

FORMAL SUBMISSION OF PLANNING OBJECTION

An Coimisiún Pleanála,

64 Marlborough Street,

Dublin 1,

D01 V902.

Date: 14th July 2026

RE: Formal Planning Objection / Observation

Planning Reference: PAX16.324387

Proposed Development: 13 wind turbines (180-metre tip height each), 110kV substation, Battery Energy Storage System (BESS), and associated infrastructure at Muingmore, Doolough, and Tristia townlands, Co. Mayo.

Developer: RWE Renewables Ireland Limited

Objector: Sean Howard, Wardley, Monterey Road, Greystones, Co. Wicklow & Muingmore, Co. Mayo

1. Introduction & Overview

I submit this objection to the proposed wind farm development at Muingmore, Co. Mayo. This submission builds upon previous representations to demonstrate that the proposed development fundamentally conflicts with the **Mayo County Development Plan 2022–2028** on landscape, visual, and ecological grounds.

Furthermore, this submission raises a critical, material deficit in the applicant's Environmental Impact Assessment Report (EIAR) regarding operational acoustic impact.

Specifically, the applicant's reliance on obsolete UK assessment methodology has been overtaken by events, rendering their noise impact conclusions unreliable and legally vulnerable.

2. Landscape & Visual Impact: Conflict with the Mayo Development Plan

The introduction of industrial-scale wind turbines into this highly sensitive, exposed coastal environment represents a profound material conflict with the Council's own stated policies, objectives, and established visual protection zones.

A. Incompatibility with Landscape Character & Sensitivity Mapping

- **Landscape Sensitivity Map 5.5 (Volume 4):** The subject site is explicitly mapped as having a **High Potential to create an adverse impact** from wind energy development. The Landscape Appraisal identifies this low-lying, open, and horizontal landscape as highly vulnerable to changes.
- **Irreparable Scale Conflict:** The immense vertical scale of modern wind turbines (typically exceeding 150–180 meters in tip height) is fundamentally incompatible with the open, flat-to-undulating peatland and coastal topography of this zone.

B. Direct Contravention of Development Plan Objectives NEO 25 & NEO 26

Under **Chapter 10 (Natural Environment)** of the Mayo County Development Plan 2022–2028, the local authority has bound itself to strict landscape conservation objectives:

- **Objective NEO 25 (Scenic Routes):** Mayo County Council is committed to protecting the character of designated Scenic Routes. Placing giant, rotating, light-reflecting industrial structures directly in the visual corridor of the scenic routes serving the Mullet/Erris peninsula fails to preserve or enhance the wild, natural, and uninterrupted visual continuity that defines Erris.
- **Objective NEO 26 (Designated Views and Coastal Areas):** The proposal falls squarely within a highly sensitive coastal landscape policy zone. It fails to meet the strict protective criteria of NEO 26, as it is impossible to argue that this industrial wind farm preserves the "integrity and distinctiveness" of this unique coastal ecosystem.

3. Disruption of Specific Scenic Assets & Skylines

Visual Asset	Baseline Character	Impact of Proposed Development
Dooyork Lookout / Blacksod Bay	Panoramic, uninterrupted vistas looking south and southwest across the pristine tidal waters of Blacksod Bay toward the dramatic backdrop of Achill Island.	The introduction of massive, spinning turbine rotors directly into this visual sweep. The development will insert a dominating, kinetic industrial barrier into what is currently a tranquil, natural, sea-and-mountain vista.
Exposed Trista / Geesala–Doolough Skyline	A highly sensitive, low-lying, and largely undeveloped skyline. Because of the flat, open nature of the surrounding blanket bog and coastal inlets, any development that breaks	The turbines will protrude directly over this clean horizon. The rhythmic spinning of the blades will draw the eye continuously, completely destroying the remote, wild "sense of place" and natural

Visual Asset	Baseline Character	Impact of Proposed Development
	this skyline is visible for dozens of kilometers.	isolation that characterises this part of the Gaeltacht.

