

Re: Proposed Muingmore Wind Farm Development

Planning Reference: PAX 16.324387

I wish to make a formal submission objecting to the proposed Muingmore Wind Farm.

This objection is not based upon opposition to renewable energy as a principle. Rather, it concerns the suitability of this location for a development of this scale.

The proposed development is located within an environmentally sensitive upland landscape containing extensive peatland habitats, hydrological catchments, protected species, important bird habitat and an established rural tourism resource. It will also have substantial impacts on residential amenity.

In my opinion the proposal fails to demonstrate compliance with Irish and European environmental legislation and therefore planning permission should be refused.

1. Unsuitable Location

The proposed wind farm occupies one of the most environmentally sensitive upland landscapes in Erris, North Mayo which is one of the most impressive natural wonders of the Wild Atlantic Way.

The development introduces industrial-scale infrastructure into an undeveloped peatland landscape through:

- Turbines exceeding 180 metres
- Extensive new roads
- Excavation
- Drainage
- Hardstanding areas
- Borrow pits
- Electrical infrastructure

The cumulative transformation of this landscape is irreversible.

The applicant has not demonstrated why this environmentally sensitive location represents the least environmentally damaging alternative.

The EIAR considers the site suitable primarily because of wind resource and land availability rather than environmental sensitivity. This approach conflicts with the precautionary principle.

2. Insufficient Assessment of Impacts on Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)

The proposed Muingmore Wind Farm is located within a landscape that is ecologically connected to a network of European Sites designated under the EU Habitats Directive (92/43/EEC) and the EU Birds Directive (2009/147/EC).

These designated sites form part of the Natura 2000 network and are afforded the highest level of protection under European law.

While the applicant has undertaken an Appropriate Assessment process, I am not satisfied that it has demonstrated beyond reasonable scientific doubt that the proposed development will not adversely affect the integrity of nearby SACs and SPAs, either individually or in combination with other existing and proposed developments.

The Appropriate Assessment appears to rely heavily on assumptions regarding mitigation and predicted ecological responses rather than providing definitive scientific evidence that adverse effects can be excluded.

Under Article 6(3) of the Habitats Directive, where reasonable scientific doubt remains, consent should not be granted.

3. Biodiversity

The Biodiversity Chapter acknowledges the presence of:

- Blanket bog
- Wet heath
- Peatland habitats
- Protected birds
- Bats
- Otter
- Breeding bird habitat
- Upland ecology

These habitats are nationally important. Despite extensive surveys, uncertainty remains regarding:

- Breeding birds
- Raptor use
- Displacement
- Collision risk
- Cumulative impacts

The EIAR frequently concludes effects are "not significant following mitigation." However mitigation does not remove ecological impact. It merely attempts to reduce it. There remains considerable uncertainty.

4.Functional Habitat

One of the greatest concerns is the treatment of functional habitat. Birds frequently utilise areas outside designated SACs and SPAs. The absence of statutory designation does not reduce ecological importance. The EIAR places excessive reliance upon designated site boundaries while giving insufficient consideration to wider ecological networks.

The proposal risks fragmentation for protected species include:

- Feeding habitats
- Nesting habitat
- Commuting routes

5. Protected Birds

North Mayo supports internationally important bird populations. Species known from the wider area include:

1. Golden Plover
2. Merlin
3. Hen Harrier
4. Peregrine
5. Whooper Swan

The applicant cannot guarantee that operational turbines will not result in displacement of birds, habitat loss and collision mortality particularly over the lifetime of the development.

6. Peatland and Habitats

Blanket bog is an Annex I habitat under the Habitats Directive.

Although degraded areas occur, peatlands remain significant carbon stores and hydrological regulators. Construction requires excavation, drainage, road construction and turbine foundations

All of these alter peat hydrology.

Peat restoration proposed by the applicant cannot fully recreate natural blanket bog ecosystems within meaningful ecological timescales.

4. Hydrology

The development presents significant risks to:

- Groundwater
- Surface water
- Downstream rivers
- Wetlands

Construction activities involving peat excavation increase risk of:

- Sediment release
- Siltation
- Erosion
- Altered drainage

Peatland hydrology is extremely complex.

The applicant's modelling cannot eliminate uncertainty regarding long-term drainage impacts.

Climate change will further increase extreme rainfall events over the operational life of the wind farm.

The drainage design has not demonstrated resilience under future climate scenarios.

5. Peat Stability

Peat failure represents a recognised hazard for wind farms.

