

Catherine Clarke & Ian Williams

8 Carrowkibbock Lower

Ballycastle

County Mayo

F26 XY82

Clarkykath@gmail.com

25.06.2026

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

**Re: Objection to the Proposed Tirawley Wind Farm Strategic Infrastructure
Development Objection Submission to An Coimisiún Pleanála**

Re: Planning permission for the construction of Tirawley Windfarm consisting of 16 no. wind turbines, a permanent 110kV substation, 110kV underground cable and grid connection, and ancillary development in the townlands of Ballymurphy, Ballynaleck, Barnhill Lower & Upper, Barroe, Billoos, Carn, Carrickanass, Carrowmore, Castlelacken Demesne, and other townlands in County Mayo.

Case Number: PAX16.324258

Dear Sir/Madam,

I am writing as a resident of the area of the proposed Tirawley Wind Farm project, submitted by Constant Energy Limited, to formally lodge my objection to this Strategic Infrastructure Development application. This development poses significant and irreversible risks to the local environment, biodiversity and local residents.

I wish to adopt and support the detailed submission made by the Lacken Ballycastle Community Landscape Protection Group in relation to the proposed Tirawley Wind Farm development (PAX16.324258). In particular, I endorse the concerns raised regarding cumulative wind farm development across North Mayo, impacts on the Céide Fields cultural landscape, effects on tourism and recreation, biodiversity impacts, inadequacies in community consultation, and the assessment of the Battery

Energy Storage System. While I do not repeat those detailed arguments in full, I request that they be considered as forming part of this submission.

In particular the proposal threatens critical habitats for protected species such as the Hen Harrier, involves substantial habitat removal including over 4 km of hedgerow, and raises serious concerns regarding visual impact, and traffic disruption. These issues, coupled with shortcomings in the Environmental Impact Assessment Report, justify a refusal of permission for this project.

Having reviewed the public information provided, engaged with the community consultation materials, and carried out independent research. I wish to raise the following concerns:

1. The International Private Companies Making Huge Profits From Ireland's Energy Utility, Paid Through the Local Community's Ever Increasing Energy Bills

a. Constant Energy Limited

Constant Energy Limited is a Limerick company. It coordinates tenders for technology firms towards the green transition from fossil fuel, using administrative support from the Irish government and councils with money from the European Union.

Since 2011 it has been keen to win government contracts, with engineering companies to develop liquid hydrogen production from wind power in Bellacorrick, Co. Mayo. One of its first tender requests to Mayo County Council was for renewable energy in July 2021, which was based on The European Green New Deal of the time: striving to be the First Climate Neutral Continent. It aims to cut emissions by at least 50% by 2030, rising towards 55%. The 2025 neutrality goal is legally binding through the European Climate Law. It was launched by President von der Leyen in 2019. **It is supposed to ensuring a just transition for the communities most affected. Constant Energy has not engaged with the local community in any fashion before they put in their 2026 Tirawley Wind Farm application.**

In January 2024, Mayo Country Council gave planning permission to Constant Energy Ltd and Consultant's Jennings O' Donovan & Partners Ltd, for approval of a 114 mw natural gas fired peaking power plant at the site that covers 4.35 hectares, at an abandoned farmstead, two kilometres from Bellacorrick village. Local objections to the planning application were not upheld by Mayo County Council. The plant will be a mix of natural gas and hydrogen gas to generate electricity. The proposed peaking plant will include two open cycle gas turbines.

In June 2025, Mayo County Council gave planning permission to Constant Energy and Jennings O Donovan & Partners Ltd consultancy, for a hydrogen plant and energy centre in Killala on the old Asahi site. It is a multi- million-pound investment.

However, the investment is based on the contractors producing green hydrogen by accessing the green energy for the hydrogen production from wind turbine power. So now the Tirwaley Wind Farm Application is being considered by ACP. Mayo County Council does not support the building of Constant Energy and Jennings O'Donovan & Partners Ltd Consultancy's 16 turbines within the planning of this project in North Mayo, along Killala Bay.

The planning authorities and politicians ensured that the gas energy plants were given planning permission before the local communities had the opportunity to see the final application for the turbine location plans. This is a clear example of big business with the help of compliant politician and planning authorities trying to force the local community's hand, without proper engagement and transparency on what was being planned. **I believe it was all decided behind closed doors and presented to the community in a drip feed format, to control the narrative and manage consent for the overarching plan.**

The European Green Deal-Striving to be the first climate neutral continent.
https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en

Planning granted for 114 MW Bellacorick power plant, McNulty A., 4th January 2024, Mayo Live.
<https://www.mayonews.ie/news/home/1386909/planning-granted-for-114mw-bellacorick-power-plant.html>

Request for Quotation- Ireland's Renewable Energy Co-ordinator

Public RFT - Ireland's Renewable Energy Project Co-ordinator

b. Schroder-Greencoat Renewable Energy

If we examine the state of play of the Schroder-Greencoat Renewable (SGR) Site in Killala, the first thing to note is that SGR says under Who Are We, "We invest, own and operate cash generative European renewable energy infrastructure generation and storage assets. Our aim is to provide investors with attractive risk-adjusted returns, delivering an annual dividend that increases progressively, while growing the value of our investment portfolio over the long term." Its priority is making profit from renewable technology.

In November 2019, Greencoat Renewable (then an Irish registered company), bought 5 turbines community wind farm in Killala with a 6th one that has been built in 2021. It produces 20.4 MW of electricity. They bought it for £32.7 million. 75% of the

company has been taken over by Schroeders LLP. SCR invests in bioenergy, renewable heat, solar and wind energy infrastructure in the UK, Europe and the United States. Since 2017 it has bought 40 sites across Europe, providing £1 billion in dividends to shareholders. It sells power to the grid, ie, the nation state, and directly to large corporates requiring clean energy via Power Purchasing Agreements. The company has bought 33 onshore wind farms and 2 offshore. It made 75.2 million in profit for shareholders in 2024. 25 of the onshore wind farms are in Ireland. So, Ireland is providing them with about three quarters of their revenue from onshore wind.

The original founder of Greencoat Renewable Energy in 2009, is an English man, Richard Nourse the third. He was a non-executive of URENCO for 12 years, Resigned 7th October 2021. URENCO is an international supplier of enriched Uranian, particularly for military purposes. It uses its civil produce as cover for its main income stream.

The Chair is an Irish man, Greencoat Renewable Energy is considered Irish, but its main business driver came from the UK. The main reason is to attract European business to the UK, using Ireland as a conduit, after Brexit. Schroder LLP is a London based financial company going back to the slave trade, which it supported, and it supported the Confederates, in the American Civil War,

Greencoat Snaps up Mayo Wind Farm for €37.3 M, Donnelly, E, 19th November 2019, Irish Independent.
<https://www.independent.ie/business/irish/greencoat-snaps-up-mayo-wind-farm-for-372m/38704691.html>

Schroder Greencoat Renewable Website

Who we are - Greencoat Renewables

Schroders-Greencoat LLP. Annual Report & Financial Statements. Year Ending 31st December 2024. Company House UK.

application-pdf

URENCO'S Role In The Nuclear Fuel Chain WISE/NIRS Nuclear Monitor #783-784
A special double issue of the WISE/NIRS Nuclear Monitor
www.wiseinternational.org/nuclear-monitor

NM783-784URENCOSPECIAL.PDF

Richard Nourse. Founder of Greencoat Renewable. LinkedIn website. No mention of URENCO

Richard Nourse | LinkedIn

URENCO Limited. Annual Report and Financial Statements December 2025

application-pdf

c. AVAIO Digital

In January 2022, after the government introduced a moratorium on data centre development in Dublin due to the then energy shortages in the city, American AI companies, moved their focus to the West of Ireland, where the fields looked so much greener, for making greenbacks. The Mayo community was unaware of what was about to happen. All they were told was that Killala would receive lots of money and Mayo would be at the cutting edge of the new global AI development. AVAIO Digital, specializes in wholesale data centre development in commercially attractive locations in North America and Europe. Killala's Asahi site, was seen as a perfect acquisition

On the 11th January 2022, AVAIO bought up the old Asahi site, outside Killala. It was not made known to the local community that these companies buy equity and then attract other businesses to help them achieve their ultimate aim; to set up the infrastructure for their data centres. Instead, they highlight that they will provide employment, helping reduce GHG, since they are supposed to generate their own energy.

In May 2025, An Coimisiún Pleanála gave planning permission to AVAIO Digital to build a data centre on its site, ignoring the enormous local opposition to it.

