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07.07.2026

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

Re: Objection Submission to the Proposed Muingmore Wind Farm Strategic Infrastructure Development: Submission to An Coimisiún Pleanála- Case reference: PAX16.324387

Re: Planning permission for the construction of WE Renewables Ireland windfarm, consisting of 13 wind turbines with a capacity of up to 86MW. It would be located within the townlands of Muingmore (An Mhoing Mhór), Doolough (Dumha Locha), Tristia (Troiste), Moneynierin (Moing an Iarainn) and Bangor (Baingear) County Mayo. (www.muingmoresid.ie)

Dear Sir/Madam

I am writing as a homeowner in North Mayo where the Muingmore Wind Farm project, submitted by WE Renewables Ireland 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 residents.

Noise

Turbines of the height proposed for this site, up to 180 metres to blade tip, are a different order of scale to anything currently in this landscape. This area experiences strong, unbroken Atlantic wind for much of the year, and I am seriously concerned about the noise these turbines would generate in those conditions, close to homes, for the guaranteed 35-year lifespan of the project.

The most important negative health effects from wind farm noise will be during the operational life span of the wind turbines. Chapter 9 of the RWE Ireland report states that there is no robust evidence to support that low frequency noise wave lengths adverse health effects. Therefore, modern turbines do not produce harmful levels. It also states that ground-borne vibration levels at homes are far below human and therefore does not adversely affect human health.

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 Lnight 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 are 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

Communities in North Mayo are at a significant disadvantage because of the political, legal and judicial systems presently in place, which includes the planning process, The planning process is designed to smooth the path for big business to always achieve its goal of accessing public fundings to make private profits, while social and environmental justice is provided with lip-service.

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

A report from TU Delft the Netherlands, titled: Scientific breakthrough in Delft exposes danger of low-frequency sound by Maandag, 22 June 2026is translated here
"Recognition of health damage by TU Delft offers a new legal and social precedent for 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'.

For 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 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 residents near wind turbines and heat pumps. 22 June 2026
Wetenschappelijke doorbraak in Delft legt gevaar laagfrequent geluid bloot (Translate to English)

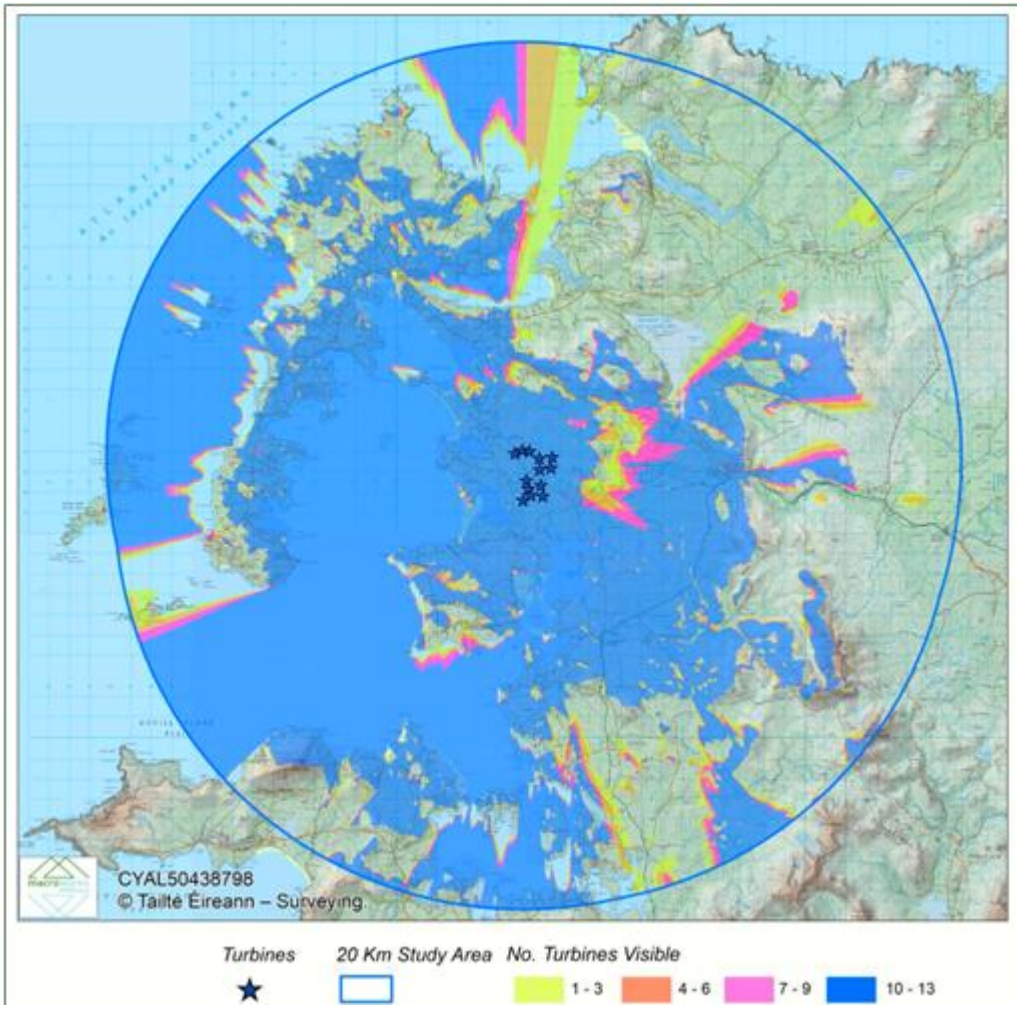
Paul Burgess (2024) highlights in his video that infra sound negatively effects people, animals and birds. People suffer from sea sickness and are unable to sleep, cows reduce their milk production by about 60% and chicken stop laying eggs. Animal mortality increases substantially. As you increase the 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

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 Muingmore Wind Farm

Visual Impact

A development of thirteen turbines at 180M height would permanently and irreversibly change the character of this landscape, which is currently open and undeveloped. From the Figure below, all turbines will be visible from most of the 20 km theoretical map.



Photograph 1: Figure 10-8 of EIAR RWE Ireland, Muingmore Wind Farm Landscape & Visual Assessment: Bare-ground Zone of Theoretically Visibility (ZTV) Map based on a turbine tip height of 180 m. (See Technical Appendix 10-2 for larger scale map), Page 28.

Wind turbines are large and visually dominant structures. Their presence would significantly alter the natural and historic landscape character that makes the Northwest Mayo area unique. This visual intrusion would undermine the sense of place and authenticity that visitors expect.

i. 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.

ii. **Tourism cumulative impact**

I am concerned about the cumulative impact the 13 turbine Muingmore Wind Farm will have on tourism in not only the Achill area, but throughout North Mayo. Recently Glenora wind farm has been approved by An Coimisiún Pleanála for 22 turbines. The coast road on the Northwestern section of Mayo is an extremely important part of the Wild Atlantic Way, and it is an extremely important economic asset to the area. The cumulative effect of Muingmore, 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 coastline is impressively historic from a geological and cultural heritage perspective and the presence of a Crannog within the site boundaries that relates to our Bronze Age heritage, linking historic communities with the Céide fields complex and down Patrick Head.
The rich past, present and future heritage that residents could experience 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.

iii. <u>Natural heritage</u>

From Achill Island to the bounders of Country Mayo to Sligo, North Mayo has a unique geological history, that will no longer be accessible to future generations of academic researchers, education specialists and natural history enthusiast, since the sprawl of wind farms compartmentalises our heritage into wind farm boundaries. Any artefacts will be further encaged within private protected areas. Our natural landscape must remain publicly available to future generations to continue to explore our bogland history through geology, artefact and ancient structural discoveries beneath our feet.

We have the privilege of living on geological heritage that spans back to the formation of the earths surface. It is presented here to highlight how the North of Mayo can showcase geological sequencing through time.

Figure 2 represents geological timescale of the earth's bedrock and Figures 3 to 9 outline the singularly unique nature of the ground we walk on in North Mayo. It is indeed

hallowed ground, carved from the later part of the pre-Cambrian period, which is the oldest period of geological history. Very little is known of this period. So, it is our responsibility to ensure that we provide future access to educators and researchers to inform future generations of their earth's history. Most of this period's rock has been metamorphosed, making it ideal for wind turbine anchorage. But it also opens the possibility of peat slippage due to noise reverberations through the ground and the presence of fault lines, which is the case surrounding Muingmore Wind Farm proposal, while 3 fault lines lay under Glenora's proposed wind farm

