own right and should not simply be regarded as an ancillary component of the wind farm.

I have concerns regarding:

- Fire risk;
- Thermal runaway;
- Toxic smoke;
- Emergency response;
- Access for emergency services;
- Firefighting requirements;
- Contaminated firefighting water;
- Potential pollution of surrounding watercourses;
- Noise from cooling systems, inverters and transformers;
- Security lighting;

- Fencing and CCTV; and
- Additional visual impact.

I ask that the cumulative environmental and residential impact of the BESS, substation and wind turbines is assessed as a single development rather than considering each component in isolation.

9. Roads and Construction Traffic

I am also seriously concerned about the construction phase.

The construction of a development of this scale will inevitably involve substantial heavy vehicle movements, abnormal loads, turbine components, concrete deliveries, construction equipment and associated traffic.

Local roads are used by residents, farmers, school buses, walkers, cyclists and other road users.

There are concerns regarding:

- Road safety;
- Heavy construction traffic;
- Abnormal loads;
- Road widening;
- Damage to local roads;
- Dust;
- Mud;
- Vibration;
- Noise;
- Traffic delays; and
- Disruption to residents and businesses.

The impact on people living in the area should be given proper weight.

10. Archaeology and Cultural Landscape

The wider area also has archaeological and cultural significance.

Relevant archaeological features include the **Crannog, Dumha Locha (RMP MA025-004)**, the **Megalithic Tomb/Court Tomb (MA026-002001)**, and the **Penal Mass Station (MA026-007)**.

The potential impact should not be limited to direct physical damage.

A development involving 180-metre turbines, access tracks, cabling, a substation and BESS could fundamentally alter the setting and visual context of archaeological and cultural features.

The potential for peatland to preserve archaeological and palaeoenvironmental material should also be properly recognised.

11. Cumulative Impact and the Future of the Area

I believe the cumulative impact is one of the most important issues facing the local community.

The question should not simply be whether 13 turbines can technically be accommodated on this particular site.

The question should be whether the Muingmore development, when considered together with existing and proposed wind farms and associated energy infrastructure in Erris and North Mayo, represents an acceptable long-term outcome for the landscape and the people who live here.

There must be a point at which the cumulative industrialisation of a rural landscape becomes unacceptable.

The fact that the current County Mayo Renewable Energy Strategy now identifies this area as **Unsuitable for wind energy development** is highly relevant to that question.

12. Conclusion

I fully recognise the importance of renewable energy and the need for Ireland to develop sustainable sources of energy.

However, the need for renewable energy does not mean that every location is suitable for large-scale wind energy development.

In this case, I believe the proposed Muingmore Wind Farm is inappropriate because of its scale, location, proximity to homes, impact on residential amenity, landscape impact,

potential impacts on peatland and water, ecological concerns, construction traffic and cumulative impact on the wider Erris area.

Most importantly, I ask An Coimisiún Pleanála to give serious consideration to the fact that, on 13 July 2026, Mayo County Council adopted the Renewable Energy Strategy for County Mayo as Variation No. 2 to the County Development Plan, and that the Muingmore site is identified as Unsuitable for wind energy development.

The applicant's own EIAR acknowledges that the site is now located within an area deemed **"Unsuitable"** for wind energy development.

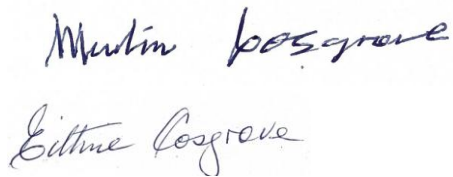
This creates a significant issue of material contravention which must be properly addressed in the determination of this application, including consideration of Section 37(2)(b) of the Planning and Development Act.

In light of the current Development Plan designation of the site as "Unsuitable" for wind energy development, the resulting issue of material contravention, the significant impacts on residential amenity, landscape character, peatland, water resources, ecology, roads and cumulative development pressure in Erris, I submit that this proposal does not represent sustainable development in the interests of the proper planning and sustainable development of the area.

I therefore respectfully request that An Coimisiún Pleanála refuse permission for the proposed development and give full weight to the current planning policy, the concerns of local residents, and the environmental, landscape, residential and infrastructural impacts outlined above.

For these reasons, I respectfully ask An Coimisiún Pleanála to refuse planning permission for the proposed Muingmore Wind Farm.

Yours faithfully,



The block contains two handwritten signatures in blue ink. The first signature, 'Martin Cosgrove', is written in a cursive style. The second signature, 'Eithne Cosgrove', is also in cursive and is positioned directly below the first. A horizontal line is drawn under the second signature.

Name: Martin & Eithne Cosgrove

Address: Muingmore, Bunnahowen, Ballina, Co Mayo, F26H282

Date: 06 August 2026