FORMAL SUBMISSION TO AN COIMISIÚN PLEANÁLA

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Co.Mayo
F26 H9 C2
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Planning Reference: PAX16.324387
Proposed Development: Muingmore Wind Farm
Applicant: RWE Renewables Ireland Limited
Location: Townlands of Muingmore and Doolough, County Mayo

Dear Sir/Madam,

I wish to make a formal observation objecting to the proposed Muingmore Wind Farm, PAX16.324387. Permission should be refused.

I live in Mount Jubilee with my husband and our three young children. Our home is identified as House 50 in the application documentation and is approximately 850 metres from the nearest proposed turbine. This decision will not affect us for a few months or for the duration of a construction contract. It will affect how we live in our home, our children's daily lives and the place we hope, one day, to leave to them.

Introduction

I was born and reared in Erris. I moved to Dublin for work when I was younger, but I always knew I wanted to come home. I returned fourteen years ago because this is where I wanted to live and where I wanted to bring up my three children.

I love the peace and quiet here. Life is slower and more relaxed. Our house is on high ground, and we can see for miles across Geesala, Doohoma and towards Ballycroy. On clear nights, I sit outside with my children, and we look at the stars. We have even watched the Northern Lights from our own garden. These are simple moments, but they are a big part of why I love living here.

Because the area is so quiet, sound travels across the bog. You can hear things from a long distance away, especially at night when everything is still. That is why I am so worried about the noise from turbines of this size. This is not an area with constant traffic or background noise. The quietness is one of the things that makes living here so special.

We also love the wildlife around us. We are always spotting animals when we are out walking or driving. We see hares, deer and foxes. We hear corncrakes. We have seen otters and their young crossing the road. These are not animals we only read about or see in photographs. They are part of the place where we live, and my children have grown up watching for them.

I walk my dog every day along these roads. My children often walk or cycle beside me. I do not worry about them because the roads are quiet and they feel safe. I keep asking myself if that will still be the case if this development goes ahead.

Every morning, I drop my daughter to the collection point for her secondary school bus. My younger children travel on the national school bus. These buses already have to travel on narrow country roads. How are they meant to travel safely if they are meeting heavy construction traffic, abnormal loads, roadworks and temporary traffic lights?

These are not small concerns to me. This is our everyday life.

My home is also the biggest investment my husband and I have made. We worked hard for it, and we have built our family life here. I am deeply worried about what will happen to its value if this wind farm is allowed to go ahead. Who will want to buy a house surrounded by views of turbines, aviation lights, construction traffic, noise and shadow flicker? I fear that our home may lose a large part of its value. To us, it is our home and we do not intend to leave, but that does not mean its value should be allowed to fall because of a development we never asked for.

I also love everything about Mount Jubilee, especially the pride people have in being from Mount Jubilee village. Families here have strong ties to the land, the bog, the old school, the church and the history of the area. People care deeply about where they come from. I have no doubt that a wind farm of this size would change the village and the wider area completely.

I have spent months reading the Environmental Impact Assessment Report, the Natura Impact Statement, the technical appendices, maps, figures and supporting material. I have gone back and forth between chapters because information that appears reassuring in a main EIAR chapter is sometimes qualified by a limitation, an assumption or a different figure contained in an appendix. This should not be the case.

My objection is not based on one issue. It arises from the overall scale of the development, the distance from homes, the uncertainty over the turbine model, the predicted shadow flicker, noise, traffic, road safety, effects on the bog and water environment, risks to protected wildlife, the proposed aviation lighting, the lack of meaningful community engagement and the number of important details left to be decided after permission.

This is an application for permission to place very large industrial structures within an existing community. People already live here. Children already travel these roads. School buses already use them. Residents walk, cycle, drive to work, visit elderly relatives, farm their land and bring children to school and activities.

The development has to fit safely into that existing environment. The community should not be expected to reorganise its life around the construction and operation of the wind farm.

The impacts cannot be separated from each other.

The application must therefore be assessed as a complete project and not as a collection of separate technical chapters.

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1. SHADOW FLICKER AND THE EFFECT ON LOCAL HOMES

1.1 My concern as a resident 850m from the nearest turbine.

Shadow flicker is not an abstract figure to me. It concerns what will happen inside my home if this proposal is granted.

My house is identified as House 50. I have children living here. Our rooms are used throughout the day for ordinary family life. The assessment should tell me clearly whether moving turbine shadows are predicted to enter my home, which rooms and windows may be affected, what months the effects may occur, what times of day they are predicted and which turbine or turbines would cause them.

The application does not give me that clear, house-specific answer.

Instead, residents are presented with computer-generated totals and are expected to rely on a future turbine shutdown system. That does not give me confidence that the effect on my own home has been properly examined.

A turbine blade passing between the sun and a house can create repeated changes between light and shade. This would not be comparable to a passing cloud. Depending on the position of the sun and turbine, the change can repeat as the blades rotate.

Inside a home, that may be experienced across a wall, floor, window, television screen or other part of a room. It can interrupt work, meals, homework, rest and normal use of a room. Where it occurs in the early morning or evening, it may affect bedrooms and family routines.

The fact that an event may occur only at certain times of the year does not make it acceptable. Predictability does not remove the disturbance.

1.2 The applicant's own results show a layout-dependent problem

The applicant's own modelling predicts considerable shadow flicker before mitigation.

The figures identified in the application are substantial.

The daily 30-minute guideline is exceeded at 37 receptors under Scenario 1, 41 receptors under Scenario 2 and up to 49 receptors under Scenario 3.

Under the worst annual scenario, Receptor 44 is modelled at approximately 80.9 hours. The worst-day result is approximately 82.2 minutes under Scenario 3, while Receptor 47 is modelled at approximately 72 minutes on its worst day.

The uploaded submission also identifies up to 38 homes as exceeding the annual 30-hour figure before mitigation.

These are not isolated or marginal effects.

When dozens of receptors exceed the daily guideline before mitigation, that indicates a problem created by the physical layout. It means the turbines have been positioned so that substantial predicted effects are generated at surrounding homes and then dealt with through proposed operational shutdowns.

That is the wrong order.

The first planning response should be to avoid or reduce the effect through turbine positioning. A shutdown system should not be used to justify an otherwise unacceptable layout.

1.3 Standardised house and window dimensions

I am particularly concerned about the information used to represent local houses.

Technical Appendix 11-1 appears to apply repeated standard dimensions to a large number of receptors. The dimensions recorded include a width of 10 metres, a depth of 5 metres and a height of 3 metres.

The issue is not simply whether those dimensions are described as conservative.

Homes in Muingmore and Doolough are not identical boxes. They differ in orientation, elevation, window position, extensions, room use, surrounding vegetation and the direction each house faces.

One house may have a large living-room window facing a turbine. Another may have a child's bedroom on that side. A house may have a kitchen or home-working space facing the evening sun. Trees, sheds and neighbouring buildings may also affect when shadow reaches a window.

A generic model cannot identify those differences.

The use of a large theoretical window may increase a calculated surface area, but it does not establish which real window would be affected or how the shadow would enter an occupied room. It does not tell a family whether a bedroom, kitchen or living area would experience the effect.

The assessment should have included a proper survey of homes predicted to experience significant shadow flicker. At a minimum, it should have recorded the orientation of each relevant house, the position and dimensions of affected windows, and whether those windows serve a bedroom, kitchen, living room or other frequently occupied space.

It should also have recorded extensions and roof windows, local ground level and elevation, existing screening, the turbine responsible for each predicted event, and the precise dates and times when the effect is predicted.

This is particularly important where the applicant intends to use house-specific shutdown programming.

A shutdown system cannot be accurately programmed unless the information about the house is accurate.

1.4 Uncertainty over the final turbine

The applicant has not selected the final turbine model.

The design range includes differences in rotor diameter, hub height and blade dimensions. Those differences can change the timing and duration of shadow flicker.

A larger rotor can cast a shadow over a different area. A different hub height changes the position of the rotor relative to the sun and nearby houses. The speed and operational characteristics of the selected machine may also affect how the shadow is experienced.

The shadow-flicker chapter must therefore demonstrate that the assessed turbine is genuinely the worst case for every affected receptor.

It is not enough to state generally that a worst case has been assessed. The application does not identify the turbine model used for each scenario; the hub height and rotor diameter used; why that configuration represents the worst case; whether another candidate turbine could produce a longer effect at certain homes; whether the final turbine can be selected without rerunning the assessment; or how the final shutdown calendar will be checked against the actual turbine installed.

The application seeks permission for a range of turbine models, but it has not established that every model within that range will remain within the assessed limits at every receptor. Permission cannot safely be based on that uncertainty.

1.5 Dependence on an automated shutdown system

The applicant proposes to manage shadow flicker through an automated shutdown protocol.

That approach raises practical questions which are not adequately answered by saying that shadow flicker is capable of mitigation.

A shutdown system would have to remain accurate and operational over the full life of the wind farm. It would depend on correct house coordinates, correct window information, accurate turbine positioning, maintenance of sensors, reliable software, accurate time settings and suitable monitoring of sunlight and weather conditions.

The application does not state whether the system will use astronomical calculations alone or real-time sunlight sensors, how cloud conditions will be recorded, whether a turbine will shut down before a predicted event begins or how quickly it will restart.

The application also does not explain what happens if a sensor, communications link or control system fails, how residents can report an unpredicted event, how quickly a complaint must be investigated, whether residents will receive the shutdown record, who will independently audit the system, what corrective action will follow a missed shutdown or how the system will be updated after changes to a house, window or surrounding screening.

The condition should not place the burden on residents to repeatedly prove that shadow flicker is occurring.

The application does not secure a clear and enforceable obligation on the operator to prevent shadow flicker rather than leaving residents to repeatedly prove that it is occurring.

1.6 Screening is not a complete answer

Curtains, blinds, planting or other measures at residents' homes are not an adequate answer to shadow flicker caused by the development.

Residents should not have to keep blinds closed to make their homes liveable. A house may already rely on natural light. Planting may take years to mature, may lose leaves, may fail in exposed conditions and may not screen an elevated rotor.

It would also be unreasonable to interfere with a resident's view or daylight to compensate for a problem caused by a commercial development.

The mitigation must be applied at the turbine, not imposed on the householder.

1.7 Gaps in the house-specific shadow-flicker assessment

The shadow-flicker assessment is incomplete because it does not contain a verified, house-specific assessment for every materially affected receptor.

For House 50, there is no clear confirmation of the annual predicted exposure under every turbine scenario; the maximum daily exposure; the turbines responsible; the months and times involved; the windows and rooms potentially affected; the assumptions made about my home; or the exact shutdown measures proposed.

The present assessment shows that the layout creates extensive effects and then depends on software to correct them.

In my view, that is not an acceptable basis on which to grant permission.

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2. ROADS, SCHOOLCHILDREN, SCHOOL BUSES, WALKING AND PUBLIC SAFETY

2.1 The roads are part of daily life

The roads around Muingmore and Doolough are local rural roads. They are not separate construction corridors.

They are used every day by residents going to work, parents bringing children to school, school buses, farmers, delivery drivers, older people, cyclists, walkers and emergency vehicles.

My children use these roads. We walk our dog along these roads everyday. Our children play outside their home. They cycle and walk between houses. Those activities may not appear in traffic counts, but they are part of the existing road environment and must be considered.

A traffic assessment based mainly on vehicle numbers can miss the most vulnerable road users. A child walking at the road edge is not represented by an annual average daily traffic figure. Neither is a parent pushing a buggy, a person walking a dog or a child waiting for a school bus on a dark winter morning.

2.2 Scale of the proposed construction traffic

The traffic figures identified from Chapter 14 indicate a very large increase during peak construction.

The figures include up to 311 HGV movements and 51 light-vehicle movements per day. The uploaded submission calculates that this could amount to a 2,592 per cent increase in HGV movements and a 593 per cent increase in total traffic on parts of the local network.

It also refers to 234 Abnormal Indivisible Load movements associated with turbine components.

Even allowing for differences between a "movement" and an individual vehicle, this represents a major change in the character and use of the roads.

It is not enough to say that the increases will be temporary. A construction period of months or years is not temporary in the daily life of a child travelling to school.

2.3 School-bus safety

School buses operate to a timetable. Our children wait at informal collection points beside the road.

The application does not identify every school-bus route and collection point that could interact with construction traffic. It also does not assess the actual times at which buses travel, relying instead on general daytime traffic periods.

Particular attention is needed during morning school-bus collection; afternoon return times; periods when children cross the road to reach a bus; winter mornings and evenings when visibility is poor; bad weather; periods of roadworks or temporary traffic lights; and abnormal-load movements.

