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[318701 | An Coimisiún Pleanála –](#)

**TO CONSIDER THE REPORT ON THE PROPOSED STRATEGIC INFRASTRUCTURE DEVELOPMENT,  
AN BORD PLEANÁLA REF: ABP 318701 FOR GLENORA WINDFARM**

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### 1. Introduction and Background Context:

**"We can't destroy biodiversity in order to save the planet."**

Teresa Fagan, Chairperson of the Lacken-Ballycastle Protection Group referred to 'The Power Imbalance'. That imbalance is not unfortunately confined solely to environmental expertise available to WF companies. It extends to almost every arm of the State and any organisations remotely connected to it.

If the Irish State was genuinely interested in environmental protection it would be recruiting trained environmentalists to its ranks in order to monitor and ensure compliance. As of now,

trained environmentalists can mostly, perhaps exclusively find employment working for companies whose sole objective is to proliferate wind and solar farms. In fulfilling the role of providing EIARs they must one hopes, objectively identify environmental risks. I observe however that having done so objectively, in order to ensure ongoing employment, they then conclude invariably that every risk can be MITIGATED. In order to counteract this phenomenon, ACP should independently commission the EIARs and pay for them and then charge the WFs. That would help to ensure objectivity without environmentalists fearing repercussions.

Of course, some risks can be reduced and perhaps mitigated in some cases but one must ask the question, why has one arm of the State established environmental protection areas via NHAs, SACs and SPAs and then have another arm of the State exposing these areas to unnecessary risks, when it is quite apparent that these areas are already deteriorating environmentally due to inadequate supervision and application of protection regulations.

The Irish record on the lack of real environmental protection speaks for itself. One only needs to consult the Environment Protection Agencies website to experience despair.

<https://www.epa.ie/publications/monitoring--assessment/assessment/state-of-the-environment/irelands-state-of-the-environment-report-2024.php>

‘Ireland’s environmental record is marked by a lack of real protection, as highlighted by recent assessments and reports. The country has been criticized for its inadequate care of the environment, with the latest “State of the Environment” Report by the Environmental Protection Agency (EPA) stating that the State is “always playing catch-up” on environmental protections. The report indicates that Ireland generally aims no higher than to “get by” with minimum standards, but often fails to reach even those’.

**Environmental Non-Governmental Organisations (NGOs):** There are over 40 Environmental NGOs that are funded wholly or partially by the Irish State (Tax Payers). While they apparently are motivated to advocate to government for improved environmental regulations, they seldom if ever act effectively to criticize the dismal overall performance in actually applying these regulations. Regulation does not protect the environment unless they are diligently applied and those who break them are punished adequately to dissuade. Ireland’s performance in environmental protection is abysmal – most recent example - ‘Eur 40 million of peat illegally extracted from 38 sites and exported’. Ireland pays lip service to environmental protection. If these NGOs were not funded by government, perhaps they would actually be more effective and more prepared to act constructively in order to effectively protect the environment, as opposed to paying lip service. They tend to advocate for more regulations, as opposed to criticizing the government for not actually acting and ensuring that current regulations are adhered to.

**The Media:** It is the experience of members of the Irish public that any attempts to raise issues of concern relating to environmental and health issues concerning wind farms, invariably

fall on deaf ears. Our current Taoiseach Michael Martin raised his legitimate and 'sincere concerns' while in the Dail opposition in June 2013 (Link to his oral PQ on the Dail Record - <https://www.youtube.com/watch?v=SjPb4XPBca4>). Do I need to state the obvious! Four years later in 2017, Environmental Journalist Paul Melia wrote a press article in which he quoted Minister Naughten to the effect that updated wind energy regulations would be introduced in the first quarter of 2018. See copy of the Press Article in **Appendix 1**.

Mr Melia became a government adviser in early 2019 and here we are in 2026 with 20 year old wind energy guidelines still in place and they tell us it will be sorted by the end of the year. This phrase is regularly used but they don't state which year. It's a lot like the Spanish Manyana. See a copy of the Statutory Instrument signed by then Taoiseach Leo Vradker and used to appoint Mr Melia in **Appendix 2**. All legal and above board one must state.

See Justine Mc Carthy's Press Article Fri Apr 26, 2024 in **Appendix 3**. It speaks for itself concerning the undermining of investigative journalism by government recruitment! One could refer to this as the decommissioning of journalists.

Sam Smyth is the only Irish journalist to twice win Journalist of the Year honours - in 1991 for his investigation into business scandals and in 1997 for his exposure of a political scandal that led to the resignation of government Minister for Transport, Energy and Communications Michael Lowry on 03 Dec 1996. Mr Lowry did not however resign his Dail Seat but has repeatedly topped the poll in his constituency since 1987. Mr Lowry, TD played a pivotal role in the formation of the current government. Considering all aspects of the equation, one can merely wonder why Ireland unfortunately now has no forensic investigative journalism and newspapers invariably refuse to publish letters that are not supportive of RE.

This of course removes some of the checks and balances that independent investigative journalism should contribute – for example why is electricity so expensive, when we are told daily that RE reduces electricity costs?

Of course it is also apparent that Dail Eireann does not have an effective opposition, particularly in the Energy Field. Inexplicably, energy policy was not once raised as an issue in the run into the last general election in 2024, when it actually was 'the elephant in the room'. For some reason no politician or indeed media journalist could see the elephant. It should have been the core issue for both politicians and effective journalists. However, across the board, no journalists it is clearly failing to deliver on Ireland's objectives concerning 2030 CO2 reduction targets or indeed Net Zero by 2050. While many Irish and indeed international engineers, based on science and engineering (Irish Academy of Engineers Report) are now questioning and confronting the accepted Wind Energy ideology, it is still not being reflected in a review of government energy policy. They continue with the green ideology that established itself, 30 years ago, without any real scientific or engineering basis. Anyone who questions it is a heretic. The powers that be get away with side stepping the issue because neither the Dail opposition or journalists wish to confront the issue of a failing energy policy that will eventually make us so economically uncompetitive that it will eventually bankrupt the economy.

<https://mail.google.com/mail/u/0/#inbox/FMfcgzQfBZcMwxpDRvXmFBwPSXcwqHJH?projector=1> While some of the world is waking up to the fallacy of RE, Europe and Ireland are laggards.

### **Judicial Reviews:**

**The purpose of Judicial Review (JR) legislation is** to provide citizens with legal rights where a government or their institutions err in law. This provision is vitally important in a planning context particularly where under SID, there is no right of appeal and no other means to redress an error by a State Institution. A democratic State would therefore cherish and foster judicial review safeguards. No democratic State would ever consider removing this essential safety net and would instead identify ‘The Elephant in the room’ and act appropriately’. Unfortunately, as I write, the Irish government is in the process of introducing legislation (commenced under the 2024 Planning and Development Act) that will render the taking of JR proceedings excessively expensive, even where a member of the public wins the JR case. So in effect a government agency makes an error in law – a member of the public takes a JR case and wins and the person who takes the case must incur excessive levels of expense. The wheels of justice clearly grind slowly in Eire and are in fact currently regressively! The dissuasive authoritarian objective is of course obvious. It is in the context of this authoritarianism regime that ACP must endeavor to act evenhandedly and hopefully objectively.

I should state firstly that I have much sympathy and understanding of the invidious position that An Coimisiún Pleanála (ACP) has been placed by successive governments, particularly since 2007 when Strategic Infrastructural Development legislation was introduced. I appreciate that planning decisions fall into what is regarded as a ‘quasi-judicial’ role.

