

Maura McDonagh

Geesala, Ballina, Co. Mayo, F26R990 - Tel. (097) 86962

The Secretary

An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Re: Proposed Muíngmore Wind Farm

Case Reference: PAX16.324387

5th August 2026

Dear Sir/Madam,

I wish to make an observation on the proposed Muíngmore Wind Farm.

I am in my 91st year. I was born in Tullaghaun Bawn and reside 5km away in Geesala, in Erris, where for the past 7 decades I have lived and brought up my seven children – several of whom also live in Geesala with their own children. I am a farmer with cattle on my land [albeit farmed now through my sons]. I write in respect of myself but also out of concern for my children and grandchildren and subsequent generations.

I am making this submission and observation on the following 9 grounds:

- Environmental concern for impact on watercourse and wildlife;*
- Environmental concern for impact on the blanket bog and habitat;*

- *Impact on the visual environment and associated tourism concerns;*
- *The large physical scale of the proposed development;*
- *Capacity to respond to a site emergency given the location etc;*
- *Impact on day to day life of the community and families therein [FLICKER];*
- *Impact on day to day life of the community and families therein [NOISE];*
- *Unsuitability of road infrastructure and impact on residents.*
- *Legal obligation to engage with site-specific objections and to assess the project as a whole*

1. Environmental concern for impact on watercourse and wildlife;

The proposed site is connected through its streams, drains, bogs and watercourses to the wider environment around Blacksod Bay. Water frequently travels through underground fissures and channels, meaning that impacts can occur far from the original source of disturbance.

The Mullet/Blacksod Bay Complex is protected as a Special Area of Conservation under site code 000470, while Blacksod Bay/Broad Haven is protected as a Special Protection Area under site code 004037.

These protected areas support a wide range of wildlife, including otters, harbour seals and grey seals. They also support protected birds such as the Great Northern Diver, Red-throated Diver, Curlew, Dunlin, Common Scoter and Bar-tailed Godwit.

The environmental effects of the wind farm cannot be considered only within the red line of the development site. Water moves through the bog, drains, streams and rivers before reaching the wider bay. Any increase in sediment, peat runoff or pollution during construction could travel beyond the immediate works area and affect habitats further downstream.

I am concerned that the Environmental Impact Assessment does not adequately reflect local experience of flooding and extreme weather events. The proposed development includes:

- Large turbine foundations.*
- Significant volumes of concrete.*
- New access roads.*
- Drainage works.*
- Excavation and peat disturbance.*

These activities have the potential to alter water movement within a sensitive environment. Given the importance of local water resources and the uncertainty surrounding the hydrological impacts of the development, I believe a precautionary approach should be adopted. I respectfully request that you refuse planning permission or seek independent review of the hydrological assessment.

2. Environmental concern for impact on the blanket bog and habitat;

I am particularly concerned about the scale of construction on blanket bog. Blanket bog is recognised under the EU Habitats Directive as habitat code 7130. It is an important habitat that stores carbon, holds water and supports plants, birds and other wildlife.

The development would require the excavation of considerable volumes of peat for turbine foundations, access roads, cable routes, the substation and the battery storage compound. Cutting through the peat and changing the natural drainage could affect a much wider area than the direct footprint of the works. Water could be held back in some places while other parts of the bog could begin to dry out.

The land is also sloping in parts. Peat can become heavily saturated after long periods of rain, which are common in the Erris region. This raises a genuine concern about peat movement, slope failure and the possibility of a landslide.

I respectfully submit that any Decision Maker must know what - if any - detailed investigations have been carried out by the Applicant at each turbine location, along every new road and cable route, and at the proposed substation and BESS compound. It is not enough to give general assurances about peat stability. The risks should be properly assessed for each individual part of the site before any planning decision is made as to do otherwise would render the decision being made in an informational vacuum without the necessary assessments and results being known at the time the decision is made.

I am also concerned that some important design and construction matters may be left to be decided later. The final foundation designs, piling methods, drainage details and water protection measures should be available for the public and An Coimisiún Pleanála to examine now. These matters could have a major effect on the bog, water quality and nearby communities. Any decision made in the absence of such information and assessments would be susceptible to challenge.

