

FORMAL OBJECTION TO PLANNING APPLICATION NO. 324387

To Whom It May Concern,

I wish to formally object to Planning Application No. 324387, relating to the proposed wind farm development at Muingmore, Doolough, Geesala, Ballina, County Mayo. While renewable energy is essential to meeting Ireland's climate obligations, such development must comply with Irish planning legislation, the Mayo County Development Plan, and Ireland's obligations under European Union environmental law. The proposed development raises serious concerns regarding peatland integrity, carbon emissions, water-table disruption, ecological damage, landscape protection, tourism, and the well-being of local communities.

The following grounds form the basis of my objection.

1. Conflict with the Mayo County Development Plan

The Mayo County Development Plan requires that renewable energy development be balanced with the protection of landscapes, biodiversity, water resources, and rural communities. The proposed industrial-scale wind farm would permanently alter one of North Mayo's most remote and visually distinctive peatland landscapes by constructing turbines, access roads, crane hardstands, substations, and extensive drainage networks.

This directly conflicts with the Plan's objectives to safeguard sensitive landscapes and ensure that renewable energy projects do not cause unacceptable environmental harm. These principles are reinforced by the European Landscape Convention, which obliges Ireland to protect landscapes of exceptional character from inappropriate development.

2. Impact on Tourism and Natural Amenity

North-West Mayo's tourism economy depends on its undeveloped Atlantic scenery, blanket bogs, dark skies, fishing waters, wildlife, and nature-based recreation. Industrial turbines exceeding 150–200 metres in height would fundamentally alter this landscape and diminish the visitor experience.

The European Tourism Agenda 2030 emphasises sustainable tourism that protects natural heritage. The proposed wind farm conflicts with the European Tourism Agenda 2030, which prioritises the protection of natural landscapes, cultural heritage, and rural environments as core tourism assets. Industrial-scale turbines, extensive road networks, and aviation lighting would fundamentally alter the undeveloped peatland scenery that underpins North Mayo's nature-based tourism economy. The Agenda emphasises sustainable tourism development that *enhances* natural heritage rather than degrades it, making large-scale infrastructure in sensitive peatland and dark-sky areas incompatible with its objectives. Hydrological disruption, peatland damage, and ecological disturbance further undermine the environmental quality that the Agenda identifies as essential for rural tourism competitiveness. By industrialising a landscape relied upon for walking, wildlife observation, angling, photography, and tranquillity, the proposal directly contradicts the Agenda's requirement to safeguard Europe's most valuable natural tourism resources.

3. Impact on Protected Scenic Landscapes

The proposed development would industrialise an area currently characterised by open blanket bog, uninterrupted horizons, and natural tranquillity. The introduction of large turbines, extensive road networks, and aviation lighting would permanently alter the character of this sensitive landscape. Under the European Landscape Convention, Ireland is required to integrate landscape protection into planning policy and prevent degradation of landscapes of high environmental and cultural value.

4. Ecological Impacts: Wildlife, Fisheries, Deer Habitat and Peatland Biodiversity

The proposed site supports blanket bog habitat, wild red deer, breeding birds, raptors, freshwater species, and numerous protected flora and fauna associated with upland peatlands and local waterways.

Ireland is legally obliged to protect biodiversity under:

- Habitats Directive (92/43/EEC)
- Birds Directive (2009/147/EC)
- Nature Restoration Regulation (EU 2024/1991)
- EU Biodiversity Strategy for 2030

Construction activities—including excavation, drainage, blasting, and road building—would fragment habitats, disturb wildlife movement corridors, and alter hydrology. Water-table disruption can degrade downstream wetlands, streams, and fisheries, affecting salmonid species and aquatic invertebrates protected under EU law. Wind farm developments across the EU have been refused or modified where Appropriate Assessment concluded that significant adverse effects on Natura 2000 sites or protected species could not be excluded.

The proposed wind farm is fundamentally at odds with the EU Biodiversity Strategy for 2030, which requires Member States to halt biodiversity loss, restore degraded ecosystems, and protect sensitive habitats such as peatlands, wetlands, and upland watercourses. Large-scale peat excavation, drainage, and road construction would directly degrade blanket bog—one of the priority habitats the Strategy identifies for strict protection and restoration. The project risks fragmenting wildlife corridors, disturbing protected bird and mammal species, and altering hydrology in ways that damage downstream wetlands and fisheries, all of which contradict the Strategy’s requirement to prevent ecological deterioration. The Strategy also emphasises maintaining ecosystem services such as carbon storage, water regulation, and natural flood mitigation; these functions would be compromised by peatland disruption and water-table alteration. By industrialising a high-value natural landscape and undermining its ecological integrity, the proposed development runs counter to the EU’s legally binding commitment to protect and restore Europe’s most vulnerable habitats and species.