A construction traffic plan prepared after permission would be too late to establish whether the proposed traffic can safely coexist with school-bus services.

This information was needed before the application could be properly decided. It should not have been left for a later construction traffic plan.

There should be no assumption that the school bus can simply change route or alter its timetable. The service exists for local children. It should not be made less reliable or less safe to accommodate the development.

The assessment must also consider what would happen if a school bus and an HGV meet on a narrow section of road where neither can pass safely. Reversing a large vehicle over a distance creates a further hazard. Reversing a bus carrying children is not an acceptable routine solution.

2.4 Walking and cycling

Many parts of the local road network have no footpath, no cycle lane and little or no hard shoulder, it's a one lane road along the grassmeale. Two cars can not pass together at the same time.

Walkers use the road edge. Children cycle locally. People walk dogs. Residents may need to step onto a soft verge or into vegetation when a vehicle passes.

The effect of a large HGV is different from that of a car. It occupies more road width, has larger blind spots, requires more stopping distance and can create spray, noise and air movement as it passes.

Where road edges are peat-based, soft or poorly supported, repeated heavy traffic can also damage the limited space used by pedestrians to move aside.

The traffic assessment does not include a road-safety audit carried out from the perspective of a pedestrian and child. It is assessed mainly from the perspective of vehicle capacity.

It does not identify sections with no safe refuge; blind bends and crests; narrow bridges and culverts; entrances where children may emerge; school-bus stops; walking routes used by residents; locations where roadside vegetation reduces visibility; places where road flooding or ponding occurs; or areas where an HGV cannot pass a pedestrian while maintaining a safe distance.

Without that work, the assessment does not establish that the routes are suitable.

2.5 Temporary traffic lights, convoys and delays

The construction of the project is likely to require road controls, escorts, temporary traffic lights, stop-and-go arrangements and restrictions during abnormal-load deliveries.

The application does not specify where those controls would be placed or how long residents could be delayed.

A delay is not merely an inconvenience where a resident is travelling to work, collecting a child, attending a medical appointment or waiting for emergency assistance.

Repeated road closures or traffic holds could also divide the community. Residents may avoid certain routes or stop walking because they no longer feel safe.

The cumulative effect over a prolonged construction period needs to be assessed honestly.

2.6 Road strength and condition

The local roads were not designed for the proposed intensity of heavy industrial traffic.

A visual road inspection is not enough. The application does not provide proper information on pavement construction, road width, sub-base condition, culverts, bridge capacity, verge stability or drainage.

The road network is located in an area containing peat and soft ground. Repeated loading may cause rutting, edge failure, settlement or damage that is not immediately visible at the surface.

The application contains no pre-construction survey with structural testing and a full photographic and video record agreed with Mayo County Council and made publicly available.

Monitoring should continue during construction, not only before and after it.

Waiting until the end of construction to repair damage would not protect residents while the damaged road remains in use.

2.7 Emergency access

The traffic assessment must address emergency access in detail.

The traffic assessment does not explain how an ambulance, fire appliance or Garda vehicle would pass an escorted abnormal load, a convoy of construction vehicles, temporary traffic controls, road-widening works, a stopped or broken-down HGV or a section reduced to one-way traffic.

This is particularly important in a rural area where emergency response journeys may already involve considerable distances.

A general statement that emergency access will be maintained is not sufficient. A workable protocol must be presented and agreed before permission.

2.8 Night-time deliveries and turbine erection

The application refers to the possibility of abnormal turbine loads being delivered outside normal working hours.

Night deliveries would create their own effects. These include headlights, escort vehicles, flashing beacons, engines, braking, reversing alarms, traffic control, communication between workers and disturbance outside local homes.

The application does not clearly explain what would happen when the components arrive at the site.

Would blades, tower sections and nacelles be parked or stored until normal working hours? Would they be unloaded immediately? Could crane operations or turbine erection begin during the night or early morning?

Large crane operations may require floodlighting, generators and a substantial workforce. If out-of-hours erection is possible, those effects must be assessed now.

These matters are left to a future contractor, even though they should have been assessed before permission was sought.

Any permission would need to state clearly that turbine erection, unloading, crane operation and floodlit work are prohibited outside defined daytime hours, except in a genuine emergency. Commercial convenience or a favourable weather window should not automatically be treated as an emergency.

2.9 Construction workers and light vehicles

The focus on HGVs should not cause the additional light traffic to be overlooked.

Construction workers, contractors, supervisors, deliveries, maintenance vehicles and visitors would all add traffic. Shift changes may create concentrated movements in the early morning and evening, at the same times residents are travelling to work or bringing children to school.

The location and capacity of worker parking are not confirmed. Parking along local roads, at junctions or near houses would create a further safety problem.

The application also does not explain whether workers would be transported collectively to reduce traffic or how any such arrangement would be monitored.

2.10 Missing road-safety information

I do not believe the applicant has demonstrated that the local roads can safely carry the proposed construction traffic while continuing to serve residents, school buses, children, walkers and emergency vehicles.

The application does not contain a complete independent structural survey of the haul routes, identification of all school-bus routes and collection points, consultation with the relevant school transport operators, a vulnerable-road-user safety audit or swept-path analysis for the largest vehicles at every restricted location.

It also does not contain bridge and culvert capacity assessments, complete traffic-control and resident-access arrangements, protection for school-bus collection and return periods, a workable emergency-access protocol, full details of night deliveries or enforceable arrangements for continuous road inspection and immediate repair.

These matters cannot be postponed to a Construction Traffic Management Plan after permission.

The existing community has to be protected before construction begins, not compensated after the roads have been damaged or someone has been placed at risk.

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3. DARK SKIES, AVIATION LIGHTING AND NIGHT-TIME CHARACTER

3.1 The existing night environment

The night sky is part of the character of this area.

On a clear night, we can see stars without the orange glow experienced around larger towns. At certain times we can see the Northern Lights. Darkness is part of the peace of living here.

It also changes how the landscape feels. During the day the bog and distant hills are visible. At night, the landscape becomes dark and quiet. There are no 180-metre structures marked out above the houses.

The turbines would not disappear after sunset.

Because of their proposed height, aviation warning lights may be required. Those lights would introduce elevated red points across the landscape, potentially operating every night for the full life of the wind farm.

This would be a permanent change.

3.2 Relationship with Mayo Dark Sky Park

Mayo Dark Sky Park is located within Wild Nephin National Park and extends across approximately 150 square kilometres. Its official material describes the area as containing some of the darkest and most pristine skies in the world. Ballycroy is one of its main viewing locations.

This designation should not be treated as though darkness only matters inside a line on a map.

Dark-sky quality depends on the wider region. Elevated lights can be visible from a considerable distance, particularly in an open landscape with limited competing light.

The application must therefore assess whether the proposed aviation lights would be visible from Ballycroy and Mayo Dark Sky Park; from approach roads and viewing points; from nearby communities; across Blacksod Bay; from walking routes and open bog; from homes in Muingmore and Doolough; and cumulatively with existing and permitted wind turbines elsewhere in Erris.

A visual-impact assessment based on daytime photomontages is not sufficient to assess this effect.

Verified night-time visualisations showing the intensity, colour, number and pattern of the lights from relevant viewpoints are not included in the application.

3.3 Information missing from the application

The final aviation-lighting scheme should not be deferred.

The public has not been told which turbines would be lit, whether lights would be placed on every turbine or only perimeter turbines, the height of the lights, whether more than one light would be required on each structure or the intensity of each light.

The application does not state whether the lights would remain continuously illuminated or flash, whether they would be synchronised, whether their intensity would reduce in clear conditions, how they would appear in mist, rain and low cloud, whether blade movement would periodically obscure them or whether an aircraft-detection lighting system has been examined.

The interaction between the rotating blades and a fixed light also requires assessment. Where a blade passes in front of a light, a distant observer may experience an apparent pulsing or interruption even where the light itself is technically steady.

That is a different effect from a normal fixed light on a mast.

3.4 Light in fog, mist and low cloud

Weather conditions in Erris are important.

Red aviation lighting may appear more intense or create a glow when reflected or scattered by mist, low cloud or rain. The effect cannot be assessed only using clear-weather visibility.

The application does not provide night-time photomontages or technical modelling under representative local conditions, including low cloud.

The assessment does not consider whether simultaneous lighting across both turbine clusters would create the appearance of a broad industrial site rather than separate individual lights.

3.5 Wildlife and artificial light

Artificial light is not only a landscape issue.

Regulation (EU) 2024/1991 on nature restoration recognises scientific evidence that artificial light can negatively affect biodiversity and states that Member States may consider stopping, reducing or remedying light pollution in ecosystems.

The wind-farm lighting must therefore be considered alongside bird and bat activity.

The site is used by bats, breeding birds, wintering birds and birds moving between feeding and roosting areas. Introducing elevated lighting could alter behaviour, create attraction or avoidance effects and add another pressure to species already exposed to habitat loss, construction disturbance and collision risk.

The ecological assessment does not address the actual proposed lighting design. A general commitment to minimise light cannot replace that assessment.

3.6 Construction lighting

The operational turbines are only part of the issue.

Construction may require lighting at compounds, turbine foundations, crane areas, the substation and the Battery Energy Storage System compound. Night-time deliveries could also require mobile lighting.

The application does not state where temporary lighting would be used; its maximum height and brightness; the direction in which lights would face; the hours of operation; whether lighting would be motion-activated; how light spill onto bog, watercourses and homes would be prevented; how bat-sensitive areas would be protected; or whether large crane operations could be floodlit at night.

The BESS and substation lighting must also be assessed as permanent features. A fenced industrial compound with security and operational lighting may create a continuous source of artificial light closer to ground level.

3.7 The value of darkness

Darkness is sometimes treated as an absence rather than a feature. In this part of Mayo, it is a real environmental and cultural asset.

Mayo Dark Sky Park received international recognition for its work on dark-sky protection and for highlighting the effects of light pollution on biodiversity, nature, climate, health and communities.

It would be inconsistent to promote the darkness of Erris while allowing a major development to introduce elevated lights without a complete regional assessment.

The question is not whether each light complies with an aviation specification. The planning question is what the combined lighting would do to the night-time landscape and to people who live within it.

3.8 Missing night-time lighting assessment

A complete aviation and night-time lighting assessment is missing from the application. That assessment should have been carried out before the project was submitted for permission.

The missing assessment needed to include the final lighting scheme; verified night-time photomontages; a zone-of-theoretical-visibility study for the lights; views from homes, local roads, Blacksod Bay and Mayo Dark Sky Park; assessment during mist and low cloud; cumulative assessment with other turbines; assessment of ecological effects; details of construction, BESS and substation lighting; and consideration of aircraft-detection or reduced-intensity systems where legally and technically available.

In the absence of that information, An Coimisiún Pleanála cannot properly understand the permanent effect on the night sky.

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4. PROTECTED WILDLIFE, BIRDS, BATS AND HABITATS

4.1 Ecological Value of the Proposed Site

The proposed site contains bog, cutover peatland, forestry, drains, streams, ponds, fields and existing buildings.

I have personally seen otters in the area. Local residents see birds of prey, snipe, waterbirds and other wildlife throughout the year.

The application's own surveys confirm that the site is used by a wide range of species. The issue is therefore not whether wildlife is present. It is whether the proposed development can proceed without unacceptable habitat loss, disturbance, displacement or collision risk.

4.2 European and national protected sites

The wider area contains a concentration of protected sites.

These include Blacksod Bay/Broad Haven Special Protection Area, Mullet/Blacksod Bay Complex Special Area of Conservation, Carrowmore Lake Special Protection Area and Bellacorick Bog Complex Special Area of Conservation.

They also include Glenamoy Bog Complex SAC, Slieve Fyagh Bog SAC, Tristia Bog Natural Heritage Area, Wild Nephin National Park and the wider Ballycroy area.

Blacksod Bay/Broad Haven SPA comprises sheltered marine waters, bays and coastal habitats in north-west Mayo. Mullet/Blacksod Bay Complex SAC includes much of the Mullet Peninsula, the sheltered waters of Blacksod Bay and associated coastal habitats. The SAC's protected marine interests include large shallow inlets and bays, mudflats and sandflats and reefs.

Bellacorick Bog Complex SAC is protected for habitats including blanket bog, wet heath, peatland depressions, lakes and fens.

These designations matter because the development site does not operate in isolation from the surrounding landscape.

Birds move across designation boundaries. Water flows downstream. Peatland hydrology crosses ownership lines. Pollution does not stop when it reaches the edge of the planning application.

4.3 Blanket bog habitat

The application identifies areas of PB3 Lowland Blanket Bog and PB4 Cutover Bog. Some of the vegetation and peatland areas appear capable of corresponding with Annex I blanket bog habitat, code 7130.