3. Impact on the visual environment and associated tourism concerns;

Tourism is very important to the entire Erris region. Both my children and Grandchildren have worked in local hotels and bars over the years - and some still do. These jobs gave/give them both income and opportunity and are very important for young people growing up in rural areas. The rich resource of Erris is in its natural and unspoilt beauty.

The prospect of Thirteen wind turbines, reaching approximately 180 metres in height, would be visible across a wide area. Together with the new roads,

compounds, security fencing, lighting, substation and battery storage facility, the development would introduce a major industrial presence into the landscape. This would, sadly, be a blot on an otherwise wild and unspoilt vista which is an increasingly rare phenomenon in this country.

I respectfully submit that the potential impact on tourism and local employment related to such tourism needs to be assessed and considered in far greater depth. The landscape and natural environment already support local businesses and provide employment for families and young people. The building of such a large scale wind turbine facility would have a devastating effect on what is the only natural resource in the area which provides income and employment opportunities.

4. The large physical scale of the proposed development;

This is not a minor development. The application proposes thirteen wind turbines with a blade tip height of up to 180 metres, a rotor diameter of up to 163 metres and a hub height of up to 105 metres, together with foundations, hardstands, underground cabling, site tracks, a temporary construction compound, peat and spoil management areas, road works, drainage and numerous other associated ancillary infrastructure.

The applicant also seeks a ten year permission and a 35 year operational life from commissioning. The applicant's own Natura Impact Statement also states that, for assessment purposes, the overall project includes both the wind farm and the grid connection. This is therefore a long-term industrial scale development with extensive associated works and effects, and it must be assessed on that basis.

I am especially concerned about the proposed Battery Energy Storage System, or BESS. The application describes a compound containing **120 battery**

containers and 15 inverter containers, within an area measuring approximately 156 metres by 99 metres.

This is a very large development in its own right. I respectfully submit that the Decision Maker in this matter requires [but has not been provided with] a clear explanation as to why a battery facility of this scale is required for thirteen turbines. It must surely be established by the Decision Maker – if they are to make a truly informed decision - whether it is intended only for the Muingmore Wind Farm or whether it could also store electricity from other projects or from the wider national grid? The necessity of such a development in the overall context of the Applicant's construction proposals requires closer scrutiny by the Decision Maker or the decision made will not be fully informed.

5. Capacity to respond to a site emergency given the location etc;

The risks associated with the BESS must also be fully considered. These include the possibility of fire, thermal runaway, noise from cooling equipment, security lighting, polluted firefighting water and the ability of the local emergency services to deal with a serious incident.

The public should be able to see a full emergency response plan before any permission is granted. The details should include access for fire services, water supplies, containment of contaminated water and procedures for protecting nearby residents and the environment.

6. Impact on day to day life of the community and families therein [FLICKER];

My home is in Geesala, a little over a kilometre from the proposed site. From a review of the applicant's shadow-flicker maps, it appears that my house may experience some shadow flicker.

I would like to know exactly how many hours my home could be affected, what time of day it could happen and during which months of the year. The assessment should be based on the final turbine model, blade size and exact turbine locations. However, as is apparent from the Applicant's own application documents, they do not know what size or model of turbine will be installed at this point. The Applicant therefore requests the Planning Authority to approve this project without key information being known or available to it.

In such circumstances, a promise from the Applicant to shut down a turbine after shadow flicker occurs does not remove the concern. Local residents should know before permission is granted what the likely effect will be on their homes and daily lives. I would respectfully submit that the Planning Authority MUST know such effect and impact, in order to properly consider and assess the Applicant's application. In the absence of such information, the application should, with respect, be refused.

My family home is less than 2km from the nearest turbine. I reside in the village of Geesala with my family beside me, across the road. At that distance, I am concerned that the proposed development would have a direct and serious effect on our residential amenity through noise, vibration, visual dominance and shadow flicker. Given the proposed 35 year operational life, this is not a temporary or short-lived interference but a long-term alteration of the living environment of my family and our homes.

