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Submission in Response to Applicant's "Response to Submissions"

Case Reference: ACP-323761-25

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Date: 30/06/2026

Introduction We, Orla Mckeogh and Kevin McDonagh, submit this response to the applicant's "Response to Submissions" dated February 2026. Our original submission raised substantive concerns regarding amenity, health, procedural integrity, and environmental impact. The applicant's responses are generic, non-site-specific, and fail to address the issues raised.

Technical Response to TNEI Noise Assessment
Introduction

This chapter provides a detailed response to the Applicant's noise assessment prepared by Technical Noise & Environmental Consultants (TNEI) as part of the Applicant's Third Party Submissions Response.

The review focuses on whether the Applicant has adequately demonstrated, through site-specific assessment and robust predictive analysis, that the proposed development will not give rise to significant adverse noise effects on residential amenity.

The assessment is considered in the context of:

- the Environmental Impact Assessment Report (EIAR);
- TNEI's Noise Assessment Response;
- applicable Irish and international guidance; and
- relevant planning and environmental assessment principles.

Where appropriate, direct reference is made to statements contained in the TNEI response.

Reliance on the Wind Energy Development Guidelines (2006)

TNEI places significant reliance on the Wind Energy Development Guidelines for Planning Authorities (2006) as the primary basis for the noise assessment methodology.

The response asserts that these Guidelines remain the appropriate standard for wind turbine noise assessment in Ireland.

It is accepted that the 2006 Guidelines remain in force and are widely applied in planning assessments. However, continued reliance on these Guidelines does not, in itself, establish that they are sufficient to fully assess the potential environmental effects of modern wind turbines of the scale proposed in this development.

The turbines proposed in the present application are significantly larger, both in hub height and rotor diameter, than those typically envisaged when the 2006 Guidelines were prepared. The Guidelines therefore represent a minimum policy framework rather than a comprehensive demonstration of environmental acceptability in all circumstances.

The Environmental Impact Assessment process requires that likely significant effects be assessed in the context of the receiving environment and the characteristics of the proposed development, not solely in terms of compliance with dated guidance.

Accordingly, compliance with the 2006 Guidelines should not be interpreted as conclusive evidence that residential amenity will be protected under all operational conditions.

ETSU-R-97 Methodology

TNEI relies upon ETSU-R-97 as the underlying assessment framework for operational wind turbine noise.

While ETSU-R-97 remains widely used in wind energy assessment, it is based on assumptions regarding turbine technology and operational characteristics that predate modern large-scale turbines.

A key limitation of ETSU-based assessment is that it focuses on averaged noise levels (LA90,10min) and does not fully capture more complex noise characteristics such as:

- amplitude modulation;
- intermittency effects;
- low-frequency fluctuations; and
- temporal variation under stable atmospheric conditions.

These characteristics are frequently cited in relation to noise annoyance at operational wind farms, even where compliance with ETSU-derived limits is achieved.

The reliance on ETSU-R-97 therefore provides a baseline assessment but does not, in itself, demonstrate that all relevant noise impacts have been fully characterised.

Predictive Noise Modelling and Assumptions

TNEI states that predictive noise modelling demonstrates compliance with relevant noise criteria and therefore concludes that significant effects are unlikely.

However, predictive modelling is inherently dependent upon the assumptions used. The reliability of conclusions therefore depends on whether those assumptions accurately represent worst-case operational conditions.

The Applicant's response does not fully set out or critically examine the following modelling parameters:

- atmospheric stability classes and frequency of stable night-time conditions;
- wind shear profiles and their effect on downwind propagation;
- ground absorption coefficients across varied land cover;
- terrain modelling resolution and shielding effects;
- operational modes of turbines under different wind speeds;
- cumulative operational scenarios across the full wind farm site;
- receptor selection completeness, including all sensitive dwellings.

In the absence of detailed justification of these assumptions, it is not possible to independently verify that the modelling represents conservative worst-case conditions rather than average or typical operating scenarios.

This is particularly relevant given that wind turbine noise impacts are often most pronounced under stable night-time atmospheric conditions, which are not always fully captured in standard modelling approaches.

