

Clohanmore,
Cree,
Kilrush,
Co. Clare.

11/05/2026

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

**Re: Submission / Observation on planning reference number: ACP 324155-26
Proposed Cahermurphy West Windfarm Development**

Dear Sir/Madam,

We, John Killeen and Maura Whelan wish to lodge an objection to the proposed wind farm development 'Cahermurphy West Windfarm', Planning Reference No: ACP 324155-26 on the following grounds.

The proposed turbines are of an industrial scale entirely out of character with the existing residential and rural environment. The visual impact on our property will be severe and unavoidable. The development will fundamentally alter the outlook from our home and negatively affect our quality of life and enjoyment of our property.

Our house is identified as No. 79 within the shadow flicker zone. Erected in 2020, this house has been designed to achieve the maximum amount of natural light possible. It is south facing and consists of large windows to the front. Three of the four bedrooms are also south facing. Two of the proposed eight turbines (turbine 1 and turbine 3) are located 1074m to the east of our property. The EIAR also calculates that we will potentially experience 35 minutes of shadow flicker per day. This exceeds the recommended daily allowance of 30 minutes per day. As it was deemed to take the design, dimensions of each window and orientation of the house into consideration, we believe that the shadow flicker analysis is inaccurate as the impact will be far greater than originally predicted. The analysis does not represent the true impact shadow flicker will have on our family and quality of life as all our living areas of the house will be affected.



Figure 1: Photomontage of proposed Cahermurphy West Windfarm taken from the boundary of house No. 79

We are also deeply concerned regarding noise impacts and the practical habitability of our home. The proximity of the eight turbines is such that we believe we will no longer be able to comfortably open windows for normal household ventilation without being subjected to turbine noise and disturbance. The application does not adequately address these residential amenity concerns.

In addition, the developer has failed to provide meaningful mitigation measures for neighbouring residents. No adequate vegetation screening or landscape buffering has been proposed to reduce the visual dominance of the turbines from our home. The absence of such mitigation demonstrates a failure to properly consider the impact on nearby residents.

A 2003 study by Stansfeld and Matheson found that children in general represent a group who are particularly vulnerable to the non-auditory (infrasound) effects of noise. The report stated *“In view of the fact that children are still developing both physically and cognitively, there is a possible risk that exposure to an environmental stressor such as noise may have an irreversible negative consequence for this group”*. The World Health Organisation recommends a minimum of 1.5km distance between industrial turbines and homes. Likewise, the French Medical Association recommends a minimum of 2km distance between industrial turbines and homes.

We respectfully submit that the proposed development fails to adequately protect residential amenity and will have a serious and long-term negative impact on the living conditions of nearby homeowners.

We request that An Coimisiún Pleanála give full consideration to:

- the excessive visual dominance of the turbines,
- the adverse impact on residential amenity,
- the likely noise disturbance,
- the inability to reasonably enjoy and ventilate our home,
- the lack of adequate mitigation and screening measures,

- the devaluation of our property

The Hen Harrier is an Annex I species under the EU Birds Directive and is recognised as one of Ireland’s most threatened breeding raptors. The species has undergone severe national decline in recent decades, and the conservation of remaining breeding territories is now regarded as an urgent national priority. Recent findings from the 2023 National Survey of Breeding Hen Harrier in Ireland confirmed that the national population has declined by approximately one-third since 2015, with only 85 confirmed breeding pairs remaining nationally.

Hen Harriers are especially sensitive to disturbance during nesting and foraging periods. Windfarm developments are known to cause displacement from traditional breeding territories and can reduce breeding success through habitat degradation and increased disturbance. The proposed development would inevitably result in the loss and fragmentation of important foraging habitat and would further increase cumulative pressures on an already vulnerable regional population.

Of particular concern is the confirmed presence of a Hen Harrier nest site by the applicant located approximately 800 metres from the proposed windfarm boundary during the 2024 breeding season. The proximity of an active breeding territory to the proposed development gives rise to very significant concerns regarding disturbance, displacement, habitat fragmentation and collision risk during both the construction and operational phases of the project.

The experience in West Clare is particularly relevant and instructive. Evidence from the 2023 National Hen Harrier Survey demonstrated that the breeding population in north and west Clare declined by approximately 22% since 2015 and by approximately 56% since peak levels recorded in 2010. Surveyors specifically identified wind turbines and associated infrastructure as likely contributing factors through disturbance and displacement effects.

Similarly, previous ecological assessments in Clare identified significant reductions in breeding pairs in areas associated with expanding wind farm development and associated infrastructure

The existing foraging habitat for the hen harrier is located in a central location to support both the breeding pair to the east and the current population that have established winter roosts and nest sites to the west of the development. The proposed hen harrier enhancement site lies to the east and is at the extremities of the foraging range for the local hen harrier population, particularly hen harriers located in and around the proposed development. This enhancement area will only cater for one breeding pair situated near Doo Lough Lake and not for the newly established hen harrier breeding territory from the proposed windfarm. If anything, Cahermurphy West Windfarm will act as an artificial barrier and divide the hen harrier territory.

Barry O'Donoghue published '[The Ecology and Conservation of Hen Harriers in Ireland](#)' in 2010. In the report he predicted that the number of breeding females in the West Clare area would remain the same (see graph below), however in the 2015 national survey there was sharp decline of breeding hen harrier recorded in West Clare. It could be argued that this decline aligns with the erection of over 100 wind turbines in the North and West Clare territory.