**The Role of An Coimmissiun Pleanala:** As a vital pillar of democracy akin to the courts and the judiciary, ACP should be totally independent and not subject to ministerial or political interference. Governments should of course play a role in policy development but not meddle in day to day planning decisions. Since the introduction of Strategic Infrastructural Developments (SID 31 Jan 2007) the independence of ACP has been deliberately undermined in order to allow government politicians to have undue influence in decision making.

The introduction of SIDs also removed the right to appeal and in effect this left Judicial Review as the only ‘appeal alternative’ for people who felt their rights were being eroded. In removing the right of appeal in SID applications, they have also undermined the principles of ‘Natural Justice’.

Natural Justice plays a crucial role in promoting fairness, transparency and accountability in decision-making processes, by ensuring that individuals are treated justly and given a fair opportunity to be heard. Natural Justice upholds the integrity of legal and administrative system. The principles of Natural Justice in planning decisions was undermined totally when SIDs were introduced. SIDs were designed to bypass local democratic institutions like County

Councils and remove citizens' rights to fair planning decisions. The independence and integrity of ACP, of course, has also been undermined.

### **Consensus:**

I have outlined above how a controlling consensus can be achieved in a so called democracy, if the government controls the media, environmentalists, NGOs, Judicial Reviews and the many other vital organs of the State. All societies need a level of consensus in order to achieve important goals. There are normally dissenting voices and real democracy requires this. For example, the divorce referendum was barely passed at just over 50% in favour. Invariably, only dictatorships achieve 100% consensus. Excessive consensus smacks of authoritarianism and Ireland is currently in its firm grip. Perhaps it is merely coincidental that this process of achieving consensus via State control, commenced from the time of Ireland's financial crash in 2007 (SIDs introduced) and the subsequent arrival of the IMF in 2010.

### **Energy Policy:**

I should also state that I am unequivocally in favour of reducing or, if possible, replacing fossil fuels in Ireland's energy system for the many reasons that I will not go into here for brevity reasons. What commenced as an unattainable if desirable objective under the Greens has however over the years now evolved into a money making machine for the few, at a huge increase in electricity costs to the many and to some who cannot afford it. There are currently 300,000 Irish electricity and Gas customers in arrears with their bills, despite significant subsidization via the Apple Tax Windfall, over the 3 previous winters. It appears that Renewable Energy is increasing the cost of electricity beyond affordability, while the government propaganda pretends otherwise and they tells us wind is free.

It is quite obvious that Renewable Energy alone can never achieve Net Zero or indeed reduce the cost of electricity. It is just not sensible to have a faith based belief in RE, when it is itself totally dependent on fossil fuel back up. How can one logically suggest that RE can replace fossil fuels, when it actually depends totally on fossil fuels, for back up. We appear to proceed from one illogical decision to the next one, initially propelled by green ideology, now sustained by a renewable energy propelled feeding frenzy, where we pay WFs (0.6 Billion in curtailment payments annually) not to produce electricity because the Grid can't cope with it. Of course we simultaneously pay fossil fuel companies a similar amount in capacity payments to remain idle but on standby in case the intermittent wind does not blow.

Of course in our wisdom we actually banned drilling for Gas in 2021, and our reserves have now largely expired. We now talk of building an LNG Port in Shannon so that we can import more Gas to back up RE. The government has also given the go ahead to Gas Networks Ireland to build 2 MW of Gas plant, not to mention Data Centers that have been advised to provide their own electricity supplies via Gas. This raises fundamental and contradictory questions. If RE is going to replace fossil fuels, why do we need to invest so much in electricity generation from Gas and why do we need to build an LNG Port at Shannon? If we clearly need to build more

Gas Plants, and therefore have a higher Gas requirement, why did we ban drilling for Gas in 2021? Ireland appears to be seriously into 'green washing' and virtue signaling.

Ireland also banned nuclear energy in 1999. Ireland is not large enough to be fueled by the old style large nuclear plants but we are on the cusp of newer technology that could ideally suit our situation. Small Modular Nuclear Reactors (SMNRs) will ideally suit the Irish scenario. SMNRs is the only technology that can deliver Net Zero in Ireland and replace both RE and fossil fuels.

The Irish media and indeed others are clearly misleading people into believing that wind and solar power are clean and cheap. They are neither. There are environmental impacts associated with manufacturing, maintaining and disposing of solar panels and wind turbines (Chinese coal) and their costs are not comparable to fossil fuel or nuclear power because wind and solar need backup power, requiring duplicate generating technologies. Battery storage may mitigate (over-night) particularly in the case of Solar but have insignificant storage impact in the case of wind energy. Roof top solar is not a bad idea but large scale solar farms in Ireland is nonsense. The irony though is that if subsidization was removed, neither wind or solar energy could survive.

#### **See Appendix 4 Energy Policy.**

A recent Report by the **Irish Academy of Engineers** provided an objective assessment of Ireland's renewable energy strategy and its lack of progress. To say the least, our progress in replacing fossil fuels with RE is not impressive and the cost of doing so is making our energy so expensive as to render us uncompetitive internationally. Government agencies and politicians ignore the report because it tells the objective truth and members of the public should be kept in the dark. This is of course having economic consequences and also impacting seriously on our cost of living. While a small number of people are profiting enormously from RE, the remainder are paying excessively for it via taxation and excessively expensive electricity. We are told repeatedly that RE is cheap but nevertheless if all subsidies and over charging of customers was discontinued, RE companies would not survive financially. Customers are effectively being over charged in order to sustain the ideology of RE.

I have synopsised the main points of the **Irish Academy of Engineers** Report and conclusions in **Appendix 5.**

Under current government energy policies, a huge area of North County Mayo looks like becoming a large continuous wind farm, where fewer and fewer people will reside. This will of course also impact on tourism, regardless of the propaganda that states that tourists are not 'put off' by turbines. People have been fed false information worldwide for the last 30 years about the necessity and effectiveness of RE and by now it has become so embedded in their psyches that they accept it as inevitable and beneficial, without serious questioning its effectiveness.

Our current Taoiseach Michael Martin behaves like the gentleman in the naked Emperor Fable, although he displayed a thorough knowledge and concern about the health impacts of turbines in a parliamentary question in June 2013 -

(<https://www.youtube.com/watch?v=SjPb4XPBca4>).

Many Irish residents and indeed tourists accept the blight of turbines on our scenic bog landscapes because they have been falsely indoctrinated that they are all totally necessary in order to save the planet. There is almost a total consensus, based on false information, that WE is acceptable at any price. People in general have not been informed about the health consequences (infra noise) of turbines that are placed in proximity to houses or indeed farm animals. Due to our scattered housing pattern, it is becoming more difficult to find WF sites where turbines are not placed too close to housing or indeed farm animals. In the few locations where this is possible, the environmental damage to carbon sink bogs is still unsustainable.

The impacts of poor rural economy planning and the consequent demise of the North West of County Mayo is eloquently set out in this Western People press article by Liam Alexander Heffron. [https://www.westernpeople.ie/opinion/the-heart-of-another-rural-community-has-stopped-beating\\_arid-42320.html](https://www.westernpeople.ie/opinion/the-heart-of-another-rural-community-has-stopped-beating_arid-42320.html) The proliferation of wind farms in North West Mayo will undermine and discourage tourism and exacerbate this rural decline.

## **2. Previous Planning History:**

**Mayo Planners Report prepared by reference to the current Glenora planning application refers to two previously refused applications in the Glenora area as follows:**

**Report to Elected Members of Mayo County Council as required by Section 37E(4) of the Planning & Development Act 2000 (as amended). An Bord Pleanála Ref No: ABP 318701**

A planning Refusal in 2004 is documented on Page 15 of the Report in respect of PL.16.206517 (ABP).