Sally Rooney, the local Irish author, put forward a compelling argument against siting a Data Centre in Killala, due to the poor energy infrastructure and high probability of electricity blackouts and the enormous amount of water they use, as happened in Dublin. However, when big business is in control, we are all the little people crying in the wind. The decision has been appealed and the local community has not been told the outcome of the court case, if it has been finalised.

Part of the AVAIO agreement is that it provides its own generated energy.

However, it has bought land beside one of our local energy utility distribution sites. It has full access to the North Mayo's electricity resources and any green energy research and developments taking place there.

Also, it was lucky for AVAIO, that within a month, June 2025, An Coimisiún Pleanála allowed Constant Energy Ltd, Jennings O'Donovan & Partners, with Clean Power Hydrogen LTD, to set up a hydrogen production site based on non-membrane hydrolysis at the AVAIO site. Serendipity indeed!

So, not only will AVAIO have access to the potential hydrogen gas from the wind turbines, that Jennings O'Donovan & Partners are trying to get planning permission for, but also the local wind turbines, where a Lithium battery storage facility at Killala Community Park, and possible electricity through SSE and/or ESB services on site.

AI facilities use enormous amounts of water and energy. The local community are propagandised to believe, if we do not have the fastest web network conductivity, we will return to the Middle Ages. If we do not embrace AI, our creative competitive edge will disappear. All their promises and fear mongering are an example of them over-playing their hands.

End Data Centre Development

New data centre research identifies the amount of energy and water the centres use, as well as the nefarious nature of data companies, such as Palantir, Meta and their associated companies, in assisting the targeting of Palestinian, Lebanese, Iranian and Russian women and children in their homes, schools, buses and hospitals, resulting in their murder. The CEOs of these companies were the closest of friends with Jeffrey Epstein. Our politicians should lobby the government to end all connections with such companies. They do not work in the interest of the people of Mayo or Ireland.

Artificial Intelligence and The Green Transition to non-fossil fuel alternatives is big business, and Mayo is ripe for the picking to locate these businesses here.

The powers that be, hope that the local community will not wonder why their local needs and wants are not being addressed by their democratically elected councillors and MPs, while global businesses are given Cart Blanche to do as they please. However, the tide is turning, and local councillors are understanding the depth of feeling surrounding the development of these wind farms and reject the Tirawley Wind Farm development

AVAIO TO BUY TWO PLOTS OF LAND IN COUNTY MAYO IRELAND FOR DATA CENTRES, 11th Jan 2022, AVAIO Digital Press release
<https://avaiodigital.com/avaio-to-buy-two-plots-of-land-in-county-mayo-ireland-for-data-centers/>

US firm reveals details of 1.5 billion investment in Mayo. O'Malley, P., 14th May 2025, The Western People.

https://www.westernpeople.ie/news/us-firm-reveals-details-of-1-5-billion-investment-in-mayo_arid-57603.html

d. Jennings O'Donovan & Partners LTD

In August 2023, Jennings O'Donovan, a multidisciplinary consulting engineering firm based in Sligo, became part of RSK, a British global conglomerate that provides engineering and environmental consultancy solutions. RSK increases its reach and profits by acquiring smaller businesses. The "& Partners Ltd" relates to RSK. RSK made a 21% increase in its revenue over the financial year 2024 to 2025, which came to £2.2 Billion. It acquired 11 companies over that year, in U.K., Australia and

Africa. Jennings O Donovan no longer is a local engineering consultancy firm, but part of a much larger global player.

It has close links with Israel through its research and development in the Middle East, particularly, Israel, as well as Somalia and Ukraine where it provides technology to detect unexploded ordnance (UXO).

In 2024, RSK secured a £520 million capital injection (£500 million from a consortium led by an equity finance investor, Searchlight Capital Partners Ltd. This funding explicitly supports UXO and risk management initiatives via RSK OM, enabling enhanced services like advanced drone-based surveys (e.g., using SENSYS MagDroneR4 for large-scale UXO detection) and ground penetration testing.

Searchlight Capital Partners Ltd is a global private investment firm with offices in Toronto, U.K. and New York. In 2019, it acquired Bezeq Tel, the largest telecom group in Israel.

The UN listed Bezeq Tel as one of the companies illegally operating in the West Bank supporting the illegal Israeli settlements and it is on the BDS list to boycott. It is 25th on the list. Searchlight has since sold off Bezeq Tel making an enormous profit in doing so.

Searchlight Capital Partners Ltd stated

“Since Searchlight assumed control in 2019, Bezeq has undergone a substantial value-creation process. Bezeq’s market capitalization has risen by approximately 250%, while Bcom’s share price has appreciated by more than 300%.”

“During this period, Bezeq completed one of Israel’s largest-ever infrastructure projects – connecting 2.9 million households to fiber infrastructure and launching nation-wide 5G services. The Group also advanced key regulatory reforms aimed at improving service quality for Bezeq customers while strengthening the Group’s profitability.”

“This transaction reflects the substantial progress Bezeq has delivered in recent years. We are proud of the significant value generated for shareholders, the strengthened financial and operational position of the Group, and its positive impact on Israeli communications sector. Under the continued leadership of Chairman Tomer Raved and Bezeq’s management team, we believe the Group is well positioned for further growth. We thank our partners in Israel and globally for their trust and cooperation throughout this period.”

B Communications Ltd is owned by Searchlight Capital Partners Ltd.

So a green energy company is trying to convince us they are serious about reducing GHGs, while being in lock step with a genocidal Israeli regime, in relation to detecting unexploded ordnances (which I assume would also include identifying Hamas’s stored weapons underground for all them to be bombed), and scanning Gaza for unexploded bombs, to allow the IDF to take over the 70% of Gaza as indicated by the Israeli PM Netanyahu. This company has accepting major financial support from

a financial equity firm that owned a telecommunication's company operating in internationally recognised illegal settlements in the West Bank, where it has made major profits. Palestinian genocide continues in the West Bank, where they are being dispossessed of their homes and belongings, tortured and murdered, on a daily basis in the West Bank. Constant Energy wants to convince us the Jennings O'Donovan & Partners Ltd priority is saving the planet?

A study in June 2024 showed that “The emissions from the first 120 days of the Israel-Gaza conflict exceeded the annual emissions of 26 individual countries.”

The report calls for “urgent need for mandatory military emissions reporting through the UN Framework Convention on Climate Change (UNFCCC) to better understand and mitigate the climate impact of conflicts.”

Why have these companies not been vetted by the Irish Government? They are making a farce of the individual countries' 2030 GHG targets.

I will be expanding on the role of the military in increasing GHG's later on in this document.

RSK Group. RSK acquires consulting engineering firm operating in renewable energy and water sectors. 7 August 2024. RSK Website.

[RSK acquires Jennings O'Donovan | RSK Group](#)

RSK Group. RSK completes preferred equity raise with total investment increasing to £520 million. 23 September 2024. RSK website

[RSK completes equity raise total investment £520m | RSK Group](#)

Missile Artillery Hypersonics Ballistics and Soldier Systems Update.55., 12th January 2023. Battle Updates

<https://battle-updates.com/update/missile-artillery-hypersonics-ballistics-and-soldier-systems-update-55/>

RSK Group. Unexploded ordnance ground investigation business. 11th January 2024, RSK Website,

<https://rskgroup.com/news/rsk-unexploded-ordnance-ground-investigation-business/>

RSK completes Preferred Equity Raise. 23rd September 2024, RSK Website

<https://rskgroup.com/news/rsk-completes-preferred-equity-raise/>

Searchlight Announces Agreement with Communications Ltd. 24th June 2019
Gan, R., (Israel)

<https://searchlightcap.com/news/searchlight-announces-agreement-with-b-communications-ltd/>

Israeli Regulator Approves Searchlight Taking Control of Bezel Tel. 11th November 2019. Reuters.

<https://www.reuters.com/article/business/israeli-regulator-approves-searchlight-taking-control-of-bezeq-tel-idUSKBN1XL1HF/>

Gan, R., (Dec 9, 2025) Bcom Sells Entire Bezel Stake. Searchlight Capital website, Israel

[Bcom Sells Entire Bezeq Stake – Searchlight Capital](#)

Annual report of the United Nations High Commissioner for Human Rights and reports of the Office of the High Commissioner and the Secretary-General. Agenda Item 2. 26th September, 2025. Human Right Council.