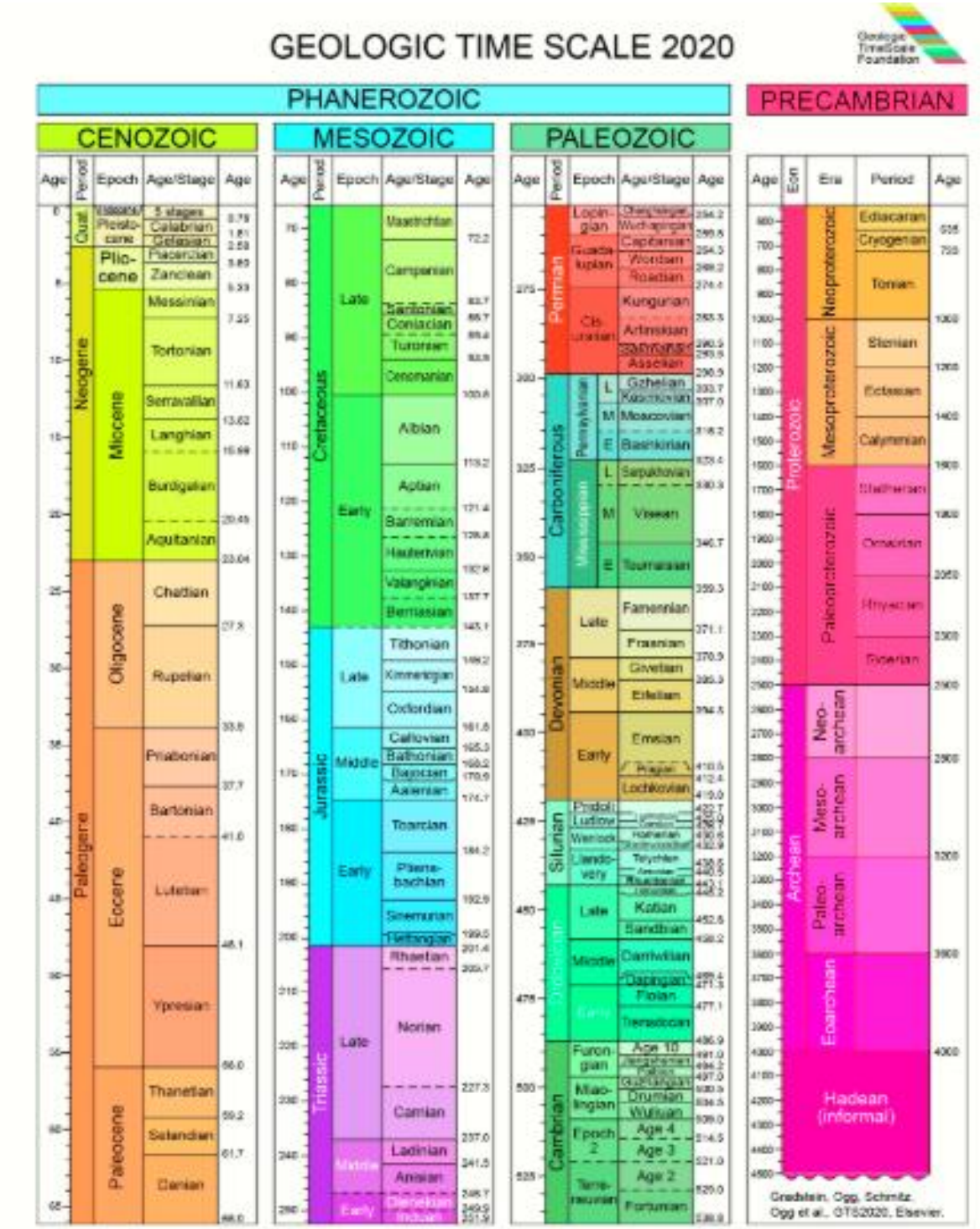


Figure 2: Geological Timescale of the Earths Bedrock age, 2020 Geology Timescale Foundation

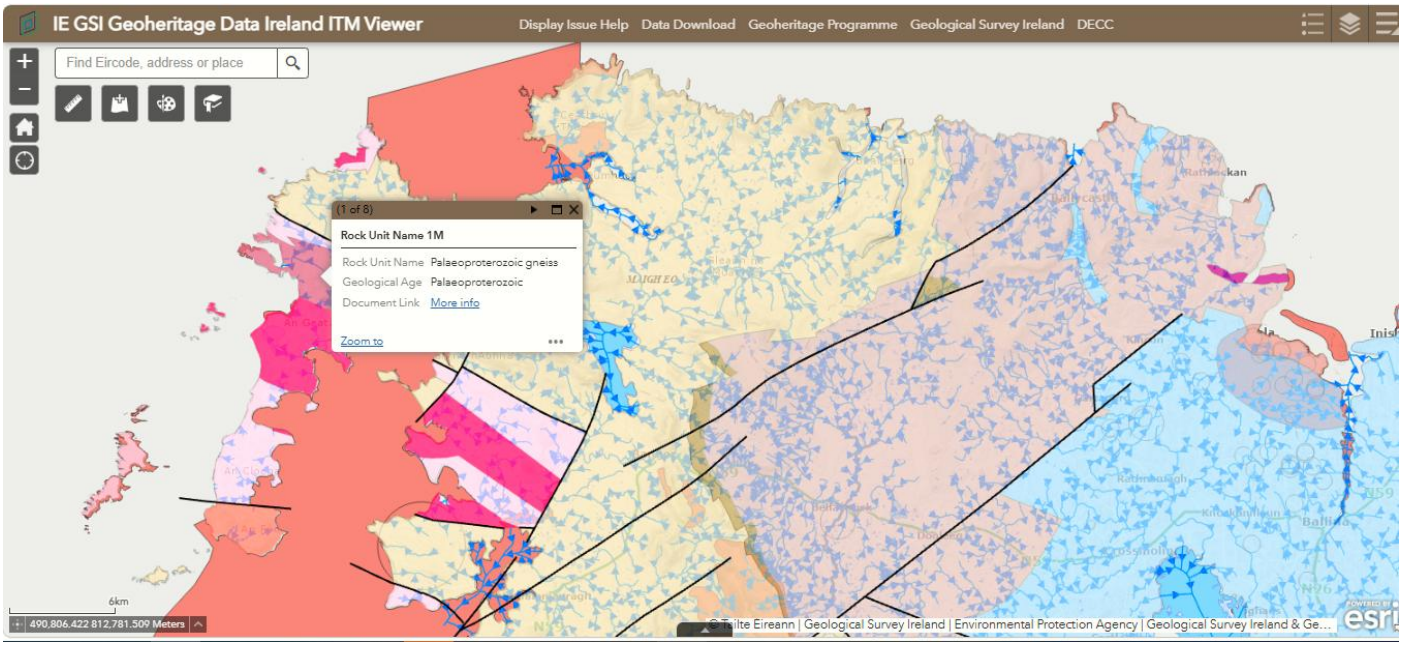


Figure 3: IE GSI Geoheritage Data Ireland ITM Viewer, highlighting the oldest rock formation in Ireland found on Achill Island, Paleoproterozoic Gneiss from Paleoproterozoic Era (formed 2500M-1600M years ago)

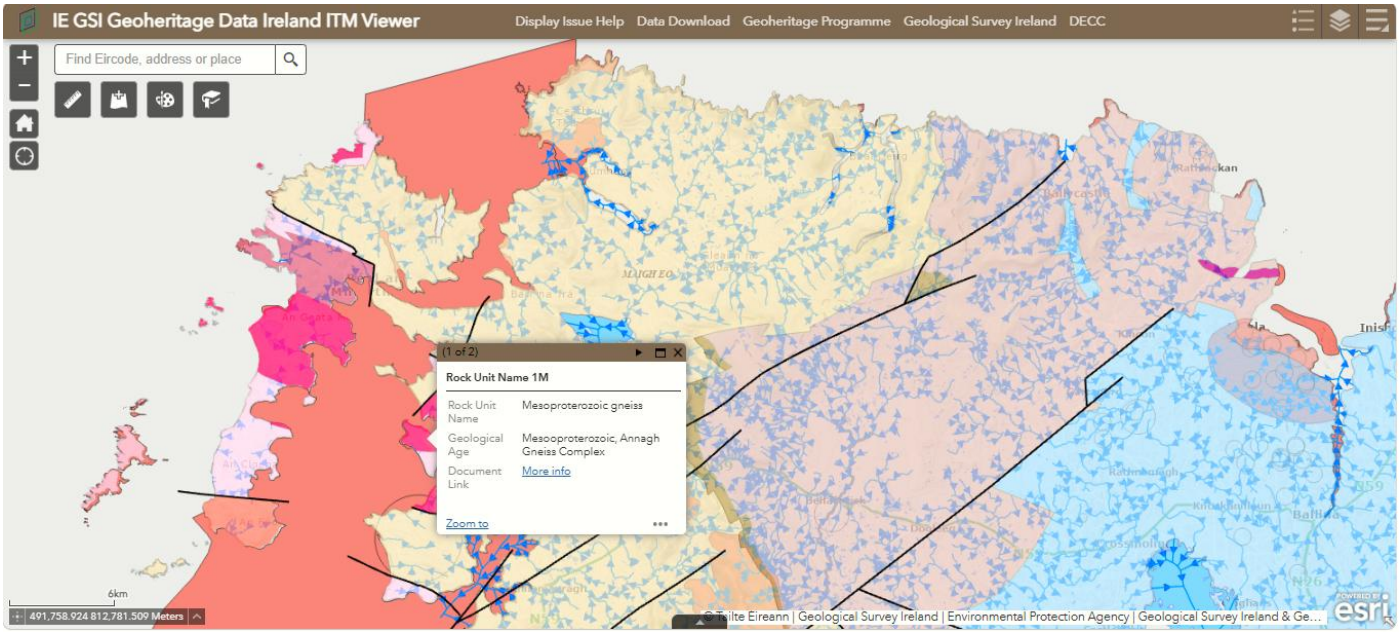


Figure 4: IE GSI Geoheritage Data Ireland ITM Viewer, highlighting the next younger rock formation in Ireland found under Muingmore Wind Farm Proposed Site. Mesoproterozoic Annagh Gneiss Complex from Mesoproterozoic Era (formed 1600M-1000M years ago)