### **Extract:**

**“Decision :** Refused by MCC 17/02/2004 / Refused by ABP (11/04/2004)

**Applicant:** Airtricity Developments (Ireland) Ltd. and Coilte Teoranta.

**Proposed Development:** Permission sought for the construction of a wind farm, consisting of

29 wind turbines (max hub height of 65m and max blade diameter 80m with a total height not exceeding 100m), a 110kV

substation including pylon and control buildings, one 65m high meteorological mast, construction and upgrading of site entrances, site tracks and associated works.

**Decision :** Refused by MCC 17/02/2004 / Refused by ABP (11/04/2004)

**Reasons (ABP)**

1. The location of the site in an area designated as vulnerable in the [then]current CDP where there is an objective to recognise and facilitate appropriate development in a manner that has regard to the character and sensitivity of the landscape.....the proposed wind farm sited at this location, would be inter visible with existing and permitted wind farm developments at Bellacorick, would constitute an obtrusive development which would detract from the rural character and scenic amenities of this sensitive and vulnerable area.....
2. Having regard to the extent of the existing and permitted wind farm development in the general Bellacorrik area, the proposed wind farm development would be premature pending the preparation of a Wind Energy Strategy for the County.

**Page 15 continued;**

They refer here to the Inagh River being in the Owenmore River catchment. The Glenora River is also in this catchment. In fact, the Glenora River is the source of the Owenmore salmanoid river.

**Immediately west of subject site Pl.Ref**  
02/174

ABP 16.131318

**Details**

**Applicant:** Contracts Renewables Ltd  
**Proposed Development:** Wind farm (30 turbine, 1.75M) with hub height 67m and rotor diameter of 66m, 110kV substation building/compound and associated works.

**Decision:** Refused by MCC (06/11/2003) / Refused by ABP (02/04/2004) Reasons ABP

1. [...] the proposed development is sited in a prominent location...a sensitive landscape that adjoins the designated vulnerable area comprising **the Owenmore River system** [.....] The proposed wind farm, sited at this elevated, prominent and exposed location, would constitute a highly obtrusive development that would detract from the rural character and scenic amenities of this sensitive and vulnerable area [...]would contribute to the erosion of the visual and environmental amenity of the area.
2. The site of the proposed development hosts extensive priority habitat designated under the EU Habitats Directive, namely blanket bog and dry heath. In addition the Glenamoy Bog Complex SAC and the site is in the immediate vicinity of the designated Bellacorick Bog Complex SAC, which lies to the south [...]

**the site hosts the protected bird species of golden plover and red grouse and contains the Inagh River which is part of the Owenmore River System, an important salmonid fishery in north Mayo.... [...]**

It is considered that the proposed development including the construction of a substation and compound, as well as the operation of the wind farm, would have significant adverse impacts on the ecological ornithological and aquatic importance of this site and the immediate area by way of destruction of habitat, disturbance and displacement of protected species, and pollution potential for the important watercourses within and bounding the site.....[...]

**End of extract.**

One must legitimately wonder if the area was deemed unsuitable for a much less obtrusive turbines in 2004, what makes it suitable for much larger turbines 20 years later. Nothing has altered, except a policy that now advocates for environmental and visual damage to these protected and vulnerable habitats.

**P 21 of the Mayo Planners Report refers as follows:**

**8.4 Built Heritage, Archaeological Sites, Special Amenity Orders**

**UNESCO Sites:**

No UNESCO World Heritage Sites (WHS) or those on a Tentative List are located on or in close proximity to the proposed development. The Céide Fields and North West Mayo Boglands were previously included in the 2010 Tentative List for Ireland.

<https://www.ireland.com/en-ca/things-to-do/attractions/ceide-fields/>

**National Monuments:**

One monument subject to a Preservation Order is located within 10km of the nearest proposed turbine and consists of an Early Christian Enclosure and church site (MA014-061/001-006, Preservation Order No. 11/1983). It is located 9km to T16 and T22 and is located to the east of the proposed development site. Potential impacts and mitigation are addressed in Section 13.4.3 of Chapter 13 of the EIAR.

**Record of Monuments and Places (RMP)**

There are no recorded monuments directly within the subject site (EIAR site boundary).

**The Céide Fields:** The Céide Fields is a statutory Recorded Monument (ref MA006-032). The Zone of Archaeological Potential relative to the proposed development measures 3km to the nearest proposed turbine (T15). The 2011 publication entitled Excavations on Céide Hill, Behy & Glenulra, North Co. Mayo, 1963-1994 provides a map of the surveyed extent of the Céide Field walls. The surveyed field walls measure 1km to the east of the nearest proposed turbine (T22).

It is quite clear from excavations by numerous archeologists in the Ceide area and surrounding parishes that the Field Wall System is not just confined to the immediate area surrounding the Ceide Visitor Center but is geographically extensive but is largely yet unexplored. Further exploration of course is justified in the context of UNESCO Designation and World Heritage Site Status.

Archaeological Excavations at Rathlackan E580 Neolithic and Bronze Age Landscapes of North Mayo [https://www.academia.edu/31796044/Archaeological\\_Excavations\\_at\\_Rathlackan\\_E580\\_Neolithic\\_and\\_Bronze\\_Age\\_Landscapes\\_of\\_North\\_Mayo](https://www.academia.edu/31796044/Archaeological_Excavations_at_Rathlackan_E580_Neolithic_and_Bronze_Age_Landscapes_of_North_Mayo)

Excavations on Céide Hill, Behy & Glenulra, North Co. Mayo, 1963-1994  
Seamas Caulfield, Gretta Byrne, Noel Dunne and Graeme Warren  
With substantial contributions by Seán Ó Nualláin and Madeline Murray  
And specialist reports from Killian Driscoll, Linda Fibiger, Meriel McClatchie,  
Lorna O'Donnell and Helen Roche GIS managed by Emmett O'Keeffe December 2011  
<https://researchrepository.ucd.ie/entities/publication/eb6fc103-ccf1-4d3a-ae38-8374aab609bf>

### 3. *Ineffectiveness of Wind Energy:*

**While wind energy is highly promoted by the industry and indeed by government using taxpayers' money but the public are never informed about the down sides.**

- Planning Permission has already been awarded extensively in locations where the Grid does not have the capacity to take the electricity. Planning should never be awarded where the Grid does not have the necessary capacity to accept the electricity. Doing so results in tax payers funding extraordinary amounts in Curtailment Payments where no electricity is actually delivered. This currently amounts to approx Eur 50 Million per month nationally (or 0.6 Billion annually).
- Ireland's Electricity Grid is incapable of taking all of the WE produced and upgrading it to accept all of the WE is an extremely expensive process.
- Capacity payments for 'fossil fuel backup' in excess of 500 million is paid annually.
- Wind Energy is the most ineffective method on the planet at producing electricity. Each turbine produced 27% of its Installed Capacity during 2024 (Eir Grid data).
- Wind Energy can never replace fossil fuel because it is itself 100% dependent on fossil fuel backup.
- Dependence on WE will make Ireland's economy uncompetitive as the duplicate system causes our electricity costs to be internationally uncompetitive.
- The Irish 2030 target and will also fail to deliver Net Zero by 20250.
- Dependence on WE and excessively high electricity prices is causing customers to go into arrears – 300,000 in 2026.
- The ineffectiveness of WE and its impact on the Irish economy has been examined and questioned by many reputable engineers and energy consultants. The Irish Academy of Engineers concluded in 2025 that WE can never achieve Net Zero and they also state that its impact on electricity costs will make the Irish economy uncompetitive internationally. The recent Report published by the Irish Academy of Engineers demonstrates that Renewable Energy cannot meet the 2030 or 2050 Net Zero targets.