<https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session60/advance-version/a-hrc-60-19-aev.pdf>

Otu-Larbi, F., Neimark, B., Bigger, P., Cottrell, L., and Larbi, R. June, 2024. A Multitemporal Snapshot of Greenhouse Gas Emissions from the Israel-Gaza Conflict. Queen Mary University London.

https://www.qmul.ac.uk/sbm/media/sbm/documents/Gaza_Carbon_Emissions.pdf.

2. The Irish Working Class are Paying for GHG emissions & Ecocide Carried Out by Other Countries due to the foundation of the Climate Monitoring Mechanism being built on a False Premise

As stated in the Introductory Chapter of Constant Energy's Tirawley Wind Farm application, "In 2023, the European Union (EU) adopted an amendment of the Renewable Energy Directive (EU/2023/2413), which is referred to as "RED III... The RED III sets an 80% target for electricity production from renewable sources by 2030."

However, EU's Climate Monitoring Mechanism undertaken by The European Environmental Agency does not report GHGs (Green House Gases) from the military industries of its countries. It only includes energy, industrial processes, land use, land use change & forestry (LULUCF), waste, agriculture, and transport.

Ireland spends 0.45% of its GDP on military expenditure. We are a neutral country and only undertake peace missions. We are not a member of NATO. So we do not need to increase our military spending to 2%, even though our Irish Government is trying to justify this. The cradle to grave GHG emissions from the equipment used by our military is not recorded. But Irish emissions are minuscule in comparison to other countries emissions.

Stockholm International Peace Research Institute (SIPRI) stated on 27th April 2026, that, "Global military expenditure increased to \$2887 billion in 2025, the 11th year of consecutive rises, bringing the global military burden—military expenditure as a share of gross domestic product (GDP)—to 2.5 per cent, its highest level since 2009. At 2.9 per cent, the annual spending increase was significantly smaller than the 9.7

per cent increase recorded in 2024.” In 2025 Ukraine increased its military spending to 40% of its GDP according to SIPRI.

In 2019 a research paper “Under the Radar: The Carbon Foot-Print of EU Military, stated, “that the carbon footprint of EU military expenditure in 2019 was approximately 24.8 million tCO₂ e, which is equivalent to the CO₂ emissions of about 14 million average cars”.

Since then, we have seen the blowing up of the Nord Stream pipeline. It is now generally accepted that the explosion of the Nord Stream was initiated by the US with the assistance of some European countries. The Ukraine war has continued for 5 years, while the Palestinian genocide is now reaching its 3rd year, having expanded to Lebanon, Iran and the rest of the middle East. Germany is the second highest provider of weapons to Israel.

Research by Bun *et al.*, (2024), reported that “War-related GHG emissions for the first 18 months of the war in Ukraine were 77 MtCO₂-eq.”

Neimark *et al.*, (2026) indicated that “Israel-Gaza conflict carbon emissions exceeded 30 million tons”.

The International Government Panel on Climate Change ignores the impact of war on climate change. Ireland’s working class are paying the price and been punished for huge releases of GHGs, that have nothing to do with their every-day activities.

It is time our politicians and NGOs like An Coimisiún Pleanála and other associated Environmental, Agricultural and Human Health NGOs stood up and called a halt to this onshore windfarm madness that is cause so much stress and upset to local communities up and down the country.

Constant Energy states in its Introduction, that “The extent of the challenge to reduce greenhouse gas emissions in line with our International and EU obligations is well understood by Government and is reflected in the National Policy Position on Climate Action and Low Carbon Development (2014) and the Climate Action and Low Carbon Development Acts 2015 to 2021. **This statement is based on a false premise.** The Wind Farm issue is being assessed under a false premise. All development must stop until there is a national conversation to address this issue.

3. Who is benefiting from the development of wind farms throughout North Mayo, including the Tirawley Wind Farm, now under assessment?

You will see that large numbers of our community will be putting forward submissions to reject the development of the Tirawley Wind Farm, particularly the Lacken Ballycastle Community Landscape Protection Group submission, which we fully

support and have provided evidence to be included. It addresses, in great detail, the failings of the Constant Energy application.

Therefore, in this section I outline how the local community is at a significant disadvantage because of the system in place, including the planning process, which is designed to smooth the path for big business to always get what it wants and social and environmental justice is provided with lip-service. I focus in on noise pollution.

Kelleher & Dobbs (2025) has stated that

“In April 2023, the Citizens Assembly on Biodiversity Loss (CABL) recommended that a referendum be held on inserting environmental human rights and Rights of Nature into the Constitution. In December 2023, the Joint Oireachtas Committee on Environment and Climate Action published its own report examining the recommendations of CABL. The Committee accepted ‘in principle’ the recommendation on a referendum on a right to a healthy environment and Rights of Nature and recommended that the government begin the preparatory steps to consider a referendum within the lifetime of the then current Dáil. In October 2024, the government adopted a report responding to the CABL recommendations but did not address the referendum recommendations in detail. The question of constitutionalising environmental rights remains a live question, the urgency of which is only likely to grow.”

Kelleher, O and Dobbs, M. (2025) CEJ Report: Constitutionalising Environmental Rights – Practical Insights into the Irish Context. School of Law and Criminology, Maynooth University Commissioned by Community Law & Mediation Funded by Lifes2Good Foundation and Maynooth University Social Sciences Institute.
<https://communitylawandmediation.ie/wp-content/uploads/2025/06/CLM-Report-Right-to-a-healthy-environment-Report-online.pdf>

Ireland’s State of the Environment (ISoE) EPA report 2024 examined a range of environmental parameters relating to environmental protection. Before any protection policies are put in place a baseline data bank must be present to provide a picture of where there are deficiencies. In relation to noise, it states that:

“Each local authority is required to set out the steps that have been taken to prevent, protect against and reduce excessive environmental noise, as identified in their noise action plan. The plans are assessed by the EPA regarding the effectiveness of plan implementation and associated actions (Figure 3.5). In 2022, only 19% of local authorities achieved the required standard in this NEP (Noise Equivalent Power. Unit of measurement to standardise pollution detection, converting it to Watts/square root of Hertz that can be compared), compared with 33% in 2021 (EPA, 2023a). Noise was the lowest performing enforcement priority across the entire performance framework.”

Environmental Protection Authority (2024) Ireland’s State of the Environment- EPA report LOWRES

ISBN: 978-1-80009-199-3

[Ireland’s State of the Environment Report 2024 | Environmental Protection Agency](#)

Mayo was one of 11 counties that registered as providing limited assessment of noise pollution. Therefore, its noise planning documents are of little value since they do not reflect the real-life situation.

WHO noise guideline state that night-time noise above 45 dB L_{night} can be associated with adverse effects on sleep, resulting in cardiovascular disease, annoyance and sleep disturbance, if continuous.

The EPA is working with councils to develop more consistent plans that focus on priority important areas (PIAs). To work, it must involve initial screening of noise-exposed sites based on strategic noise mapping. This process identifies important areas and most important areas (areas of greatest exposure to environmental noise using the results of the strategic noise mapping and harmful effects assessment). The results are to be incorporated into the planning authority's noise action plans.

The chapter concludes that national policy for environmental noise is not as well advanced as in other environmental areas.

However, ISoE-EPA 2026, does not address the fact that new developments in noise research is now emphasising the negative effects of continuous infra-sound, not just on humans, but on biodiversity. Various epithelial cell structures in a living organism, including humans, can sense mechanical movement over an epithelial cell. In humans, the steady beat of the heart and blood volume and laminar flow patterns are the over-riding factors that regulates the specialised epithelial cell sensing apparatus.

If pressure to specialised epithelial cells, endothelium, is increased by environmental factors such as infra-sound (sound below 20 hertz), the resulting mechanical shear stress, from blood flow is detected (sensed) by the endothelium. This resultant energy is changed (transduced) into altering membrane potential and produces chemical kinases. Both are biochemical signal transmitters. The kinase moves to cell receptors that initiate the production of oxidative signalling, disrupting vascular homeostasis. Extensive research from various studies indicates that redox signals initiate inflammation signalling pathways, which in turn, can compromise vascular health. This is called *endothelial mechano-transduction*. (Bellut-Staeck, 2024; Chatterjee, 2018).

Bellut-Staeck, 2024 states:

“Recent studies confirm the importance of a balance of the nitrous oxide metabolism due to a synchronized release *at the right time, in the right place, and with the right quantity*. Misinformation, caused by external forces, must inevitably lead to an increase in *oxidative and oscillatory stress*, the main reason for a loss of endothelial integrity with inflammation diseases like atherosclerosis. This could indicate the long-sought pathophysiological way in which *infrasound* and *vibration* can exert a stressor effect at the cellular level. Noise-exposed citizens, who live near infrastructures such

as *biogas installations, heat pumps, block-type thermal power stations, and bigger industrial wind turbines (IWT's)*, show worldwide mainly a symptomatology associated with microcirculatory disorder.