The impact on residential amenity is compounded by the scale of the project. The material before the planning authority acknowledges that turbine dimensions have a bearing on shadow flicker and noise. I am informed that shadow flicker at my home may arise albeit the potential duration is unknown at this remove – which in and of itself is concerning. Even before one considers the separate issue of construction impacts, such degree of repeated daily

flicker, combined with turbine noise and vibration, would represent a serious and unacceptable interference with ordinary family life, health, rest and enjoyment of the home.

Construction phase effects are also material. The documentation confirms that peat extraction will be required and that excavation groundworks may involve rock breaking and potentially blasting, and that abnormal-load turbine deliveries, local road widening and accommodation works are proposed on the surrounding road network. Those matters raise obvious and legitimate concerns in relation to vibration, disturbance, traffic risk, noise and disruption for nearby residents and land users.

7. Impact on day to day life of the community and families therein *[NOISE];*

One of my principal objections concern the Applicant's treatment of amplitude modulation. The Applicant's own Environmental Impact Assessment Report expressly states that it is not possible to predict an occurrence of amplitude modulation at the planning stage. It also states that there is nothing at the planning stage that can presently be used to indicate a positive likelihood of other amplitude modulation occurring at any given proposed wind farm site. The same material defines amplitude modulation as periodic fluctuations in the level of audible wind turbine noise linked to blade passing frequency, and accepts that so-called other amplitude modulation may be heard as periodic thumping or whoomphing at relatively low frequencies and may persist for several hours depending on atmospheric conditions, including wind speed and direction.

That is an important admission. The planning authority is being asked to make an informed decision on residential amenity and human health, yet the Applicant accepts that one of the most intrusive potential characteristics of turbine noise cannot be predicted in advance and cannot be positively ruled

in or out at this site. The same chapter also accepts that there is no clear industry or governmental consensus on how amplitude modulation should be regulated or managed through the planning and operational stages.

That uncertainty is especially serious in this case because the Applicant's own survey describes the surrounding noise environment as one where the principal baseline sources are occasional local traffic, farming activity, birdsong and distant agricultural activity, with no indication of significant local night-time noise sources. The same chapter identifies the surrounding noise-sensitive locations as areas of low background noise. In such a setting, a pulsing or beating turbine noise is likely to be materially more noticeable and more disturbing than a steady average sound level.

The applicant's proposed response to this problem is not to assess and exclude amplitude modulation now, but to deal with it only after complaints arise. The Environmental Impact Assessment Report states that assessment of amplitude modulation is typically triggered in response to complaints, because the specific location or locations at which it presents cannot be predicted at planning stage. It further states that, if a complaint or exceedance arises, the operator will investigate and may then implement mitigation such as a curtailment programme under a Noise Complaint Monitoring Programme. In substance, the planning authority is therefore being asked to grant permission first and investigate later. That is not a sufficient evidential basis for an informed planning decision where a nearby family dwelling and working farm are concerned.

There is also a further internal inconsistency in the applicant's case. The same chapter states that there were no difficulties or limitations encountered when undertaking the assessment. That assertion sits uneasily beside the repeated admission that amplitude modulation cannot be predicted at planning stage, that nothing can positively indicate its likelihood at a proposed site, and that

its specific occurrence is only typically investigated after complaint. In my submission, that inconsistency materially undermines the confidence that can properly be placed in the chapter's conclusion that operational noise effects will be not significant.

I am also concerned that the application does not properly assess the risk of enhanced amplitude modulation and adverse turbine noise character at my dwelling. Using general technical knowledge, terrain characteristics, including open or relatively flat ground conditions, together with atmospheric stability, wind shear and wake effects, are recognised risk factors for turbine noise presenting as pulsing, beating or thumping noise. Such noise can be significantly more intrusive than average noise levels alone would indicate. Given the quiet rural setting and the proximity of my family home, it is not sufficient to rely on generic compliance conclusions under the Wind Energy Development Guidelines for Planning Authorities (2006) or ETSU-R-97.