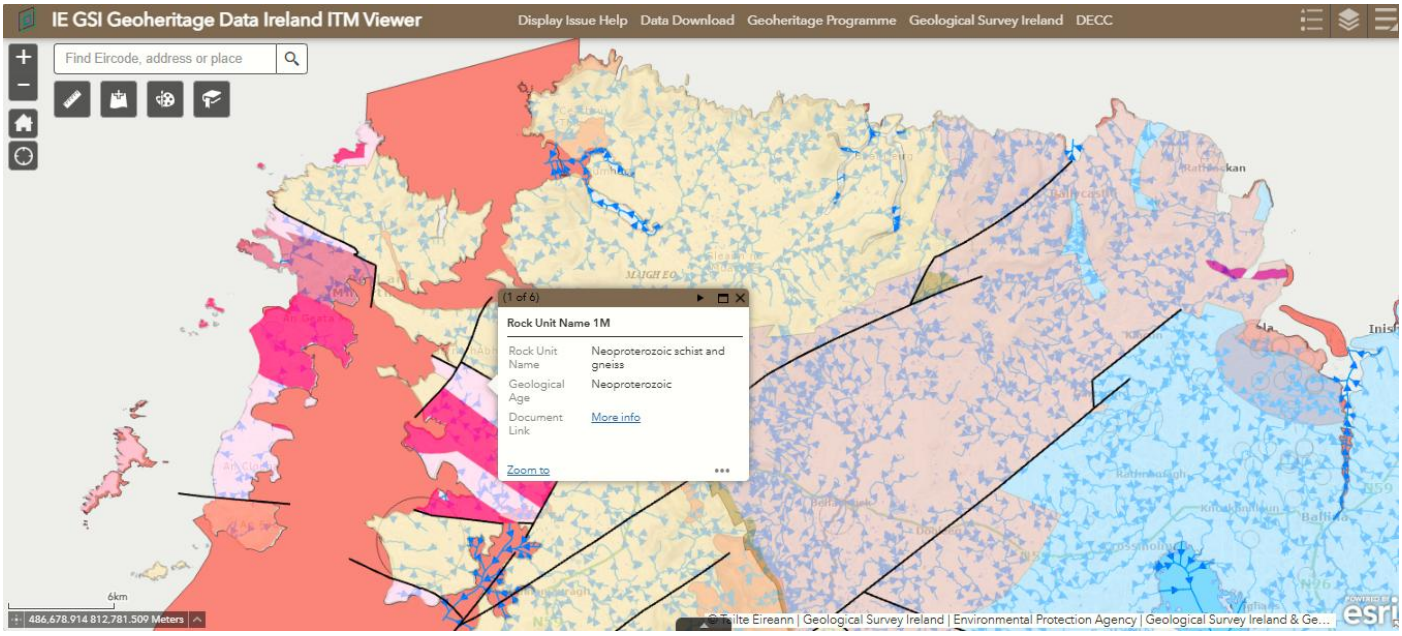


Figure 5: IE GSI Geoheritage Data Ireland ITM Viewer, highlighting the next younger rock formation in Ireland found under Muingmore Wind Farm Proposed Site. Noeproterozoic Schist & Gneiss from Neoproterozoic Era (formed 1000M-540M years ago)

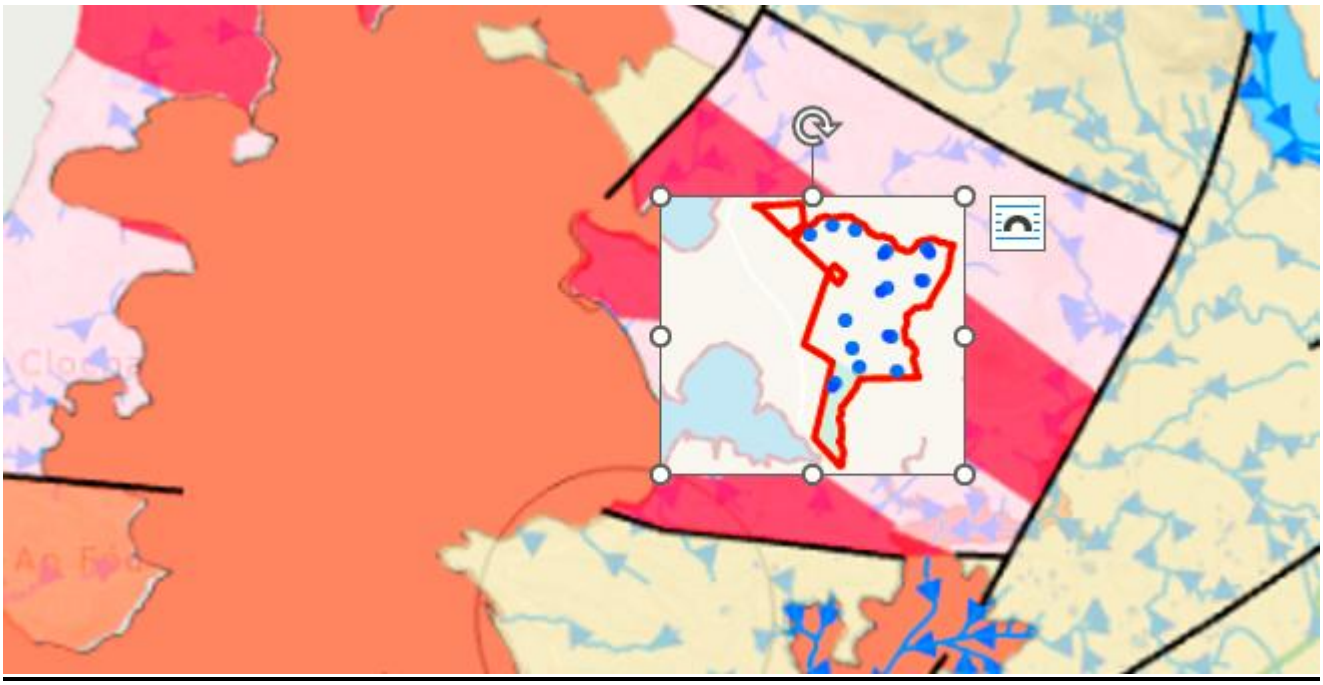


Figure 6: IE GSI Geoheritage Data Ireland ITM Viewer, with overlay of windfarm boundary highlighting both Mesoproterozoic and Noeproterozoic bedrock rock formations under Muingmore Wind Farm Proposed Site. (formed 1600M-540M years ago)

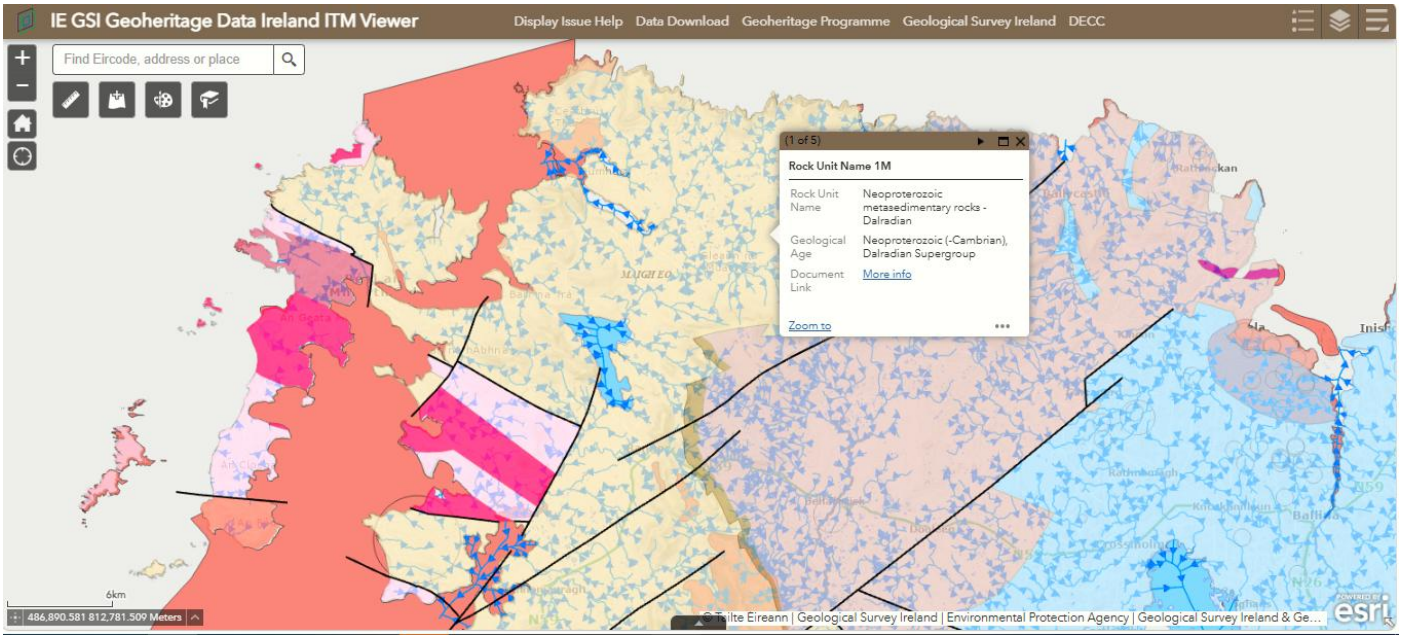


Figure 7: IE GSI Geoheritage Data Ireland ITM Viewer, highlighting the younger developed rock formation which combines the Noeproterozoic bedrock era and the Cambrian-Dalradian supergroup formations to the East and Northeast of Muingmore Wind Farm Proposed Site, reaching the North Mayo Coastline. (formed between 1000M-440M years ago). A section of this bedrock is found under the proposed Glenora Wind Farm that also will lay over 3 faultlines