5. Carbon Emissions from Peatland Disturbance

Blanket bogs are among Europe’s most important long-term carbon sinks. Disturbing deep peat releases large quantities of stored carbon and reduces future sequestration capacity. This undermines Ireland’s climate commitments under:

- EU Climate Law (Regulation EU 2021/1119)
- European Green Deal
- EU Biodiversity Strategy for 2030
- Nature Restoration Regulation

Wind farm construction on peatlands typically requires:

- Excavation of turbine foundations
- Widening and deepening of drainage ditches
- Removal of vegetation
- Construction of access roads and cable trenches

These activities accelerate peat oxidation, increase carbon emissions, and can cause long-term hydrological instability. Scientific studies across the EU have shown that poorly sited wind farms on peatlands can result in net carbon loss, contradicting the intended climate benefits of renewable energy.

The construction of turbine foundations, access roads, cable trenches, and associated drainage works would cause significant peat disturbance, accelerating peat oxidation and releasing long-stored carbon into the atmosphere. This converts a natural carbon sink into a carbon source, directly undermining Ireland's commitments under the EU Climate Law (Regulation EU 2021/1119), the European Green Deal, and the Nature Restoration Regulation (EU 2024/1991). These instruments require Member States to reduce greenhouse gas emissions, protect carbon-rich ecosystems, and avoid actions that increase climate vulnerability.

Hydrological disruption caused by drainage and excavation would further degrade peatland function, lowering the water table, drying peat, and increasing carbon release. This also threatens downstream wetlands, rivers, and fisheries—ecosystems explicitly protected under the EU Biodiversity Strategy and the Water Framework Directive (2000/60/EC). The cumulative effect is a measurable deterioration of biodiversity, water quality, and climate resilience, contrary to EU environmental law and national policy. For these reasons, the proposed development is incompatible with the EU Biodiversity Strategy for 2030, breaches Ireland's obligations to protect carbon-rich peatlands, and poses unacceptable risks to climate mitigation, hydrology, and ecological integrity.

6. Water-Table Disruption and Impact on Local Waterways

Peatlands rely on stable hydrology. Drainage for turbine bases and access roads lowers the water table, causing:

- Peat shrinkage and erosion
- Increased sedimentation in streams
- Altered water chemistry
- Flooding or drying of downstream wetlands
- Damage to freshwater habitats and fisheries

Under the Water Framework Directive (2000/60/EC), Ireland must prevent deterioration of water bodies and protect aquatic ecosystems. Any development that risks sedimentation, turbidity, or hydrological change must be rigorously assessed. Local rivers and streams support trout, salmon, eels, and freshwater pearl mussels—species protected under EU law. Construction runoff, peat silt, and drainage alterations pose significant risks to these populations.

7. Construction Traffic, Road Infrastructure and Community Impact

Transporting turbine components, concrete, steel, and heavy machinery over rural roads will cause:

- Road safety risks
- Infrastructure damage
- Noise and dust
- Disruption to farming and fishing access
- Reduced amenity for residents

The local road network consists primarily of narrow, winding, and structurally limited regional and local roads not designed to accommodate abnormal loads, including turbine blades exceeding 60–80 metres, tower sections, nacelles, transformers, and heavy construction machinery.

Transporting these components would require repeated movements of high-axle-weight vehicles, cranes, articulated lorries, and concrete trucks. Such traffic is known to cause road surface failure, subsidence, edge collapse, and long-term structural degradation, particularly in areas with peat-based subsoils and weak road foundations. These impacts constitute a significant environmental risk under the Environmental Impact Assessment

Directive, which requires assessment of cumulative effects on human health, infrastructure, and environmental quality.

Furthermore, the construction phase would generate significant noise, vibration, dust, and traffic disturbance, affecting rural communities and agricultural activity. The Aarhus Convention requires that communities not be subjected to disproportionate environmental burdens without full and meaningful participation in decision-making. The scale of machinery and transport required for this project represents an environmental burden far beyond what the existing infrastructure can safely or sustainably support.

For these reasons, the proposal is inconsistent with EU environmental law, fails to meet the requirements of the Mayo County Development Plan regarding rural infrastructure protection, and presents unacceptable risks to road quality, water systems, biodiversity, and community well-being. Under the Environmental Impact Assessment Directive, cumulative impacts—including traffic, noise, and human health—must be fully assessed.