8. Unsuitability of road infrastructure and impact on residents.

The construction traffic is another major concern. Many of the roads around Geesala, Doolough and the surrounding areas are narrow, have soft edges and pass over bog or weak ground. They were not built to carry large numbers of heavy construction vehicles.

The development would involve concrete lorries, stone trucks, cranes, abnormal turbine loads and other heavy vehicles. The weight and volume of this traffic could cause road damage, subsidence and broken road edges.

The same roads are used every day by residents, school buses, farm vehicles, cyclists, walkers and emergency services. The applicant should provide a detailed structural survey of every road that would be used. This should be completed before permission is granted and should be available to the public.

There should also be clear information on the number of daily vehicle movements, the hours when deliveries would take place, possible road closures and how residents would safely travel to work, school, shops and medical appointments.

Repairing roads after construction would not undo years of disruption or remove the danger created during the works. The safety and structural ability of the road network should be proven before the development is allowed to proceed.

9. Legal obligation to engage with site-specific objections and to assess the project as a whole

*The applicant's own noise chapter states that it relies on the Wind Energy Development Guidelines for Planning Authorities (2006), together with ETSU-R-97 and other guidance, while also acknowledging the existence of more recent draft guidance. In that regard, I rely on *Balz & Heubach v An Bord Pleanála* [2019] IESC 90, in which the Supreme Court made clear that section 28 guidelines are the starting point, and often the finishing point, but that where information and submissions are put before the decision-maker suggesting that the authority should go further, the authority must engage with that material and, if rejecting it, must give reasons.*

That principle is directly relevant here. I am not suggesting that the planning authority must disregard the 2006 Guidelines. I am saying that the authority cannot simply stop there. It must specifically engage with the matters I am raising, including the fact that I am a concerned local resident, the effect of construction traffic and industrial activity on my well-being and enjoyment of my home, the effect of possible turbine flicker and noise on my peace and enjoyment of my property and my concerns for the various and multitudinous environmental impacts of this proposed development as set out herein.

I also relying on the decision in *Nagle View Turbine Aware Group v An Bord Pleanála* [2024] IEHC 603 and *Nagle View Turbine Aware Group [No. 2] v An Bord Pleanála* [2025] IEHC 3.

Nagle View [No. 2] [2025] IEHC 3 is relevant because the High Court emphasised that complaints of lacuna or incompleteness must rest on a concrete factual basis. My submission does exactly that. My concerns are not abstract. They are grounded in the applicant's own material and in the specific circumstances of my home and farmlands.

The applicant's own Environmental Impact Assessment Report and Natura Impact Statement say that the proposed project includes not only the wind farm but also the grid connection, including the proposed on-site substation, underground cabling and end masts. That is important in light of *Ó Grianna v An Bord Pleanála* [2014] IEHC 632, where the High Court held that a wind farm and its grid connection could not be artificially separated where, in reality, they formed part of the same overall project. The planning authority must therefore assess the full burden of this project on adjoining lands as a whole. It should not look at the turbines in isolation and ignore the combined effect of turbine proximity, construction traffic, access works, road widening, substation and grid infrastructure, cable route works, soil disturbance, invasive species risk, and long-term operational effects.

Summary

Having considered the size and location of this proposed development, the risks to the blanket bog and water environment, the possible effect on protected sites, the impact on local roads and tourism, the size of the BESS facility and the effect on nearby homes, I do not believe this is a suitable development for this location. The lack of specific information on key aspects of the development e.g. the turbine size and model, as well as the lack of consideration of the real impact of the noise and flicker effect of these turbines,

means that the Planning Authority is being asked to approve a project where the full and true impact of same is unknown. This cannot be acceptable or permitted.

*In all the circumstances pertaining hereto, I respectfully ask An Coimisiún Pleanála to refuse permission for the proposed Muingmore Wind Farm under case reference **PAX16.324387**.*

Is Mise le Meas,

Maura McDonagh