The ineffectiveness of Renewable Energy has also been outlined by many reputable and qualified people worldwide. Kathryn Porter is particularly incisive and explains the myths very clearly. See further information concerning energy issues in Appendix 4.

### 4. **Observations Concerning the Submission by Failte Ireland:**

Failte Ireland, in cooperation with Mayo North Tourism are active in developing the tourism industry in North Mayo in the coastal zone from Ballina to Belmullet. Their aims and objectives are set out in this draft Report.

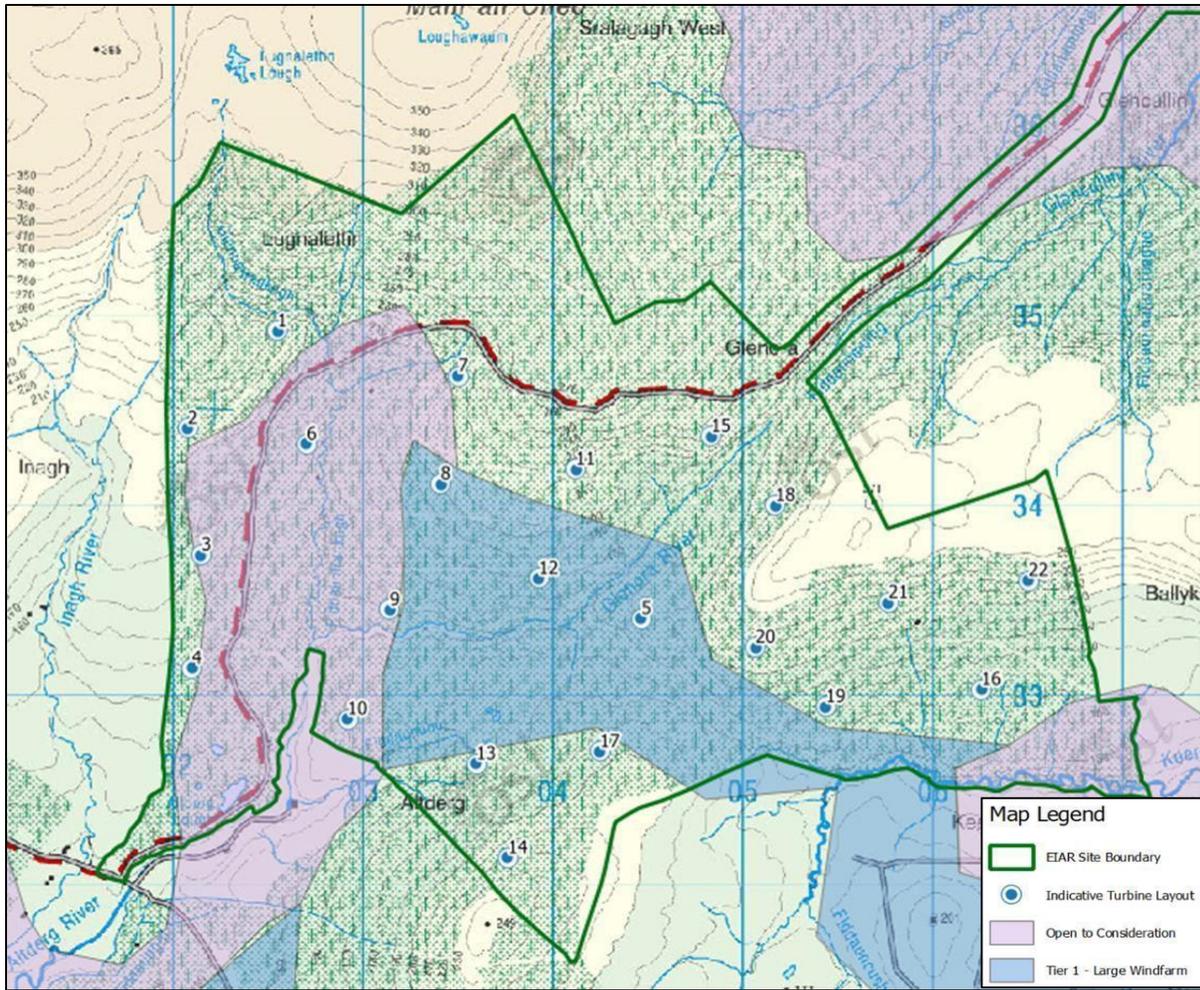
<https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/Wild%20Atlantic%20Way/Wild%20Mayo%20DEDP/Draft-Natura-Impact-Report-Draft-Wild-Mayo-DEDP.pdf>

It is quite apparent that a proliferation of wind farms in the North Mayo Area is not compatible with Failte Ireland's tourism proposals. **I observe that the tourism plan proposed in the above link was supposed to be finalized in 2024, yet 2 years later it has not been circulated for public appraisal and comment.** One must wonder if the foot dragging is occurring, lest a viable tourism plan could undermine wind farm proliferation. It is unfortunately common practice for WFs to be prioritized over tourism initiatives that would benefit rural areas. Wind Farms disadvantage rural communities by enriching a few, while disadvantaging the majority and causing community rifts. They also undermine the value of houses and in many instances actually militate against residents getting planning permissions, lest it impede WFs.

**The Failte Ireland submission** is very relevant and certainly not supportive of installing this wind farm, for the numerous reasons stated by them, which I have outlined in the extract below. I suggest that it is important to particularly focus on their following statement that points out that 14 or 15 of the 22 turbines are located in an area – **'outside of areas where wind farm developments are open for consideration.'** **Additionally, they mention that these turbines are targeting an area where the slope gradient is excessive - > 10% and there are vulnerable features, such as streams/river corridors.**

**This map of the Glenora WF** is instructive in setting out the Renewable Energy Strategy Tiers 1 and 2 and the Undesignated areas. It also sets out the turbine locations and outlines the route of the Western Way walking route through the proposed turbines. It is quite incongruous that this WF should be proposed and that sanitization of this unique landscape could be considered in order to facilitate it. It is merely a matter of time before people become educated to the real health risks associated with proximity to turbines. It took 40 years for the truth to emerge in the case of the Stardust Fire Tragedy, as powerful people were protected. Let us hope that the suppression of information in the case of wind turbines is less successful and the public are informed in that regard much sooner.

In their response, MKO suggest that the unspecified area should be treated as if it was suitable for wind turbines. That proposition has no merit and in effect, if it was applied in practice in this arbitrary fashion it would undermine landscape appraisal designations nationwide. There is no legal basis for this suggestion.



**The light blue shading indicates Tier 1 - Suitability for Large Wind Farms. The Pink shaded area denoted 'Open to Consideration' and the light Green denotes Unclassified areas. The Inagh NHA and river are immediately west of the proposed site boundary.**

Faillte Ireland fully understand that if wind farms on the scale envisaged in North Mayo actually receive planning permission, it will effectively undermine and perhaps shut down tourism as it currently exists and will certainly undermine engagement with the potential of the Ceide Fields in the wider geographic area, from Ceide to Killala and plans to have it established as a UNESCO Site and exploit its potential World Heritage status.

North Mayo Tourism do a very practical job in tourism promotion right across the North Mayo area. Their tourism promotion is very visible daily on social media platforms. They are also active on the ground in establishing, with community support, local walks in the Ballycastle, Lacken and Moygownagh areas. More extensive walks such as The Western Way have already been established. More recent plans are in train to establish a coastal walk from Ceide to Down Patrick. There is potential with the latter plan also to extend this walk to Kilcummin Pier in Lacken.

In commenting on tourism attitudinal surveys concerning wind farms, Failte Ireland state that some tourists are indifferent or don't actually notice the intrusion of turbines on the landscape. Failte Ireland do point out that these older surveys are dated and do not reflect the size and scale of the turbines now being installed that break both the Sky and Ridge Line.