Excavation on deep peat carries inherent risks.

Although stability assessments have been undertaken, these rely upon assumptions regarding peat conditions that may change during construction.

Residual risks remain.

6. Landscape and Visual Impact

The turbines will fundamentally alter the landscape character.

The proposed structures dominate:

- Upland views
- Local roads
- Residential outlook
- Tourism Routes

The visual assessment underestimates cumulative effects when considered alongside existing and proposed wind farms throughout North Mayo.

The combined industrialisation of the landscape has not been adequately addressed.

7. Residential Amenity

Residents will experience significant impacts including:

- Visual dominance
- Shadow flicker
- Aviation lighting
- Turbine movement
- Noise
- Reduced enjoyment of family home owners

The planning system should protect established rural communities.

8. Tourism

North Mayo's economy depends significantly upon landscape quality.

Visitors are attracted by:

- Wild Atlantic Way
- Dark skies
- Blanket bog
- Coastal scenery
- Walking

- Heritage
- Wildlife
- Tranquillity

Industrial wind energy infrastructure conflicts with these tourism assets.

The EIAR gives insufficient weight to the economic value of landscape tourism.

No convincing evidence has been provided that tourism will remain unaffected.

9. Cumulative Effects

The proposal cannot be assessed in isolation.

The region already contains:

- Existing wind farms
- Consented developments
- Grid infrastructure
- Proposed renewable projects

Each additional development contributes to incremental degradation.

The cumulative assessment understates the combined effects upon:

- Biodiversity
- Landscape
- Residents
- Tourism
- Hydrology

9. Precautionary Principle

European environmental law requires uncertainty to favour environmental protection.

Throughout the EIAR the applicant repeatedly relies upon predicted mitigation, monitoring and management plans rather than demonstrating avoidance of impacts.

Where scientific uncertainty exists regarding protected habitats and species, permission should not be granted.

10. Compliance with Planning Policy

The proposal raises concerns regarding compliance with:

- EU Habitats Directive
- Birds Directive
- Water Framework Directive
- National Planning Framework
- Climate Action Plan (requiring sustainable—not simply renewable—development)
- Mayo County Development Plan

- Appropriate Assessment requirements

The burden of proof rests with the applicant to demonstrate beyond reasonable scientific doubt that protected European sites and species will not be adversely affected which has not been fully discharged.

11. Inadequate Assessment of Major Accidents, Disasters and Emergency Response

The Environmental Impact Assessment Report (EIAR) does not adequately assess the potential for major accidents or disasters associated with the proposed development, nor does it demonstrate that effective emergency planning arrangements are in place to protect nearby residents, emergency responders and the surrounding environment.

Under the Environmental Impact Assessment Directive (2014/52/EU), implemented in Irish planning legislation, an EIAR is required to describe the likely significant effects of a project resulting from the vulnerability of the development to major accidents and disasters relevant to the project.

While the EIAR acknowledges that risks exist, it relies largely on general statements and standard construction and operational management measures rather than undertaking a comprehensive site-specific assessment of accident scenarios, their likelihood, consequences and emergency response requirements.

12. Lack of a Comprehensive Site-Specific Emergency Response Plan

The documentation does not include a detailed, site-specific Emergency Response Plan demonstrating how emergencies would be managed throughout the construction and operational phases. The absence of a detailed Emergency Response Plan limits the ability of the competent authority to properly assess whether risks to public safety have been adequately addressed. The proposed development is situated within a remote upland area where emergency response times may be significantly longer than in urban environments.

11. Conclusion

Having considered the Environmental Impact Assessment Report and associated planning documentation, I respectfully request that An Coimisiún Pleanála refuses planning permission for the Muingmore Wind Farm.

The proposed development represents an inappropriate industrialisation of a sensitive upland peatland landscape and presents unacceptable risks to biodiversity, protected habitats, hydrology, landscape character, tourism and residential amenity.

The applicant has not demonstrated that significant environmental effects can be avoided, and too much reliance is placed upon mitigation and post-consent management rather than avoidance of impacts.

Furthermore, the application does not provide a comprehensive, site-specific Emergency Response Plan demonstrating coordinated arrangements with the relevant emergency services, nor does it adequately assess whether local emergency response capabilities are

sufficient for a development of this scale and complexity. The absence of clear operational procedures, emergency access arrangements, communication protocols and environmental protection measures leaves uncertainty regarding the project's preparedness for major incidents.

For these reasons, I respectfully request that planning permission be refused.

Yours Faithfully,

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