Previously cut, drained or planted peatland should not automatically be treated as having little value.

Degraded blanket bog may retain deep peat, stored carbon, wetland vegetation, water-storage functions and the ability to recover. It may also provide feeding and nesting habitat and form part of a larger hydrological system.

The applicant proposes roads, turbine bases, drainage, forestry removal and other works across this environment. The direct construction footprint is only part of the effect.

Drainage can lower water levels beyond the edge of a road or foundation. Forestry felling can alter interception and runoff. Excavation can expose peat and increase sediment movement. Roads can interrupt existing water flow while new drains can redirect it.

The habitat assessment must therefore consider indirect drying and fragmentation, not just the area physically covered by stone or concrete.

4.4 Kestrel breeding site and flight activity

The ornithological results identify a breeding pair of kestrels using existing buildings within the central part of the site during 2021, 2022 and 2023.

That is a repeated, multi-year breeding record.

The survey data identified in the uploaded submission records 192 kestrel flight observations within the 500-metre turbine study area, amounting to 17,901 seconds of flight time. Approximately 14,977 seconds occurred within Height Band B, between 10 and 150 metres, which overlaps substantially with the proposed rotor-swept area.

This is a serious issue.

The kestrels are not being assessed as birds that happened to pass over the site once. They have bred there and repeatedly used the surrounding airspace.

Any proposal to prevent access to the existing nesting buildings and provide nest boxes elsewhere requires close examination. A nest box does not guarantee that an established breeding pair will relocate successfully. It also does not remove the turbines from the pair's existing hunting area.

The assessment must address disturbance during site clearance and construction; loss or alteration of the nesting site; displacement from feeding areas; collision risk during hunting flight; the effect on

breeding success; the reliability of any proposed alternative nesting site; and long-term monitoring and corrective action.

Mitigation should not depend on the assumption that the birds will change their established behaviour to suit the development.

4.5 Whooper swan and greylag goose

Whooper swan is listed under Annex I of the Birds Directive. The application records whooper swan flight activity within the study area, including time spent within the proposed collision-risk height.

The uploaded submission identifies approximately 1,125 seconds of whooper swan flight time within the relevant height band.

Greylag goose activity is also recorded. Approximately 4,335 seconds of flight activity within the collision-risk height is identified from one significant observation.

Large waterbirds may move between feeding, resting and roosting areas. Their use of the site has to be understood in the context of nearby SPAs, coastal waters and lakes.

A calculation predicting less than one collision per year does not mean the risk is automatically acceptable. For species of conservation concern, a small annual number can become significant over a 35-year operational period, particularly when combined with other wind farms.

The assessment does not examine actual flight lines, weather conditions, seasonal use or connections with nearby protected sites in sufficient detail. It relies too heavily on an overall avoidance-rate assumption.

4.6 Snipe, woodcock and peatland birds

Snipe are strongly associated with wet ground and peatland habitats.

The survey information records snipe flight activity within the rotor-swept height, including approximately 2,153 seconds in the collision-risk zone.

Snipe and woodcock can fly in poor light, at dawn, dusk and during display activity. These behaviours may not be fully represented by daytime vantage-point watches.

The assessment does not demonstrate that survey timing and coverage were adequate for breeding display, dawn and dusk activity, winter movement, poor-weather conditions or seasonal changes in habitat use.

Drainage and construction may also affect the wet ground and invertebrate resources on which these birds depend.

4.7 Meadow pipit and twite

The application recorded substantial use of the site by meadow pipit, including up to 56 breeding individuals during one walkover survey.

Meadow pipits are an important part of the peatland bird community. They also provide prey for raptors. Changes to vegetation, drainage and construction disturbance may therefore affect the wider food web.

Twite were also recorded, including 33 birds during the 2022–2023 non-breeding period.

Twite are of particular conservation concern in Ireland. Their presence is reduced to a line in a species table. The assessment does not identify the habitats they were using, whether those habitats would be removed or disturbed or whether construction could affect movement between feeding areas.

4.8 Gulls, herons and birds of prey

The applicant’s data also records substantial activity by gull species, grey heron, sparrowhawk and buzzard within the turbine area.

The uploaded submission records substantial flight activity within the relevant height band.

The figures include approximately 8,452 seconds for lesser black-backed gull, 3,537 seconds for black-headed gull, 2,650 seconds for herring gull and 6,654 seconds for great black-backed gull.

They also include approximately 1,105 seconds for grey heron, 5,588 seconds for sparrowhawk and 741 seconds for buzzard, with additional buzzard activity above that height band.

These figures show repeated use of the airspace by different species with different flight behaviours.

Gulls may move between the coast, feeding areas and inland habitats. Sparrowhawks hunt at speed and may focus on prey rather than obstacles. Herons travel between waterbodies. Buzzards use rising air and may circle over broad areas.

A model that applies a general avoidance percentage does not replace examination of those behaviours.

4.9 Owls and nocturnal species

The bird assessment should clearly state how owls and other nocturnal species were surveyed.

Standard daytime vantage-point surveys may not provide adequate information on species active after dark. Construction lighting, aviation lights, habitat removal and turbine collision risk may have different effects during the night.

The application does not identify the number and timing of nocturnal surveys; the weather conditions; the areas covered; the owl records; whether existing buildings were inspected; whether forestry edges and open hunting areas were surveyed; or how nocturnal collision risk was considered.

An absence of records is only meaningful where the survey method was capable of detecting the species.

4.10 Corncrake recovery in the wider area

There have been efforts to protect and restore corncrake populations in north-west Mayo.

The significance of those efforts is wider than an individual record inside the turbine boundary. Habitat connections, disturbance and bird movement across the wider coastal and agricultural landscape should be considered.

The application does not explain whether the survey timing and methods were suitable to detect calling corncrake or whether cumulative effects could undermine conservation work in the wider Erris area.

4.11 Leisler's bat and other bat species

All Irish bat species are strictly protected.

Leisler's bat is particularly relevant because it is a high-flying species and may be vulnerable to turbine collision and barotrauma. The application records bat activity across the site, with especially high activity around the T10 and T11 area.

This area already carries several overlapping concerns, including proximity to a dwelling, peat and slope issues, uncertain restoration rights and nearby archaeology.

High bat activity should weigh heavily against locating turbines in that area.

4.12 Detector failures and survey limitations

The bat appendix records that detectors associated with T01 and T02 failed to collect data during a relevant 2024 summer period. It also indicates that the spring static-detector deployment did not begin until 28 May 2024.

The report included in the planning file carried wording identifying it as a draft document that should not be cited.

These issues require a direct response from the applicant.

A detector failure at a proposed turbine location creates an information gap at the place where the information is most important. Data from another location may assist interpretation, but it is not the same as data from the turbine footprint.

Starting a "spring" deployment at the end of May may also miss part of the earlier emergence and movement period.

The application does not contain complete detector records for every proposed turbine location; the dates and operating periods for each detector; full confirmation of equipment failures; an explanation of any proxy data used; justification for the survey season; a final signed bat report; a turbine-specific collision-risk assessment; clear curtailment parameters; or enforceable post-construction monitoring and corrective measures.

4.13 Curtailment must be specific

A general promise to curtail turbines during periods of bat activity is not enough.

The application does not state the wind-speed threshold, temperature threshold, months, hours or weather conditions during which turbines would be stopped or feathered.

The application also does not explain whether those thresholds are based on site-specific data or whether they apply to every turbine or only selected machines.

T10 and T11 recorded the highest bat activity, yet the application does not properly examine their removal from the layout. Instead, it relies on operational curtailment for decades.

4.14 Survey gaps for birds

The ornithological appendix acknowledges limitations in survey effort.

The uploaded submission identifies incomplete breeding-raptor survey effort during 2021 and 2022, incomplete breeding walkover and dusk surveys, access restrictions and only approximately 4.5 hours of observation per vantage point during part of the first autumn passage period.

The significance of a survey gap depends on what could have been missed.

Bird use of peatland and coastal landscapes changes by season, weather, time of day and water conditions. A limited snapshot cannot safely be treated as representative without a clear scientific justification.

The collision-risk figures cannot be relied upon where the underlying field data is incomplete.

4.15 Cumulative collision risk

The proposed turbines would be located within airspace already used by birds moving across Erris and north Mayo.

The assessment must consider existing, permitted and proposed turbines across Erris and north Mayo. A bird moving between coastal feeding grounds, lakes, bogs and roosts may encounter more than one wind farm.

The cumulative assessment does not examine the complete journey made by birds or the combined operational life of the projects.

It is not enough to calculate a small number for each wind farm separately and assume the combined effect remains small.

4.16 Gaps in the ecological assessment

Permission should be refused where the applicant has not established a complete and reliable ecological baseline.

The ecological assessment is missing a final signed bat report, replacement data for failed detector locations, a turbine-specific assessment for T10 and T11, full consideration of Leisler's bat, completed breeding, passage and nocturnal bird surveys and an independent review of the collision-risk model.

The assessment does not use actual flight lines alongside model outputs, fully examine the established kestrel nesting site, adequately address cumulative effects with other wind farms, demonstrate protection of otter and aquatic habitats, fully assess Annex I blanket bog or prove that all mitigation land is legally secured.

The recorded wildlife activity shows that this is an active ecological area. The gaps in the surveys reduce confidence precisely where certainty is required.

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5. DOOLOUGH STREAM, BLACKSOD BAY AND PROTECTED WATERS

5.1 My knowledge of the Doolough Stream

I know the Doolough Stream from living here.

I have stood at the bridge in Muingmore and watched the clear water running beneath it. To me, it is not simply a blue line on one of the applicant's maps. It is a real watercourse, connected to the bog, the drains, the wetlands and the wider coastal environment.

The proposed development would involve peat excavation, road construction, turbine foundations, forestry felling, stream crossings, drainage works, construction compounds and large numbers of heavy vehicles moving across wet ground.

All of this would take place within the same catchment.

The question is not only what happens on the turbine site. The question is where the water goes afterwards.

It flows through the Doolough system and towards Blacksod Bay, which is part of a protected and environmentally sensitive coastal area.

5.2 Water does not stop at the site boundary

The site is made up of peatland, forestry, drains, streams, ponds and wet ground. Water moves through all of these areas.

Rain falling on disturbed peat does not remain beside a turbine foundation. Sediment released from an access road does not stay within the red line boundary. Water follows the fall of the land, enters drains and culverts, crosses through peat and eventually reaches streams and coastal waters.

The possible sources of pollution are clear.

They include exposed peat, loose soil, road stone, forestry brash, disturbed drains, concrete-contaminated water, fuels, oils, hydraulic fluids, tyre particles, brake dust and plastic material from construction activity.

The pathways are also clear. Pollution can move through existing drains, new drains, overland flow, groundwater movement within the peat, stream crossings, culverts and settlement systems. Heavy rainfall can carry material further and faster.

The receiving environment extends far beyond the construction compound or turbine base.

It includes the Doolough Stream, connected drains and tributaries, ponds, wetlands, fish habitat, otter habitat and the protected waters of Blacksod Bay.

That full route should have been examined as one connected system. Instead, much of the assessment is divided between separate chapters and separate legal tests.

Water does not behave that way.

5.3 The applicant's own fish surveys show the value of these waters

The applicant's aquatic surveys confirm that the local water environment supports fish.

The results include 34 brown trout at Site C2 on the Doolough Stream and 43 brown trout at Site C4. Atlantic salmon, brown trout and European eel were recorded at Site B6, while brown trout and European eel DNA were also recorded in ponds.

Those findings matter.

They show that these waters are not low-value drains carrying surplus water away from the site. They are part of a living aquatic system.

Brown trout depend on suitable water quality, clean habitat and access to feeding and spawning areas. Atlantic salmon are protected under the Habitats Directive. European eel populations have suffered serious decline.

Fine sediment can cover spawning gravel and reduce the oxygen available within it. Peat and silt can affect water clarity, feeding habitat and aquatic insects. Nutrients and construction pollution can change the chemical condition of the water.

A stream can look normal from the road while damage is taking place beneath the surface.

5.4 The condition of the Doolough Stream makes further pressure more serious

The applicant's own material identifies the Doolough Stream as being at Poor Status and At Risk under the Water Framework Directive. That is important.

A waterbody which is already below Good Status should not be placed under further pressure from peat excavation, drainage changes, forestry felling, road construction, sediment release or construction runoff.

The Water Framework Directive is not limited to preventing a complete collapse in water quality. It also requires that a project does not cause deterioration and does not make it more difficult for a waterbody to reach its environmental objectives.

The present condition of the Doolough Stream should have led to a particularly careful assessment.

Instead, the application relies heavily on standard construction controls such as silt fencing, settlement ponds, check dams and buffer zones.