**Perhaps these surveys need to be confined more specifically to the target market = to walking or cycling tourists**, who because of the slower pace and closer engagement with nature and scenic topography are more likely to observe the intrusive nature of large turbines – particularly when they have to walk through them. By their nature, car or bus tours tend to confine themselves to main routes and mostly scenic sea focused routes such as the Wild Atlantic Way. As turbines are precluded from locations on the seaward side of roads, they do not normally impede these views and may therefore largely go unnoticed.

I also wish to point out that if tourists or indeed local residents and the public in general were educated fully with regard to the health issues associated with turbine noise and their low inefficiency levels, their informed attitudes could be quite different. I have observed that the attitude of many residents to wind turbine installation is one of acquired complacent and fatalistic acquiescence. "I suppose we have no choice".

As stated in my introduction, all organs of the State are currently involved in insuring that the Irish public are exposed only to pro WE propaganda. They are not informed about the associated Health Issues (conceded by Irish Courts) the associated high cost of electricity impacts and the risk of Grid collapse, as recently experienced in The Iberian Peninsula. While a handful of people are profiting from WE, the majority are subsidising it via excessively expensive electricity and the destruction of scenic environments for both residents and tourists. We are repeatedly informed via propaganda that WE will reduce our electricity costs, while our electricity bills continue to rise.

**Failte Ireland's Submission could be synopsised as follows:-** 'The assessment fails to adequately address the nature of direct and indirect - and potentially secondary - impacts that the Proposed Development will have on the landscape and tourism, including The Western Way, the Wild Atlantic Way and the wider context of the Ceide Fields.'

**Extracts from Failte Ireland’s Submission:**

“The Irish landscape is one of the primary assets for tourism in the country and has been the cornerstone of international tourism marketing campaigns for decades. International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore, as the Irish landscape is one of the primary reasons for visiting the country, it is essential that the quality, character and distinctiveness of this valuable resource is protected.

Within the hierarchy of plans, these Strategies have ensured that the development of renewable energy infrastructure, such as wind farms, is plan-led and can be located to avoid, or minimise disproportionate negative impacts on other land uses, including tourism-related uses and the receiving environment.

The Ceide Fields Visitors Centre, a significant tourist destination which received in excess of 22,000 visitors in 2022, lies c.5.5km north of the wind farm site. While the land slopes north towards the spectacular coast, the 6,000 year old Neolithic stone-wall field system, dwelling areas and megalithic tombs, extend southwards over hundreds of acres of the uplands, which today are covered by a natural blanket bog with its own unique vegetation and wildlife.

It is an objective of the Mayo County Development Plan 2022-2028 (BEO 2): *To protect the tentative World Heritage Site in Mayo on the UNESCO Tentative list - Ireland 2010, The Ceide Fields, from inappropriate development and support its nomination to World Heritage Status.*

A 32km section of The Western Way runs from Bellacorrick to Ballycastle. Approximately 12km of this amenity, recreational and tourist route is dominated by the presence existing/ permitted wind farms / turbines at Bellacorrick / Oweninny / Sheskin. The remaining c.20km of the Way passes through a rural and isolated landscape, including the site where, with the exception of coniferous plantations, upland peatland landscapes drained by streams and lakes and natural processes prevail.

Tourism and Recreation Policy TRII of the Mayo County Development Plan 2022-2028 also sets out:

*"To promote Mayo as a premier walking / cycling destination in the Country and support the further development of walking routes and trails within the county and the integration and linkage of these with other existing / proposed routes and trails both within and outside of County Mayo, in accordance with national walking strategy guidance and in conjunction with the Tourism Section of Mayo County Council, Failte Ireland and other relevant stakeholders. Opportunities to enhance ecological connectivity should be integrated as part of any linking of routes to strengthen and support green infrastructure."*

The *Landscape Appraisal for County Mayo* (in Volume 4 of Mayo County Development Plan 2022-2028), indicates that the proposed wind turbines are located in 'Landscape Character Area E: North Mayo Mountain Moorland'. The ridgelines / skylines, including Maumakeogh, surrounding the site are highlighted as being 'Vulnerable Features', as are the river / stream corridors (e.g. Bellananaminnan, Sralagagh, Keerglen, Glenulra and Oweninny) surrounding the site (refer to section 3.1(a) and associated mapping in the *Landscape Appraisal for County Mayo*).

The stated policy with regard to areas designated as vulnerable (section 3.1 (b) of the *Landscape Appraisal for County Mayo*) is that:

*"These areas or features designated as vulnerable represent the principal features which create and sustain the character and distinctiveness of the surrounding landscape."*

***To be considered for permission, development in the environs of these vulnerable areas must be shown not to impinge in any significant way upon its character, integrity or uniformity when viewed from the surroundings. Particular attention should be given to the preservation of the character and distinctiveness of these areas as viewed from scenic routes and the environs of archaeological and historic sites."***

**The site is also located within the 'Slopes >10%' landscape, which are 'Areas Designated as Sensitive' (refer to section 3.2 (d) and associated mapping in the *Landscape Appraisal for County Mayo*). This clearly points to the risk of peat slippage being recognized as a hazard within the Landscape Appraisal for County Mayo document.**

The *Renewable Energy Strategy for County Mayo* (in Volume 4 of the Mayo County Development Plan 2022-2028), identifies Priority Areas, Tier 1 Areas (large and clustered wind farms) and Tier 2 Areas, where wind farm developments are preferred (Priority & Tier 1), or are open for consideration (Tier 2). The proposed Glenora Wind Farm is not located within or adjacent to a Priority Area. Reviewing Figure 14-6 of Chapter 14 of the EIAR it is clear that 3 turbines are within a Tier 1 area and a further 4 or 5 are within a Tier 2 - open for consideration area. However, the remaining 14 or 15 turbines are outside of areas where wind farm developments are open for consideration. These excluded areas coincide with the sensitive 'Slopes >10%' and the Vulnerable Features (stream/ river corridors) identified in the landscape appraisal as noted above.

The impact of the proposed development on tourism and amenity during the construction phase and operation phase is set out at Sections 5.10.2.5 and 5.10.3.5 respectively. However, while noting the inclusion of a Recreational and Amenity Plan (under construction stage impacts?) it is considered that the assessment of the 18-to-24-month construction phase is basic and high level and fails to adequately address the major landscape and visual disturbance that the proposed development will introduce into this remote and secluded landscape. The assessment also fails to adequately address the nature of direct and indirect - and potentially secondary - impacts that the Proposed Development will have on the landscape and tourism, including The Western Way, the Wild Atlantic Way, Downpatrick Head and the wider context of the Ceide Fields.

While there is good discussion on operation phase landscape and visual impacts, for the most part **the assessment underestimates the effects arising from the**

**introduction of a wind farm development into the landscape**, the direct and indirect change in the character of the landscape and the change in the viewer - including tourist - experience.

Therefore, we would ask that An Bord Pleanála in their assessment gives full and adequate consideration to the likely significant impact that the Glenora Wind Farm would have on the high quality landscape environment, which is a critical tourism asset and resource underpinning the value and quality of the Wild Atlantic Way, the Ceide Fields and the north Mayo coast, The Western Way and local tourism initiatives.”

#### **5. Submissions made by the Dept of Housing, Local Government and Heritage - National Parks and Wild Life Service (NPWS)**

A submission made by the National Parks and Wild Life Service under the aegis of the Department of Housing, Local Government and Heritage makes among others, two very relevant observations as follows:

- They refer to the drainage risk to the Inagh Bog NHA.
- They highlight risks to the Red Listed Golden Plover that breed there and imply similar risks to the Kestrel.

