

Planning Observation– Proposed Muingmore Wind Farm, Co. Mayo

To: An Coimisiún Pleanála

Re: Proposed Muingmore Wind Farm at Muingmore , Doolough, Geesala, Co. Mayo

Applicant: RWE Renewables

Reference: Proposed 13 turbine wind farm and associated infrastructure in Muingmore/Doolough, Erris, Co. Mayo

App. number: PAX16.324287

Lodged by: Susan Cosgrove and Michael Gaynard

We wish to lodge a formal objection to the proposed Muingmore Wind Farm development.

While we recognise the importance of renewable energy generation and Ireland's obligations in relation to climate action, we submit that this proposal is inappropriate in this location due to its likely impacts on the landscape, ecology, fisheries, residential amenity and rural infrastructure of the Erris region.

The proposed development comprises thirteen turbines of substantial height together with associated roads, foundations, electrical infrastructure and construction works. The scale and nature of the development would introduce a significant industrial element into a sensitive coastal and rural environment.

For the assistance of the Planning Authority, the grounds of objection are set out under the numbered headings below. While separately identified, the issues raised are interrelated and should be considered both individually and cumulatively when assessing the proposed development

1. Visual Impact and Landscape Damage

The proposed turbines, reportedly up to approximately 180–200 metres in height, would industrialise a highly scenic and largely unspoilt landscape in the Erris region.

The scale, height and prominence of the turbines would:

- Permanently alter the character of the Wild Atlantic Way landscape;
- Create significant visual intrusion over a wide geographical area;
- Damage panoramic coastal views enjoyed by residents and visitors;
- Undermine the rural and natural character of north-west Mayo.

This area derives substantial value from tourism, recreation, heritage and landscape amenity. The cumulative visual impact would be excessive and contrary to proper planning and sustainable development.

2. Impact on Tourism and Local Economy

Erris and the surrounding coastal region rely heavily on tourism connected to scenery, tranquillity, outdoor recreation and the natural environment. The proposed industrial scale wind farm risks substantially reducing the attractiveness of the area to visitors who mainly visit to see the unspoilt Wild Atlantic Way.

The area is renowned for its unspoilt coastal scenery, ecologically sensitive and coastal habitats which provide unmatched recreational use for walkers, swimmers, cyclers, and nature conservationists observation.

The area is also hugely attractive to recreational anglers however for reasons set out below, we believe this wind farm will drastically affect fish stock which in turn will affect visiting anglers.

The proposed large industrial scale turbines into this landscape would dominate views from the bay and adjoining coastal routes; diminish the natural and scenic character of the coastline; negatively affect visitor experience and local recreational amenity;

Quite simply, it will introduce a visual intrusion into a currently undeveloped coastal environment and would fundamentally alter the setting of both bays and reduce the environmental quality of one of north Mayo's important natural coastal amenities.

In turn this naturally will negatively affect accommodation providers, local businesses and tourism operators in the area and ultimately undermine long term sustainable economic activity in the region.

3. Protected species

We do not profess to be experts regarding protected species in the area but will set out the small number that we have personal knowledge of:

Great yellow bumblebee

The great yellow bumblebee is considered a protected and highly threatened species in Ireland. It is listed as Endangered in Ireland and indeed is protected through habitat conservation under Irish and EU biodiversity laws.

The Irish population of this bee is mainly confined to this area of northwest Mayo and is therefore treated as a priority conservation species.

Of note wind turbines do not usually kill or harm the bee as part of its flight path however have a hugely damaging effect on them indirectly through habitat changes and ecosystem changes.

The proposal to place this wind farm on the bog and grassland areas proposed will directly reduce the habitat available for these protected bees, it will reduce if not remove, wildflower areas during construction and furthermore the affect on drainage in the bogs and surrounding peatland will damage and reduce feeding and nesting corridors. For a rare species like the great yellow bumblebee, even small habitat loss matters.

Corncrake

This region forms part of one of Ireland's remaining core breeding areas for the Corncrake.

National survey data indicate that breeding territories in the core western strongholds of Donegal, Mayo and Galway have increased in recent years, with approximately 281 territories recorded nationally in 2025, representing a 20% increase on the previous year, and a substantial 70% increase since 2018 in these key regions.

Despite this recent improvement, the overall population remains highly restricted compared with historical levels, and Erris continues to support a meaningful proportion of the national population within a limited number of suitable sites.