Those measures may reduce risk when they are correctly designed, installed and maintained. They do not remove the risk. They can block, overflow, tear, settle or fail, particularly during prolonged rainfall.

This is Erris. Wet ground, strong winds and days of continuous rain are normal conditions, not rare events.

The assessment should have shown how the proposed drainage and sediment controls would work during those conditions. It should also have shown what happens if a settlement pond is already full, if a culvert blocks, if a silt fence fails overnight or if runoff leaves the site during a period of heavy rain.

That information is not set out with the certainty needed for a development of this scale.

5.5 The same water pathway engages two separate legal duties

The Doolough Stream is not only relevant under the Water Framework Directive.

The same stream and drainage network also connect the development site to the Mullet/Blacksod Bay Complex SAC and the wider protected waters of Blacksod Bay, including the Blacksod Bay/Broad Haven SPA.

This means that the same source of pollution and the same physical water pathway engage two separate areas of European law.

Under the Water Framework Directive, the assessment must establish that the project will not cause deterioration in the Doolough Stream and will not prevent or delay the achievement of its environmental objectives.

Under Article 6(3) of the Habitats Directive, the assessment must separately establish that the project will not adversely affect the integrity of a European site.

These are different legal tests.

Passing one does not mean the other has been passed. A conclusion that the Water Framework Directive will not be breached does not automatically prove that the SAC and SPA will be protected. In the same way, a conclusion under the Natura Impact Statement does not remove the need for a complete Water Framework Directive assessment.

The physical process is the same in both cases.

Peat is disturbed. Sediment or nutrients enter a drain. The material reaches the Doolough Stream. It then continues downstream towards Blacksod Bay and the protected sites within it.

The applicant has separated these matters into different assessment exercises. On the ground, they cannot be separated.

5.6 One environmental event can cause more than one legal failure

If suspended peat, sediment, nutrients, dissolved organic material or construction pollution enters the Doolough Stream, it may affect the ecological condition of the stream itself.

That creates a Water Framework Directive concern.

The same material may then continue downstream towards the Mullet/Blacksod Bay Complex SAC and the Blacksod Bay/Broad Haven SPA.

That creates a Habitats Directive concern.

One pollution event can therefore affect the status of the Doolough Stream and the integrity of the protected European sites downstream. It does not become two different events simply because it is discussed under two different headings in the application.

The applicant needed to demonstrate that the project would avoid deterioration in an already Poor-status waterbody, would not make the achievement of Good Status more difficult and would not adversely affect the conservation objectives of the SAC or SPA.

It also needed to remove reasonable scientific doubt about what would happen to peat, sediment, nutrients and other pollutants once they entered the water system.

That joined-up assessment is not there.

5.7 Forestry felling, roads and drainage must be considered together

Forestry felling would take place alongside road construction, peat excavation and turbine works.

These activities cannot be treated as separate sources of risk.

Felling can expose soil and peat, disturb forestry drains and increase runoff. Heavy machinery can damage wet ground. Brash and loose material can enter drains. Removing trees can also change how much rain reaches the ground and how quickly water moves across the site.

At the same time, new roads and turbine foundations would alter existing drainage patterns. New drains may redirect water. Roads may interrupt natural flow. Culverts may concentrate water into new locations.

The timing of these works matters.

Opening up large areas of peat and forestry at the same time would increase the amount of exposed ground. Leaving those areas open during a wet period would increase the opportunity for sediment and peat to move.

The application should have clearly shown the sequence of felling, excavation, road building and drainage installation. It should also have demonstrated how much land could be exposed at one time and how long it would remain exposed.

Those details are too important to be left to a contractor after permission.

5.8 Concrete, fuel and chemical pollution

The construction of thirteen turbine foundations would involve a very large amount of concrete.

Fresh concrete and cement-contaminated water can be highly alkaline and harmful to fish and aquatic habitats. Fuel, oils and hydraulic fluids create further risks where cranes, excavators, dump trucks and other heavy machinery are operating close to drains and watercourses.

The application should have fully identified where concrete would be mixed, poured and washed out. It should also have shown the location and capacity of contained washout areas, the route taken by concrete delivery vehicles and the measures that would prevent contaminated water from entering the peat or drainage system.

The same applies to fuels and oils.

The final storage areas, refuelling points, spill-containment arrangements and emergency response procedures should have been included in the application.

A promise that good construction practice will be followed is not the same as assessing the actual risk at this site.

Once concrete water, oil or fuel enters a drain during heavy rain, it may move quickly. It cannot simply be collected again further downstream.

5.9 Blacksod Bay cannot be treated as too far away

Blacksod Bay is part of a protected coastal system.

The Mullet/Blacksod Bay Complex SAC includes sheltered coastal waters and protected habitats such as large shallow inlets and bays, mudflats, sandflats and reefs. The Blacksod Bay/Broad Haven SPA supports important bird populations.

The applicant cannot dismiss the bay as too distant simply because pollution would first pass through smaller drains and streams.

That is the route by which the pollution would travel.

The concentration of sediment or peat may change as it moves downstream. Some material may settle. Some may be carried further during high flows or prolonged rain. The assessment needed to explain what would happen.

It was not enough to assume that distance would remove the risk.

The cumulative effect of repeated smaller releases also matters. A series of sediment events during months of construction may cause harm even where no single event is described as major.

The protected status of Blacksod Bay means that uncertainty should not be accepted.

5.10 My otter sighting

I have personally seen otters in this area, including otters with their young. I reported the sighting to the National Parks and Wildlife Service.

This is direct evidence that otters are using the area.

Otters move through connected streams, drains, ponds and banks. They may not be seen during a short survey because they travel over a wide area and may use different parts of their territory at different times.

The failure to find an otter on one survey day does not mean that the habitat is unused.

The assessment should have fully examined possible resting places, holts, feeding areas and routes between watercourses. It should also have considered the effect of construction noise, lighting, excavation, culverts and water pollution on otters and the fish they depend on.

A pre-construction survey is not a replacement for a complete application-stage assessment.

The wildlife is already here. The assessment should have been based on that fact from the beginning.

5.11 Monitoring does not correct an incomplete assessment

Water-quality monitoring would be necessary if the development were to proceed, but monitoring cannot be used to fill gaps in the application.

The baseline should have been established well in advance and should have covered normal flow, low flow, high flow and periods of heavy rain. Occasional sampling may miss a short pollution event, particularly where water levels rise quickly.

The application should have clearly identified the monitoring locations, the substances to be tested, the frequency of sampling and the levels at which work would stop.

It should also have explained who would have the authority to stop construction and what would happen after a breach.

Monitoring without a defined response is of little value.

More importantly, monitoring after permission would only record what had already happened. It would not undo pollution that had entered the Doolough Stream or moved towards Blacksod Bay.

5.12 Conclusion

The Doolough Stream is not an expendable drainage channel.

It supports fish, forms part of the habitat used by otters and connects the proposed development site to the protected waters of Blacksod Bay.

The same pathway of peat disturbance, sediment release, nutrient movement and construction pollution is relevant under both the Water Framework Directive and Article 6(3) of the Habitats Directive.

These legal duties are separate, but the environmental mechanism is the same.

The application should have examined the full route from the disturbed peat and construction areas, through every drain and stream, to the SAC and SPA downstream. It should have shown that the development would not cause deterioration in the Doolough Stream, would not make the achievement of Good Status more difficult and would not adversely affect the integrity of the protected European sites.

It has not done so.

Important drainage details, pollution controls, monitoring arrangements and responses to failure remain incomplete or are left until after permission. That is too late.

The missing information goes to the heart of whether this development can be carried out without harming the Doolough Stream and the protected waters beyond it.

The uncertainty supports refusal of permission.

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6. NOISE, AMPLITUDE MODULATION AND LOW-FREQUENCY SOUND

6.1 The existing sound environment at my home

I live at House 50, approximately 850 metres from the nearest proposed turbine. This is a quiet rural area, particularly during the evening and at night.

There are normal sounds. Wind moves through the trees. There is rain, wildlife, occasional traffic and activity around neighbouring houses and farms. These sounds rise and fall naturally. They are not the same as sound repeatedly coming from fixed industrial machinery.

The proposed turbines would operate whenever wind conditions permit, including during the night. Their noise would not be limited to normal working hours. It would become part of the background to sleeping, opening a bedroom window, sitting outside and using our home and garden.

I have three young children. I am concerned about placing turbines of this size so close to homes without a clearer assessment of the character of the noise that residents may hear, rather than relying mainly on calculated average levels.

6.2 The applicant's conclusion

The applicant states that baseline noise measurements were taken at seven locations and that operational turbine noise will comply with the derived daytime and night-time limits at surrounding homes. It concludes that turbine noise, together with the noise from the substation and BESS, will not produce a significant effect.

The conclusion is only as reliable as the assumptions on which it is based.

That conclusion depends on the accuracy of the baseline measurements, the suitability of the monitoring locations, the sound-power information used for the candidate turbines and the corrections applied to the calculations. It also depends on the selected ground-absorption values, assumed atmospheric conditions and the final turbine operating in the mode assessed.

The final turbine has not been chosen. The assessment therefore has to establish that every turbine allowed by the proposed design range can comply, not merely the model used in one set of calculations.

6.3 Reliance on ETSU-R-97

Chapter 9 relies heavily on ETSU-R-97 and the 2013 Institute of Acoustics guidance.

ETSU-R-97 was produced in 1996, when turbines were considerably smaller than the machines now proposed at Muingmore. The United Kingdom published replacement guidance on 19 June 2026. The UK Government states that the new document replaces ETSU-R-97 and should now be used for new onshore wind noise assessments across the UK.

I accept that the new UK guidance is not automatically binding on an Irish planning decision. I am not suggesting otherwise.

It is still relevant. It shows that the methodology on which the Muingmore assessment is largely based has required substantial updating to address changes in turbine technology, noise-assessment methods, cumulative noise, tonality, amplitude modulation and operational compliance monitoring.

The Muingmore application was submitted at the point when the principal guidance on which it relies was being replaced in the country where that guidance originated. That development is directly relevant to the reliability of the assessment and cannot be ignored.

The application contains no comparison between the Muingmore assessment and the updated guidance and does not identify whether any result, limit or proposed condition would change.

6.4 Amplitude modulation

Amplitude modulation is the repeated rise and fall in the level of turbine noise as the blades rotate. It may be heard as a swish, thump or pulse.

It is the repetitive nature of the sound that can make it particularly noticeable. A calculated average level may remain within a numerical limit while the repeated change in sound level remains intrusive.

The updated UK guidance defines amplitude modulation as periodic fluctuations in the level of sound. It provides a method for applying a character correction of up to 5 dB where amplitude modulation is established during operational monitoring. It also requires analysis over defined frequency ranges and short time intervals.

This is important because the applicant cannot confidently predict before construction whether excessive amplitude modulation will occur at a particular home. That uncertainty does not justify ignoring it. It makes a strong and enforceable operational condition more important.

Any permission would need to contain a condition that specifically identifies amplitude modulation; requires investigation at the affected home rather than at a distant proxy location; requires the operator to provide turbine operating and wind data; applies an appropriate character correction; requires noise-reduced operation or shutdown where necessary; and does not leave residents waiting through a prolonged complaint process.

The updated UK guidance recognises that noise character can vary considerably between locations and states that a character correction established at one location cannot normally be transferred to another.

A measurement at a monitoring location elsewhere in Muingmore or Doolough may therefore fail to represent what is occurring at my house.

6.5 Low-frequency sound and infrasound

Low-frequency sound and infrasound should not be treated as interchangeable terms.

Infrasound generally refers to frequencies below 20 Hz. Low-frequency sound generally covers the range from approximately 20 Hz to 200 Hz. The updated UK guidance states that, in the absence of a specific low-frequency tone, its proposed overall criteria are intended to provide protection from low-frequency turbine sound. It separately provides for the assessment of tonal noise.

I do not claim that the existence of low-frequency sound proves that harm will occur. That would go beyond the evidence available.

My concern is more direct. The application does not demonstrate that the assessment is capable of identifying a specific low-frequency tone, tonal component or recurring low-frequency characteristic if it occurs.

A-weighted figures reduce the contribution made by lower frequencies when producing a single overall level. They are useful for general environmental noise assessment, but a single A-weighted result does not show the full frequency content of the sound.

For that reason, any operational complaint protocol should allow for one-third-octave frequency analysis; narrowband tonal analysis where required; indoor and outdoor measurements where the complaint concerns an internal room; assessment under the wind direction and operating conditions in

which the disturbance occurs; and examination of the combined sound from the turbines, transformers, inverters, cooling equipment and substation.