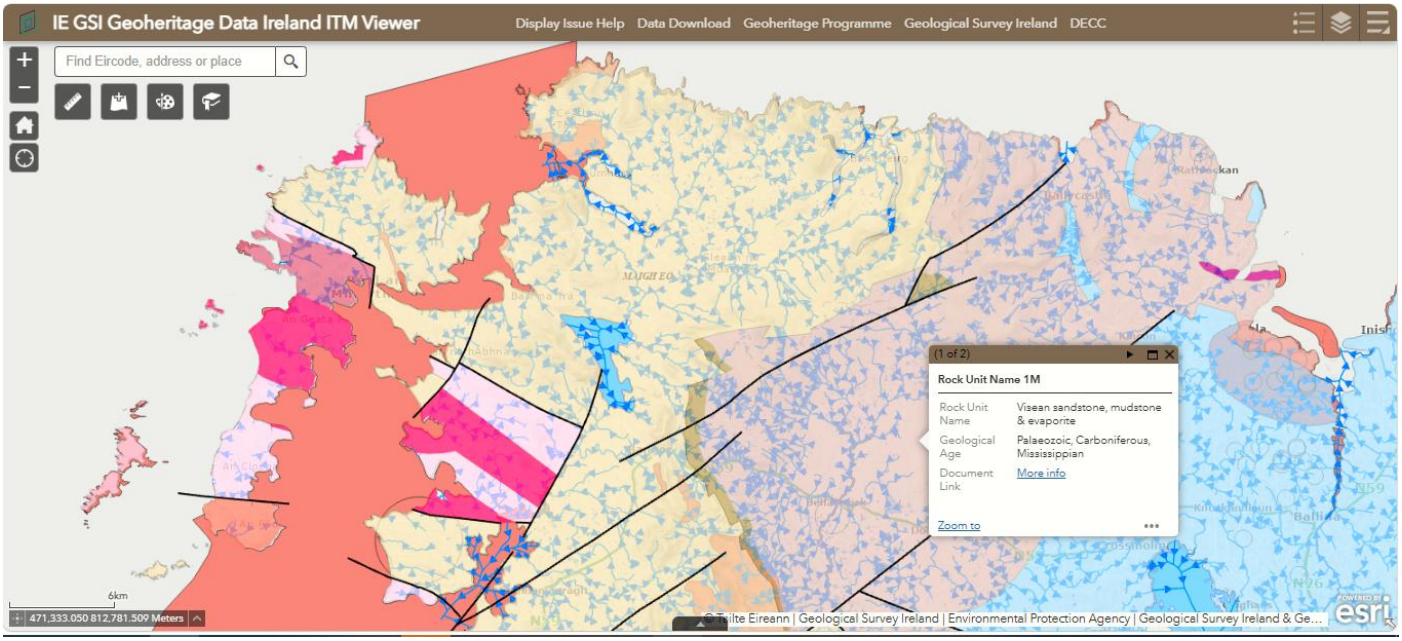


Figure 8: IE GSI Geoheritage Data Ireland ITM Viewer, highlighting the younger developed formations of Visean Sandstone, Mudstone and Evaporite from the Palaeozoic, Carboniferous, (Mississippian subperiod) Era. It is found adjacent to Figure 7's bedrock and is also found under the Glenora Wind Farm proposed site. (formed between 550M – 300M years ago)

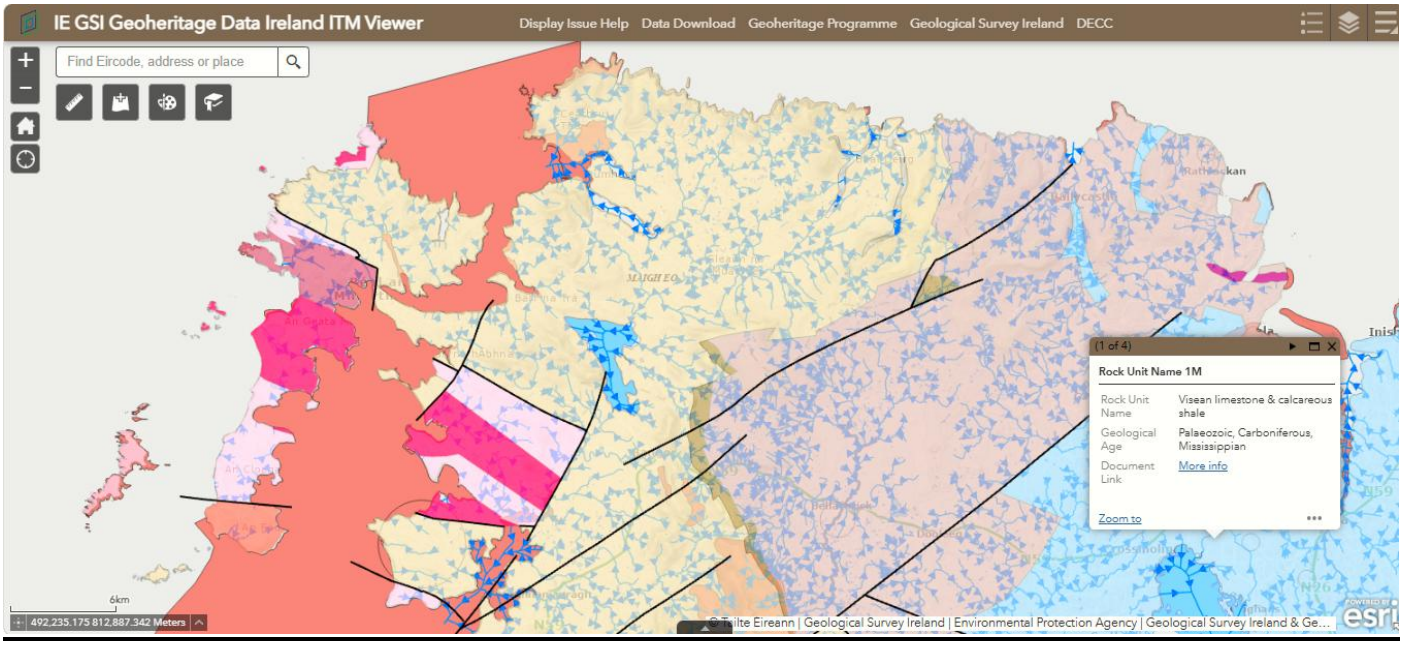


Figure 9: IE GSI Geoheritage Data Ireland ITM Viewer, highlighting the developed formations of Visean Limestone and calcareous shale from the Palaeozoic, Carboniferous, (Mississippian subperiod) Era. It is found adjacent to Figure 7's bedrock and is also found under the Glenora Wind Farm proposed site. (Formed between 550M – 300M years ago

Dark Skies

The Bortle dark sky scale uses a 9-level numerical scale to scientifically record the brightness of the night sky at a particular location. I have used it to compare the night sky brightness at Ballycroy Community Centre, Muingmore and Glenora in Figure 10 to 12. All three reveal similar numerical recordings. This indicates that both Muingmore and Glenora are on a par with the internationally renowned Ballycroy Dark Nights area.

ALL WIND FARMS OF OVER 150 m HAVE TO PLACE RED INFRA-RED LIGHTS ON THEIR WIND TURBINES

The fact that the North of Mayo has proactively developed a tourist economy around its unique Dark Sky natural environment, which can be expanded to the Céide Fields and Muingmore, indicates that the powers that be are unable to recognise the immense importance of these natural environs to the public and the local biodiversity. The enormous personal experience from such a (now) rare natural experience is translated into a monetary transaction for wind farm developers. To shift the burden of climate change to the local community's endeavours, forcing them to protect their heritage, to try and make their livelihood an enchanting experience, is just beyond comprehension., It is an infringement of the local communities right to protect their environment from an ever-present light pollution during the night period. Not only has the wind energy developers infringed on light pollution but will ensure a continuous supply of noise pollution towards any biome in at least a 5 km sphere. It is now well established that constant infra-red light interferes with organisms' circadian rhythms, which impact health and reproductive processes.