Marine ecosystems, but also insects, appear to be particularly at risk from increasing emissions of very low frequencies. There is evidence for the increasing incompatibility of ever lower frequencies for all organisms and therefore for *whole biodiversity*."

Infra-sound has a long-range propagation, allowing it to travel long distances with little attenuation. It is therefore used for monitoring distant events.

It can penetrate solid objects and travel through dense media, such as the Earth's crust and is used to monitor earthquake, volcanic eruptions and other natural seismic events

Its low frequency makes it less susceptible to scattering and absorption. One wavelength can vary from a few meters to several kilometres.

Animals such as elephants, use it to communicate to herd members, through stamping on the ground.

Bellut-Staeck, U. M. (2024) Chronic Infrasound Impact is Suspected of Causing Irregular Information via Endothelial Mechano-transduction and Far-reaching Disturbance of Vascular Regulation in All Organisms. Medical Research & its Applications, Eds: Rokeya, B. & Vol 8: P65-79.
<https://doi.org/10.9734/bpi/mria/v8/727>

Chatterjee S (2018) Endothelial Mechano-transduction, Redox Signalling and the Regulation of Vascular Inflammatory Pathways. Front. Physiol. 9:524.
<https://doi.org/10.3389/fphys.2018.00524>

I would now like to use the Glenora Wind Farm Application process as an example of how the system is biased towards international companies being prioritised over the needs and desires of the local community.

The local community (representing at least 129 people) and NGOs placed submissions to An Coimisiún Pleanála- Marine Section, with regards to the Glenora wind farm application clearly outlined that human health and wellbeing, biodiversity, soil, hydrology, peatland & natural heritage of the area would be greatly diminished if this windfarm was allowed to go ahead. My husband and I sent in a detailed submission in relation to the application, as did many of the local community & NGOs. They are available here:

Brendan Boyd.pdf, Catherine Clarke.pdf, Céide Coast Community Company.pdf,

Dolores Boyd.pdf, Geraldine McManus.pdf, Kevin Loftus.pdf,

Lacken Ballycastle Community Landscape Protection Group: Microsoft Word - Final ACP Submission Glenora Gaeilge (representing 129 members of the community)

Glenora Observation PDF -Marion Bourke, Mary Clarke Boyd.pdf

Michael & Rosalind Callander.pdf

Prescribed organisation submissions

An Taisce.pdf, Department of Defence.pdf, Department of Housing, Local Government and Heritage.pdf, Executive Report from Mayo County Council.pdf, TII.pdf

An Coimisiún Pleanála rejected arguments that the area is considered vulnerable and has allowed the windfarm with 22 turbines, some as high as 180 M, higher than the Spire in Dublin (120 M) to go ahead. The stated policy about 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."

Landscape appraisal of County Mayo (2008) 1Mayo Landscapes Intro.pdf

The likelihood of peat slippage due to shallow tree rooting and the underlying bedrock being impermeable rock meta-dolerite) is very high due to drilling during construction of the windfarm and from the infra-sound constantly emitted once the wind turbine is established. Paul Burgess (2024) highlights in his video that infra sound negatively effects people, animals and birds. People suffer from sea sickness and are unable to sleep, cows reduce their milk production by about 60% and chicken stop laying eggs. Animal mortality increases substantially. As you increase the size of the turbine you increase the infra-sound and its reach. Wind turbines produce very low infra-sound in single numbers that result in buildings vibrating. The infra-sound is higher within a confined space than in the open space.

Burgess, P. (2024) Climate Realism: The Danger of Windfarms - The danger of Infrasound. Bing Videos

Infra-sound was not addressed in ACP 's response on giving the windfarm company the go ahead to build. The go-to answers for all obstacles to building wind farms is

for Pleanala to stipulate that the applicant must adhere to mitigating rules included in the document it produces, which basically allows wind farm companies to completely change the natural environmental horizon, placing biodiversity, natural heritage and human health in jeopardy.

In the Tirawley Wind Farm Application, Chapter 12, p.12, provides research for 1997 states that it uses to justify having wind Turbines within 1 KM of residential dwellings or community centres/schools etc. The developers propose to build wind turbines within 1.1 KM at AT 02, 1.4 KM at AT 03 and 1.6KM AT 04 distance from St Patricks School. Many residential areas are within 1 KM of the turbines.

A report from TU Delft the Netherlands, titled: Scientific breakthrough in Delft exposes danger of low-frequency sound by Maandag, 22 June 2026 is translated here

“Recognition of health damage by TU Delft offers a new legal and social precedent for local residents near wind turbines and heat pumps.

Although the study focused on a university ventilation system, the implications for the hundreds of thousands of Dutch citizens living around wind farms and industrial heat pumps are immense.

The discussion thus definitively shifts from the question of whether it makes people sick, to the question of when the government will take responsibility to protect its citizens.

The Delft Case: From denial to scientific evidence

An in-depth internal investigation by Delft University of Technology has led to a crucial institutional recognition: prolonged exposure to low-frequency noise causes severe health problems.

Since May 2025, six employees at the Faculty of Applied Sciences (TNW) at TU Delft have been suffering from a complex syndrome of severe health complaints, including acute shortness of breath, heart problems, hypertension (high blood pressure), nausea, and disorientation.

Remarkably, these symptoms showed a strong resemblance to an earlier wave of unexplained sick leave in 2016, shortly after the initial completion of the faculty building.

Contrary to regular social practice, where such complaints are often marginalized, the university board decided in June 2025 to form a multidisciplinary research team.

This team, consisting of internal specialists and external noise experts, conducted systematic measurements for a little over a year.

The results, which were recently published via the university's journalistic platform Delta, left no room for ambiguity: the complaints were directly caused by a recent

expansion of the central ventilation system, which generated invisible but penetrating low-frequency vibrations.

"Such levels of low-frequency noise were measured in the building that the usual audibility and nuisance standards were significantly exceeded. This convincingly demonstrates that prolonged exposure leads to serious somatic complaints." —

Spokesperson for the TU Delft Research Team

The physiology of the invisible humming noise

Low-frequency noise (LFN) is in the frequency range between roughly 20 and 125 Hertz. Although this noise is barely perceptible audibly to the human ear, the physical sound waves possess enormous mechanical energy that penetrates deep into structures and the human body.

Clinical physicist and audiologist Jan de Laat, affiliated with the Leiden University Medical Center (LUMC), explains that the human body does not primarily register LFN via the eardrum, but via the mechanical balance organ in the inner ear.

With chronic exposure, this organ becomes chronically disoriented. The body is in a constant state of apparent motion, leading to symptoms such as vertigo (dizziness), migraine, bowel problems, and progressive hearing loss.

Furthermore, the constant vibrations trigger the limbic system — the cerebral structure responsible for emotion and stress regulation — which can cause patients to develop deep anxiety and panic disorders.

For the employees in Delft, this recognition came too late; they have since been on long-term sick leave, transferred, or forced to leave the institution.

The social paradox: Wind turbines and heat pumps

The thoroughness with which TU Delft investigated and acknowledged the source of the complaints is in stark contrast to the prevailing government policy outside the walls of the academy.

According to official data from the RIVM report 'Perception of the living environment: nuisance and sleep disturbance', published in September 2025, the scale of this problem among the Dutch population is now gigantic:

- Tens of thousands of adults experience severe and chronic noise nuisance from wind turbines near residential areas.
- More than 200,000 households now experience severe nuisance from the dominant, low-frequency humming noises of heat pumps.

Instead of a systematic source analysis like the one in Delft, citizens consistently encounter a wall of skepticism when dealing with agencies such as the Municipal Health Service (GGD) and regional environmental agencies (Omgevingsdiensten).

Complaints are often diagnosed as 'psychosomatic' or dismissed with the assertion that the nuisance is 'all in the head'.

Practice put to the test: The story of a local resident

For local residents living near large-scale wind energy projects, the Delft case provides the definitive validation of their daily reality. Renata van Heuven, who lives more than three kilometers from the recently commissioned Goyerbrug Wind Farm in Houten, told *de Andere Krant* that she recognizes the medical spectrum of the TU employees in detail. Since the activation of four giant turbines (tip height 230 meters) in January of this year, her health has been ruthlessly destroyed.

"From the first day the turbines went into operation, I developed a constant brain fog," explains Van Heuven. "My body began to vibrate involuntarily as soon as I was in the house. You physically feel the mechanical vibrations pulling inside through the floor and the furniture."