The operator should not be permitted to dismiss a complaint solely because an overall A-weighted level is below a limit where a distinct tone or recurring noise characteristic is present.

6.6 The baseline measurements and calibration drift

The background-noise results require further scrutiny.

Technical Appendix 9-3 appears to record differences between initial and final field calibration at five monitoring locations.

The recorded differences are 0.6 dB at NML1 in Tristia, 0.7 dB at NML2 in Tristia, 0.6 dB at NML3 in Doolough, 0.8 dB at NML5 in Doolough and 1.0 dB at NML7 in Muingmore.

A result above 0.5 dB should not be treated as automatically invalidating an entire monitoring period without independent technical confirmation.

No proper technical explanation is provided for these calibration differences.

For each monitor, the application does not state the make and model of the instrument and calibrator; the manufacturer's permitted field-calibration tolerance; the applicable Institute of Acoustics requirement; whether the difference was investigated; whether any data was excluded; whether a correction was applied; or how the recorded difference affects confidence in the resulting background-noise curve.

This is particularly important in a quiet area. Small changes in the baseline may affect the limit ultimately assigned to a house.

6.7 Monitoring locations and reflective surfaces

The position of each microphone must also be examined.

A monitoring location near a wall, shed, hard surface, dense vegetation, flowing water or other local noise source may not represent the free-field sound environment at surrounding homes.

The new UK guidance describes a free-field position as one not significantly affected by reflective surfaces and generally located at least 3.5 metres from them.

The photographs and site records for all seven Muingmore monitoring locations need to form part of the assessment. The final graphs alone do not establish that the monitoring positions were suitable.

The application does not explain the distance from buildings and other reflecting surfaces; nearby trees and vegetation; local water or traffic noise; microphone height; periods affected by rain; periods affected by equipment interference; or the amount of data removed before regression analysis.

6.8 Uncertainty over the final turbine

The proposed design envelope includes the Nordex N149, Nordex N163 and Vestas V150, or another turbine falling within the stated range.

The final turbine choice matters to the noise assessment.

Different turbine models can have different maximum sound-power levels, octave-band profiles, blade speeds, trailing-edge features, control settings, tonal characteristics and noise-reduced operating modes.

The turbine which is worst for shadow flicker or visual impact may not be worst for noise.

The application does not identify the turbine used in each noise calculation or prove that it represents the worst acoustic case. A later turbine selection could have a different frequency profile or higher sound-power output while still fitting within the physical planning envelope.

The final turbine's warranted sound-power and octave-band data are not available at application stage. Leaving that information until before construction means the acoustic effect of the turbine actually installed has not been assessed as part of this application.

6.9 Combined noise from the turbines, BESS and substation

The turbines are not the only operational noise source.

The BESS would include inverters, power-conversion equipment, cooling and ventilation systems. The substation would include transformers and other electrical equipment. Some of these sources may operate at night and may have tonal characteristics.

The updated UK turbine guidance expressly states that it does not assess BESS or substation noise and that those sources require a separate assessment method.

Separate assessment methods must not result in the combined real-world noise being overlooked.

A resident will not hear a noise chapter. They may hear turbines, electrical equipment, cooling fans and transformers at the same time.

The application does not provide a combined night-time assessment at every relevant dwelling, including House 50. It does not examine the quietest background periods and relies instead on broader annual or seasonal averages.

6.10 Complaint investigation and enforcement

Any noise condition must be capable of being enforced.

The application does not contain an enforceable requirement for the operator to retain and provide turbine operating data; wind speed and direction at turbine height; power output; operating mode; curtailment records; fault and maintenance records; and complaints received.

Measurements should be taken at the complainant's property under the conditions in which the noise occurs.

The operator should pay for the investigation, but the person carrying it out should be independently approved. The resident should receive the complete report and supporting data.

The proposed condition does not clearly secure immediate corrective operation where non-compliance, tonality or excessive amplitude modulation is found. Another report alone would not protect residents.

6.11 Unresolved gaps in the noise assessment

An independent review of the noise assessment has not been provided. Without it, the calibration records, monitoring locations, final turbine uncertainty and updated 2026 guidance remain unresolved.

The missing independent review needed to address the calibration records, monitoring locations, final turbine uncertainty, updated 2026 guidance, amplitude modulation, tonal noise, low-frequency complaints, cumulative turbine noise and the combined operation of the BESS and substation.

In its present form, the assessment does not give me sufficient confidence that the quiet night-time environment at my home would be protected throughout the proposed 35-year operational life.

7. BATTERY ENERGY STORAGE SYSTEM AND 110 kV ONSITE SUBSTATION

7.1 A separate industrial development within the wind farm

The Battery Energy Storage System and the onsite 110 kV substation should not be treated as small ancillary items. Together they would form a substantial electrical and industrial compound with their own safety, environmental, noise, lighting, drainage and landscape effects.

The planning documents describe a BESS compound containing 120 battery containers and 15 inverter or power-conversion containers. The compound is approximately 156 metres long along its north-western side, 153 metres along its south-eastern side and 99 metres wide. It would include internal roads,

concrete foundations or plinths, drainage, a water tank, electrical equipment, lighting, CCTV and a 2.6 metre palisade fence.

This would be a large permanent installation. It would sit beside the onsite substation and form part of a wider energy complex that also includes 13 turbines, transformers, switchgear, cabling, access roads and the future grid connection. The effects of those elements must be assessed together.

7.2 The final battery system has not been selected

The Battery Safety Management Plan describes itself as a live document. It states that it will be updated after consent, when the final BESS technology, supplier, operating parameters, container configuration and safety systems have been selected.

That is a central weakness. Battery chemistry, cell arrangement, module design, container construction, cooling method, fire detection, gas ventilation and suppression systems can affect how a fault develops and how an emergency must be managed. Those are not minor construction details.

The application identifies foreseeable hazards including thermal runaway, fire, gas release, electrical faults and environmental contamination. At the same time, it leaves the technology-specific assessment and the complete Emergency Response Plan until the pre-construction stage.

An Coimisiún Pleanála is therefore being asked to approve the location and scale of the BESS before the precise equipment and its complete emergency arrangements are known. In my view, that is not enough information for a development of this size on peatland close to homes, local roads and connected watercourses.

7.3 Thermal runaway and fire propagation

A fault in a lithium-ion battery cell can cause a rapid rise in temperature. If heat spreads to adjoining cells or modules, the event can develop into thermal runaway and may continue even after the original electrical supply has been isolated.

The planning application does not provide the full test evidence for the exact system proposed and instead relies on a future supplier confirming compliance after permission. The final battery chemistry and cell type, the module and rack arrangement inside each container, the fire-resistance and ventilation design of the enclosure and the full-scale propagation test used for the proposed product are all missing.

The application also does not state the separation distance needed between containers, the circumstances in which fire can spread from one container to another, the expected duration of a serious event or the method by which damaged batteries would be cooled, isolated, removed and stored safely.

Without that information, the stated separation distances and safety strategy cannot be tested against the actual battery product that would be installed.

7.4 The proposed firefighting water supply

The Battery Safety Management Plan refers to a water supply of 1,500 litres per minute for at least two hours and identifies a proposed storage tank of 180,000 litres. It also states that the principal strategy is self-containment, with the tank intended mainly for exposure protection and boundary cooling rather than direct suppression inside a burning container.

That distinction matters. The application does not explain what happens if an incident continues for longer than two hours, if more than one container is affected or if water is required simultaneously for boundary cooling and protection of adjoining equipment.

It also does not show how water would be delivered at the necessary pressure and flow to every part of the compound during a loss of normal electrical power. The reliability of pumps, backup power, hydrants, hoses and access routes is not established.

A numerical tank capacity on a drawing is not, by itself, an emergency response strategy.

7.5 Contaminated firefighting water and the Doolough catchment

Any water used around damaged batteries may come into contact with battery residues, metals, electrolyte, combustion products and other contaminants. The application proposes perimeter drainage and attenuation, but it must demonstrate that the system can contain a credible emergency volume together with rainfall already present in the drainage network.

The BESS and substation are proposed on peatland within a wider drainage system connected to local watercourses. Doolough Stream and the downstream route towards Blacksod Bay are already central concerns in this application. A release from the BESS would not remain inside the security fence if the containment system were overtopped, damaged or left open.

The application does not provide the impermeable area available for emergency containment, the total containment volume after allowing for rainfall and normal drainage storage, the location and operation of automatic and manual isolation valves or the route followed by water if the principal containment area is exceeded.

The application does not set out the procedure for testing contaminated water before removal, the method of transporting and disposing of it, monitoring points between the compound, Doolough Stream and downstream waters or clear stop-work and notification procedures following a leak or fire.

The risk must be assessed through the complete source-pathway-receptor connection: the battery compound as the source, the drainage and peatland water system as the pathway, and Doolough Stream, aquatic life and protected coastal waters as the receptors.

7.6 Toxic smoke, off-gas and plume movement

The Battery Safety Management Plan recognises gas release and off-gas events as credible emergency scenarios, but the application does not assess the movement of smoke and gases from a major container incident under the wind conditions experienced at Muingmore and Doolough.

The assessment does not identify which homes, roads, school-bus routes, work areas and neighbouring lands could be affected under different wind directions and weather conditions. It does not state whether residents may need to remain indoors or leave the area, who would issue that advice or how it would be communicated during the night or during a power or mobile-network failure.

A detailed plume assessment should be completed at planning stage using the final battery chemistry or a clearly justified worst case. It should not be left until after the battery supplier is appointed.

7.7 Emergency Response Plan and Fire Authority consultation

The application states that a comprehensive Emergency Response Plan will be prepared at the pre-construction stage and that consultation will take place with the local Fire Authority.

Those steps are necessary, but they are being proposed too late. The application does not confirm that Mayo Fire Service has examined the proposed layout or is satisfied with access, water supply, equipment spacing, incident information, evacuation arrangements and the resources required for a prolonged battery event.

The Emergency Response Plan is not complete. It does not set out 24-hour alarm monitoring, responsibility for calling the emergency services, remote and local emergency shutdown, safe distances for staff, residents and first responders, wind-direction monitoring, plume information or two independent emergency access routes.

It also does not explain what happens if one access route becomes unusable or fully cover water supply, pumping capacity, backup power, road closures, continued access for residents and emergency vehicles, notification of nearby households and schools, containment and disposal of polluted water and damaged batteries, post-incident monitoring and regular exercises with the local emergency services.

A promise to produce this plan later does not allow the public to examine whether the proposed site can be managed safely.

7.8 Emergency access on narrow rural roads

The ability to reach the BESS during an emergency cannot be separated from the road and traffic issues raised elsewhere in this observation. Local roads may also be carrying construction traffic, abnormal loads and maintenance vehicles.

The application does not demonstrate that fire appliances, ambulances and Garda vehicles can reach and leave the compound if a construction vehicle has broken down, an abnormal load is on the route, temporary traffic lights are operating or smoke has made one approach unsafe.

Emergency access must remain available at all times. It cannot depend on moving heavy equipment after an incident has already begun.

7.9 Noise from inverters, cooling systems and transformers

The BESS and substation would introduce operational noise in addition to turbine noise. Potential sources include inverters, transformers, switchgear, ventilation, pumps and heating, ventilation and air-conditioning equipment used to control container temperature.

Some of this equipment may operate during the quietest part of the night. Fans may change speed as temperature and charging demand change. Transformers and inverters may produce tonal or low-frequency components that are more noticeable than an overall average level suggests.

The application does not provide a combined assessment of the turbines, BESS and substation at every relevant dwelling, including House 50. It does not assess maximum simultaneous operation under the quietest representative background conditions. Separate chapters do not show the sound a resident may actually hear when all equipment is operating together.

Final supplier sound-power and frequency information for every principal item is not included. This leaves open the possibility that a later technology choice could produce a greater effect than the equipment assessed in the EIAR.

7.10 Lighting, fencing and industrial appearance

The BESS compound would include security fencing, CCTV, internal equipment and lighting. Beside the substation, it would create a large industrial enclosure in an open rural and peatland setting.

The application does not state the number, height, brightness or direction of all permanent lights. It does not distinguish between continuously illuminated security lighting, task lighting and emergency lighting. The resulting light spill towards homes, roads, peatland, bats and the wider dark-sky environment has therefore not been properly assessed.

Planting is not an immediate answer. Vegetation may take years to establish in exposed conditions and cannot fully screen lighting or elevated equipment during the early operational period.

7.11 Peat excavation, foundations and drainage

The application records peat of approximately 1.8 to 3 metres in the BESS and substation area. The construction of concrete plinths, internal roads, drainage and electrical infrastructure would require substantial excavation and replacement of peat.