8. Impact on Dark Skies

North Mayo possesses some of Western Europe's darkest skies. Aviation lighting on turbines would introduce permanent artificial light, affecting:

- Wildlife
- Astronomy
- Tourism
- Landscape quality

Dark sky protection is increasingly recognised in European environmental policy.

9. Cumulative Environmental Effects

The EIA Directive requires cumulative impacts to be assessed holistically. In this case, cumulative effects include:

- Carbon emissions from peat disturbance
- Hydrological disruption
- Waterway degradation
- Habitat fragmentation

- Landscape industrialisation
- Traffic impacts
- Loss of dark skies
- Tourism decline
- Community impacts

Collectively, these represent a substantial and irreversible transformation of a landscape of recognised environmental importance.

10. Concerns Regarding the Accuracy and Representativeness of Visual Impact Assessment Material

A particular concern relates to the photomontages, wirelines and visual representations submitted in support of the application.

Visualisations are intended to assist the Planning Authority, statutory consultees and members of the public in understanding the likely landscape and visual effects of a proposed development. It is therefore essential that viewpoint selection, camera positioning and cumulative impact assessments provide a fair, accurate and representative depiction of the development's likely effects.

Having reviewed a number of the submitted visualisations and having extensive familiarity with the local area, I am concerned that certain viewpoints may not adequately represent the extent of the visual impacts that would be experienced by local residents and road users.

VP17A – Local Road at Trista

While the photomontage itself appears technically realistic, the selected viewpoint does not appear to adequately represent the number of residential receptors within the surrounding area.

In particular, the visualisation fails to reflect the presence of approximately eleven residential dwellings within this locality. As a result, the viewpoint may understate the extent to which local residents would experience visual effects arising from the proposed development.

The omission of a broader residential context limits the usefulness of the visualisation in assessing the true impact on nearby dwellings and local amenity.

VP19 – L1206 at Trista

The viewpoint selected for VP19 also raises concerns regarding representativeness.

A viewpoint located approximately 150 metres further along the road would present a materially different perspective. From such a location, it would be considerably more apparent that existing tree cover does not effectively screen a number of the proposed turbines.

Consequently, the selected viewpoint may overstate the screening effect provided by vegetation and may not fully represent the visual impact that would be experienced by residents and road users travelling through the area.

VP13 – Local Road at Doolough

As a resident familiar with the Doolough landscape and its existing views toward the Bellacorick area, I am concerned that the cumulative wireline and cumulative visualisations associated with VP13 may not accurately represent the existing and proposed turbine relationship within the view.

The cumulative wireline appears to depict a noticeably smaller turbine understood to represent the existing Bellacorick Wind Farm. Based on my knowledge of the landscape, I do not believe this accurately reflects the prominence, scale or visual relationship of the Bellacorick turbines as experienced from this location.

This raises concerns regarding whether the cumulative assessment fully and accurately represents the combined visual impacts of existing and proposed wind energy developments within the wider landscape.

VP16A – L1205 at Doolough

I have significant concerns regarding the representativeness of photomontage VP16A.

Based on local knowledge of the landscape, the location of the proposed wind farm, the proposed turbine heights and the surrounding topography, the visualisation appears to substantially understate the prominence and visual scale of the proposed turbines.

In my view, the photomontage does not provide a realistic representation of the likely visual impact that would be experienced from this location and may therefore underrepresent the true landscape and visual effects of the development.

Need for Independent Review

Given the importance of visual impact assessment in determining the acceptability of a development of this scale, I respectfully request that the Planning Authority critically assess the methodology used in selecting viewpoints and preparing photomontages and wirelines.

Where doubt exists regarding the representativeness of the submitted visualisations, independent verification should be sought, and additional viewpoints should be required to ensure that the full extent of visual and cumulative impacts is properly assessed.

Accurate visual representations are fundamental to a fair assessment of landscape and visual impacts. Where photomontages, wirelines or viewpoint selections underrepresent the visibility, scale or cumulative impact of proposed structures, there is a risk that decision-makers and members of the public may not be presented with a complete understanding of the likely effects of the development.

In light of the concerns identified above, I respectfully submit that the Planning Authority should require further verification of the visual assessment methodology and, where necessary, additional viewpoints to ensure that the likely impacts upon residents, visitors and the wider landscape are fully and accurately assessed.

The concerns outlined above should not be viewed in isolation. Rather, they represent a series of interconnected environmental, landscape, ecological and community impacts arising from a large-scale industrial development proposed within one of the most remote and environmentally sensitive landscapes in County Mayo. Taken together, these impacts warrant a cautious and precautionary approach to the assessment of this application.