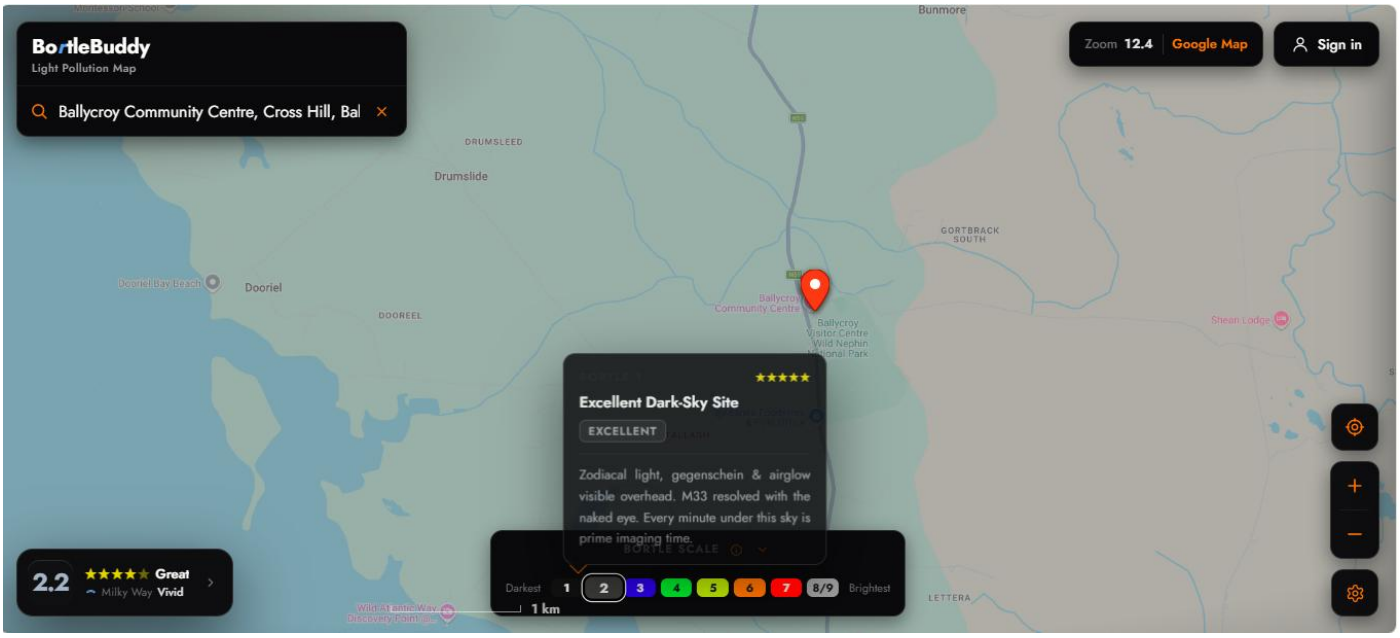


Figure 10. Ballycroy Community Centre Dark Nights Bortle reading, No 2, Excellent Dark Sky Site.

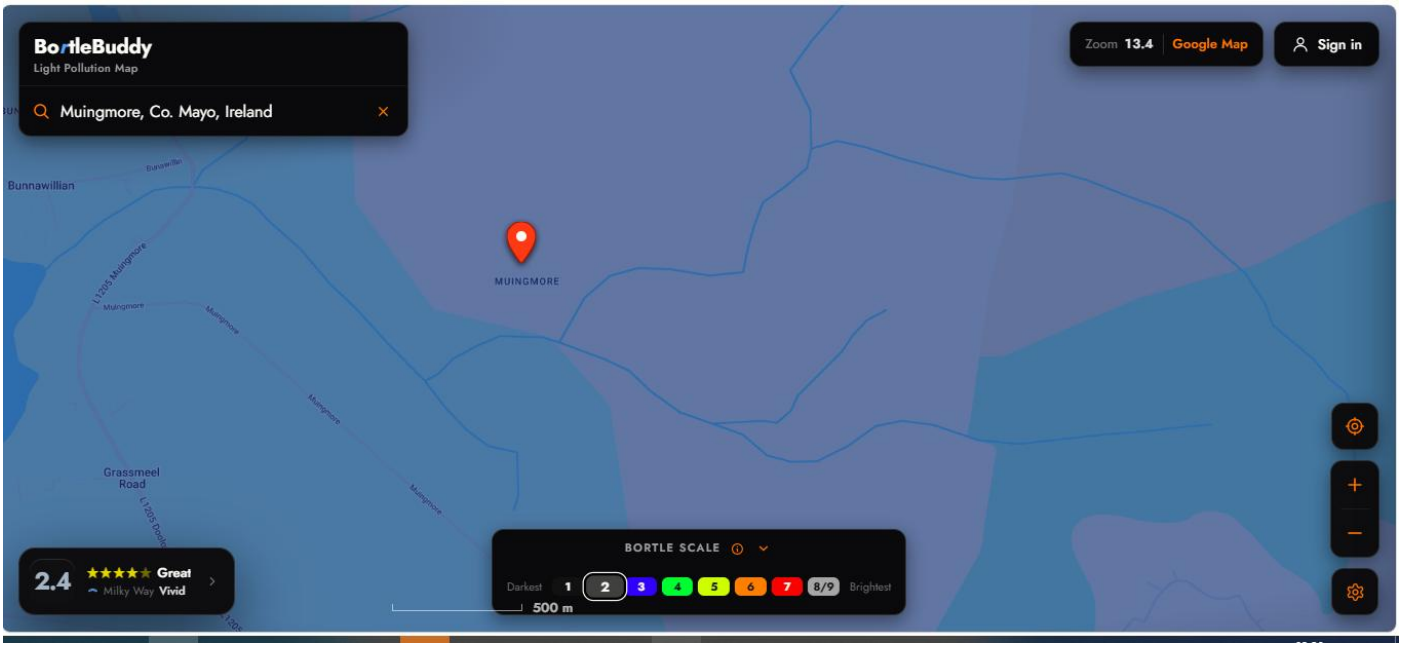


Figure 11: Muingmore Dark Nights Bortle reading, No 2, Excellent Dark Sky Site

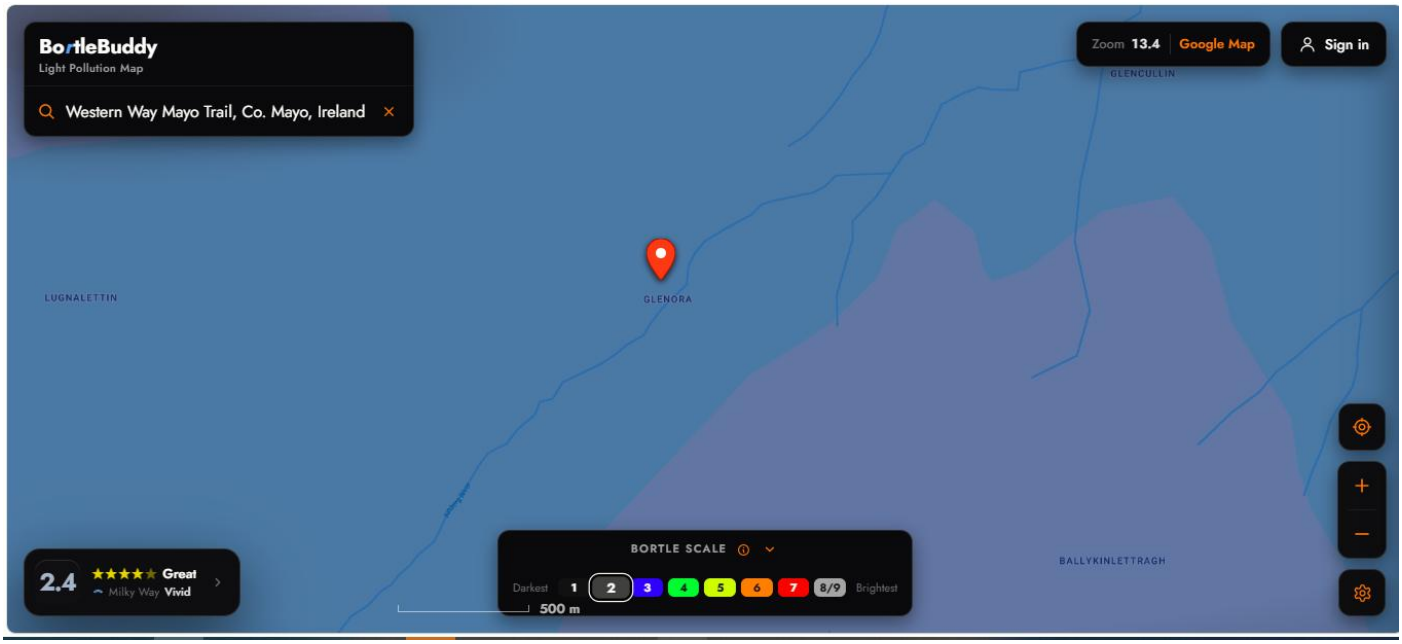


Figure 12. Glenora Dark Nights Bortle reading, No 2, Excellent Dark Sky Site

Public perception of Wind farms and solar power Renewable Energy

The SEAI RESS National Survey Key Findings 2023 report were used to provide a very positive local community perception of wind farm developments in Ireland and is used by the authors of Muingmore Wind Farm application.

However, the survey shows several methodological and presentation issues that can be considered to bias the result.

a. The treatment/control design focuses only on 50 RESS1 sites (selection bias)
b. The survey redistributes interviews where residences were sparse (sampling bias),
c. Small subsamples (especially <1km) reduce statistical power, yet percentages are reported without margins of error or significance tests (misleading precision)
d. Propensity-score matched Equal Distributions (Propensity Score Matching - statistical technique used to reduce selection bias by matching individuals from different groups, based on similar characteristics. It attempts to simulate the conditions of a randomized experiment) may not reflect household-level demographics (ecological fallacy).
e. Many questions are hypothetical or rely on self-reported familiarity/attitudes which invite social-desirability and acquiescence bias.
f. Question framing often contrasts “too few” vs “too many” renewables which nudges pro-renewable responses.
g. Combining responses for wind and solar and for known vs hypothetical projects obscures technology-specific effects
h. Charts use selective aggregations and highlighted percentages (e.g., emphasizing positive views) without raw counts or confidence intervals (visual misrepresentation)
i. Low reported engagement actions (74% “none of the above”) suggests nonresponse or question-interpretation issues.

j. Overall, the report emphasizes favourable headline percentages while omitting discussion of nonresponse bias, question wording, alternative phrasings, and robustness checks that would be needed to substantiate causal claims about proximity effects.

