

Stephen Sweeney

Tristia,
Bangor-Erris,
Ballina,
County Mayo,
F26 NYT2.

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

**RE: FORMAL OBJECTION TO THE PROPOSED MUINGMORE WIND FARM STRATEGIC
INFRASTRUCTURE DEVELOPMENT**

Dear Sir/Madam,

I respectfully submit this objection to the proposed Muingmore Wind Farm Strategic Infrastructure Development and request that An Coimisiún Pleanála refuse planning permission.

This submission is made following a review of the Environmental Impact Assessment Report (EIAR) Non-Technical Summary and from my perspective as a local resident who will be directly affected by the proposed development. The proposal comprises 13 wind turbines with blade tip heights of 179–180 metres, an onsite 110kV substation, Battery Energy Storage System (BESS), permanent access roads, drainage infrastructure, forestry felling and associated works on approximately 454 hectares of predominantly blanket bog and peatland. The applicant also seeks permission for a 35-year operational life.

I fully recognise and support Ireland's commitment to reducing greenhouse gas emissions and increasing renewable energy generation. Renewable energy infrastructure is essential if Ireland is to meet its national and European climate obligations.

However, support for renewable energy should not remove the obligation to ensure that developments are appropriately located and do not result in unacceptable impacts on local communities, protected habitats, biodiversity or residential amenity.

My objection is therefore not to renewable energy, but to the siting and scale of this particular proposal.

1. Personal Statement

I respectfully make this submission not only as a member of the public, but as a resident of Tristia, County Mayo, whose family will be directly affected by the proposed Muingmore Wind Farm.

After spending many years living and working abroad, my family made the important decision to return home to County Mayo to establish our permanent home and build our future in the community where our roots lie.

We invested our life savings in purchasing land and constructing our new family home in Tristia. This was not simply a financial investment, but a long-term commitment to rural Ireland and to raising our family in a peaceful, safe and environmentally rich setting.

My wife and I have a four-year-old child, and one of the principal reasons for returning home was to provide our child with the opportunity to grow up surrounded by the unique landscape, tranquillity and strong community spirit that this area offers.

We deliberately chose this location because of its peaceful rural character, clean environment, outstanding natural beauty and quality of life. We expected that the planning system would continue to protect these qualities for future generations.

Our newly built family home is located approximately 960 metres from proposed Turbine T12. While this distance exceeds the minimum setback distances generally referred to in guidance, it does not eliminate the significant effects that industrial-scale turbines of approximately 180 metres in height may have on our family's daily lives over the proposed 35-year operational lifetime.

The proposed development would fundamentally alter the environment that influenced our decision to return home. Instead of raising our child within a peaceful rural landscape, we face the prospect of living in close proximity to a major industrial energy development for decades to come.

Planning policy at both national and local level seeks to support vibrant rural communities and encourage families to live and invest in rural Ireland. I respectfully submit that developments of this scale should not undermine those objectives by significantly reducing the residential amenity of families who have made long-term commitments to their communities.

This objection is therefore not simply about planning policy or environmental assessment. It is about protecting the quality of life of my young family and preserving the unique rural environment that encouraged us to return home and invest in County Mayo.

2. Scale of the Proposed Development

The EIAR confirms that this is a significant industrial development rather than a modest renewable energy project.

The application includes:

13 wind turbines;
turbines with blade tip heights of 179–180 metres;
a Battery Energy Storage System;
an onsite 110kV electrical substation;
approximately 454 hectares of development lands;
permanent access roads;
crane hardstands;
drainage infrastructure;
forestry clearance;
underground electrical infrastructure;
a proposed operational lifespan of 35 years.

These turbines will be among the tallest structures in County Mayo.

While the EIAR naturally focuses on technical mitigation measures, the planning authority must also consider the permanent transformation of the receiving environment.

This proposal represents the introduction of industrial-scale infrastructure into what is presently a predominantly rural landscape characterised by peatland, blanket bog, scattered dwellings and open countryside.