The assessment does not identify the total peat volume, the final deposition location or the effect on the local water table. It also does not show whether the compound drainage could draw water away from adjoining peat or redirect shallow flow towards Tristia Bog NHA, Doolough Stream or other connected drains.

Ordinary surface-water drainage and emergency firewater containment must be clearly separated. A valve or basin intended for emergency use is only protective if its normal operating position, inspection system and overflow route are fully defined.

7.12 Capacity, charging source and possible wider grid use

The application does not state the maximum BESS capacity in megawatts and megawatt-hours, its maximum charging and discharging rate or the number of daily cycles assumed in the environmental assessment.

The application does not state whether the BESS is restricted to electricity generated by the 13 Muingmore turbines or whether it may import electricity from the wider grid. The documents refer to the ability to store power generated locally and release it when required. That leaves the actual operating purpose and intensity of use unclear.

I am not alleging that an unapproved expansion is planned. The problem is that the permission sought is not defined precisely. The number of containers, maximum capacity, charging source and operating limits are not fixed clearly enough to prevent the compound becoming a wider regional storage facility without a fresh planning assessment.

7.13 The substation and what remains after the wind farm

The application does not clearly distinguish every permanent substation and control element, including the onsite 110 kV substation and any independent power producer equipment. It does not state who will own each part or what will happen when the turbines reach the end of their operational life.

The application does not establish whether the substation, grid equipment, roads, fencing, lighting or BESS may remain after the 35-year wind-farm period. If any part may continue operating, its longer-term landscape, noise, drainage and safety effects have not been assessed on that basis.

A decommissioning chapter cannot assume that all effects end when the turbines stop if major electrical infrastructure is intended to remain.

7.14 Information missing from the application

Permission should be refused unless the BESS and substation are fully assessed as a substantial part of the project rather than as ancillary infrastructure.

The application was submitted without the final battery chemistry, supplier and container system, full-scale fire and propagation test evidence, a completed Emergency Response Plan, the formal response of Mayo Fire Service, a site-specific smoke and gas plume assessment or verified firefighting-water and contaminated-water containment calculations.

It was also submitted without a combined turbine, BESS and substation noise assessment, the final lighting design, complete peat, drainage and water-pathway calculations, the maximum MW and MWh capacity and permitted charging source, or a clear statement of what electrical infrastructure will remain after decommissioning.

The present documents repeatedly defer essential safety and technology-specific information. Those gaps should not be filled by conditions after the planning decision.

8. ARCHAEOLOGY, CRANNOGS AND CULTURAL HERITAGE

8.1 The cultural landscape

Mount Jubilee, Muingmore, Doolough, lakefield and geesala contain a long record of human settlement.

That history is not limited to monuments with a red circle around them on a map. It survives in place names, routes across the bog, old buildings, religious sites, burial places, crannogs and features known to local families.

The open landscape is part of their setting. A monument cannot always be understood by examining only the ground immediately beneath it.

8.2 Archaeological features identified in the application

The application identifies several archaeological assets requiring assessment.

The identified assets include the crannog at Dumha Locha, RMP MA025-004, the megalithic court tomb at Troiste, MA026-002001, and the Penal Mass station, MA026-007.

The applicant used a one-kilometre study area for buried archaeology and a five-kilometre area for setting effects. It states that the closest turbine would be approximately 230 metres from the crannog at Dumha Locha and concludes that no significant effect would occur.

I do not accept that distance alone is enough to reach that conclusion.

A turbine approximately 180 metres high, together with rotating blades, roads, hardstands, drainage and aviation lighting, could alter the setting of a monument even where the turbine foundation does not physically touch it.

8.3 The crannog at Dumha Locha

A crannog is connected to its water and wetland setting.

The archaeological value may include the visible island, submerged material, access routes, deposits around the edge and the hydrological conditions which helped preserve organic remains.

The assessment is largely confined to direct excavation within the recorded monument boundary and does not properly examine the wider effects.

It does not consider changes to groundwater level, changes to nearby drainage, peat excavation, altered runoff, vibration, sediment movement, access-road construction or the effect of the turbines on the crannog's setting.

The proposed turbine close to the crannog is also within the wider T10 and T11 area where concerns overlap in relation to peat, drainage, bats and nearby homes.

Those issues should be assessed together.

8.4 Court tomb at Troiste

The court tomb, record number MA026-002001, represents a much earlier period of settlement.

Its importance is not confined to its stones. A megalithic tomb was deliberately placed within a landscape. Its relationship with surrounding ground, horizons, routes and other monuments can form part of its significance.

The settings assessment does not show the full proposed development from the monument, including all turbines that could be visible, their moving blades and aviation lights.

A photomontage taken in favourable weather does not fully represent the operational effect. Winter conditions, clear evening light and darkness are not properly considered.

8.5 The Monument -Penal Mass station and religious heritage

The Monument -Penal Mass station, MA026-007, is part of the religious and community history of this area.

Such places can have meaning that is not fully expressed by their physical remains. Their quietness, seclusion and relationship with the surrounding land may be part of why they are valued.

The assessment should not treat an effect as negligible merely because no excavation would take place within the recorded boundary.

Mount Jubilee, the old church and other local religious and community features also form part of the cultural landscape. Their age, local use, views and associations should be recorded through proper fieldwork and local consultation.

8.6 Burial places and locally known sites

National archaeological databases do not necessarily contain every burial place, children's burial ground, old route, structure or feature known to local residents.

The archaeological assessment does not include meaningful consultation with residents and local historians. Local information has not been fully mapped and investigated, even though the absence of a feature from the Record of Monuments and Places does not mean that it has no archaeological or cultural value.

This is especially important in bogland where surface evidence may be limited.

8.7 Archaeology preserved in peat

Peat can preserve timber, leather, pollen, plant remains and other material that would normally decay in dry ground.

It can also hold a record of past vegetation, land use, burning and environmental change.

The application suggests that drainage, peat cutting and other modern disturbance reduce the likelihood of substantial palaeoenvironmental remains.

Disturbance in one part of the site does not prove that intact deposits are absent elsewhere.

The construction of kilometres of access roads, turbine foundations, hardstands, cable trenches, drainage, the BESS and substation would open large areas of ground. A watching brief during excavation should be a final protection, not a replacement for adequate investigation before permission.

8.8 Unknown buried archaeology

The application does not identify which parts of the development footprint were physically walked and which were inaccessible because of forestry, water, deep peat or land-access restrictions.

Geophysical survey may not work equally well in all peat conditions. Where it is unsuitable, other methods may be required.

The proposed pre-construction archaeological work is not clearly defined to include targeted testing of turbine foundations, crane hardstands, road alignments, borrow pits, BESS and substation areas, cable routes, stream crossings and peat-deposition areas.

The final road and drainage designs should be reviewed by the project archaeologist before work begins.

8.9 Archaeological monitoring and stop-work procedures

Where monitoring is required, the archaeologist must have authority to stop work.

The procedure does not state who must be contacted, how an area will be secured, how peat and spoil will be stored, how a find will be protected from weather, who pays for excavation or preservation or how construction will be redesigned where avoidance is necessary.

Archaeological monitoring should not become an exercise in recording a feature immediately before it is removed.

Preservation in place should be the first option where significant remains are discovered.

8.10 Cumulative effect on cultural heritage

The setting of the monuments must also be assessed cumulatively with existing and permitted wind farms, power infrastructure, roads and forestry.

One turbine may appear as a distant structure. A group of 13 turbines, seen with other turbines across the landscape, can change the wider setting in a more fundamental way.

The movement of the blades and night-time lighting are also relevant. A static wireline does not show either effect.

8.11 Gaps in the archaeological assessment

A full archaeological and cultural-landscape assessment is missing. The work carried out does not deal adequately with local knowledge, inaccessible ground, peatland preservation or the wider historic landscape.

The missing assessment needed to include the crannog at Dumha Locha, the court tomb at Troiste, the Penal Mass station, Mount Jubilee, local religious heritage, potential burial places and unknown peat-preserved archaeology.

The conclusion that a turbine approximately 230 metres from a crannog would cause no effect is not adequately explained.

Until the physical, hydrological and setting effects are properly assessed, permission should not be granted.

9. MAYO COUNTY DEVELOPMENT PLAN AND ADOPTED RENEWABLE ENERGY STRATEGY

9.1 Variation No. 2 is now part of the County Development Plan

Mayo County Council adopted Variation No. 2 of the Mayo County Development Plan 2022-2028 on 13 July 2026. The purpose of the variation is to incorporate an updated Renewable Energy Strategy for County Mayo.

This is important because the planning application was prepared and submitted before the final strategy was adopted, but An Coimisiún Pleanála must decide the application having regard to the planning policy in force when it makes its decision.

The adopted policy cannot be treated as an irrelevant document merely because the applicant submitted its application earlier.

9.2 The site is shown as unsuitable

The updated Wind Suitability Map, Map 6.10, places the Muingmore and Doolough project area within land classified as unsuitable for wind-energy development.

The applicant was aware that this change was being proposed.

Chapter 4, section 4.10.1.2 and pages 43 and 54 of the applicant's Planning Statement should be examined closely. The application acknowledges the proposed unsuitable classification and indicates that adoption before An Coimisiún Pleanála's decision would result in a material contravention of the County Development Plan.

That acknowledgement is significant.

The applicant cannot describe the proposed policy change as material while the strategy is in draft and then treat it as unimportant after it has been adopted.

9.3 The designation is based on real constraints

The unsuitable designation is not an arbitrary line.

The Renewable Energy Strategy considers environmental and planning constraints including protected habitats, peatlands, landscape sensitivity, ground conditions and other development limitations. The adopted strategy states, for example, that areas of high landslide susceptibility are unsuitable for wind development because of ground-instability risk.

The accompanying Strategic Environmental Assessment recognises the importance of avoiding functioning peatlands, protecting their carbon-storage role and considering effects on hydrology, birds, habitats, landscape, cultural heritage and water.

Those are the same issues that arise repeatedly at Muingmore.

The site contains extensive peat. It is close to protected bog and coastal sites. It drains towards sensitive waters. It contains archaeological features. It lies within an open coastal and bog landscape where large turbines would be widely visible.

9.4 National targets do not make every site suitable

The applicant places considerable weight on national renewable-energy and climate targets.

Those targets are important, but they do not make every individual site suitable for wind development.

The County Renewable Energy Strategy records that Mayo had already exceeded the County Development Plan's former 600 MW renewable-energy target. It identifies approximately 793.3 MW of connected and contracted wind capacity, with further wind development awaiting decisions when the strategy was prepared.

This does not, by itself, provide a reason to refuse Muingmore.

It does show that refusing this particular site would not amount to Mayo making no contribution to renewable energy. Mayo has already made a very substantial contribution.

The planning question is whether these 13 turbines, at this location, can be reconciled with the adopted Plan and the environmental conditions present on the site.

9.5 A material contravention cannot be brushed aside

I understand that An Coimisiún Pleanála may have statutory powers in a Strategic Infrastructure Development case that do not apply in exactly the same way to an ordinary local-authority application.

That does not make the County Development Plan meaningless.

The proposed development materially conflicts with an adopted plan, yet the application does not clearly confront that conflict or provide a site-specific justification for overriding it. A general reference to renewable-energy targets does not answer the reasons why Mayo County Council classified this land as unsuitable.

The adopted Map 6.10 designation, the environmental reasoning behind it, the applicant's own acknowledgement of material contravention, Mayo County Council's concerns about visual impact and the cumulative amount of energy infrastructure already present in this part of the county all point to a serious planning conflict that remains unresolved.

9.6 The local planning decision deserves weight

Variation No. 2 followed a statutory plan-making process involving technical assessment, public consultation and a decision by the elected members of Mayo County Council.

The development plan is intended to guide where development should and should not take place.

It would undermine confidence in that process if a site newly and deliberately classified as unsuitable were approved almost immediately without a clear and convincing site-specific explanation.

9.7 Application of the adopted planning policy

Applying the adopted Mayo County Development Plan and Renewable Energy Strategy to this site leads to the conclusion that permission should be refused.

The proposal is not merely in tension with a general policy. It is located on land now mapped as unsuitable for the development proposed.

That conflict must carry substantial weight.

10. LANDSCAPE, VISUAL EFFECT AND CUMULATIVE DEVELOPMENT

10.1 The landscape where people live

The landscape around Muingmore and Doolough is open and exposed.

The bog, forestry, scattered houses, water, distant hills and broad sky create its character. The lack of large structures is part of how it is experienced.

This is not only a view for tourists. It is the view from our windows, the school-bus route, the road to work and the places where people walk.

Thirteen turbines approximately 180 metres high would become the largest and most visible structures in the area.