Amplitude Modulation

TNEI acknowledges that amplitude modulation (AM) may occur but concludes that it is unlikely to be significant in this case.

Amplitude modulation is widely recognised as a key factor in noise annoyance associated with wind turbines. It is characterised by periodic variation in sound level, often perceived as "swishing" or "thumping".

While ETSU-based assessment does not explicitly model AM, its occurrence in operational wind farms has been documented in peer-reviewed literature and in operational experience across multiple jurisdictions.

The Applicant's response does not provide:

- a site-specific assessment of the likelihood of amplitude modulation;
- analysis of meteorological or topographical conditions that may influence AM occurrence;
- assessment of cumulative AM effects from multiple turbines operating simultaneously; or
- a defined monitoring or mitigation strategy should enhance AM occurrence post-construction.

In the absence of such analysis, the conclusion that amplitude modulation will not result in significant effects is not fully substantiated by project-specific evidence.

Low Frequency Noise and Infrasound

TNEI concludes that low frequency noise and infrasound are not expected to result in adverse effects.

While the majority of scientific literature indicates that infrasound from modern turbines is below the threshold of audibility, low-frequency noise remains relevant in terms of perception and annoyance.

The relevant planning question is not solely whether measurable health effects occur, but whether the development may give rise to adverse effects on residential amenity, including sleep disturbance and reduced quality of life.

The Applicant's response does not fully engage with the distinction between:

- measurable acoustic thresholds; and
- human perception and annoyance responses under real-world conditions.

Accordingly, this aspect of the assessment remains based primarily on general literature rather than site-specific evaluation.

WHO Environmental Noise Guidelines

TNEI states that the World Health Organization Environmental Noise Guidelines (2018) should not be treated as an assessment methodology and therefore attributes limited weight to them.

While it is correct that the WHO Guidelines are not a planning standard, they represent the most recent international synthesis of evidence on environmental noise and health outcomes.

The Guidelines identify environmental noise as a risk factor for sleep disturbance and annoyance at lower levels than those set out in ETSU-R-97.

The Planning Authority is entitled to have regard to this evidence when assessing whether the Environmental Impact Assessment adequately considers likely significant effects on residential amenity.

The WHO Guidelines therefore remain relevant contextual evidence, even if they are not directly transposed into Irish planning thresholds.

Operational Experience and Comparable Developments

TNEI argues that complaints or operational issues at other wind farms are not directly relevant to the assessment of this proposal.

While each development must be assessed on its own merits, operational experience from comparable developments provides valuable evidence regarding real-world performance of predictive models and the occurrence of phenomena such as amplitude modulation and low-frequency noise.

Such evidence is particularly relevant where predictive models rely on assumptions that may not fully capture complex atmospheric and operational conditions.

Accordingly, operational experience should be considered as supporting contextual evidence rather than being dismissed entirely.

Webster & Rollo v. Meenaclogher Wind Farm Ltd.

TNEI distinguishes the High Court judgment in Webster & Rollo v. Meenaclogher Wind Farm Ltd. on the basis that it relates to private nuisance rather than planning law.

While this distinction is correct, the judgment remains relevant insofar as it demonstrates that compliance with planning conditions and predictive assessments does not necessarily prevent significant adverse effects in practice.

The case illustrates the limitations of predictive modelling in fully capturing operational impacts, and therefore supports the need for careful scrutiny of modelling assumptions at the planning stage.

Overall Assessment of TNEI Noise Conclusions

The TNEI response concludes that noise impacts will be acceptable based primarily on:

- compliance with ETSU-R-97 derived criteria;
- adherence to the 2006 Wind Energy Guidelines; and
- predictive noise modelling results.

However, the analysis does not fully address:

- the limitations of ETSU-based methodologies in capturing modern turbine characteristics;
- uncertainty in modelling assumptions under worst-case conditions;
- site-specific factors influencing amplitude modulation;
- operational experience from comparable developments; and
- the distinction between compliance and actual residential amenity outcomes.