3. Residential Amenity

Residential amenity should be afforded substantial weight in determining this application.

My newly constructed family home is located approximately 960 metres from proposed Turbine T12.

Although this exceeds the minimum separation distances generally referenced within Irish guidance, it does not remove legitimate concerns regarding the effect of a turbine approaching 180 metres in height operating continuously over a proposed 35-year period.

Planning law requires that developments protect the reasonable enjoyment of existing homes.

The combined effects of:

visual dominance;
operational noise;
low-frequency sound;
blade movement;
aviation lighting;

shadow flicker;

construction activity;

must be assessed collectively rather than in isolation.

The cumulative impact of these factors has the potential to fundamentally alter the living environment that my family specifically chose when returning home to County Mayo.

4. Noise

The EIAR concludes that operational noise can be managed through predictive modelling and compliance with applicable standards. While I acknowledge the work undertaken by the applicant, I respectfully request that An Coimisiún Pleanála carefully consider whether modelling alone provides sufficient certainty that residential amenity will be protected over the full operational life of the development. The applicant's own consultation process identifies noise as one of the principal concerns raised by local residents.

In particular, I ask the Board to consider:

whether the assessment adequately reflects night-time conditions when background noise levels in rural areas are naturally very low;

the potential for cumulative operational noise from multiple turbines;

the effect of prevailing wind directions on noise propagation towards nearby dwellings;

low-frequency noise and amplitude modulation ("blade swish"), which can be more intrusive than steady background noise;

whether predicted compliance with guideline values necessarily equates to protection of residential amenity.

The transition from the existing quiet rural soundscape to continuous turbine operation would represent a significant and permanent change to our family's enjoyment of our home.

5. Shadow Flicker

My home is located approximately 960 metres from Turbine T12, and I request that the Planning Authority carefully examine the applicant's shadow flicker assessment as it relates to my property.

Shadow flicker is influenced by several variables, including turbine location, topography, solar position, blade dimensions and the orientation of individual dwellings. Although mitigation measures and control systems may be proposed, I respectfully submit that the Board should consider whether such measures provide sufficient certainty over the proposed 35-year operational period.

In particular, I ask that consideration be given to:

whether any predicted shadow flicker at my dwelling has been assessed using worst-case assumptions;

the long-term reliability of any turbine control or shut-down systems;

the arrangements for monitoring and enforcing compliance throughout the lifetime of the development;

who will bear responsibility should mitigation fail or if residents experience unacceptable impacts.

The fact that mitigation may be required demonstrates that shadow flicker has the potential to affect residential amenity. In my view, where there is uncertainty, the planning authority should adopt a precautionary approach and be satisfied that the amenity of existing residents can be protected for the duration of the development.

6. Landscape and Visual Impact

One of the principal considerations for An Coimisiún Pleanála is whether the proposed development is appropriate within its receiving landscape.

The EIAR describes the Main Wind Farm Development Site as a predominantly rural landscape consisting of blanket bog, peatland, open moorland and dispersed one-off housing. The site lies approximately 0.5 km north of Geesala and contains numerous residential properties in close proximity. The EIAR records that there are 109 residential properties within 1 km of the wind farm site, with the nearest dwelling located approximately 740 metres from a proposed turbine.

While visibility alone is not sufficient to justify refusal of planning permission, the planning assessment should consider the overall change in landscape character and the effect on those who live within it.

The proposed turbines will extend to approximately 180 metres above foundation level, making them among the tallest structures in the region.

Unlike many other forms of development, wind turbines are highly dynamic structures. Their scale, rotating blades, aviation lighting and continuous movement mean they cannot be assimilated into the landscape in the same manner as conventional rural development.

For my family, who deliberately chose to return to Muingmore because of its open rural landscape and peaceful surroundings, the proposed development would fundamentally alter the setting of our home and diminish the qualities that made this location such an attractive place to live.

I respectfully submit that this impact should be afforded significant weight.

8. Biodiversity and Ecological Impact

The EIAR confirms that the proposed development is located within an environmentally sensitive landscape containing peatland habitats, streams and ecological features connected to European designated conservation sites.