10.2 The applicant's own assessment records widespread visibility

The applicant places the southern part of the site within Area B: North West Coastal Moorlands and the northern part within Area C: North West Coastal Bog.

The applicant’s own landscape assessment records far-reaching effects.

It acknowledges potential comprehensive visibility of between 10 and 13 turbines along the eastern half of the Mullet Peninsula, areas of high and very high landscape sensitivity around the coast and elevated land, and residual effects described as borderline significant in the immediate area and at nearby receptors.

Despite this, the applicant ultimately classifies the wider effects as moderate or not significant in EIA terms.

The words attached to the final classification should not obscure what the assessment is actually saying.

Residents and visitors across a wide area may see most or all of the development.

10.3 Mayo's landscape sensitivity mapping

The adopted Renewable Energy Strategy contains Map 5.5, entitled Landscape Sensitivity - Impact From Wind Farm Development. Mayo County Council's landscape methodology recognises that wind farms can have a high potential to create adverse effects in sensitive landscape areas.

Map 5.5 should be read together with the final wind-suitability map.

The landscape sensitivity map is not, on its own, a wind-farm permission map. It does show why a development of this scale requires caution. Map 6.10 then provides the final strategic conclusion that the site is unsuitable.

10.4 Scale of the proposed turbines

The maximum rotor diameter is approximately 163 metres. The overall height is approximately 180 metres.

The blades would sweep through a very large vertical and horizontal area. Movement makes turbines more noticeable than a static structure.

The proposed development is also divided into two clusters. That could make it appear across a wider section of the landscape rather than as one compact group.

From some locations, the viewer may see turbines spread across the horizon, with gaps between the northern and southern sections. That relationship needs to be shown honestly in the photomontages.

10.5 Views from homes

The visual assessment must give proper weight to residents.

A person living near the site does not experience the turbines from a single fixed viewpoint for a few minutes. The development may be seen from windows, gardens, entrances and roads every day.

A resident does not experience a turbine as a single still image.

The effect changes with light, weather, blade position, sun direction, cloud level and season.

A photograph taken on one clear day cannot represent all of those conditions.

The assessment does not identify the homes with the clearest and closest views or provide house-specific wirelines and photomontages where effects may be substantial.

10.6 Missing or incomplete presentation of turbines

Every visual image must contain all turbines that could reasonably be visible.

I remain concerned that some of the application material does not show the full 13-turbine development consistently.

An omitted turbine changes the apparent scale, spacing and balance of a view. It may also conceal the relationship between the two clusters.

The application does not contain a transparent audit of every photomontage, wireline, landscape figure and cumulative image. Without that audit, it is impossible to know whether the visual material consistently shows the full development.

The coordinates, hub heights and rotor diameters used should be stated. Where a turbine is not shown, the reason should be explained.

10.7 Cumulative landscape effect

The applicant's cumulative map identifies existing or permitted wind-energy development including Bunnahowen, Bellacorick, Oweninny, Sheskin Phase 1, Sheskin Phase 2 and Sheskin South.

The effect should not be assessed only by measuring the distance between project boundaries.

A person travelling through Erris may see one wind farm, then another, followed by another group on the horizon. From elevated or coastal locations, more than one development may be visible at the same time.

The cumulative assessment does not properly consider simultaneous visibility, successive visibility along roads, the experience from the Mullet Peninsula, views from Blacksod Bay, views from Doolough Beach or the increasing presence of aviation lights after dark.

The issue is the overall change in the character of Erris, not whether the base of one turbine can be seen beside the base of another.

10.8 Coastal views and Blacksod Bay

The open water of Blacksod Bay allows long views.

Turbines may be visible across the bay from roads, beaches, islands, boats and coastal settlements. There may be fewer buildings or trees to interrupt those views.

The assessment does not include views from the water itself. People working, fishing or travelling on the bay experience the landscape from a different angle than people viewing it from land-based roads.

The coastal landscape is also sensitive because the skyline and horizon remain prominent.

10.9 Night-time landscape

The landscape chapter cannot end at sunset.

Aviation lights on structures approximately 180 metres high would create a new night-time pattern across the horizon. BESS and substation lighting would add lower-level illumination.

The night-time assessment does not show the number of illuminated turbines, the intensity of the lights, the effect in low cloud and mist, visibility from homes or cumulative lighting with other wind farms.

The absence of night-time photomontages leaves a major part of the landscape effect unexplained.

10.10 Tourism and the reputation of Erris

The area is valued for open scenery, peatlands, beaches, Atlantic views, wildlife and dark skies.

The applicant refers to tourism studies from elsewhere to support its conclusion that turbines do not necessarily deter visitors. General surveys cannot decide the effect on this particular landscape.

The relevant question is what visitors come to Erris to experience and how the proposed development would affect that experience.

A person visiting a commercial wind-farm visitor centre is not necessarily comparable to a person choosing a quiet coastal area because it appears wild, open and undeveloped.

10.11 Landscape assessment and conclusion

The applicant's own findings record widespread visibility and borderline significant effects near the site. Those findings carry greater weight than the reassuring summary conclusion presented elsewhere in the chapter.

The development would be visible from homes, roads, bogland, tourism locations and parts of the Mullet Peninsula. It would also add to an existing concentration of wind-energy infrastructure in Erris.

The proposed scale is not compatible with the character and sensitivity of this landscape.

11. TRISTIA BOG NATURAL HERITAGE AREA

11.1 Protected status

Tristia Bog is a designated Natural Heritage Area, site code 001566.

The official National Parks and Wildlife Service site synopsis describes it as an area of lowland blanket bog approximately five kilometres north-west of Bangor. It lies within the townlands of Fauleens, Srahataggle South and Tristia.

The site is part of the same wider bog and water landscape as the proposed development.

Its protected status must be given real weight. It should not appear in the application merely as another boundary on a designated-sites map.

11.2 Hydrological connection

The National Parks and Wildlife Service synopsis states that Tristia Bog straddles the catchments of the Munkin and Owenmore Rivers and the catchment of Doolough Stream.

That makes the site particularly relevant to my concerns about Doolough Stream.

The connection is not only visual or geographical. It is hydrological.

Drainage, forestry, peat excavation and construction can alter how water moves through the wider bog system. The red line of a planning application does not necessarily define the hydrological zone of influence.

The application does not demonstrate that works within the Muingmore site cannot change water levels, flow direction or water quality affecting Tristia Bog NHA.

11.3 Conservation value

The official synopsis describes an extensive, undulating blanket bog with pools and island hummocks.

The synopsis records bog-moss communities, wet and dry heath, a lake, river and stream habitat, flushes, exposed rock and diverse blanket-bog vegetation.

The National Parks and Wildlife Service states that Tristia Bog contains lowland blanket bog of considerable conservation interest. It also explains that lowland blanket bog accounts for less than three per cent of the world's peatlands and that the Irish lowland form is an extreme hyperoceanic variant with a very restricted global distribution.

This is not ordinary unused ground.

It is a scarce habitat within a landscape where peatland has already been drained, cut, planted and developed.

11.4 Existing threats identified by the National Parks and Wildlife Service

The site synopsis identifies drainage connected with peat cutting as a risk to the hydrological integrity of the NHA.

It also states that surrounding plantation forestry can affect the bog through drainage, fertilisation and self-seeding conifers.

Those existing pressures make further hydrological disturbance more serious, not less serious.

The existing pressures identified for Tristia Bog are closely related to the works proposed in this application.

The mechanisms identified by the National Parks and Wildlife Service are directly relevant to forestry felling, new drains, access roads, deep peat excavation, turbine foundations, the BESS and the substation.

The applicant must demonstrate that these works will not add to the drainage and drying pressures already recognised.

11.5 The former grass-meal site and the western margin

The National Parks and Wildlife Service records that the former Foras Taluntais grass-meal site adjoins the western margin of Tristia Bog NHA.

The proposed substation and BESS are in the wider Grassmeale area, but the application does not show their exact relationship with the NHA boundary, its catchment or the surrounding peat.

A large excavated and drained compound should not be assessed only by the distance between its fence and a protected-site line.

Its drainage outlet and zone of hydrological influence matter more.

11.6 Drainage and peat depth

Peat beneath the BESS and substation compound is stated to reach between approximately 1.8 and 3 metres. The proposal involves excavation, concrete foundations and a new surrounding drainage system.

The assessment does not model whether the works could draw down the local water table, redirect shallow groundwater, increase runoff, alter the timing of flows or interact with drains leading towards the NHA or Doolough Stream.

Generic statements that water will be intercepted and treated do not establish the extent of the hydrological effect.

11.7 Forestry removal

Forestry around blanket bog may already influence drainage.

Removing it can create another period of change. Machinery disturbs the ground, existing drains may be opened, and runoff patterns can alter following felling.

The combined effect of forestry removal, turbine construction, roads and compound excavation must be assessed together.

The assessment separates activities that would take place on the same bog system. It does not properly assess their combined effect.

11.8 Buffer and monitoring

A narrow buffer measured from the mapped NHA boundary cannot substitute for hydrological assessment.

The required protection distance should be based on peat depth; slope; drainage direction; groundwater movement; water-table monitoring; and the location of construction works.

Baseline water-level monitoring should begin before construction and include locations between the development and Tristia Bog.

Trigger levels should be set. If the water table falls or water chemistry changes beyond an agreed range, work should stop while the cause is investigated.

11.9 Landscape setting of the NHA

Tristia Bog is also experienced as part of an open blanket-bog landscape.

The proposed turbines, roads, BESS, substation, fencing and lighting would affect its wider setting. The experience of a protected bog is not limited to its plant list.

The sense of openness, uninterrupted skyline and darkness are part of its character.

This should be assessed separately from the direct habitat calculation.

11.10 Missing site-specific assessment

A specific assessment of the effects on Tristia Bog NHA is missing from the application.

The missing site-specific assessment needed to cover hydrology, drainage, forestry removal, peat excavation, water quality, the BESS and substation, landscape setting and cumulative effects.

The official site synopsis already identifies drainage and surrounding forestry as threats to the bog's integrity. The proposed development would introduce further drainage and ground disturbance within the same wider catchment.

The conclusion of no significant effect is not supported by clear site-specific evidence showing how this protected bog will remain hydrologically secure.

12. ROCHDALE ENVELOPE, UNCERTAIN TURBINE DESIGN AND DEFERRED DETAILS

12.1 What the Rochdale Envelope means in this application

The applicant has not chosen the final turbine model. Instead, it seeks permission for turbines falling within a stated range of dimensions and operating characteristics. This is commonly described as the Rochdale Envelope approach.

In plain language, the approach allows some design details to remain open at application stage where the possible range is clearly defined and the environmental assessment tests the worst realistic outcome within that range.

The use of a design envelope is not automatically unacceptable. The difficulty arises where the range is so broad, or the assessment so inconsistent, that the public and An Coimisiún Pleanála cannot tell what development has actually been assessed.

The key question is not whether the words “Rochdale Envelope” appear in the application. The question is whether the applicant has demonstrated, topic by topic, that every turbine and configuration permitted by the proposed envelope would remain within the effects examined in the EIAR and Natura Impact Statement.

12.2 The turbine model and dimensions remain open

The application refers to candidate turbines including the Nordex N149, Nordex N163 and Vestas V150, or another turbine within the stated design range.

The range allows an overall blade-tip height of approximately 179 to 180 metres, a hub height between approximately 98.5 and 105 metres and a rotor diameter between approximately 149 and 163 metres.

The application also uses different generation scenarios, including turbine outputs of approximately 5.7 MW, 6 MW and 7 MW, in parts of its calculations. At the upper end, 13 turbines rated at 7 MW would amount to 91 MW.

These differences are not insignificant. A 163 metre rotor has a much larger swept area than a 149 metre rotor. Changing the hub height alters the lower and upper blade-tip heights. Turbine power, blade speed, acoustic output, transport requirements and electrical infrastructure may also differ.

12.3 There is no single worst turbine for every environmental topic

A basic problem with the application is the suggestion that one general worst-case turbine can represent the entire project.

Different models may produce different worst cases.

The turbine with the highest sound-power level or most prominent frequency content may be worst for noise, while the largest rotor or a different hub height may produce the longest shadow flicker at a particular house. The greatest rotor-swept area may be worst for bird and bat collision risk, while the highest hub or broadest blade sweep may create the greatest visual effect from a particular viewpoint.

The longest blade and largest component dimensions may be worst for abnormal-load transport and road alterations. The heaviest nacelle, tower or rotor may require different foundation, crane and hardstand assumptions, while the highest electrical output may be worst for the substation, BESS, transformers, cooling demand and grid export.

There may therefore be no single configuration that is worst in every chapter. The applicant must identify the topic-specific worst case and prove that it remains conservative for all turbine models permitted by the application.