4. Cumulative Visual Effects & Pre-Application Concerns

- **Visual Saturation (Enclosure Effect):** The Erris and West Mayo region has already contributed disproportionately to wind energy infrastructure (e.g., Oweninny and surrounding developments). The cumulative visual impact of adding another major wind development in this immediate coastal vicinity will create an inescapable sequence of turbine views, creating a visual "enclosure effect" that erases the wilderness value of the region.
- **Disregard for Pre-Application Planning History:** It is of critical material relevance to highlight that **Mayo County Council has formally expressed serious pre-application visual concerns** regarding this site. The planning authority previously flagged that the scale and positioning of turbines at this location would present an unacceptable visual impact on sensitive receptors. The applicant's layout fails to resolve these fundamental issues.

5. Material Deficit in Acoustic Assessment: The Overtaking of ETSU-R-97

The applicant's EIAR relies heavily on the **ETSU-R-97** framework to assess and rate operational wind-turbine noise. It is understood that the applicant has previously argued that ETSU-R-97 remains the applicable standard until Irish or UK reviews are finalised.

This argument has been entirely invalidated by recent events, leaving the EIAR's noise impact assessment obsolete:

CHRONOLOGY OF TURBINE NOISE STANDARDS

- 1996: ETSU-R-97 Published (Now Obsolete)
- June 19, 2026: UK Gov publishes "Assessment and Rating of Wind Turbine Noise 2026"
- PRESENT: ETSU-R-97 is officially replaced; EIAR relies on an obsolete, decertified standard.

A. The Shift in Best Practice Technical Guidance

On **19 June 2026**, the UK Government published **Assessment and Rating of Wind Turbine Noise 2026**. This document formally and comprehensively **replaces ETSU-R-97** for new planning assessments across the UK.

- The UK Department for Energy Security and Net Zero has explicitly stated that ETSU-R-97 "**should no longer be applied**" as it has been overtaken by decades of advancements in acoustic science, turbine technology, and human response modelling.

B. Why This Matters to An Coimisiún Pleanála & Mayo County Council

The issue is not whether UK planning guidance is legally binding within the Irish jurisdiction. Rather, the material facts are as follows:

1. **The Applicant's justification has collapsed:** The applicant's defence of its reliance on the 30-year-old ETSU-R-97 framework was predicated on the basis that "the UK review was not yet complete." That review has now concluded. The very justification used to excuse the use of an antiquated 1996 standard has evaporated.
2. **Omission of Key Technical Safeguards:** By relying solely on ETSU-R-97, the applicant's EIAR fails to account for critical technical updates established in the 2026 guidance. This includes modernised, stringent approaches to assessing **amplitude modulation (AM)** and the updated assessment of cumulative noise impacts.
3. **The Risk of "Calibration Drift" Masking True Impact:** The local community's concerns regarding baseline sound meter calibration drift are compounded by this systemic methodological failure. If the baseline data is compromised by drift, and the predictive model is running on an outdated 1996 methodology, the true acoustic impact on nearby residential receptors cannot be reliably predicted.

C. Required Action

An Coimisiún Pleanála has a duty to ensure that environmental impact assessments are robust, legally defensible, and reflective of the current state of scientific knowledge.

Submission Request:

The Board must reject the noise assessment as currently presented. The applicant must be required via a **Further Information Request** to submit a comprehensive **sensitivity and comparison assessment** mapping their noise projections against the modernised parameters set out in the ***Assessment and Rating of Wind Turbine Noise 2026*** guidelines. Without this comparative sensitivity analysis, the Board cannot safely conclude that the development will not result in significant, adverse noise pollution for local residents.

6. Conclusion

In light of the designated landscape protections, the clear breaches of **Objectives NEO 25 and NEO 26**, and the reliance on an obsolete acoustic framework that has been formally replaced as of June 2026, I urge An Coimisiún Pleanála to refuse planning permission for this development.

Signed,

Sean Howard

Date: July 15, 2026