It is quite clear from their observations that they consider that a wind farm should not be located in Glenora and I fully endorse that view.

Relevant excerpts are included in Appendix 5 of this document and of course the complete submission is also available to ACP.

## Appendix 1

### Windfarms 'louder than a bird' to be shut – Minister Denis Naughton - Mon 26th June 2017

Irish Independent - Windfarms 'louder than a bird' to be shut.

Journalist PAUL MELIA.

Windfarms louder than birdsong will be forced to shut down under new regulations due to take effect early next year.

Energy Minister Denis Naughton has defended new wind energy guidelines, saying that the noise produced by turbines will dictate whether they can be located close to communities.

The draft regulations, which are subject to public consultation, include a minimum setback distance of 500m between homes and turbines, or one-of-four times the height of the turbine and the nearest residential property.

But Mr Naughton said the regulations included a "zero-tolerance" approach to shadow flicker and nuisance sound.

The maximum noise level which can be produced on a consistent basis will be 43 decibels and a bird call is about 44 decibels.

"The primary test now is not setback, it's sound," Mr Naughton (right) told the Irish Independent.

"This is a significant change in the approach that's going to be taken from here on. The difficulty with setback is that it's from the nearest turbine, and only takes into account the nearest turbine, but sound takes into account the -windfarm and multiple windfarms.

"The reality is, from talking to people, the one big issue which has come up is the sound issue. The standards -(today) are unenforceable, and these regulations bring in the most -robust -system -probably in the world in -relation to sound."

Monitoring of noise from turbines will be put in place and the Environmental Protection Agency will be charged with enforcement.

A person living up to 3km from a windfarm could experience a problem with low-frequency sound, he said, and that this would have to be taken into account when deciding planning permission for new windfarms.

He also said that a condition of receiving payments from the State for producing clean energy would also require noise limits to be kept below the threshold.

If a problem arose, and the sound levels could not be reduced, the turbine would be forced to power down. While the industry was "not happy" with the regulations, he believed they provided the appropriate protections for communities.

The Government is also proposing a community dividend in areas where turbines are approved.

The regulations are due to take effect in the first quarter of next year.

## Appendix 2

### 1. Mr Melia was appointed as Special Adviser to the Minister for Housing on 07 Feb 2019.

[S.I. No. 154/2019 - Appointment of Special Adviser \(Minister for Housing, Planning and Local Government\) Order 2019](#)

*Notice of the making of  
this Statutory  
Instrument was  
published in*

*"Iris Oifigiúil" of 8th March, 2019.*

The Government, on the request of the Minister for Housing, Planning and Local Government and in exercise of the powers conferred on them by [section 11](#) (1) of the [Public Service Management Act 1997](#) (No. 27 of 1997), hereby order as follows:

1. This Order may be cited as the Appointment of Special Adviser (Minister for Housing, Planning and Local Government) Order 2019.

2. **Paul Melia**, particulars of whose address have been deposited at the offices of the Department of Housing, Planning and Local Government, is appointed to be a Special Adviser to the Minister for Housing, Planning and Local Government with effect from 7 February 2019.



GIVEN under the Official Seal of the Government,

5 March 2019.

LEO VARADKAR

Taoiseach.

## **Appendix 3**

**Justine McCarthy - Irish Times - Fri Apr 26, 2024**

“During goodbye drinks for a former colleague some years ago, the departing journalist took me aside to offer friendly career advice. If you want to fit in, stop covering stories you think are important and follow the consensus news agenda, he warned me. He meant it helpfully. But I felt my soul shrivel as I watched him rejoin the others at the bar raising a glass to his departure from the Fourth Estate. He had been a reliable reporter and would be a loss to journalism. That former colleague was part of a traditional trickle of journalists crossing the Rubicon to trade in the dark art of spin-doctoring. In the early years, such moves were rare and seldom and, thus, seemed wonderful. But the trickle has turned into a flood.

Currently, there are 12 former journalists employed as ministers’ advisers. Eight of them were previously based in Leinster House as political editors, correspondents and reporters. Another was the editor of a daily newspaper. No doubt, each one had good personal reasons for changing careers – financial necessity, ambition to work inside the system, family responsibilities, even altruistic belief in public service – but the cumulative effect is damaging the perception of Irish journalism and that has repercussions for the common good.

When those who are supposed to be the watchdogs for the public interest become the guard-dogs at the gates of government, a country’s conversation becomes vulnerable to the dog that barks the loudest. Some exceptionally talented former political correspondents now ply their skills to enhance their ministers’ profiles, limit the damage caused by bad publicity and divert media attention by feeding fresh angles in off-the-record briefings or leaking stories to people they once

worked alongside on the press gallery. They are not doing anything dishonest but facts are malleable and their new occupation is to make them as potent or impotent as needs be.”

## **Appendix 4**

### **Further Background on Energy Policy**

Having observed a significant number of wind turbines out of my South and East windows facing over Killala Bay for the last 2 years, I had serious doubt about their efficacy and reliability. Eventually I got published Eir Grid data that prove that my suspicions are well grounded. During 2024 WE produced only 27% of the Installed Capacity of the turbines; ie the 5 GW installed produced only 1.2 GW of electricity. Apart from the low efficiency, there is the unreliability factor and therefore the constant need for fossil fuel backup. The need for a dual system leads to Capacity and Curtailment Payments and very expensive electricity. We now have 500,000 consumers in arrears with their ESB bills – Oral PQ - Pierce Doherty, TD – September 2025. Richard Boyd Barrett, TD stated the figure at 300,000 one year previously, so things are going south.

**A crucial point:** WE installed (5GW) up until now, is replacing some of the electricity that was being produced by already installed fossil fuel Plants. Ireland's Demand is now approximately 4 GW but rising with Data Center installation, etc. So already Ireland must have a fossil fuel based infrastructure in situ to meet 4 GW or perhaps slightly more to cover spikes. From here onwards however, the expense of backing up new RE and WE installations must come from new Gas Plants. Gas Networks Ireland was recently quoted in a press statement that the government has given the go ahead for 2 GW of Gas Plant installations by 2030. They also state that at times they supply 80% of Ireland's electricity when there is little or no RE. Paying for the capital cost of wind energy and capacity payments to those new Gas plants will drive electricity prices exponentially higher - not to mention the Grid investment required to cater for more RE - in order to reduce wastage and reduce curtailment costs.

The additional expenses associated with RE are derived from a number of sources.

- Firstly, if wind is not blowing adequately, fossil fuel plants must step in and provide power – that costs.
- Secondly, if the wind is blowing, fossil fuel plants must be paid Capacity Payments to remain on standby. This currently costs over 500 million per annum. That is the greatest waste of money.
- Thirdly, if the wind blows excessively and the Grid is unable to accept the electricity, Curtailment Payments must be paid. At present these amount to approx Eur 100 Million per month.
- Fourthly, the pricing structure for WE and Solar is skewed excessively in favour of RE.

A recent auction (September 2025) showed that RE was guaranteed a rounded price of 10 C per KWh. If it did not achieve this in the market place, the government agreed to top it up. At this time, Gas was priced on the open market at 8 C per KWh. So Gas was 2 C per KWh cheaper than RE. In addition to the 2 C margin in favour of Gas price, RE must also add all of the other subsidization costs already outlined above. This explains that while wind is free, WE is actually very expensive. Ireland needs to carry out a forensic assessment of why our electricity costs are rising exponentially, in spite of assertions to the contrary from our government and its agencies.

Believing in the ideology that WE could effectively replace fossil fuel and produce 80% of Ireland's electricity may have been excusable 20 years ago but now the evidence is damning that it cannot and indeed that RE has little or no impact on reducing CO2 output, due to the embedded increase in CO2 actually caused by RE itself.