12.4 Noise cannot be left to the final supplier

Noise is particularly sensitive to turbine choice. Two turbines of similar height can have different sound-power levels, octave-band profiles, control modes, blade designs, rotational speeds and tonal characteristics.

The final turbine should not be allowed merely because it fits within the height range. The applicant must show that its warranted sound-power level and full frequency data are no worse than the turbine assessed. The same applies to noise-reduced operating modes and any assumptions about serrated blades or other acoustic treatment.

The application does not contain a schedule identifying the exact turbine used in every noise calculation. It also leaves open the installation of an 'equivalent' turbine without demonstrating, through an independent acoustic review, that it would be no worse at every receptor and in every relevant frequency band.

A revised assessment submitted after permission would not cure the present uncertainty because the public would have had no opportunity to examine the final machine before the decision.

12.5 Shadow flicker depends on rotor and hub geometry

Shadow flicker is affected by the position of the sun, the location of each house, hub height, rotor diameter and the final turbine coordinates.

A larger rotor may increase the area over which a moving shadow can reach a house. A different hub height may alter the dates, times and duration of exposure at individual windows. The turbine that creates the highest annual total at one receptor may not create the worst daily effect at another.

The application already predicts daily exceedances at a large number of homes before mitigation. Where the final turbine remains undecided, the applicant must demonstrate that the shutdown calculations cover every permitted rotor and hub-height combination.

This also depends on accurate house information. Generic window dimensions cannot be combined with an open turbine envelope and then treated as a precise house-specific assessment.

12.6 Birds and bats - the rotor-swept zone changes

The bird and bat assessments depend on the dimensions of the rotor-swept zone. A change in rotor diameter or hub height changes the lowest and highest points reached by the blades and the total swept area.

That matters where the application records kestrel, snipe, whooper swan, greylag goose, gulls, sparrowhawk and other species flying within height bands that overlap the proposed blades. It also matters for Leisler's bat and other bat species using the site.

The collision-risk assessment does not state the exact hub height and rotor diameter used for each species. It also does not explain whether a larger rotor, lower blade tip or different operating speed would produce a higher result.

Where detector data is incomplete or survey effort is limited, the uncertainty created by the open turbine design becomes greater. It is not reasonable to combine gaps in the ecological baseline with flexibility over the machine that creates the collision risk.

12.7 Landscape and visual material must show the full envelope

The visual assessment should represent the largest and most visible turbine configuration for each viewpoint. Overall tip height alone does not show the full visual difference between a smaller rotor on a taller hub and a larger rotor on a lower hub.

The balance between tower height and blade length changes how a turbine appears in the landscape. It also changes the amount of movement across the skyline and the lower point reached by the blade.

Every photomontage and wireline needed to state the turbine model, hub height, rotor diameter and blade-tip height used. The application also needed a clear audit confirming that all 13 turbines are shown wherever they could reasonably be visible. That information is not provided consistently.

An omitted turbine is not a minor drafting error. It can change the apparent scale, spacing and relationship between the northern and southern clusters.

12.8 Aviation lighting and the night-time view

The final turbine choice can also affect the exact height and arrangement of aviation lighting, the relationship between the nacelle light and moving blades and the visibility of the development after dark.

The Rochdale Envelope is being used to defer the lighting scheme. The application does not identify the maximum number of lit turbines, the height and intensity of the lights or the worst night-time appearance of both clusters.

The night-time visualisations do not use or identify the turbine configuration that produces the greatest visible blade sweep and lighting effect. The dark-sky impact cannot be assessed through daytime images alone.

12.9 Turbine spacing and wake effects

The distance between turbine centre points should be examined against the largest proposed rotor diameter of approximately 163 metres. A spacing that appears adequate for a smaller rotor may represent fewer rotor diameters when the larger machine is selected.

I am not asserting that a particular turbine pair will suffer unsafe wake effects. My concern is that the engineering evidence needed to answer that question is not included.

The application does not include a table showing the centre-to-centre distance between every relevant turbine pair and the same distance expressed as a multiple of both the 149-metre and 163-metre rotor diameters. It also does not explain the manufacturer or industry spacing criteria used or whether terrain and prevailing wind direction were considered.

The application also does not assess whether wake turbulence could affect blade loading or operating performance, whether turbulent inflow could alter noise or amplitude modulation, whether curtailment would be required or whether every candidate turbine is suitable for the proposed spacing.

If the final turbine requires different spacing or additional curtailment, that is not a matter that should first emerge after permission.

12.10 Roads, transport and construction assumptions

The final turbine affects the dimensions and weight of blades, tower sections, nacelles, hubs and transformers. Those differences can affect swept-path analysis, abnormal-load movements, overrun areas, bridge and culvert loading, crane requirements and the duration of deliveries.

The traffic assessment does not identify the largest and heaviest component within the full design envelope or confirm that the route, road works and temporary alterations have been assessed for that component rather than for a smaller indicative model.

The same uncertainty applies to night deliveries and storage on arrival. The transport effects of the largest component that could be installed have not been fully assessed simply because all candidate turbines fall within the same overall height limit.

12.11 Foundations, hardstands and peat disturbance

Different turbine weights and tower designs can affect foundation loading, crane capacity and hardstand requirements. On a peatland site, those differences may alter excavation, piling, imported stone, drainage and settlement risks.

The application does not identify the maximum structural loads assumed for the foundations and crane hardstands or prove that the civil works assessed in the EIAR are sufficient for every turbine allowed by the envelope without increasing the construction footprint or peat disturbance.

A post-consent foundation redesign should not be allowed to create additional excavation, drainage or habitat loss beyond what the public has examined.

12.12 BESS, substation and project output

The uncertainty is not confined to the turbines. The final turbine output affects the maximum wind-farm capacity and may affect transformers, grid equipment, cooling, electrical losses and the operating role of the BESS.

Where the application uses 5.7 MW, 6 MW and 7 MW scenarios, it does not identify which project components were assessed against the maximum 91 MW case. The BESS capacity and charging assumptions are not fixed clearly enough to prevent expansion following selection of a higher-output turbine.

The application does not present one coherent maximum project description covering the turbines, BESS, substation and grid export. The separate ranges could combine to allow a larger overall project than any single chapter has assessed.

12.13 Deferred plans and post-permission decisions

The turbine envelope sits alongside other details proposed for later determination, including aspects of traffic management, drainage, construction methods, noise verification, lighting, the BESS supplier and emergency planning.

Conditions can control how an assessed development is built and operated. They should not be used to carry out the missing environmental assessment after permission has been granted.

Where a later decision could change the environmental effect, the relevant limit and assessment must be in the application now. Otherwise, residents are asked to comment on one project while a materially different version may be selected later.

12.14 Public participation and planning certainty

The purpose of the application documents is to allow the public and the competent authority to understand the development for which permission is sought.

A resident should not have to guess which turbine will be installed, how loud it will be, which rotor will be used for shadow flicker, what blade-swept zone was used for birds and bats, or whether every photomontage shows the same machine.

The range must be clear enough that the outer environmental limit of the project can be understood. If the applicant cannot identify that limit, the assessment is not sufficiently certain.

12.15 Information missing before the application can be decided

The application does not contain a single design-envelope schedule identifying every candidate turbine model and any proposed equivalent, together with tip height, hub height, rotor diameter, blade length, lower blade-tip height, rated output, maximum rotational speed, principal component weights and sound-power and octave-band data for each operating mode.

The missing schedule needed to identify the turbine used in every noise, shadow, ecology, landscape and transport assessment, explain topic by topic why it represents the worst case, give turbine spacing in metres and rotor diameters and confirm that all 13 turbines appear in every relevant map, wireline and photomontage.

It also needed to state the maximum foundation, hardstand and transport assumptions, set out the final relationship between turbine output, BESS capacity and substation design, and prevent the installation of any model that is worse than the assessed envelope in any environmental respect.

12.16 Conclusion on the Rochdale Envelope

My objection is not based on the claim that all design flexibility is prohibited. It is based on the extent of the unresolved detail and the failure to show one consistent, topic-specific worst case across the application.

The turbine that is worst for noise may not be worst for shadow flicker. The largest rotor may be worst for birds and bats. A different hub height may create the greatest effect at a particular home or viewpoint. A heavier or longer component may be worst for roads and peat disturbance.

A general statement that the worst case has been assessed is not enough. The application does not provide the evidence needed to demonstrate the worst case for each chapter and each candidate turbine.

Unless that evidence is provided before the planning decision, the application does not give sufficient certainty about what may ultimately be built. For that reason, the design envelope and the associated deferral of important details support refusal of permission.

13. LACK OF MEANINGFUL COMMUNITY ENGAGEMENT

13.1 Engagement should have been open and accessible

The consultation carried out by the applicant did not give the wider community a proper opportunity to examine the proposal together and receive clear answers in an open setting. An information day, an appointment or a series of individual conversations is not the same as a properly advertised public meeting where residents can hear the same information, raise questions and see how the applicant responds to concerns shared across the area.

This distinction matters for a development of this scale. The proposal affects homes, school routes, local roads, protected habitats, water, archaeology, the night sky and the future use of the area. These are community-wide issues. They should not have been dealt with through fragmented conversations with individual residents.

13.2 Wednesday event during the working week

The applicant arranged an engagement event in a hotel 15miles from the proposed development , on a Wednesday during the working week and gave little notice. That timing made attendance difficult for people who were working, including those working away from Erris. It also made matters harder for parents who had to arrange childcare, people caring for relatives, older residents who needed transport and anyone who could not leave work during the day.

I have three young children. Attending an event at short notice is not simply a matter of turning up. Work, childcare and family arrangements have to be made. A midweek event with limited notice may be

described as available to the public, but in practice it excludes many of the people whose homes and daily lives would be affected.

13.3 No proper engagement with local groups

The applicant did not properly meet with the local groups that were trying to understand the application, review the technical documents and represent concerns raised by residents. Meeting selected individuals is not a substitute for meeting established community groups and answering their questions on the record.

Local groups had questions about shadow flicker, turbine noise, low-frequency sound, school buses, abnormal-load traffic, Doolough Stream, Blacksod Bay, protected wildlife, peat stability, the BESS, aviation lighting and the final turbine design. Those questions deserved a structured response before the application was finalised.

13.4 Consultation took place after the main design decisions

Meaningful engagement should take place early enough for local knowledge to influence the project. By the time residents were shown the proposal, the turbine locations, road layout, BESS compound, substation and main environmental assessments had already been prepared. The process appeared to be about presenting a largely settled design rather than asking whether it was suitable or how it should change.

Residents know where school buses stop, where roads flood, where children walk, how water moves after prolonged rain and where wildlife is regularly seen. That knowledge should have informed the application before the layout was fixed.

13.5 Missing record of community engagement

The application does not contain a complete record of community engagement. It does not identify all dates and times of events, the notice given, the groups invited, the number of attendees, the questions raised, the written answers provided or every change made to the project as a result. It also does not explain why the principal event was arranged on a Wednesday during working hours or why no properly advertised open community meeting was held with sufficient notice.

Consultation does not cure defects in an environmental assessment. It does, however, matter to public participation and to confidence in the planning process. In this case, the engagement was too limited, too late and too difficult for many local people to access.

CONCLUSION

I have read this application carefully because the proposed development would be close to my home and would affect the place where my husband and I are raising our three children. The documents do not give me confidence that the effects on our family, our neighbours or the wider environment have been fully understood.

The shadow-flicker assessment predicts substantial effects at local homes and then depends on a future shutdown system. The noise assessment relies on an older methodology, unresolved turbine selection and baseline measurements that require further explanation. The proposed construction traffic would use narrow roads already relied upon by school buses, children, walkers, residents and emergency services.

The site is connected through peat, drains and watercourses to Doolough Stream and onwards towards protected coastal waters at Blacksod Bay. The application records important bird and bat activity, a multi-year kestrel nesting site, protected peatland habitat and archaeological features. It also proposes a large BESS and substation while leaving central safety, drainage, noise and emergency-response details to a later stage.

The final turbine has not been selected. Different machines create different worst cases for noise, shadow flicker, wildlife, landscape, roads and foundations. The application does not show clearly enough that every turbine permitted by the proposed envelope has been fully assessed. It also contains repeated deferral of important information until after permission.

Mayo County Council has now adopted a Renewable Energy Strategy which maps this area as unsuitable for wind-energy development. That policy decision, the sensitivity of the landscape and protected environment, the scale of the proposed development and the unresolved technical issues all point in the same direction.

For the reasons set out in this observation, the proposed Muingmore Wind Farm does not accord with the proper planning and sustainable development of the area. Permission should be refused.

Kind Regards

Olivia Munnelly