11. Relevant LeCo. Galway)gal Challenges and Precedents

Across Ireland and the EU, wind farm developments have faced legal challenges where environmental impacts were inadequately assessed. Examples include:

1. **Derrybrien Wind Farm** (— Found to have breached the EIA Directive due to peatland instability and landslide risk; Ireland was fined by the Court of Justice of the European Union.
- **Kerry, Donegal, and Scottish Highlands cases** — Wind farms refused due to impacts on peatlands, scenic landscapes, and protected species.
- **EU Natura 2000 case law** — Numerous rulings confirm that developments must be refused where significant adverse effects cannot be ruled out.

1. Coumragappul Wind Farm, Co. Waterford (Ireland) – Refused Due to Scenic Landscape & Exclusion Zone

- **Reason for refusal:**
- An Bord Pleanála (now the Planning Commission) refused permission because the proposed turbines (185m high) were located in an **“exclusion zone”** for renewable energy projects and would have a **significant visual impact** on a **scenic upland area** in the Comeragh Mountains.

This is a strong precedent showing that **visual impact on scenic rural landscapes** is grounds for refusal.

2. Knocknamona Wind Farm, Co. Waterford (Ireland) – EU Court Ruling on Appropriate Assessment

- **Issue:**
- The Court of Justice of the European Union ruled that **planning permission was invalid** because the Appropriate Assessment (AA) was carried out **without site-specific conservation objectives**, violating the Habitats Directive.

This case confirms that **wind farms near protected habitats** can be struck down if ecological assessments are incomplete.

3. Massey Case (Ireland) – EU Court Ruling on Protected Sites

- **Issue:**
- Joined with Knocknamona (C-356/25), the CJEU held that **wind farm assessments must consider conservation objectives** for Special Protection Areas (SPAs).

This strengthens legal grounds for refusal where **peatlands, SPAs, SACs, or protected species** are present.

4. Muingmore Wind Farm, Co. Mayo (Ireland) – Major Community Objection on Peatlands & Protected Sites

- **Status:**

A North Mayo community group lodged 33 objections to the proposed Muingmore Wind Farm, citing:

- Construction on **Atlantic blanket bog**
- Drainage into **three European protected sites** (two SACs, one SPA)
- Impacts on **Ramsar wetlands**
- Risks to **maerl beds** in Blacksod Bay (highly sensitive marine habitat)

While not yet refused, this case demonstrates **strong environmental grounds** commonly used to overturn peatland wind farm proposals.

5. Hocht & Ors v An Coimisiún Pleanála (Ireland) – High Court Challenge Involving Peat Waste & EIA Defects

- **Issue:**

Applicants challenged a wind farm approval due to:

- **Peat/spoil waste management concerns**
- Alleged **EIA inadequacies**
- Impacts on property rights and turbary rights

This case shows that **peat disturbance and inadequate environmental assessment** are valid legal grounds for overturning wind farm permissions.

6. SU & Wild Ireland Defence CLG v An Coimisiún Pleanála (Ireland/EU) – CJEU Case on Birds & Habitats Directives

- **Issue:**

- The CJEU ruled that **screening and AA must consider conservation objectives**, reinforcing strict protection for SPAs and SACs.

This case strengthens legal arguments against wind farms in **ecologically sensitive rural areas**.

Summary of What These Cases Demonstrate

Across Ireland and the EU, wind farms have been **refused or legally challenged** where:

- They are located in **scenic rural landscapes** (Comeragh Mountains).
- They impact **peatlands, blanket bog, or carbon-rich soils**.
- They drain into or disturb **protected sites** (SACs, SPAs, Ramsar wetlands).
- Their **Appropriate Assessment** under the Habitats Directive is incomplete or flawed.
- Their **EIA** fails to address peat disturbance, hydrology, or biodiversity impacts.
- They pose risks to **sensitive marine habitats** (maerl beds).
- They threaten **protected species** (kestrel, bats, raptors).

These cases provide **strong legal precedent** supporting objections to wind farms in **peatland-rich, scenic, and environmentally sensitive areas**.

These precedents demonstrate that peatland-rich, scenic rural areas require heightened protection.

Conclusion

Renewable energy must be developed responsibly. The proposed wind farm raises serious concerns regarding compliance with:

- The Mayo County Development Plan
- The Habitats Directive
- The Birds Directive
- The Water Framework Directive
- The Environmental Impact Assessment Directive
- The Nature Restoration Regulation
- The European Landscape Convention

- The Aarhus Convention
- The EU Biodiversity Strategy for 2030
- The EU Climate Law

For the reasons outlined above, I respectfully request that planning permission for this development be refused.

Yours faithfully,
Seán Murphy
Doolough
Geesala,
Ballina
Co. Mayo

6/8/2026