### **Grid Incapacities:**

It is very apparent that there is very little strategic planning involved in the WE area specifically. **Too many wind farms are awarded planning permission where the Grid is incapable of taking the electricity that they sometimes produce and no firm plans are in place to deal with Grid deficiencies.** A recent press article stated that less than 20% of the electricity produced in the local Oweninny Wind Farm is actually used, yet tax payers pay for all of the unused electricity. In October 2025, approximately 100 million euro has been paid nationally in Curtailment Payments in October alone, as the Grid is unable to take the electricity produced. Even more Capacity Payments are being paid where no electricity is produced. Over 500,000,000 million (0.5B) is paid annually in Capacity Payments to fossil fuel back up companies. These companies are on standby in case there is insufficient wind. These payments will increase as more WE is installed.

Many Irish and indeed non Irish people who are qualified and knowledgeable in the energy field are now informing us and supplying rational arguments that show that achieving Net Zero via RE is a fairytale. Unfortunately, RE has now caught on 'cult like' politically and in the media and nobody in power wants to hear or countenance counter arguments. Fear of massive EU fines is also driving irrationality. Our government wants wind energy at literally any price and are breaking the law and are prepared to damage our environment (carbon sink bogs) in order to save the environment. Fear is not an effective vehicle to produce rational thought.

**These views are being supported by Bill Gates who produced the following submissions in advance of COP30 – 28 October 2025.**

The first link provides an energy overview. The second discusses the role of nuclear energy.

[https://www.gatesnotes.com/work/accelerate-energy-innovation/reader/three-tough-truths-about-climate?WT.mc\\_id=20251028100000\\_COP30\\_BG-EM](https://www.gatesnotes.com/work/accelerate-energy-innovation/reader/three-tough-truths-about-climate?WT.mc_id=20251028100000_COP30_BG-EM)

<https://www.gatesnotes.com/work/accelerate-energy-innovation/reader/the-future-of-energy-is-subatomic>

[Ireland needs to catch up and replace ideology with science and engineering. Our economic survival depends on it.](#)

### **Data Centers:**

"Data Centers tend to get bad press in Ireland and to an extent they are being scapegoated. The Irish economy's current buoyancy is largely based on IT and Pharmaceutical. WE would be foolish to shoot the golden goose. They are not the core issue in Ireland. The core issue is the fallacy of basing our energy system and replacement of fossil fuels on Renewable Energy. Wind Energy is particularly inefficient and unreliable. It is therefore not a suitable substitute for fossils because it is itself dependent on fossil fuel back up. It is this dual system (based on Wind and Fossil Fuel) that is driving up electricity costs and making our economy uncompetitive. We are being misled by the government but also by our supposed parliamentary opposition who also spout unviable energy policies. When the blind lead the blind ....."

### **Engineering Analysis and Assessment:**

While many State agencies are complicit in their unquestioning support for RE. Fortunately, many engineers have been objectively questioning its basis and productivity. For example the Irish Climate Science Forum – a group of concerned engineers ([www.icsf.ie](http://www.icsf.ie)) have been active in analyzing the energy situation. They engaged a non Irish engineer (Douglas Pollock) based in Chile to carry out an analysis. Mr Pollock concluded that if Ireland continues on the current RE - Net Zero based path, Irish electricity prices may triple or quadruple and unfortunately result in very little reduction in CO2 output.

The Renewable Energy situation in the UK is quite similar to Ireland but they have not banned the nuclear energy option. **Kathryn Porter** is the founder of Watt-Logic, an independent energy consultancy. She holds a Master's in Physics from the University of Exeter and an MBA from London Business School. **Kathryn Porter** is totally skeptical of RE delivering Net Zero and her skepticism is based on science and logic.

### **Two short videos illustrate some of her concerns regarding Net Zero:**

<https://vm.tiktok.com/ZNdGVfCdS/>

<https://vm.tiktok.com/ZNdGVr6YK/>

<https://www.youtube.com/watch?v=u4B7MRaGqsQ>

[Kathryn Porter's and Douglas Pollock's presentations are available at www.icsf.ie](http://www.icsf.ie)

Another group referred to as 'The Irish Academy of Engineering' have also expressed serious reservations.

<https://britpanorama.co.uk/technology/engineers-question-govts-2050-decarbonisation-target/#:~:text=An%20all-island%20body%20representing%20engineers%20has%20questioned%20the,target%20of%20decarbonising%20the%20electricity%20sector%20by%202050.>

Unfortunately, the only response from our government, supported by WEI, is more propaganda that RE reduces electricity costs. Propaganda confronts reality when electricity costs to consumer continue to rise.

### **Bill Gates views expressed in advance of COP30:**

<https://www.gatesnotes.com/work/accelerate-energy-innovation/reader/the-future-of-energy-is-subatomic>

[https://www.gatesnotes.com/work/accelerate-energy-innovation/reader/three-tough-truths-about-climate?WT.mc\\_id=20251028100000\\_COP30\\_BG-EM](https://www.gatesnotes.com/work/accelerate-energy-innovation/reader/three-tough-truths-about-climate?WT.mc_id=20251028100000_COP30_BG-EM)

"Both fission energy and fusion energy release large amounts of energy by altering the nucleus of an atom. Fission already provides safe, reliable clean electricity around the world and I believe that fusion will too one day soon. Both will play a key role in meeting humanity's growing need for energy while also eliminating carbon emissions. "

**Andrew Montford:** The problem in Ireland is that no TD or Minister understands what's going on. Energy Policy is determined by WEI, who feed it to government. Government implements WEI policy only. We don't have opposition parties either. He talks a lot about the politics of energy in the UK and how UK opposition parties could influence the situation if they get into power. WE DONT HAVE AN OPPOSITION. They are all deluded. If you can spare 30 minutes, it is well worth a listen. He mentions Ireland at the end and his comments on 'MAD MEN' is interesting. ED Miliband must have listened to this video because he is beginning to admit that WE policy is not going to work out in the UK. <https://youtu.be/XtNiHtHHI88>

## **Appendix 5**

### **Synopsis of the Irish Academy of Engineering Report**

#### **Some Issues Raised in The Irish Academy of Engineering Report – 'Rebalancing Ireland's Energy Policy'**

1. On 17 November 2025, **The Irish Academy of Engineers** launched a significant Report titled '**Rebalancing Ireland's Energy Policy**'

2. **Many Engineering Groups** - Irish Climate Science Forum [www.icsf.ie](http://www.icsf.ie) and All Ireland Engineers, etc and indeed State Institutions (NESC – Eir Grid, etc) have already been quietly raising questions about the realistic attainability of Climate Change goals.

**The main issues raised in The Irish Academy of Engineers Report are as follows:**

**Wrong Energy Choices made initially:**

- Ireland made the wrong policy choices and adopted CO2 reduction targets without taking cognizance of the **structural limitations** and our **small isolated Grid**.
- We also have **very little Hydro Electric and no Nuclear Capacity** and Ireland is not therefore comparable to countries who have these.

**Energy Goals are proving to be unattainable:**

- Net Zero by 2050 is totally unattainable and technically impossible.
- Producing 80% of our electricity from Renewable Energy (RE) by 2030 is also a totally unattainable goal.
- **By 2050 on current energy policy, Ireland will still be 66% dependent on Fossil Fuels.**

**Electricity Cost Issues;**

- The government is ignoring the impact of RE policy on the cost of electricity to consumers and the impacts on our international competitiveness.
- **Imperfections charges account for 7%** of the total cost of electricity. These are the additional **costs of keeping the Eirgrid system stable**.
- **Capacity costs** are also necessary to back up the unreliability of RE output
- **Curtailement payments** are also incurred because the Grid is insufficiently planned or developed to cope with RE. Both payments combined cost **1.2 Billion per annum**.
- **The mechanism to pay for RE** is structured in a manner that over pays for RE produced.