The biodiversity assessment identifies a number of Important Ecological Features and records the presence of species of conservation concern including:

Curlew;

Lapwing;

Common Snipe;

Eurasian Woodcock;

Leisler's Bat;

Common Pipistrelle;

Nathusius' Pipistrelle;

Soprano Pipistrelle;

European Eel;

Lamprey.

The EIAR also acknowledges that construction activities may result in habitat disturbance, displacement of species, temporary deterioration in water quality, and collision risk during operation, with mitigation measures proposed to reduce these effects.

While I appreciate that mitigation measures have been proposed, I respectfully submit that mitigation should not automatically be equated with the absence of impact.

Where ecological uncertainty remains—particularly in relation to protected species, peatland habitats and ecological connectivity—the precautionary principle should be applied.

The burden rests with the applicant to demonstrate that adverse effects can be avoided or reduced to an acceptable level.

8. Blanket Bog, Peatlands and Hydrology

The EIAR confirms that the development area is predominantly underlain by cutover lowland blanket bog and peatland, with numerous streams flowing towards environmentally designated coastal waters.

The proposal includes:

turbine foundations;

permanent access roads;

drainage systems;

crane hardstands;

electrical infrastructure;

forestry felling;

extensive excavation within peatland soils.

Although the applicant concludes that these impacts can be managed through engineering design and mitigation measures, I respectfully question whether long-term ecological functioning of these peatland systems can be fully restored following disturbance.

Peatlands are internationally recognised as valuable carbon stores and ecological habitats.

Construction activities have the potential to:

alter natural drainage patterns;

increase sediment transport;

disturb hydrological connectivity;

release stored carbon;

reduce ecological resilience.

These are matters which warrant particularly careful consideration by the Planning Authority.

9. Water Environment

The EIAR notes that the development area contains numerous streams and watercourses which ultimately discharge towards the Blacksod Bay/Broad Haven Special Protection Area (SPA) and the Mullet/Blacksod Bay Special Area of Conservation (SAC).

Protection of downstream water quality is therefore fundamental.

While sediment control measures and Construction Environmental Management Plans are proposed, I respectfully submit that large-scale construction on peatland always carries inherent risks.

Any deterioration in water quality has the potential to affect sensitive aquatic habitats beyond the immediate development area.

The Planning Authority should therefore be satisfied that proposed mitigation is both robust and capable of long-term implementation.

10. Traffic and Construction

The EIAR anticipates an 18–24 month construction programme involving:

abnormal load deliveries;

forestry clearance;

road improvements;

turbine foundation construction;

crane operations;

electrical infrastructure;

restoration works.

The applicant also proposes new and upgraded site entrances together with temporary works along the turbine delivery route.

While construction impacts are temporary, they will nevertheless represent a prolonged period of disruption for residents.

My main concerns include:

increased Heavy Goods Vehicle traffic;

road safety;

impacts on school transport;

disruption to farming activity;

dust;

vibration;

construction noise;

deterioration of local roads.

Given the scale of the proposed infrastructure, I respectfully request that these impacts be carefully considered in the overall planning balance.

11. Community and Rural Sustainability

The applicant refers to a Community Benefit Fund and employment opportunities associated with the project.

While I acknowledge these initiatives, financial contributions cannot compensate for permanent changes to residential amenity or landscape character.

Communities are sustained not only through investment but also by encouraging families to remain in—or return to—rural Ireland.

My family recently made that decision.

We chose to return from abroad.

We built our permanent home here.

We intend to contribute positively to our local community for decades to come.

Planning policy should support those aspirations.

I respectfully submit that developments of this scale should not discourage future generations from investing in rural communities by significantly altering the environment that attracts families to these areas.

12. Planning Policy and Variation No. 2 of the Mayo County Development Plan 2022–2028

I respectfully request that An Coimisiún Pleanála give careful consideration to Variation No. 2 of the Mayo County Development Plan 2022–2028, which introduces the Draft Renewable Energy Strategy for County Mayo.