In the months that followed, she developed severe hypertension, heart palpitations, chronic insomnia, and panic attacks — symptoms that ultimately cost her her job.

Failing measurement methodologies and the political precedent

The core problem behind the social stalemate lies in the acoustic standardization that is being applied.

Official measurements by authorities utilize the so-called dBA conversion. This specific filtering method is designed to mimic human hearing sensitivity and technically flattens out lower frequencies during measurements.

On paper, this means all legal standards are met, while the physical, illness-inducing vibrations remain outside the statistics.

The Delft report breaks this dogma by demonstrating that current dBA nuisance standards fall short when dealing with structural low-frequency loads. It thereby functions as a crucial institutional precedent.

"This is the institutional breakthrough that victims all over the Netherlands have been waiting for. It proves in black and white that current noise standards offer citizens zero protection. The scientific consensus is now there; politicians can no longer look away." — Renata van Heuven, affected resident

With the publication of the findings from Delft, the discussion surrounding the energy transition and public health has reached an irreversible tipping point.

The priority undeniably shifts to The Hague: politicians will have to formulate comprehensive legislation explicitly aimed at low-frequency noise in order to effectively protect citizens against the downsides of modern climate technology."

Technical Report, ETSU W/13/00392/REP – ‘Low Frequency Noise and Vibration Measurements at a Modern Wind Farm’. Sponsored by the Department of Trade & Industry, UK 1 August 1997.

<https://www.osti.gov/etdeweb/biblio/505483>

Maandag, Recognition of health damage by TU Delft offers a new legal and social precedent for local residents near wind turbines and heat pumps. 22 June 2026

[Wetenschappelijke doorbraak in Delft legt gevaar laagfrequent geluid bloot](#)

(Translate to English)

The recent research relating to infra sound and wind turbines makes it a priority that the ACP takes seriously the health of both humans and biodiversity surrounding wind turbines. Therefore, it must reject the development of the Tirawley Wind Farm and reassess the Glenora Wind Farm decision.

A second reason for recalling the Genora Wind Farm Application is because a Southampton Environmental Master's Student has just received her Masters of Science results today. Her name is Maisie Hancock. Her dissertation was on,

An Environmental Impact Assessment on the positioning of Glenora Wind Farm on Bogland in County Mayo, Ireland. A dissertation submitted in partial fulfilment of the degree of MEnvSci Environmental Science. Faculty of Environmental and Life Sciences School of Geography and Environmental Science University of Southampton 2025-2026

“Conclusion

The renewable energy sector has been undergoing rapid growth due to increasing concerns about greenhouse gas emissions and climate change impacts. Ireland is required to meet international and national targets for carbon emissions reductions, which are set out in the European Green Deal and their own Climate Action and Low Carbon Development (Amendment) Act 2021. Increasing pressure from legislation, coupled with recent desires for energy security, has pushed councils and businesses towards onshore wind development. However, whilst there are many economic benefits to this investment, there are also associated trade-offs within the local environment that must be considered before a development is approved. Therefore, this study has followed Environment Impact Assessment (EIA) methodology to analyse the impacts for a proposed onshore wind farm in County Mayo, Ireland. Glenora wind farm will comprise of 22 wind turbines near the town of Ballycastle and has a capacity of 158MW. This research aimed to present the existing arguments for and against wind farms in County Mayo and review the potential consequences of the proposed development.

The study included scoping, review of baseline conditions at the project site, impact assessments, and considerations for mitigation measures. Scoping results showed that the majority of studies on onshore wind focussed on public opinion, economic

effects, direct environmental impacts, and indirect environmental impacts. Scoping provided guidance for the baseline conditions to be evaluated ahead of the impact assessments. The baseline conditions assessed were related to biodiversity, land and soils, hydrology, cultural heritage and archaeology, population and human health, the visual landscape, and weather and climate. The subsequent impact assessment determined that impacts to Céide Fields, blanket bogs, birds, carbon peat loss, peat habitats, Altderg river, and five designated protected sites were significant or higher. Therefore these receptors were considered for mitigation to reduce impact significance. Mitigation suggestions were able to reduce significance of impacts on these receptors to moderate or lower for all but impacts on Céide Fields. However, due to high uncertainty of potential impacts on Céide Fields, it is unclear whether development should be relocated or approved at the current site. Other sizeable concerns from Glenora wind farm are related to construction on peat bogs, as these are globally ecologically significant and considered to be very sensitive, due to long regeneration times. Disturbance of peat soils leads to direct release of greenhouse gases, as well as indirect impacts on waterways from nutrient leaching and biodiversity loss from ecosystem damage. The impacts on peat soils from Glenora wind farm should be investigated further and developers should consider alternative locations, before proceeding with construction. Glenora wind farm developers are still awaiting approval from An Coimisiún Pleanála. In the case that they do receive approval; mitigation measures should be taken into great consideration to minimise significant long-term impacts to the local environment.”

The Infra-sound data included in here EIAR while writing the dissertation.

Rather than ACP employing researchers to investigate the mainly unexplored natural heritage, biodiversity and hydrology of the area, it stipulates that the windfarm company will employ and manage these activities before they are allowed to build and consult with a local community leader.

How can this be considered an independent activity, if the consultants must toe the company line in relation to what it will allow to be presented to the local community and in reports?

There is absolutely no way the wind farm company can prevent pollution entering the local rivers, regardless of mitigation efforts, nor can they prevent loss of peatland, bird life, bat life and insect life, or ensure local farm animal and human health in the vicinity of these windfarms.

Neither did it address the issue of An Tain Bo Flidhais Trail, the trail Queen Maive took when she intended to steal Flidhais's white cow. Queen Maive's daughter Cainer, (Glen Cainer) was killed in battle and is thought to be buried near Keerglen River.

ACP failed to recognise the fact that the turbines are being built in an area of Dark Skys equivalent to the site in South Mayo in Nephin National Park, Ballycroy.

The possibility that Dalradian super group of rock structures are underneath the forested area where the Glenora Windfarm has been given the go ahead to build on this site. Meta-dolerite (dolerite, an igneous rock similar to basalt, that has been metamorphosed) has been identified by the windfarm company as present in the bedrock. It was formed 700 million years ago. Belderg Harbour has been identified as a NHA site due to these Dalradian geological formation forming the harbour backdrop. If this area was independently assessed, it should be identified as an NHA, for just any one of the points made in the above paragraphs. (See Glenora Wind Farm submission by Catherine Clarke, P 16 to 23.)

There are significant reasons to advocate for the North of Mayo to be one continuous natural Heritage Site, together with the Ceide Field Complex, The Wild Atlantic Way and the development of a coastal walk from Downpatrick Head to the Ceide Fields, since tourism of the area relies heavily on its natural heritage and biodiversity.

The Irish energy issue is being used to greenwash the never-ending stream of international companies extracting wealth from the plunder of Irish resources. The County Mayo Renewable Energy Strategy document should be a starting point to address this issue.

According to Bresnihan & Brodie (2024), "From the end of the 1970s, IDA policy shifted away from more labour-intensive manufacturing (providing regional employment and economic development), as these sectors were lost to parts of the Third World. By the end of the 1980s, the IDA was buying jobs from tech companies, with an estimated 100,000 punts paid per job "created" by the Intel facility. The primary draw to outsourcing in Ireland was low tax."

The authors unpick the relationship between modern development and environmentalism.

"State support for energy-intensive data centres perpetuates the view that the interests of multinationals (and Ireland's FDI-dependent model of development) are favoured over certain sections of the population (data centre energy consumption in 2021 accounted for 14% of electricity nationally, with rural households accounting for 12%). The formation of EPA was a state response to growing public disquiet and environmental conflicts relating primarily to the activities of multinational chemical companies but also to the agricultural industry. The EPA effectively translated contentious political debates about the FDI-led model of development (and agricultural intensification) into the technical domain of a supposedly neutral state body tasked with setting and monitoring "allowable" quantities of pollution. We see something similar with the role that An Bord Pleanála plays within planning, or the Commission for Regulation of Utilities (CRU) plays within the water and energy systems: state strategy has been to inoculate itself against any challenge to the basic model of FDI-led development by containing controversies and opposition within narrowly defined, highly technical and administrative systems"

"As early as 1998 environmental policy debate in Ireland is concerned no longer with the extent of ecological degradation, the quality of the environment or encouraging environmental sensitivity, *but with organising consent around new definitions of*

justifiable pollution.” We see similar technical discourses emerging today in response to questions raised around data centres, deflecting opposition into proposed technical solutions such as district heating systems and renewable energy.”