Ian Mullarkey, who lives next door to Oweninny Windfarm has a much clearer understanding and concrete evidence of the negative impact on his view of wind turbines. The Lacken Ballycastle Landscape Protection Group, (of which I am a member, as well as Save The Céide Fields' Community & Boglands), held a public meeting on 28th May 2026, to discuss the Tirawley Wind Farm Development. A resident living next door to the Oweninny wind farm, beside Bangor Erris attended. He stated that he and his family have been through hell! He stated that the noise is unbearable, there is a constant whishing noise, and his house has devalued by 50%. He and his family hoped to set up a B and B, but the wind farm put an end to all their dreams. Significant employment wasn't brought to the area. The companies bring their own employees. No amount of money can compensate a community's experiencing such upheaval.
The residents of Muingmore have this to look forward to.

The SEAI research approach results in manufacturing consent for wind farm development in communities that have little to no lived experience of these industrial structures. By allowing developers to use these findings to justify developing wind farms anywhere in the country, proliferates a false narrative and ensures the population who feel uncomfortable about the presence of wind farms are marginalised.

SEAI-RESS-National-Survey-Key-Findings.pdf 2023

Folie 1 Our house is now effectively worthless: Living Next Door To ... Ireland's largest onshore wind farm – The Irish Times

(20+) No Wind Turbines - Scott River | The silence is deafening | Facebook
North Mayo residents renew campaign against windfarm - news - Western People

Shadow Flicker

Chapter 11 of the EIAR report identifies several important potential impacts on residential amenities. Across all turbine scenarios, several receptors would experience more than 30 hours per year of shadow flicker, which is the threshold for significance under the 2006 Wind Energy Guidelines. Considering 3 different scenarios, 37 to 49 homes exceed 30 hours per year of shadow flicker as a worse case scenario. With a best-case scenario suggests that 6 to 8 homes would experience shadow flicker. The worst affected property is receptor 44, reaching 208.1 to 276.0 hours per year (Scenario 1 worst case)

Even though no home is within 500 m of turbines, shadow flicker occurs at distances up to 1.6 km due 49 to 163 m. considering all 3 scenarios, 60 to 92 homes

Even after applying real sunshine hours (29.3%), several homes still exceed guideline limits. The residents would be existing in a living hell of nuisance, loss of amenity and significant shadow flicker effects. Their houses would no longer be a comfortable safe home. Shadow flicker of this kind can have a real effect on people's health and quality of life over months and years. This is the second reason why the development should be rejected

Wildlife and Environment

This area supports wildlife that would be put at serious risk by a development of this scale, including species such as kestrel, barn owl, heron, cuckoo and corncrake, as well as otters and

native lizards, and it lies on a route used by migrating swans. Construction on deep peatland of this kind risks lasting damage to habitats that cannot be replaced.

by the Irish Peat Conservation Council appeal document, peat bogs are critical carbon sinks, storing vast amounts of carbon accumulated over millennia. Construction on peatland involves drainage and excavation, which releases stored carbon dioxide and methane, greenhouse gases far more potent than CO_2, negating much of the climate benefit of wind energy.

National Peatlands Strategy & Climate Action Plan (updated April 2025)
Ireland's Climate Action Plan and Peatlands Strategy prioritize peatland restoration and prohibit new drainage where possible, recognizing peatlands as critical carbon sinks and biodiversity hotspots. (https://www.gov.ie/en/department-of-the-taoiseach/publications/climate-action-forestry-peatlands-and-land-use/),
(https://www.ucd.ie/research/impact/casestudies/rewettingrestoringandprotectingirishpeatlands/)
This is in line with EU legislation.
The EU Nature Restoration Law Explained | Waterland's: Water-based solutions for carbon storage, people and wilderness.

Peatland Carbon Emissions:
Why Wind Farms on Bogs Are Problematic
Peatlands are among the most carbon-dense ecosystems on Earth. When intact, they act as long-term carbon sinks, but disturbance, such as drainage for turbine foundations and access roads, turns them into major carbon sources.

Carbon Storage:
Irish peatlands store an estimated 1–1.5 billion tonnes of carbon, comparable to tropical rainforests. (https://irishgeography.ie/index.php/irishgeography/article/download/261/217)

Emission Potential:
Just one hectare of peatland can contain up to 5,000 tonnes of carbon. Excavation and drainage during wind farm construction can release large portions of this into the atmosphere. (https://www.abdn.ac.uk/stories/peatland-windfarms/)

National Emissions:
Damaged peatlands in Ireland emit around 1.9 Mt C per year, with over half from grasslands on organic soils and one-third from drained peatlands. (https://www.mires-and-peat.net/api/v1/articles/128777-a-review-of-greenhouse-gas-emissions-and-removals-from-irish-peatlands.pdf)

The Carbon Fallacy of Wind Farm Construction on Undegraded Peat:
Studies show that wind farms on undegraded peatlands rarely deliver net carbon savings, even over decades, because construction emissions outweigh operational benefits.
(https://www.researchgate.net/profile/Jo-Smith-21/publication/273824729_Wind_farms_on_undegraded_peatlands_are_unlikely_to_reduce_future_carbon_emissions/links/5e5b917a92851cefa1d1fff0/Wind-farms-on-undegraded-peatlands-are-unlikely-to-reduce-future-carbon-emissions.pdf)

Underestimation of Carbon Calculator:
Carbon calculators used in planning often underestimate emissions from peat disturbance, especially from drainage extending hundreds of meters beyond turbine bases. (https://www.wind-watch.org/news/2021/11/01/climate-pollution-from-wind-farms-on-peat-underestimated/)

Global Perspective:

Peatlands cover only 3% of Earth's land but store 25% of terrestrial carbon. 1% of this is found in Ireland. Disturbance for wind farms undermines climate goals. (https://www.ntu.ac.uk/about-us/news/news-articles/2023/03/researchers-warn-of-urgent-need-to-understand-impact-of-windfarms-on-precious-peatlands)

Drainage Impact: Lowering the water table accelerates peat decomposition, releasing CO_2 and N_2O (nitrous oxide has 300× the warming potential of CO_2).
https://www.mires-and-peat.net/api/v1/articles/128777-a-review-of-greenhouse-gas-emissions-and-removals-from-irish-peatlands.pdf

National Peatlands Strategy & Climate Action Plan
Ireland's Climate Action Plan and Peatlands Strategy prioritize peatland restoration and prohibit new drainage where possible, recognizing peatlands as critical carbon sinks and biodiversity hotspots. Even though most of the peat may not be pristine, Irish legislation prohibits relocating drainage channels due to its impact on the local sensitive biodiversity.
(https://www.gov.ie/en/department-of-the-taoiseach/publications/climate-action-forestry-peatlands-and-land-use/),
(https://www.ucd.ie/research/impact/casestudies/rewettingrestoringandprotectingirishpeatlands/)

Hydrological Disruption
Peatlands depend on a delicate water balance. Turbine foundations, access roads, and drainage systems can alter hydrology, leading to peat drying, erosion, and further carbon emissions. This also threatens biodiversity and ecosystem services provided by intact bogs.

Biodiversity Loss
Peat bogs support rare flora and fauna, including species adapted to wet, acidic conditions. Construction and maintenance of turbines would fragment habitats, disturb wildlife, and introduce invasive species, reducing ecological integrity.

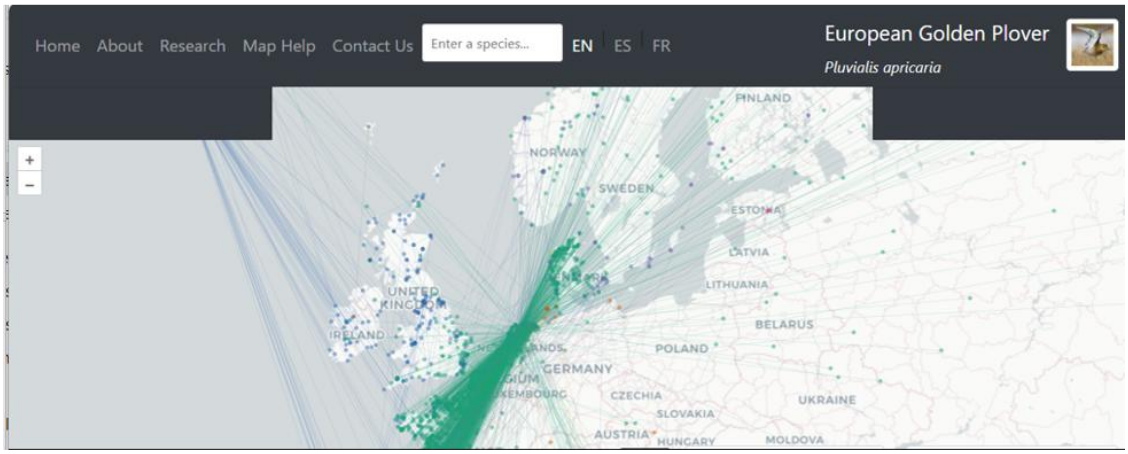
European Union (Planning and Development) (Renewable Energy) Regulations 2025
Transposes EU Renewable Energy Directive III into Irish law, requiring environmental assessments for renewable projects **near protected sites** and compliance with heritage obligations. (https://www.gov.ie/en/department-of-housing-local-government-and-heritage/circulars/european-union-planning-and-development-renewable-energy-regulations-2025/).

