

**Michael Munnelly,
Tristia,
Mount Jubilee,
Bangor Erris,
Ballina,
Co. Mayo, F26V006**

30 July 2026

Re: Planning Observation on Proposed Muingmore Wind Farm Development

An Coimisiún Pleanála Case Reference: PAX16.324387

Dear sir/madam

I Michael Munnelly of Tristia, Mount Jubilee, Bangor Erris, Ballina Co. Mayo, wish to object to the proposed Muingmore Wind Farm (Case Reference: PAX16.324387).

It is important for me to state that I do not object to the development of renewable energy infrastructure in Ireland. However, the proposed site and the scale of this development is wholly inappropriate and would be to the great detriment of the native community and environment in an area which shows evidence of continuous settlement for millennia. It is my intention to outline here the reasons for my objection to the proposal.

To begin, I feel it is relevant for me to state my personal connection to the site. My family has been settled in Tristia (also known as Mount Jubilee) and its environs for countless generations. The earliest reference to the Munnelly family in the locality appears in a sixteenth century document

listing individuals in conflict with crown forces. Our home and its farm, built by my paternal grandparents, overlooks the proposed site and takes in the broad and unbroken expanse of headland and sea which comprises the coastline of Erris and Achill Island in the distance. Proof that this view has had significance since neolithic times is evidenced by the remains of a court tomb situated on our land just below the house (MA026-002001). A boulder which sits in the garden has been examined by archaeologists who claimed that it exhibited manmade indentations and markings and may have been used as an altar. On the other side of the hill there is a penal mass station and chapel, which also has a history as a sacred site dating to pre-Christian times. I have been raised on stories of fairies, spirits and heroes born from this landscape and passed on by family and neighbours now gone. There is a very real sense of tranquility and continuity here, and of something undefinable and unmoved by time.

It must be recognised that this proposal is not merely a small-scale project; it represents a massive industrial development in an open rural landscape. The plan includes:

- 13 large wind turbines reaching up to approximately 180 metres in tip height.
- A 110kV substation and a substantial Battery Energy Storage System (BESS).
- Associated infrastructure including access tracks, hardstands, cabling, drainage systems, and construction compounds.

Turbines of this scale will permanently alter the landscape, views, roads, and peaceful rural character of Erris which has been the inspiration for internationally renowned artists and poets, including Jack B. Yeats, Paul Henry and John Millington Synge. The cumulative impact of this development alongside existing and proposed wind farms and energy infrastructure across North Mayo must be thoroughly scrutinised as overwhelming one concentrated portion of the county.

The development site is located within an ecologically sensitive landscape, surrounded by nationally and internationally protected European sites:

- Blacksod Bay/Broad Haven SPA (site code 004037)
- Mullet/Blacksod Bay Complex SAC (site code 000470)
- Bellacorick Bog Complex SAC (site code 001922)
- Owenduff/Nephin Complex SAC & SPA
- Tristia Bog NHA (site code 001566) and Tullaghan Bay and Bog NHA (site code 001567)

Crucially, the applicant's planning documents identify the presence of Annex I Habitat 7130 - Blanket bogs, with active blanket bog classified as a priority habitat under the EU Habitats Directive. Degraded or cutover peatland must not be dismissed as mere ordinary wet ground; it remains Annex I habitat and holds vital restoration potential. I request that An Coimisiún Pleanála independently verify any claims that active blanket bog or priority habitats will not be impacted. Given the wet Atlantic climate and heavy local rainfall, peat excavation, drainage alterations, and construction work pose severe risks of peat slippage, slope instability, carbon loss, and silt/pollutant runoff. Water pathways like the Doolough Stream (An Mhoing Mhór), Tristia Stream, and An Ráith directly link this site to sensitive marine and coastal systems in Blacksod and Tullaghan Bay.

The applicant's documentation acknowledges important bird and animal species within the site and surrounding area:

- Protected SPA Birds: 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.
- Sensitive Species: Corncrake, Chough, Merlin, Golden Plover, Lapwing, Whooper Swan, Barnacle Goose, and Greenland White-fronted Goose.