To achieve this, the state had to uncouple issues of capitalism and environmentalism, by effectively depoliticising them.

A colonial mind set still exists within our management structures of resources. Bresnihan & Brodie (2024) gives the following example:

“Ireland’s peatland management, for example, demonstrates the ways that colonial “improvement” in the ways that peatlands are seen as wastelands to be made profitable by immensely transformative capitalist enterprise,” today in the form of large-scale renewable energy transformations through out-of-control neoliberal capitalism that sustains the present era of the Irish State.

They authors go on to state:

“Firstly, the logics of extraction have multiple forms, which we identify across the direct material extraction of resources, the development of infrastructures to facilitate extractive processes, and the designation of environmental sinks and the distribution of responsibility (or harm) upon those in marginal rural areas.

Second, we want to demonstrate that the operability of these logics has evolved over time, and become more extensive and, crucial for our argument, embedded within “green” strategies of growth and development.

Third, and finally, we want to emphasise the role of the state in bringing this about through mechanisms of facilitation and mediation at the levels of planning and policy. In all of these cases, from responses to toxic chemicals to data centre development, the state attempts to resolve environmental conflict – around extractive growth and land use that come into frictional contact with environmental and ecological relations – through “technical adjustments” to fundamental contradictions. Various public agencies and private environmental consultancies operating within the growing field of “sustainability” were, and remain, aligned with state development policy and produce the discourses that smooth through Government policy responses, becoming the forerunners and approvers to common-sensical development policies. This form of environmental developmentalism always looks for technical solutions to fundamental environmental contradictions, united against the “irrational” objectors to progress.”

Those of us who object to these infrastructure developments are seen as irrational or cranks.

Bresnihan & Brodie (2024) continues to highlight that “A data centres is extractive because it is using huge amounts of energy, water, and data that are mediated through other, largely public, infrastructures. This is on top of the extractive financial technologies enabled by a system of taxation that is designed to support public goods but ultimately ends up facilitating a regime of accumulation that funnels capital elsewhere. Thus, data centres, like other multinational infrastructures, instantiate a

form of extraction that is more mediated, more networked, and more difficult to politicise and find points of intervention.

The construction of wind farms in rural Ireland follows familiar faultlines of rural extraction and abandonment, wherein the bogland areas that these facilities are typically built on continue to be perceived as “wasted” land if not made productive via large-scale activity. Today this takes the shape of “climate solutions” and renewable energy systems, from wind farms to battery arrays, to data systems, to all of the infrastructures required to support the transformations in the energy system, much of which is developed by multinationals. These are each very different types of resources, embedded in different sectors and strategies, but tied to similar logics and strategies that are continuous across time. Few would deny that the perception among multinationals was that Ireland was unlikely to jeopardise potential investment through stringent environmental controls.

The establishment of the EPA in 1993 was a key moment in the state’s response to growing public concern and community campaigns against toxic pollution linked to chemical manufacturing. Institutionalising “allowable” amounts of pollution served to contain public concerns within the technical domain of measurable environmental pollutants, risk and harm.

One pertinent example is the Asahi synthetic fibre plant in Killala, Mayo, established in 1977 and operating until 1997. As John Healy narrates the story of the Japanese multinational locating there, “the proposal was welcomed with open arms, and everything was done to smooth the path. A 400-acre site for the plant was secured; Mayo County Council rushed through a € 1.6 million water-supply scheme to provide the plant with the 20 million gallons of water it needed per day; and efforts to recruit 500 workers, most of them from the area, swung into action.” The involvement of the IDA and the County Council in the buildout of significant amounts of water infrastructure to supply its facilities stands in stark contrast to water provision for the rest of the region, where group water schemes have represented a kind of community-based solution to those otherwise lacking state utilities, a condition which comes from much longer histories of infrastructural underdevelopment. The state’s primary development strategies for rural areas today are centred around attracting more of these sorts of multinational investments, with significant infrastructural provision for private industry occurring under superficial state remits towards “public” good provided via the model of FDI-for-development.

Wind and battery farms in the rural northwest, for example, are largely being designed to support the growing demand of “smart” infrastructures like data centres and EVs and intermittency in the grid, respectively. Where are the corresponding supports for the electrification of rural heating systems? Or the protection of the often-fragile ecosystems affected by large-scale developments in whatever form? What are the capacities for democratic ownership of these energy supplies and other environmental futures?”

The plethora of wind farms in the application phases and those just granted are not to provide energy directly to rural homes in North Mayo, but to service the Data Centre, a Hydrogen production plant and the Lithium Battery production on the old Ashi plant site. The 20 million litres of water to the site, has already been paid for from the public purse.

“The Irish state’s bargain with empire in the selling of its environment and infrastructure to global capital has been key to its development”

From toxic industries to green extractivism: rural environmental struggles, multinational corporations and Ireland’s postcolonial ecological regime. Bresnihan, P & Brodie, P. (2024) Irish Studies Review, Vol 32: Issue 1
<https://doi.org/10.1080/09670882.2024.2304946>

Recent research has shown that data centres release significant amounts of Pfas, which are ‘forever chemicals. They remain in the soil, water and air, and act as a greenhouse gas. The compounds have been linked to cancer, birth defects, decreased immunity, high cholesterol, kidney disease and a range of other serious health problems. The Killala data centre application did not consider the effects of this chemical, nor ACP enquire about its use, impact or monitoring the site to identify it in the surroundings.

Perkins, T. (2025) Advocates Raise the Alarm over Pfas Pollution from Datacentres amid AI Boom. The Guardian, 4th October 2025.

[Advocates raise alarm over Pfas pollution from datacentres amid AI boom | Pfas | The Guardian](#)

Coming back to the question, in whose interest are data centres been built? In recent months it has become clearer that the main function of data centres is to provide state surveillance through international tech companies to merge personal financial data with the services an individual uses, to monetize and control every aspect of our lives. And the international financiers and tech giants want us to pay for it.

It is presented as making life easier and it isn’t mandatory. However, if you cannot access a service without the Digital ID, then you are obliged to get it. We are told it will not track individuals, but policies can easily change. We see how ICE in America, is targeting migrants and those opposing government policies on war, through their electronic footprint.

Our “Taoiseach Micheál Martin says the government wants all areas of the economy and society to benefit from digital and AI technologies – helping businesses to grow, improving our public services and ensuring everyone has the skills to succeed in a digital and AI-driven economy and society”

He hope to have 100% compliance within the year. That does not sound like the people of Ireland will have a choice in the matter, if the Taoiseach has already set a

target of 100%. The government's main priority is to please their bosses in the EU rather than addressing the needs of local communities.

McConvey, J.R. (2026) Ireland on track for EUDIW deadline with launch of digital wallet in 2026. BiometricUpdate.Com, 2nd Apr. 2026

Ireland on track for EUDIW deadline with launch of digital wallet in 2026 | Biometric Update

Our politicians are fully on board with the World Economic Forum surveillance approach. The data will be centralised under government control. However, government departments have experienced many data breaches just last year. There is no sign of a referendum on the issue.

Macon, K. (2026) Despite Dozens of Data Breaches, Ireland Plans to Tie Social Media to a State App. Reclaim the Net. 19th Jan.2026

Despite Dozens of Data Breaches Ireland Plans to Tie social media to a State App

4. Wind Energy already produced by Mayo Windfarms

I have produced four tables with regards to onshore wind energy production in Ireland. Table 1 shows that Mayo is the 7th highest producer of onshore wind in relation to Installation capacity (387 MW/year) and 5th highest in relation to GWh generated/year (845 GWh/Year). The raw data is from [Wind Energy By County](#) Wind Energy Ireland Live Dashboard

Table 1: Provides county specific information relating to windfarm energy production. It records, a. The Installed energy capacity, b. Generated GWh, c share of percentage of Irish onshore wind energy produced, d. CO₂ emission savings, e. Local community fund, f. Commercial rates of income from wind turbines, and g. Windfarm rates as a total of county rates percentage.