The EIAR has highlighted that the NPWS has identified Merlin, Golden Plover, Curlew, Hen Harrier Kestrels and sparrowhawks are prone to flight collision with wind turbines

Placing wind turbines in this locality causes disturbance and displacement
Which can result in disturbance to breeding birds (Merlin, waders, passerines).
As well as displacement from preferred foraging or nesting areas, especially in open peatland habitats and educed habitat suitability for sensitive species such as Curlew and Golden Plover.
NPWS emphasised that disturbance effects must be considered alongside collision risk.

Even though the peatland is degraded the loss of blanket bog habitat used by waders (Gloden Plover) and raptors is still a real risk. Fragmentation of peatland (IPCC concern) affecting wader movement and hydrology and changes in hydrology potentially altering habitat quality for ground-nesting birds.

The Golden Plover in Ireland migrates from Iceland to winter in Ireland and can be found breeding in the summer in situations where habitat is conducive, thus making Ireland its home for a year. They are found throughout, SAC and SPA sites around North Mayo and beyond.



Photograph 2: Migration pathway of Golden Plover: [Bird Migration Atlas]

The cumulative Impacts are cumulative mortality for Golden Plover across Mayo, resulting in regional population impacts due to multiple wind farms in north-west Ireland.

The EIAR examines bat collision and Barotrauma.
Bats flying within rotor-swept height may be at risk of direct collision and barotrauma (pressure changes near blades)
Species recorded on site include the Common pipistrelle, the Soprano pipistrelle, the Leisler's bat and Lesser Horseshoe Bat (in wider landscape).
The EIAR report confirmed bat activity across all seasons.

The report identified risks of disturbance of roosts or commuting routes
Due to tree felling roosting habitats can be lost. Disruption of commuting corridors, especially hedgerows and treelines along the grid connection route.

Recent research indicated the clear negative effect of wind turbines on birds

The Fondation Pour La Recherche sur La Biodiversite (FPRB) reported in 2024 the following "Birds are impacted by direct collisions, the modification of their habitats, and noise and light emissions from wind turbines. The most frequently killed species are those whose flight path coincides with the turbines' rotor swept area. They include certain species (threatened or not) with large populations, such as larks (Eremophila alpestris, Alauda arvensis, and Chersophilus duponti), but also protected species, especially migratory birds and raptors. Bird populations are also impacted by the disturbance caused by the construction of wind turbines, displaying pronounced avoidance behaviours depending on the species.

For diurnal raptors, which are mainly affected during their nesting period, their populations are often very small (sometimes only a few dozen nesting pairs): the cumulated impact of collisions with wind turbines further worsens their conservation status.

A French study by the LPO (Bird Protection League) (2017) stressed that:

- 81 % of bird carcasses found belong to protected species or species whose conservation status is of major concern.
- 60 % of bird carcasses found belong to migratory birds.

A Swiss study (Aschwanden et al., 2018) showed that:

- 55 % of fatalities were kinglets (Regulus sp.) and nocturnal migratory birds (due to limited visibility at night or in poor weather conditions).

Two studies in the United States (Smallwood, 2013; Walston et al., 2018) estimated that:

- 573,000 bird deaths each year are due to wind turbines,
- Of which 83,000 are raptors.

Multiple studies have shown that the move to more suitable habitats leads to a reduction in breeding performance in raptors, and thus to a fall in numbers.
Can turbines be perceived as a predator risk and trigger avoidance/escape strategies in species such as Dupont's lark?
Species respond differently to the construction of wind farms: by comparing data from 12 wind farms in the U.K., Pearce-Higgins et al. (2012) found that red grouse (*Lagopus lagopus scoticus*), snipe (*Gallinago gallinago*) and curlew (*Numenius arquata*) densities had decreased."

FRB_The_Impacts_of_Onshore_Wind_Power_on_Biodiversity-_Knowledge_Update.pdf

Bat Mortality due to Wind Turbines
In the 2024 FPRB's review of the effect of wind turbines on biodiversity, it stated:

"Bats can be killed either by collision or barotrauma (a sudden drop in air pressure in the vicinity of blades in motion). They can also be impacted by the loss and degradation of their habitat and by noise. Many studies have shown that mortality by collision alone could threaten the viability of populations and lead to an increased risk of extinction.

While most studies have focused on bat mortality by collision, very few studies have quantified the loss of habitat use resulting from the potential negative impact of wind turbines.

Differences in the results of the studies we looked at suggest that wind turbines have two contrasting effects: avoidance at the scale of the wind farm, and attraction at the scale of the wind turbine.

Collisions happen because bats may not detect the blades due to the extremely high speed of the rotor (up to 300 km/h at the tip of the blades), they may fly in the rotor swept area during migration or while foraging (well documented), or they may be attracted to wind turbines (see below). The attraction of bats to wind turbines varies depending on the species, the sex and age of the individual, the time of year and the location of the turbines (Reimer et al., 2018).

This attraction may be due to the high number of insects congregating near turbines, attracted by the turbines' colour and the heat they emit (most carcasses of eastern red bats (Lasiurus borealis) and hoary bats (Lasiurus cinereus) had a full stomach indicating that the individuals probably died while foraging).

It may also be due to the presence of potential mates or roosting sites, particularly for tree-bats that perceive turbines as trees (Cryan et al., 2014; Cryan & Barclay, 2009).

In Germany, bat fatalities were estimated at over 250,000 individuals per year (FRB, 2017). ® A study in the United States estimates that 888,000 bats die each year at wind energy sites (Smallwood, 2013).

Multiple studies show that: - mortality is higher at the end of the summer and in the autumn, coinciding with bat migrations. - habitats Species most likely to collide with wind turbines are those that use echolocation adapted to open (the genera Lasiurus, Lasionycteris, Pipistrellus, Vespertilio, Eptesicus and Chalinolobus). Perimyotis, Nyctalus, ® Avoidance, in particular of the lights and noise emitted by turbines, could greatly affect European bat species by reducing habitat availability (Barré et al., 2018): - Thus, 2,400 km of hedgerows could be lost to bats, according to land surveys in Bretagne and Pays de Loire (FRB, 2017). - Most species of bats are impacted within 1,000 m of wind turbines, including gleaners and other species that are not generally considered collision prone (Barré et al., 2018).

The barrier effect of large wind farms causes habitat loss constrains daily commuting routes and disconnects potential feeding and roosting sites (Roeleke et al., 2016).

Published after the FRB review, the study by Leroux et al. (2023) on the effects of wind turbine size, density and average rotation speed on European bats suggests that high turbine densities and large rotor sizes should be avoided, and turbines should be placed as far away as possible from optimal habitats such as forest edges, and not between these optimal habitats and the source of the prevailing winds.

Noise from construction activity can harm the hearing of certain species that regularly use passive listening for foraging (greater mouse-eared bats or long-eared bats), thus impacting their search for food (DREAL, 2017). Comparative studies on wind farms have established that turbines could be even more harmful to bats than birds (Cryan & Barclay, 2009; Smallwood, 2013).”

Blacksod Bay is a protected site, home to rare maerl beds, seals, otters and internationally significant numbers of wintering birds. The proposed site sits on peatland that drains directly towards the bay, and construction of this scale carries a real risk of silt and runoff reaching that water, damaging habitats that would not recover within any timeframe that matters to the species living there now.

Dark Skys

When wind turbines are erected, they must have infra-red lights placed at the very top of the turbine to prevent aircraft flying into it.

Who is behind RWE Ireland?

In 2025 RWE Global business resulted in a net profit of €2,624 million.

Distributable profit totalled €1,432 million in 2025 to pay shareholder dividends.

The head office is in Germany, originally in Essen, where it publishes its corporate Governance Declaration.

It employs 21,265 staff. 13,836 are employed in Germany, 3,205 works in the UK officers and 4,224 work in other countries, including The Netherlands, Poland, France, Spain Italy, Sweden, US, China, Turkiye, Japan, Greece, Austrialia, Denmark, Benelux, and Ireland. The application documents for Muingmore calls the wind farm developing company, RWE Renewables Ireland, but accessing the project through RWE Global, it is called RWE Renewables Europe & Australia.

This gives the indication of false advertising to convince the local Northwest Mayo population that a solely Irish company is developing a renewables through a wind farm in Muingmore, when in fact a global renewables company is actively cornering the market of accessing public funding since they no longer can make enormous profits from fossil fuels such as coal and lignite.

RWE Ireland employs 50 people. It has 1 operational onshore windfarm in Dromadda Beg, Limerick with 10 onshore windfarms in the pipeline and 2 offshore of the island of Ireland. It has an Airbourne wind test site with battery storage facilities in Bangor Erris.