The draft strategy reflects Mayo County Council's ongoing assessment of where large-scale wind energy development is appropriate within the county. Importantly, the planning documents accompanying this application acknowledge that the updated draft wind suitability mapping proposes that the Muingmore area would fall within land identified as "Unsuitable" for wind energy development, although the applicant disputes that classification.

While I recognise that the draft variation was subject to consultation and may not yet have the same legal status as the adopted Development Plan, it nevertheless represents an important expression of the Planning Authority's evolving assessment of renewable energy development across County Mayo.

I respectfully submit that this emerging policy should be afforded appropriate weight when considering whether the proposed Muingmore Wind Farm represents proper planning and sustainable development.

Where the local planning authority's evolving strategy identifies this landscape as unsuitable for industrial-scale wind energy, An Coimisiún Pleanála should carefully consider whether permission for a development of this scale would be consistent with the long-term planning objectives for the area.

In my submission, the Draft Variation reinforces the concerns expressed throughout this objection regarding landscape character, residential amenity, environmental sensitivity and the cumulative effects of further wind energy development within North Mayo.

13. Cumulative Effects

The EIAR acknowledges the need to consider cumulative effects with other existing and proposed developments and discusses cumulative impacts in several technical chapters.

I respectfully submit that cumulative impact is one of the most important issues in determining this application.

While a single development may be considered acceptable in isolation, the gradual expansion of large-scale wind energy projects across North Mayo has the potential to fundamentally change the character of the wider landscape.

The Board should therefore consider not only the impacts of the Muingmore proposal in isolation, but also:

the cumulative visual impact on the wider landscape;

cumulative impacts on biodiversity and ecological connectivity;

cumulative effects on tourism and recreation;

cumulative changes to the character of rural North Mayo;

the cumulative effect on residents who may already experience infrastructure-related impacts.

The planning system should ensure that cumulative change does not gradually erode the qualities that make North Mayo unique.

Throughout the EIAR, the applicant proposes mitigation measures intended to reduce or manage potential environmental effects. These include measures relating to biodiversity, peat management, water quality, construction practices and post-construction monitoring.

While mitigation is an important component of environmental assessment, I respectfully submit that where uncertainty remains regarding the effectiveness of mitigation—particularly over a proposed 35-year operational period—the Board should apply a precautionary approach.

In particular, I ask An Coimisiún Pleanála to consider whether there is sufficient certainty regarding:

the long-term effectiveness of noise mitigation;

the reliability of shadow flicker controls;

the protection of peatland hydrology;

biodiversity enhancement proposals;

monitoring and enforcement over the full lifetime of the development.

Planning permission should only be granted where the Board is satisfied that these matters have been adequately demonstrated.

14. Conclusion - My Family's Future

This objection is not simply about technical planning matters.

It is about the future of my family.

After many years abroad, we made the decision to return home to County Mayo.

We chose this area because it offered the opportunity to build a permanent home in a peaceful rural landscape and afforded my child an upbringing in an area where I grew up.

Like many families returning to Ireland, we invested our life savings in creating a home that we hoped would remain at the centre of our family's future.

The proposed development would fundamentally change that environment.

Instead of looking out across an open rural landscape, our family would live in close proximity to industrial-scale wind turbines, with all of the associated changes in visual character & natural activity in the peaceful surrounding environment.

This represents a profound change to the quality of life we expected when making the decision to return home.

Planning decisions inevitably involve balancing competing public interests.

I respectfully ask the Board to give meaningful consideration to the impact on families who have invested in rural Ireland and whose homes will be directly affected for decades to come.

While I recognise the importance of renewable energy and support Ireland's climate objectives, I do not believe that this proposal has demonstrated that Muingmore is an appropriate location for a development of this scale.

The proposal seeks permission for an industrial-scale development that would operate for 35 years within a sensitive rural landscape and in proximity to existing homes.

For the reasons outlined above, I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed Muingmore Wind Farm.

Yours faithfully,

Stephen Sweeney