County/Energy	Installed Energy Capacity (MW)	Generated (GWh)	Share of Irish Wind Energy Produced %	CO2 emissions saved (Tonnes)	Local community Fund Euros	Commercial Rates Income Euros
Kerry	795	1,589	12.4	473,591	597,908	11,037,000
Cork	701	1343	10.93	400,285	812,119	7,647,500
Galway	458	995	7.14	296,551	1,119,451	4,978,560
Donegal	449	774	7.79	230,737	422,839	5,558,720
Offaly	445	943	6.94	280,940	807,382	7,943,440
Tipperary	410	831	6.39	247,690	347,707	6,301,650

Mayo	387	845	6.04	251,941	774,783	7,485,82
Clare	274	513	4.28	152,913	232,254	4,361,37
Limerick	128	351	1.99	104,628	283,853	4,065,16
Wexford	123	278	1.91	82,826	18,883	2,593,30
Cavan	107	469	1.66	139,640	326,754	22,035,07
Sligo	100	186	1.56	55,370	6,748	960,66
Roscommon	96	216	1.49	64,260	193,059	1,959,12
Leitrim	95	110	1.48	32,868	60,597	1,628,14
Waterford	64	104	1.01	30,933	41,528	1, 061,44
Wicklow	53	173	0.83	51543	88828	142524
Monaghan	51	170	0.8	50,703	303,240	1,705,29
Kilkenny	37	107	0.58	31,990	58,565	1,378,49
Laois	34	51	0.53	15,086	0	444,41
Carlow	9	0	0.28	7,520	0	78,43
Meath	9	0	1.04	7,437	92,806	151,90
Louth	7.6	0	1.3	6,280	0	59,27
Dublin	1.3	0	0.07	1,074	0	5,13
Kildare	0	0	0	0	0	
Longford	0	0	0.07	0	0	
Westmeath	0	0	0.12	0	0	
Total	4833.9	10048	78.63	3016806	6589304	9380376

Table 2 identifies that Mayo is the 3rd highest producer in the Northern & Western region of onshore wind in relation to Installation capacity (387 MW/year) and 2nd highest in relation to GWh generated/year (845 GWh/Year)

Table 2: Provides Northern & Western Region specific information relating to windfarm energy production. It records, a. The Installed energy capacity, b. Generated GWh, c share of percentage of Irish onshore wind energy produced, d. CO₂ emission savings, e. Local community fund, f. Commercial rates of income from wind turbines, and g. Windfarm rates as a total of county rates percentage.

Northern & Western Region County/Energy	Installed Energy Capacity (MW)	Generated (GWh)	Share of Irish Wind Energy	CO₂ emissions saved (Tonnes)	Local community Fund Euros	Commercial Rates Income Euros
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			<i>Produced %</i>			
Galway	458	995	7.14	296,551	1,119,451	4,978,560
Donegal	449	774	7.79	230,737	422,839	5,558,720
Mayo	387	845	6.04	251,941	774,783	7,485,829
Cavan	107	469	1.66	139,640	326,754	22,035,073
Sligo	100	186	1.56	55,370	6,748	960,662
Roscommon	96	216	1.49	64,260	193,059	1,959,126
Leitrim	95	110	1.48	32,868	60,597	1,628,146
Monaghan	51	170	0.8	50,703	303,240	1,705,295
Total	1743	3765	27.96	1122070	3207471	46311411

Tables 3 and 4 are included for completion's sake.

Table 3: Provides Eastern & Midland Region specific information relating to windfarm energy production. It records, a. The Installed energy capacity, b. Generated GWh, c share of percentage of Irish onshore wind energy produced, d. CO₂ emission savings, e. Local community fund, f. Commercial rates of income from wind turbines, and g. Windfarm rates as a total of county rates percentage.

Eastern & Midland Region County /Energy	<i>Install ed Energy Capac ity (MW)</i>	<i>Genera ted (GWh)</i>	<i>Share of Irish Wind Energy Produc ed %</i>	<i>CO2 emissio ns saved (Tonne s)</i>	<i>Local commu nity Fund Euros</i>	<i>Commer cial Rates Income Euros</i>	<i>Windfa rm rates as a total of County rates %</i>
Offaly	445	943	6.94	280,940	807,382	7,943,444	30.94
Wicklow	53	173	0.83	51,543	88,828	1,425,245	4.14
Laois	34	51	0.53	15,086	0	444,415	2.72
Meath	9	0	1.04	7,437	92,806	151,905	0.24
Louth	7.6	0	1.3	6,280	0	59,277	0.15
Dublin	1.3	0	0.07	1,074	0	5,137	0
Kildare	0	0	0	0	0	0	0
Longford	0	0	0.07	0	0	0	0

Westmeath	0	0	0.12	0	0	0	0
Total	549.9	1167	10.9	362360	989016	10029423	4.24 (Average)

Table 4: Provides Southern Region-specific information relating to windfarm energy production. It records, a. The Installed energy capacity, b. Generated GWh, c share of percentage of Irish onshore wind energy produced, d. CO₂ emission savings, e. Local community fund, f. Commercial rates of income from wind turbines, and g. Windfarm rates as a total of county rates percentage.

Southern Region County/Energy	Installed Energy Capacity (MW)	Generating (GWh)	Share of Irish Wind Energy Produced %	CO ₂ emissions saved (Tonnes)	Local community Fund Euros	Commercial Rates Income Euros
Kerry	795	1,589	12.4	473,591	597,908	11,037,005
Cork	701	1343	10.93	400,285	812,119	7,647,507
Tipperary	410	831	6.39	247,690	347,707	6,301,650
Clare	274	513	4.28	152,913	232,254	4,361,373
Limerick	128	351	1.99	104,628	283,853	4,065,163
Wexford	123	278	1.91	82,826	18,883	2,593,301
Waterford	64	104	1.01	30,933	41,528	1, 061,441
Kilkenny	37	107	0.58	31,990	58,565	1,378,497
Carlow	9	0	0.28	7,520	0	78,435
Total	2541	5116	39.77	1058785	1794909	26425926

The data above clearly shows that Mayo County Council is within its right to identify the Tirawley Windfarm as inappropriate. Mayo has done its fair share of providing onshore wind energy to the grid. The more we provide the higher the government raises its targets. ACP has allowed the development of Glenora, which should not have been allowed, due to the many reasons identified by local and national NGOs and local community submission to the Glenora windfarm application process, as well as our submissions to the Mayo County Council draft renewable energy framework.

I have asked Mayo councillors and TDs to put forward a motion for a moratorium on windfarms and datacentres in Mayo.

5. Bladeless Wind Turbines

Moving parts to wind turbines that are 150 to 180 M high causes so much environmental and community destruction and distress. Take a beat, encourage the development of bladeless wind turbines that have no external moving parts and can be of much smaller dimensions, placed near roads and railway lines, and within urban areas, producing saver green energy. The prototypes are operating successfully in the lab. Within 3 to 5 years, turbines with blades will be obsolete and we will be left with huge monstrosities of turbines that will not be decommissioned without further disturbance and upset.

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6. Specific to Tirawley Wind Farm Development

I. Tourism cumulative impact

I am concerned about the cumulative impact the Tirawley wind farm will have on tourism in not only the Lacken Area but also in Ballycastle. Recently Glenora wind farm has been approved by An Coimisiún Pleanála for 22 turbines. The coast road from Lacken to Ballycastle is an extremely important part of the Wild Atlantic Way and it is a extremely important economic asset to the area. The cumulative effect of Tirawley, Glenora, Keerglen and potentially Clydagh will have on tourism in the area cannot be ignored. The communities involved have worked extremely hard over the years to promote the areas, and recently launched Failte Ireland and Mayo County Council tourism plan for the area is a significant boost for the area. This cumulative wind energy development that is planned for the North-West coast of Mayo is eroding the future that our communities can have. The Lacken Ballycastle coastline is impressively historic with the Céide fields complex and down Patrick Head, the future that residents could have will become negligible. ACP do not consider fully the cumulative impact of all projects in the area. I do not believe that the applicant has fully considered all the cumulative effect.

II. Site Suitability and Landscape Impact

The area includes sensitive landscapes, visible from the Wild Atlantic Way and other designated scenic routes, which would be adversely affected by this wind farm. The visual intrusion on the unique coastal and rural landscape is unacceptable and contrary to the policies outlined in the Mayo County Development Plan regarding landscape protection and visual amenities. (Reference: Mayo County Council submission, EIAR Chapter 17 - Traffic and Transport, Pages 9-10; Planning Statement, Pages 69-71)

III. Environmental and Ecological Concerns

The Lacken area includes sensitive habitats such as blanket bogs and areas with ecological significance under the Habitats Directive. The large volumes of peat to be extracted and the disturbance to these habitats could have long-term detrimental effects on biodiversity and peatland restoration efforts. (Reference: Appendix 1.6 Community Engagement Report, Pages 13-14; Planning Statement, Pages 69-71)

IV. Impact on Hen Harrier Habitat

I am particularly concerned about the impact of the proposed development on the hen harrier, an Annex I protected species under the EU Birds Directive and one whose Irish population has declined significantly in recent years. The

EIAR acknowledges that hen harriers are present within the study area and that the site provides suitable autumn and winter foraging habitat. The site contains a combination of blanket bog, scrub, wet grassland, semi-improved grassland and hedgerow networks, all of which are important habitats for foraging and roosting hen harriers.