The corncrake is highly sensitive to disturbance and habitat alteration, particularly during the breeding season, as it nests in tall, dense vegetation close to the ground. Any activities that result in vegetation clearance, changes to traditional late-cut meadow systems, or increased machinery or human disturbance could adversely affect breeding success. Even indirect effects such as habitat fragmentation, noise, or loss of cover may reduce the suitability of otherwise viable territories.

Given the species' vulnerable conservation status and its reliance on a small number of stronghold areas in the west of Ireland, including this region, further loss or degradation of breeding habitat could contribute to ongoing pressure on recovery efforts and undermine long-term population stability.

Wildlife especially associated with Geesala and immediate surroundings

Both Tullaghan bay and Geesala sit in some of the wildest Atlantic habitats in Ireland comprised of bogland, dunes, rocky coast and wet grassland. Because of that there are a few standout species that need to be considered in the area:

Mountain hare / Irish hare

Otter

Red deer

Badger

Pine marten

Bats

Marsh fritillary butterfly

Heathland dragonflies

Moorland hawk dragonflies

Damselflies

In short these bog and coastal areas create habitats you barely get elsewhere in Europe, which is why places around Geesala still support rare insects and birds. It is clear construction in the scale proposed will affect the wildlife listed.

Fishing and Marine Ecology

The locality is widely known for its fishing in Tullaghan Bay and indeed the Owenmore river. The proposed windfarm by the very nature of the land involved flows into these areas. The Owenmore catchment supports populations of Atlantic salmon, sea trout and brown trout which migrate between freshwater and the marine environment.

As matters stand untold damage has previously been carried out by ventures such as Bord na Mona in this area with effluent into Tullaghan Bay whilst operational, causing irreparable damage to the bay and more importantly to the local salmon and sea trout spawning habitat so much so that the quotas for local fishing men are vastly reduced to this day even though operations finished some time ago.

Whilst Tullaghan bay and indeed the Owenmore river may be argued by the developer as being far enough away to "not" be affected by this proposed development, please note this is simply not the case.

Tributary streams feeding the Owenmore (which in turn discharges into Tullaghan Bay) flow down from Muingmore and indeed surrounding areas. These streams provide important spawning and nursery habitat for juvenile fish. It is well known that even small tributaries are significant contributors to salmon production.

Therefore the construction works, road building, excavation and drainage associated with the wind farm could increase sediment entering watercourses. Fine sediment can reduce oxygen levels within spawning beds, affecting salmon and trout eggs and juvenile fish by potentially smothering spawning gravels and reducing egg survival. In turn this will affect returning adult stocks and the wider fishery resource. Scientific evidence has consistently demonstrated that salmonid species are particularly vulnerable to increased sediment loads. This is of particular concern in an area where Atlantic salmon and sea trout populations have already experienced pressures from multiple sources over many decades.

The local community is acutely aware of the historical damage caused to aquatic habitats within the region. Previous industrial activities, peat extraction operations and other developments have left a legacy of environmental impacts from which certain fisheries have never fully recovered. Many local fishermen continue to point to declining catches and reduced opportunities compared with previous generations. The cumulative effect of these multiple developments over many years on fish habitat, water quality and river ecology should be fully assessed rather than considering the Muingmore project in isolation.

Of further particular concern is the potential impact on sensitive seabed habitats, including maerl beds which are present extremely close to the proposed development. Maerl habitats are widely recognised as some of the most valuable marine environments found around the Irish coastline. They provide shelter and nursery grounds for juvenile fish, shellfish and numerous marine organisms that contribute to the overall productivity of coastal ecosystems.

Unlike many habitats, maerl grows extremely slowly and is highly susceptible to sedimentation. Increased sediment entering coastal waters can settle on these habitats, reducing their ecological function and potentially causing long-term damage that may take decades to recover from.

The importance of protecting such habitats cannot be overstated. Healthy marine ecosystems underpin healthy fish populations. Damage at any point within that ecological chain has consequences for commercial fishing interests, recreational anglers, wildlife and local tourism.

Migratory birds to Tullaghan Bay

Tullaghan Bay itself, is part of a protected coastal and wetland system used by annually migrating and overwintering birds along what is referred to as the Atlantic Flyway.