- Local Survey Records: Common Snipe, Woodcock, Kestrel, Meadow Pipit, Linnet, Lesser Redpoll, Reed Bunting, Redwing, and Twite.

Comprehensive assessments are needed regarding collision risk, flight paths, displacement, and breeding/feeding habitat loss. In addition, local populations of protected mammals—such as bat species (Leisler's, Pipistrelle, Myotis, Brown Long-eared) and Otters—as well as aquatic life will be disrupted by construction and operation. Only recently, I myself have witnessed Otters and Pine Marten close to the proposed site, and I am concerned at the impact the proposed development will have on the habitat of these creatures.

The proposed BESS compound—spanning approximately 156m by 153m by 99m with a 2.6m high palisade fence—includes 120 battery containers and 15 inverter/power conversion containers. This raises the following concerns:

- Safety & Environment: There are serious risks regarding thermal runaway, fire, toxic smoke, and the adequacy of local emergency services to respond to a fire. Contaminated firefighting runoff presents a grave threat to local waterways.
- Operational Impact: Continuous noise from HVAC cooling systems, inverters, and transformers, along with industrial lighting and security installations, will degrade night-time quiet and cause severe light pollution in the area.
- Proportionality: Questions remain over whether a BESS of this size is proportionate to a 13-turbine farm or is intended for wider commercial grid operations.

As for the impact on the local community, the potential consequences of a development of these proportions must be considered:

- Noise & Flicker: Continuous turbine operation, low-frequency noise, and night-time humming from the BESS will disrupt sleep, health, and well-being. Moving turbine blades will cause shadow flicker across homes, local gardens, and farms.
- Light Pollution: Flashing aviation safety lights across 13 turbines, combined with BESS security lighting, will erase the dark skies of Erris.
- Tourism: Erris' growing tourist economy would undoubtedly be impacted by the dominance of the proposed turbines in a landscape praised for its rugged beauty and vastness.
- Traffic & Daily Life: Local roads and the Bangor road are narrow and used by school buses, tractors, joggers, and vehicles. Heavy construction lorries, abnormal turbine loads, dust, mud, road widening, and structural vibrations will cause severe daily disruption and create safety hazards for residents, particularly children and the elderly.

As I have acknowledged previously, the site and surrounding area carry significant historical and cultural weight, including key recorded monuments:

- Crannóg, Dumha Locha (RMP MA025-004)
- Megalithic Court Tomb (MA026-002001)
- Penal Mass Station (MA026-007)

Peatland soil is acknowledged to be a remarkable preservative of unexcavated archaeological material. There is the potential that undiscovered finds could be lost in the necessary aggressive development at the site. The construction of heavy turbine bases, cabling, access tracks, and industrial buildings will irreversibly damage not only physical archaeology but also the historical setting, cultural landscape, and sense of place in the locality.

Finally, I wish to highlight that on 13 July 2026, Mayo County Council adopted Variation No. 2 (Renewable Energy Strategy) to the County Development Plan 2022–2028. As conceded in Chapter 10 of the applicant's EIAR, the subject site is located in an area explicitly designated as "Unsuitable" for wind energy. Allowing this project would constitute a material contravention of the local development plan. Under Section 37(2)(b) of the Planning and Development Act, An Coimisiún Pleanála should not grant permission in material contravention of a plan, unless extraordinary justification is established. The applicant has not established extraordinary justification.

The character of Erris relies on its peaceful environment, wild Atlantic landscapes, intact boglands, dark skies, and vibrant community. The impact of this proposal threatens our very sense of place, and more tangibly the fabric of the environment and the creatures which exist in this setting. We must protect our environment and seek sustainability in all things, but we must seek to do so in a balanced and thoroughly considered manner. The proliferation of similar and proposed developments within such a small region requires real scrutiny. The contravention of the local development plan, with no extraordinary justification being given, is a clear warning that this plan is essentially cursory in nature.

I ask that An Coimisiún Pleanála give full weight to the cumulative impacts on protected peatland, bird species, local community, culture & archaeology, water safety, and community safety that the proposed development would have. For the reasons outlined, I respectfully ask that permission for Case PAX16.324387 be refused.

Mise le meas,

Michael Munnelly