In this context, while compliance with established guidance is acknowledged, it does not in itself demonstrate that all likely significant effects have been fully identified, assessed, and mitigated.

Also please see attached a copy of an article that raises concern....

Dept "refusing" to meet with families affected by wind farms

July 3, 2026

Maria Maynes

Irish News

Families, especially children, are suffering from a lack of sleep because of noise from wind turbines, while the Government is "refusing" to meet with those affected, the Dáil has heard.

Tánaiste Simon Harris was told that the HSE's environmental health service believed an investigation was warranted in at least one case, but the Department's public health section failed to carry one out. Communities in counties including Offaly, Kilkenny, Mayo, and Limerick have all been raising concerns about the impact of wind farms for years, Mr Harris was told.

Independent Ireland TD said that turbines should not be located where they may affect residents' health, claiming that evidence shows turbines have health impacts "without doubt" in a number of locations.

It comes amid a plea for Mr Harris to meet with the Communities and Environmental Protection Alliance, along with affected families and the Minister for Health.

The Government, Mr O'Donoghue said, continues to fail to produce updated national planning rules on wind farms, amid calls for a formal public health investigation.

In response, Mr Harris did not make a firm commitment to meet with those affected, but said he would arrange a meeting with the Government.

“A number of weeks ago, I was copied into a serious letter from the Communities and Environmental Protection Alliance, CEPA, to the Minister of Health,” said Deputy O’Donoghue.

“I am informed that there has been no response, not even an acknowledgement. Representatives from five counties are in the Public Gallery today. They are from Limerick, Mayo, Kilkenny, Wicklow and Offaly, including members of the Stonestown community in County Offaly who live beside the Cloghan wind farm.”

He continued: “For more than three years, that community has raised noise complaints with the local authority, the HSE and the Environmental Protection Agency, EPA.

“The crucial point is that the HSE environmental health service examined the matter, visited the community and requested a public health investigation into the complaints.

“The public health section denied it. One part of the health service was looking for an investigation but the Department’s public health section denied it. I want to understand why. The HSE is our expert public health agency. If its own environmental health service believes a matter warrants further investigation, what justification does the Department of Health have to refuse its request?”

The House heard that rather than it being an “isolated” issue in county Limerick, there are long-running complaints reading about turbine noise and shadow flicker in Kilmeedy and Morristown. While in county Clare, the HSE had investigated a wind farm following complaints and at the request of the local authority.

“I have a copy of that investigation,” said the Limerick TD. “The Tánaiste and I met CEPA a number of years ago and we discussed these complaints. The Taoiseach is on the record 13 years ago saying that there are health implications to wind farms.

“There is something that I want the Tánaiste and all other Members sitting around the House today to do. There are two children sitting in the Public Gallery with their parents, a 12-year-old and a ten-year-old. I want the Tánaiste to tell them that he is going to sit there and not investigate the issues and hide things until 2030.

“Their parents get complaints that they have to come to school because their children are falling asleep in class. If it was the Tánaiste’s child, how would he feel as a parent? Would he deny this for 13 years? Would he deny it for ten minutes if it was his child?”

The TD told Mr Harris that it had been “proven without doubt” that there are health implications to wind turbines in certain areas.

“I am not against wind turbines in areas where they do not have health implications, but this one does. So, when the Tánaiste is giving his reply, I want him to think of the children and families this is affecting.”

Mr Harris said he was “consistently on the record” on the importance of publishing new guidelines in relation to wind energy and wind farms.

"I am a believer, as I believe the Deputy said he was, in the switch to renewable energy. It is really important. We have seen what happens when we live in a country that is too reliant on fossil fuel. We all know that.

"We can have debates about how to make that transition but our country is still addicted to fossil fuel. The impact of that on consumers and citizens in the Deputy's constituency and mine every time somebody makes a decision thousands of kilometres from here is not an abstract thing any more. It has happened not once, but twice in the last five years and plunged us into challenges like the cost-of-living crisis and real difficulties for people. We all accept that point and are not rowing on that point or debating it."

Please consider our concerns .

Kind regards

Orla McKeogh and Kevin McDonagh