Of particular concern is that a winter hen harrier roost was recorded within the study area, yet no comprehensive winter roost survey appears to have been undertaken across the wind farm site itself. The applicant's roost surveys focused primarily on areas outside the development footprint, despite evidence that hen harriers utilise habitats within the proposed development area. In the absence of a robust assessment of winter roosting activity, it is difficult to conclude that the impacts on this protected species have been fully assessed.

The development will result in the permanent loss and fragmentation of habitats used by hen harriers, including substantial hedgerow removal, loss of blanket bog habitat, forestry felling and the construction of extensive site roads and infrastructure. While mitigation is proposed, there remains uncertainty as to whether replacement habitats can adequately replicate the ecological value of the habitats being lost, particularly in the short to medium term.

I am also concerned about the cumulative effects of habitat loss, construction disturbance and operational displacement. Research has shown that hen harriers may avoid otherwise suitable habitat in the vicinity of operational turbines, resulting in a reduction in available foraging area. The application does not appear to adequately assess or mitigate this displacement effect. Given the conservation status of the species, the acknowledged presence of suitable habitat and recorded winter roosting activity within the study area, I do not believe sufficient scientific certainty has been provided to demonstrate that the proposed development will not adversely affect the hen harrier population using this landscape. The precautionary principle should therefore apply.

V. Traffic and Infrastructure Impact

The construction phase will bring significant disruption to the local road network due to the delivery of abnormal loads and turbine components. The existing roads will require widening and modifications that will impact local traffic flow and road safety. The scale of this impact has not been adequately mitigated in the proposal.

(Reference: EIAR Chapter 17 - Traffic and Transport, Pages 6-10; Appendix 1.6 Community Engagement Report, Pages 11-12)

I am concerned about the impact that the construction will have on my ability to get to work and other appointments as the amount of road works this will involve is significant. I do not consider that there have been sufficient

surveys done on the Palmerstown Bridge and this need to be assessed appropriately.

VI. Community and Socio-Economic Issues

While I acknowledge the need for renewable energy and some regional economic benefits, the socio-economic impact on sustainable family farms and local amenities is concerning. The proposal does not sufficiently address the community's needs or provide clear, direct benefits to local residents. The proposed community benefit package remains vague and unconvincing. (Reference: Appendix 1.6 Community Engagement Report, Pages 7-14)

VII. Cumulative Impact and Strategic Considerations

The project overlaps with areas where other developments are planned or existing, increasing cumulative environmental, visual, and infrastructural pressures. The scale and height of modern turbines, as noted by Mayo County Council, raise questions about the suitability of this site compared to previous assessments.

(Reference: Mayo County Council submission, EIAR Chapter 17, Pages 9-10)

7. Unanswered Questions from the Community

There are many questions that remain unanswered to the community of North Mayo.

- a. Has AVAIO, the construction company wanting to build a data centre on the SGR site (now called Killalla Business Centre, to deflect from the fact that is owned by a profit hungry company) won its court case to build its Data Centre?
- b. Do we know what data companies will use the centre if it goes ahead?
- c. If it does not receive enough energy from the 5 present, and 6th proposed wind turbines near the site, is it being allowed to access energy from other sources, such as the proposed wind farms in Glenora, Keerglen, Clydagh and Tirawley, or just use onsite gas/oil?
- d. Is the development of the company CPH2 on this site, still a priority, if the Tirawley Windfarm is not built?
- e. Was the clean energy to support the production of H2 supposed to come from this wind farm?

- f. If it is refused will this go ahead anyway?
- g. Southern & South East PLC, owns the Tawnaghmore Power Station, which is a peaker plant comprised of two 52MW gas/oil-fired open cycle unit turbines. The process involved is the combustion of gas oil (distillate fuel oil) in a gas turbine (GT) that drives a generator for electricity production.
- h. Is this electricity generator switched on when the 5 turbines are either asked to shut down, due to too much energy being produced and the grid becoming unstable, i.e., curtailment; or when the grid infrastructure cannot carry the electricity due to bottlenecks or outages, i.e., constraint?
- i. The main infrastructure on this site includes a water treatment plant, water storage tanks, bunded steel oil storage tanks and bunded transformers. Gas oil with low sulphur content is used for combustion in the gas turbines.
- j. SSE PLC is submitting a planning application to Mayo County Council to revise plans for its Mullafarry Battery Energy Storage System (BESS) project in North Mayo. The application is seeking approval for an 80MW / 320MWh battery energy storage system capable of storing up to four hours of electricity capacity. Does this energy come from the Glenora Windfarm site or oil-gas stored on site, or a combination of both?
- k. Are the proposed Clydagh and Keerglen windfarms' energy earmarked for any ,or all of the above projects. If not, where is the energy produced going to it up?
- l. There are many highly inflammable activities occurring within a restricted space outside an urban area and beside SPAs and SACs. I cannot find any indication of environmental oversight of this site. Planning permission has been given on a piecemeal basis without any consideration of the accumulative effect of potentially massive health & Safety issues. Can you direct me to reports where this has been assessed and reported and the mitigating processes indicated?

The local community feels they have been hoodwinked into accepting this major industrial transformation of their homeland by international companies, including the proposed building of Glenora, Clydagh, Keerglen and Tirawley, as part of the package, through the piecemeal approach of the planning permission. It is clear that the impact and the extent of these cumulative operations were not explained to the local community and we remain defiant that we will not allow a race to the bottoms by disregarding the local communities health and wellbeing and the destruction of

our natural environment and natural heritage to increase the profits of international companies.

In conclusion, I believe that The Aarhus Convention has been shattered due to the piecemeal approach to the planning process of renewable energy projects in North Mayo. This is an international agreement that gives people the right to access information about the environment. It also promotes public participation in decision-making and provides access to justice on environmental matters. I believe the approach was deliberate and has resulted in the complete loss of trust in the process and the political will to fight for local communities. I appreciate that our councillors have publicly rejected the development of the Tirawley Wind Farm. But too much ground has been given. We need to find ways to win this ground back.

We the local community do not want any more wind farms for the following reasons and specifically the Tirawley one, under assessment at the moment:

They will destroy our naturally beautiful surroundings that brings major tourism to our locality and will negatively affect local businesses.

- a. There will be a downturn in property prices
- b. The construction period will cause disruption to wildlife including animals and plants.
- c. Bat and bird life is known to be negatively impacted by turbines. The Ceidi Fields, considered to cover 100 km, was on the UNESCO's tentative list to become a world Heritage site. However, in 2025, our Mayo County Council did not apply to keep it on this list. This leaves the land around the site open to green industrial development, such as turbines. The people of Mayo want the council to put in an application immediate! So that in 4 years time it will be reinstated on the list.
- d. Noise and visual pollution are known to negatively affect local people's health, who live near these turbines.
- e. The government has allowed the issue of the country reducing its carbon footprint to be run by consultants and venture capitalist who are determined to make enormous profits from accessing publicly funded green transition projects. The gleeful approach to extract as much money as possible from the natural environment, highlights the cowboy approach to the running of utilities in Ireland. The government should be directly employing civil servants to carry out the work that Constant Energy Ltd is doing. Our educational system should be producing scientists and engineers that are then directly employed by our city councils to build a green energy infrastructure. , The planning must be centrally coordinated, with all local communities participating in, developing, refining, and executing these plans, rather than the advocacy nature visible over the last 10 years. We vote in political representatives to meet the needs of our communities', not to bow to the profit driven companies

that are sucking up public money and not circulating this money within our communities.

The focus of the the county's authorities is to please big business, since they provide administrative and policy support to enable the applications to get over the line and the politicians have to do very little to complete the projects. Our public is feed the lie that public service needs global enterprise, not the local community. No effort is taken to fully engage environmental scientists who can take a much broader view of how to reduce the country's GHGs while providing green energy without destroying the beauty of the countryside.

Finally, I respectfully submit that the proposed Tirawley Wind Farm project is not appropriate for this location due to the significant negative impacts on residential amenity, local landscape, ecology, infrastructure, and the community. I urge An Coimisiún Pleanála to refuse permission for this development in the interests of proper planning and sustainable development.

Thank you for considering my submission.

Yours faithfully,

Catherine Clarke & Ian Williams