RWE-Annual-Report-2025.pdf

RWE global

Projects & locations | RWE in Ireland

Introducing the Dromadda Beg Onshore Wind Farm fund | RWE in Ireland

New Peer-Reviewed Study: Infrasound Causes "significant biological impacts" - WIND CONCERNS

Planning granted to extend kitepower testing site in north Mayo
Netherlands company, part of NEW Ireland

Game changer: Mayo project uses kites to generate power

Pre-release capacity and power generation data H1 2026

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

An amendment of the Renewable Energy Directive (EU/2023/2413) was passed in 2023, called RED III. It sets an 80% target for electricity production from renewable sources by 2030.in all EU countries

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 $MtCO_2$-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.

Global military spending rise continues as European and Asian expenditures surge | SIPRI
Under-the-radar_the-carbon-footprint-of-the-EUs-military-sectors.pdf
Tracking unaccounted greenhouse gas emissions due to the war in Ukraine since 2022 - ScienceDirect
https://www.sciencedirect.com/science/article/pii/S0048969724000135
Israel-Gaza conflict carbon emissions exceeded 30 million tons - ScienceDirect

An Coimisiún Pleanála Must Advocate for North Mayo to be one continuous Natural Heritage Site

There are significant reasons to advocate for the North of Mayo to be one continuous natural heritage site, together with the Céide Field Complex, The Wild Atlantic Way, including the surrounding area of Muingmore, and the development of a coastal walk from Downpatrick Head to the Céide 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 operationality 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 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, (such as wind farms), 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 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.

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, Lithium Battery production and exporting the electricity to the EU and UK.

“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

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. CO_2 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*	*Windfarm rates as a total of County rates %*
Kerry	795	1,589	12.4	473,591	597,908	11,037,005	20.17
Cork	701	1343	10.93	400,285	812,119	7,647,507	5.52
Galway	458	995	7.14	296,551	1,119,451	4,978,560	11.46
Donegal	449	774	7.79	230,737	422,839	5,558,720	14.07
Offaly	445	943	6.94	280,940	807,382	7,943,444	30.94
Tipperary	410	831	6.39	247,690	347,707	6,301,650	15.28
Mayo	**387**	**845**	**6.04**	**251,941**	**774,783**	**7,485,829**	**16.21**
Clare	274	513	4.28	152,913	232,254	4,361,373	4.72
Limerick	128	351	1.99	104,628	283,853	4,065,163	5.77
Wexford	123	278	1.91	82,826	18,883	2,593,301	5.98
Cavan	107	469	1.66	139,640	326,754	22,035,073	10.28
Sligo	100	186	1.56	55,370	6,748	960,662	6.08
Roscommon	96	216	1.49	64,260	193,059	1,959,126	13.9
Leitrim	95	110	1.48	32,868	60,597	1,628,146	19.98
Waterford	64	104	1.01	30,933	41,528	1, 061,441	2.57
Wicklow	53	173	0.83	51543	88828	1425245	4.14
Monaghan	51	170	0.8	50,703	303,240	1,705,295	9.47
Kilkenny	37	107	0.58	31,990	58,565	1,378,497	5.4
Laois	34	51	0.53	15,086	0	444,415	2.72
Carlow	9	0	0.28	7,520	0	78,435	0.48
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	**4833.9**	**10048**	**78.63**	**3016806**	**6589304**	**93803765**	**7.91 (Average)**

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. CO_2 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 Produced %*	*CO2 emissions saved (Tonnes)*	*Local community Fund Euros*	*Commercial Rates Income Euros*	*Windfarm rates as a total of County rates %*
Galway	458	995	7.14	296,551	1,119,451	4,978,560	11.46
Donegal	449	774	7.79	230,737	422,839	5,558,720	14.07
Mayo	387	845	6.04	251,941	774,783	7,485,829	16.21
Cavan	107	469	1.66	139,640	326,754	22,035,073	10.28
Sligo	100	186	1.56	55,370	6,748	960,662	6.08
Roscommon	96	216	1.49	64,260	193,059	1,959,126	13.9
Leitrim	95	110	1.48	32,868	60,597	1,628,146	19.98
Monaghan	51	170	0.8	50,703	303,240	1,705,295	9.47
Total	1743	3765	27.96	1122070	3207471	46311411	12.68 (Average)

Tables3 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. CO_2 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*	*Installed Energy Capacity (MW)*	*Generated (GWh)*	*Share of Irish Wind Energy Produced %*	*CO2 emissions saved (Tonnes)*	*Local community Fund Euros*	*Commercial Rates Income Euros*	*Windfarm rates as a total of County rates %*
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. CO_2 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 %***	***CO2 emissions saved (Tonnes)***	***Local community Fund Euros***	***Commercial Rates Income Euros***	***Windfarm rates as a total of County rates %***
Kerry	795	1,589	12.4	473,591	597,908	11,037,005	20.17
Cork	701	1343	10.93	400,285	812,119	7,647,507	5.52
Tipperary	410	831	6.39	247,690	347,707	6,301,650	15.28
Clare	274	513	4.28	152,913	232,254	4,361,373	4.72
Limerick	128	351	1.99	104,628	283,853	4,065,163	5.77
Wexford	123	278	1.91	82,826	18,883	2,593,301	5.98
Waterford	64	104	1.01	30,933	41,528	1, 061,441	2.57
Kilkenny	37	107	0.58	31,990	58,565	1,378,497	5.4
Carlow	9	0	0.28	7,520	0	78,435	0.48
Total	**2541**	**5116**	**39.77**	**1058785**	**1794909**	**26425926**	**5.715**

The data above clearly shows that Mayo County Council is within its right to identity the Muingmore 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.

Local North Mayo community members have asked Mayo councillors and TDs to put forward a motion for a moratorium on windfarms and datacentres in Mayo, as well as requesting they request a judicial review of the Glenora Wind Farm decision. We have yet to receive a conclusive response.

A Change in Carbon Zero Approach

A different approach to carbon capture could be considered by An Coimisiún Pleanála. Rather than funnelling economic resources to big global businesses, funding could be made available to farmers to re-establish their bogland as bogland

The North of Mayo should be viewed as a continuous network corridor connecting all Natura sites due to the flight paths of protected migrating birds, and the aquatic connectivity SAC/SPA Sites. A major number of Wind Turbines fall within this area of land. As highlighted in the document,

mortality of birds and bats have been greatly underestimated over the years to allow the building of wind turbines. The EU legislation needs to be enforced to protect biodiversity

We should be encouraging our farmer scientists, engineers and communities to get involved in restoring our raised a low-lying bog through extending the pilot projects, which are successfully underway to reduce our carbon emissions through natural carbon capture.

The Environmental Protection Agency is responsible for improving the quality of rivers and catchment areas. From the evidence above, allowing wind farm companies to rule the roost in North Mayo would be completely counterproductive to achieve this goal.
https://lawaters.ie/app/uploads/2022/03/AFA0014_Ballinglen_Desktop_Assessment.pdf

Positive and effective measures must be put in place to encourage farmers to proactively embrace securing a future involving protecting our natural heritage, and our historical past. The prize will be to a sustainable farmland for the future of their families and community. It will hopefully encourage the young people of north Mayo to remain in the area to farm and thrive. The government is trying to achieve this through:

Basic Income Support for Sustainability Scheme -BISS
BISS - Agriculture and rural development - European Commission
2025 Basic Income Support for Sustainability (BISS) opens for applications

Complimentary Income Support for Young Farmers (CISYF)
Complimentary Income Support for Young Farmers - Teagasc | Agriculture and Food Development Authority

Agri-Climate Rural Environment Scheme (ACRES)
Agri-Climate Rural Environment Scheme (ACRES) - Irish Farmers' Association

If farmers are expected to follow strict farming regulations in a peatland area, then so should anyone who wants planning permission, i.e., no ploughing below 30 cm and drains can be repaired but not deepened or widened
Introduction of GAEC 2 as part of Conditionality from 2025

There are many other ways to develop green energy rather than sacrificing our natural heritage and allowing areas outside these sites to be run like the Wild West!

SEAI is crying out for investment in offshore energy production, including tidal technologies that are unobtrusive and are attached to the shoreline, using the up and down motion of the device to produce energy, rather than large rotating turbines. They do not interfere with sea wildlife.

It would be up to the community, with guidance from environmental and engineering specialists, to decide the best choice of green energy production.

https://www.seai.ie/renewable-energy/ocean-energy/ocean-energy-technologies

We must ask the question, is big business from the U.K., EU and US pushing the wind turbine craze and setting the green agenda in Ireland rather than the politicians and people of the country?

Our energy production will not be sustainable because outside global companies will run them. Our councillors and TDs need to shift a gear to end this madness of having 500 to 1000 wind

turbines on the planning papers in the North of Mayo and get back to supporting local communities through providing properly funded services that benefit all.

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. From just examining the initial planning documents associated with Muingmore Wind Farm, the application has not specifically determined the size of the wind turbines and how the company expects to connect to the grid. This identifies yet another piecemeal approach to wind farm development in North Mayo.

The Aarhus Convention 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 piecemeal approach to wind farm development throughout Mayo is deliberate and has resulted in the complete loss of trust in the process and the political will to fight for local communities

There must be a moratorium on onshore wind turbine building. There are other available renewable energy programmes that need to be fully investigated, since these onshore Wind Farms are causes major distress throughout the country.

Mise le meas / Yours sincerely,

Catherine Clarke

07/08/2026