**Energy Security:**

- **The current plan cannot bring about Energy Security.** Gas Storage capacity is much too low and there are no effective plans to reverse this. Current storage is sufficient to provide supply to meet the country's needs for **90 days**.
- Currently Ireland has a fossil fuel output capacity of approx. **6 GW of electricity**. It is estimated that this **needs to double to 12 GW** of fossil fuel by 2050. So much for the notion that RE can effectively replace fossil fuel?

## Infrastructural Deficit:

- Our Ports have not been developed sufficiently in order to import Gas or service offshore wind developments.
- Our Grid is under developed and incapable of coping with Renewable Energy output.
- **Nuclear Energy was banned in Ireland in 1999 and drilling for Gas was banned in 2021, so as of now, neither options are legally available.**
- **Nuclear** - In the particular case of Small Micro Nuclear Reactors, much preparatory work is required to create a legislative and regulatory framework that would allow their deployment if they prove to be viable. This would be a serious mistake to ignore their potential.
- If the idea that Ireland could become the **Saudi Arabia of wind** due to the country's large wind resource were to remain an objective – either in policy or in the business plans of renewables companies – the best way to facilitate this would be to allow market forces to operate and **not to offer State support contracts**. This would protect consumers from the cost of excess revenue support schemes.

**There is clearly a huge Gap between Energy Policy and reality.** The question now for our government is how do we close that gap and how quickly? **It is time for an Energy Review and rethink.**

## Appendix 6

### Extract from Department of Housing, Local Government and Heritage

**Planning Ref: PA16.318701**

*(Please quote in all related correspondence)*

20 February 2024

#### **Nature Conservation**

These observations are intended to assisting An Bord Pleanála in meeting their obligations in relation to National and EU legislation and policies for nature conservation and biodiversity, in the context of the current application.

#### **Drainage impacts on Inagh Bog NHA:**

Chapter 9 of the Environmental Impact Assessment Report (EIAR) on Hydrology and Hydrogeology identifies the potential of the proposed application to have a drainage effect on the Inagh Bog Natural Heritage Area (NHA). The EIAR states that in a worst case scenario approximately

3ha (equivalent to approximately 0.5% of the area of the NHA) could be affected by lowering the water levels in the peat, caused by drainage associated with the proposed infrastructure.

The Department notes that that the potential drainage impact on the Inagh Bog NHA is not characterised in Chapter 6 of the EIAR on Biodiversity. **No botanical or habitat surveys were conducted in the areas of the Inagh Bog NHA which may be effected by the drainage impacts associated with the proposed wind farm infrastructure.**

Consequently, the relative sensitivity of those areas potentially effected within the Inagh Bog NHA, identified in Chapter 9 of the EIAR, are not characterised or discussed in terms of their conservation value. The Department recommends that any assessment of the significance of this potential impact should be undertaken with reference to the relative sensitivity of those areas affected and not simply done with reference to the quantity (3ha) of the site that may be effected. For example, the site synopsis states that the highest quality Blanket Bog habitat within the Inagh Bog NHA is located in the south eastern corner of the site, which may correspond to the area affected without further characterisation and analysis.

The Department recommends that any potential deterioration or loss of Blanket Bog, particularly active Blanket Bog, inside the Inagh Bog NHA should be avoided. The Department also notes that any such deterioration or loss of Blanket Bog inside the Inagh Bog NHA, for which this site is designated, may be in material contravention of the following policies and objectives in the Mayo County Development Plan 2022-2028 depending on how these policies are interpreted by An Bord Pleanala.

**Characterisation and analysis of Collision Mortality Impacts:**

The department considers that the Bird Impact Assessment Report does not accurately use the methodology outlined to determine the significance of the potential mortality caused by collisions with the proposed turbines. The Bird Impact Assessment Report makes reference to the methodology outlined by Percival (2003) for determining the magnitude of an effect on a given population (e.g. High = < 20% population remains, Negligible= < 1 % population lost). According to Percival (2003), the magnitude of impact on a species population as a result of collisions, would be negligible if the estimated mortalities does not increase the natural mortality rate by 1%. However, Percival (2003) states that *'one issue in this process concerns the precise area or bird*

*population against which the degree of impact should be judged.*

**Golden plover** were recorded in the zone of influence of the turbines during both the breeding and wintering period. As the population and distribution of Golden Plover in Ireland during the breeding season is significantly smaller than during the wintering season the Department considers that a separate analysis should be undertaken where collision mortality impacts occur in both seasons. The population of breeding Golden Plover in Ireland during the breeding season is approximately 150 pairs and has a very regional distribution in Ireland with the wider area of the application site being a stronghold for breeding Golden Plover. Consequently, a relatively small impact on the breeding population in this area caused by the current application, either alone or in-combination with other similar developments, could have a significant effect on the national breeding population of this species.

Outside of protected sites Percival (2003) recommends that an analysis be undertaken as to whether a homogenous area of suitable habitat occurs with which a population may be associated and the density of this population within this area. In their guidance on this topic. However, in relation to the current proposed application, the Bird Impact Assessment Report makes reference to the national populations only when undertaking an analysis of the magnitude of the predicted collision risk impact on the species identified. For example, Section 4.3.3 of the Bird Impact Assessment Report makes reference to the national wintering population of Golden Plover, which is stated as 92,060 birds, when contextualising the estimated collision mortality of 10.491 bird per year during the lifetime of the proposed application. The Department also notes that the output, and subsequent analysis, of the collision risk modelling does not differentiate between the potential collision mortality on wintering populations and breeding populations. Section 3.3.1.9 of the Bird Impact Assessment Report outlines the records for Golden Plover during the surveys undertaken to inform the impact assessment. Golden plover were recorded in the zone of influence of the turbines during both the breeding and wintering period. As the population and distribution of Golden Plover in Ireland during the breeding season is significantly smaller than during the wintering season the Department considers that a separate analysis should be undertaken where collision mortality impacts occur in both seasons.

Given to the potential cumulative impacts of the current proposed application with the proposed Oweninny Wind Farm Phase 3, which is currently being considered by An Bord Pleanála, on Golden Plover. The proposed Oweninny Wind Farm Phase 3 occurs adjacent to the current proposed application and will also result in a predicted collision mortality

of Golden Plover. The Department notes that while Section 4.6 of the Bird Impact Assessment Report identifies the potential for a cumulative effect in relation to this impact no analysis is undertaken of the significance of this impact on the relevant population. Furthermore, no differentiation is made between the potential mortality impacts on the breeding or wintering population of this species in Section 4.6. Such a differentiation would be useful to better understand the potential impacts on local populations. Section 4.6 also notes that there was no collision mortality analysis undertaken for Oweninny Phase 1 and Phase 2. Consequently, the cumulative impacts on Golden Plover, in relation to the wind farms already built, and under consideration for consent, in the wider area remains uncertain.

**The Department notes that An Bord Pleanála should consider that Golden Plover are a red listed species whose population is in decline.** The breeding population in Ireland is unevenly distributed with North West Mayo being one of its national strongholds due to the presence of suitable habitat. The Department recommends that any potential impact on this species should be characterised accurately in any EIA and NIS provided with the application in order to ensure An Bord Pleanála has sufficient information while undertaking their determinations.

The Department also notes that while the above point has been illustrated with the use of Golden Plover as the example it is recommended the appropriate use of the methodology outlined by Percival (2003), and proposed in the EIA, is used for all target species identified at risk of collision mortality, especially those for which a relatively substantial annual mortality is predicted (such as kestrel for the current proposed development).