

JOINT OBSERVATION

STRATEGIC INFRASTRUCTURE DEVELOPMENT APPLICATION

TO: An Coimisiún Pleanála (Strategic Infrastructure Division)

SUBMITTED VIA: www.pleanala.ie

CASE REFERENCE: PAX16.324387

DEVELOPMENT TITLE: Muingmore Industrial Wind Farm, 110kV Substation & Battery Energy Storage System (BESS)

APPLICANT: Muingmore Wind Farm Limited

OBSERVERS:

1. Primary Observer: Sean O'Donoghue
2. Joint Observer: Hannah O'Donoghue

Address for Correspondence: 44 Woodside Park Road, London, England, N12 8RP

Standing / Interest: Life-long Native Diaspora (43-Year Connection) & Returning Family Member (10+ Years)

STATEMENT OF INTEREST & JOINT STANDING

We submit this joint observation as members of the North Mayo diaspora with long-standing personal, family, and economic connections to the Erris peninsula.

- Primary Observer Standing: For 43 consecutive years, I have maintained a continuous presence in North Mayo, returning regularly to reside in the area, support local businesses, and preserve our family heritage.
- Joint Observer Standing: Having married into a local family, I have been visiting the area for over a decade, I spend extended periods in North Mayo multiple times each year, contributing directly to the region's sustainable eco-tourism economy.

We formally petition An Coimisiún Pleanála to REFUSE PLANNING PERMISSION for Case Ref PAX16.324387 based on the statutory, environmental, and policy grounds detailed below.

STATUTORY & TECHNICAL GROUNDS FOR REFUSAL

I. Climate Action Obligations & Peatland Carbon Sink Preservation

Under Section 15 of the Climate Action and Low Carbon Development (Amendment) Act 2021, the Board is legally mandated to align planning decisions with national carbon budgets. Intact

blanket bog across North Mayo constitutes an irreplaceable terrestrial carbon sink. Excavating, draining, and concrete-piling deep peatland for 13 industrial turbines, a 110kV substation, and a BESS compound causes immediate, massive carbon releases through peat oxidation. Destroying an active carbon sink creates a severe carbon debt, directly conflicting with national climate mitigation targets and broader environmental responsibilities amid global climate instabilities.

II. Non-Compliance with EIA Directive 2014/52/EU

- **Unaccounted Carbon Debt:** The applicant's Environmental Impact Assessment Report (EIAR) fails to properly calculate the lifetime net carbon burden of destroying deep peatland. When factoring in peat oxidation, construction materials, local grid constraints, and the contracting of energy to private commercial off-takers (such as data center CPPAs) rather than decarbonizing public infrastructure, the project fails to demonstrate a net carbon benefit within Ireland's 2026–2030 carbon budget window.
- **Defective Noise & Shadow Flicker Baseline:** The EIAR relies on standardized, generic building parameters applied across local residences rather than site-verified surveys. Crucially, it omits the continuous, 24/7 low-frequency acoustic profile generated by the BESS cooling systems and 110kV substation transformers operating alongside turbine noise. The Board cannot grant consent on an incomplete environmental baseline.

III. Regional Landscape Character & Policy Conflicts

Combining 13 giant wind turbines (up to 200m tip height) with a heavy industrial 110kV substation and a utility-scale BESS facility fundamentally alters the character of the terrain from rural blanket bogland to a high-density industrial energy hub. This directly conflicts with the landscape protection objectives of the Mayo County Development Plan and the state-funded Wild Mayo Destination and Experience Development Plan. Replacing pristine landscapes with heavy infrastructure destroys the natural capital that underpins the region's eco-tourism economy and regional identity.

IV. EU Habitats Directive (Article 6(3)) & Major Accident Hazards

- **Natura 2000 Site Protection:** Heavy earthworks within the Blacksod–Broadhaven catchment create unmitigated risks of siltation and hydrological disruption to downstream European designated sites (Broadhaven Bay SAC/SPA and Blacksod Bay SAC). Under CJEU precedent (Waddenzee, Kelly), permission must be withheld where scientific doubt exists regarding potential impacts on protected European sites.
- **BESS Safety Risks:** The inclusion of a large-scale lithium-ion BESS introduces thermal runaway, chemical explosion, and toxic off-gassing hazards. The application lacks an agreed emergency response protocol or localized containment infrastructure for chemical firewater runoff, posing unacceptable risks to local watercourses and public safety in a remote rural location.

CONCLUSION

To safeguard North Mayo's natural carbon sinks, rural landscape character, and protected ecosystems, we respectfully ask An Coimisiún Pleanála to REFUSE PLANNING PERMISSION for Case PAX16.324387.

Signed: Sean O'Donoghue

Signed: Hannah O'Donoghue

Date: 7th August 2026