The proposed windfarm will have a direct and negative impact on a large number of annual migratory birds that populate the bay and surrounding lands. Nearby designated coastal habitats consistently record the following migratory species:

- Light-bellied Brent Goose
- Greenland White-fronted Goose
- Whooper Swan
- Golden Plover
- Grey Plover

- Ringed Plover
- Sanderling
- Dunlin
- Knot
- Curlew
- Redshank
- Greenshank
- Bar-tailed Godwit
- Oystercatcher
- Lapwing
- Red-throated Diver
- Great Northern Diver
- Common Scoter
- Red-breasted Merganser

These species are protected under the EU Birds Directive and are associated with Irish coastal SPAs and migratory wetland habitats.

These birds return annually to coastal feeding and roosting grounds and are highly sensitive to habitat disturbance, turbine movement, noise, lighting and visual intrusion.

The proposed Muingmore Wind Farm raises serious concerns regarding collision risk during migration; disruption of established flight paths; displacement from feeding and roosting areas; cumulative disturbance impacts on protected coastal bird populations.

The Atlantic coastal wetlands of this area are internationally important for migratory birds protected under the EU Birds Directive and associated SPA conservation objectives. Any risk to these species or their habitat should trigger a refusal of this planning application.

4. Peatland Risks

The Muingmore Wind Farm proposal involves development on peatland, one of Ireland's most important natural carbon stores.

Construction activities such as excavation, drainage, road building and turbine foundations can disturb peat and release carbon that has been locked away for centuries.

This raises a significant concern that a project intended to contribute to climate change mitigation could, in the short to medium term, result in the loss of substantial amounts of stored carbon from the site.

It appears contradictory that, while Ireland is investing considerable resources in reducing greenhouse gas emissions and restoring degraded peatlands as carbon sinks, a renewable energy development such as this, will require the disturbance of peat that is currently storing carbon and indeed acts as some of the country's most effective natural carbon stores.

5. Residential Amenity, Noise and Shadow Flicker

The development has the potential to negatively affect a large number nearby residents through turbine noise; low frequency vibration; shadow flicker and light pollution

It would appear clear that the scale of the turbines proposed is disproportionate to the receiving rural environment.

6. Inadequate Infrastructure and Construction Impacts

The construction phase would involve abnormal load deliveries; heavy construction traffic; excavation works and ultimately potentially damage local roads and infrastructure.

The movement of heavy goods vehicles, cranes, turbine components and other abnormal loads would place considerable pressure on roads, bridges, junctions and verges, increasing the likelihood of deterioration, structural damage and ongoing maintenance requirements. There are serious concerns regarding road safety for local residents, school transport, agricultural vehicles, cyclists, pedestrians and emergency services.

This would result in significant disruption to the local community and to a rural road network that was never designed to accommodate industrial scale construction traffic. Many of the roads in the area are narrow, winding, lack footpaths, and already struggle to cope with existing agricultural, residential and tourism related traffic.

The current road infrastructure is simply not fit for the level of traffic associated with a major wind farm construction project. The cumulative impact of these works would make local travel considerably more difficult, particularly for residents who rely on these roads for daily access to employment, education, healthcare and essential services. At peak construction periods, sections of the local road network could become effectively unsuitable for normal community use.

7. Cumulative Impact of environmental projects

This proposal must be considered alongside existing and proposed renewable energy developments in Mayo and neighbouring areas.

Of note there is already larger scale wind farm development in north mayo and further such proposed development is landscape overdevelopment and unacceptable visual clutter in such a rural setting.

Conclusion

The proposal represents an inappropriate industrial development in a sensitive coastal and rural landscape with unacceptable impacts on this fragile coastal landscape.

The proposed site lies inappropriately close to sensitive ecological areas which are European designated conservation sites including the Mullet/Blacksod Bay Complex SAC; the Blacksod Bay/Broad Haven SPA and Tullaghan Bay SAC and SPA.

As set out above, the proposed development raises serious concerns regarding habitat disturbance; peatland degradation; bird strike risk and impact on protected species and downstream impacts on coastal and marine ecosystems. These ecological impacts should weigh against granting permission.

Any climate benefits claimed for the project should be carefully weighed against the permanent loss of stored carbon and the degradation of a habitat that naturally captures and retains carbon together with its affect on the landscape, biodiversity, wildlife populations.

We ask the planning authority to prioritise the protection of the Erris landscape, biodiversity and community wellbeing in accordance with the principles of sustainable development and refuse the proposed Muingmore Wind Farm.

Yours faithfully,

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