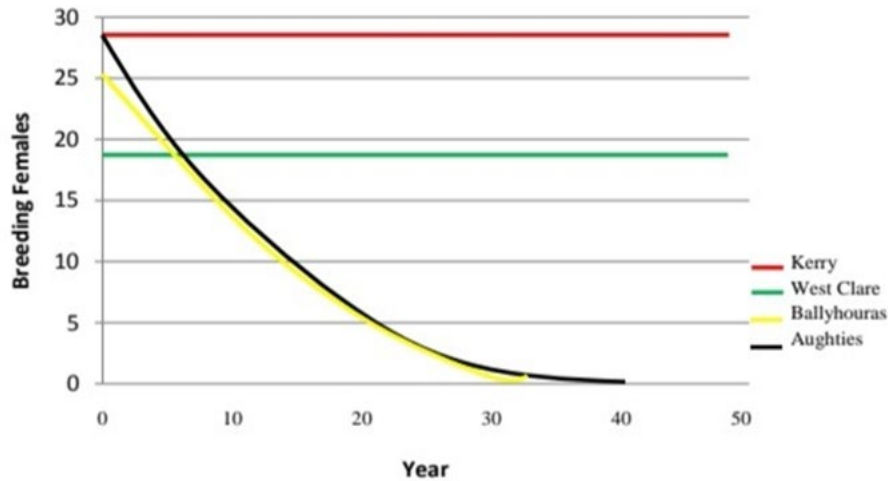


Figure 2: Population viability of Irish Hen Harrier breeding areas

According to this report, the West Clare territory plays an important role in repopulating other hen harrier territories around Ireland and as far away as the UK (see diagram below).



Figure 3: Overseas movement of Hen Harrier wing tagged in Ireland

Given:

- the confirmed nest site within 800 metres of the development boundary;
- the documented decline in Hen Harrier breeding pairs in West Clare;
- the acknowledged sensitivity of the species to disturbance and habitat loss;
- the cumulative impact of existing and proposed wind energy infrastructure in the wider region; and
- the legal obligations arising under the EU Birds Directive and Irish wildlife legislation,

it is clear that the proposed development poses a detrimental risk to the conservation status of the Hen Harrier population in this area. We respectfully request that An Coimisiún Pleanála refuse permission for the proposed development due to the likely significant adverse impacts on this protected species and its habitat.

The EIAR identifies the presence of a bat roost within the structure; however, the proposed development fails to provide sufficient mitigation measures to ensure the protection and

preservation of the roost during both construction and operational phases. Given the protected status of all bat species and their roosts under the Wildlife Acts and the EU Habitats Directive, this omission is a significant concern.

In particular, the EIAR does not adequately address the impacts associated with the proposed new internal roadway (see diagram below), which is planned at a distance of less than 7 metres from the identified bat roost. The proximity of this roadway is likely to result in disturbance through increased noise, vibration, lighting, and ongoing human activity. These impacts have the potential to negatively affect the suitability of the roost and disrupt bat behaviour, including emergence, commuting, and breeding activity.



Figure 4: Drawing of 'Farm Shed A', Structure No. 2 and proposed internal road from the EIAR

Furthermore, the EIAR fails to properly assess cumulative ecological effects. Within the past year, 300 metres of broadleaf trees used for bat foraging and commuting/transit routes have already been removed through commercial timber harvesting activities located 70 metres from the roost site. The loss of this habitat represents a substantial reduction in ecological connectivity and feeding resources for local bat populations.

The combined impact of:

- the loss of established foraging and commuting habitat,
- the close proximity of the proposed roadway,
- construction disturbance,
- potential lighting impacts, and
- the absence of robust mitigation measures,

has not been sufficiently assessed in the EIAR. The cumulative effects on bats and their habitat therefore appear to have been underestimated.

We respectfully request that An Coimisiún Pleanála give full consideration to these issues and seek further ecological assessment and clarification from the applicant. In particular, we believe the following should be required before any decision is made:

1. A detailed bat mitigation and monitoring plan;
2. Assessment of lighting, vibration, and noise impacts on the roost;
3. Reassessment of cumulative impacts, including recent habitat loss from forestry operations;
4. Appropriate setback distances between the roost and proposed infrastructure;
5. Habitat restoration and enhancement measures to compensate for the loss of foraging and commuting habitat.

We submit that the current EIAR does not adequately demonstrate that the proposed development will avoid adverse impacts on protected bat species and their habitats.

We also wish to raise a further concern regarding a second identified bat roost within the application area, specifically relating to 'Farm Shed B', identified as 'Structure No. 3' in the application documentation.

It is our understanding that the bat roost survey associated with this structure was carried out without the consent or permission of the landowner. As such, there are serious concerns regarding the legality, validity, and reliability of the survey findings and methodology.

Where ecological survey work has been undertaken through unauthorised access or trespass, the resulting survey information cannot reasonably be relied upon as robust or appropriately verified environmental data. This raises significant concerns regarding the adequacy of the EIAR and the accuracy of the ecological assessment presented to the Board.

In addition, if lawful access to the structure cannot be secured, then it is questionable whether the bat roost survey can be considered complete, reliable, or capable of informing a proper Appropriate Assessment or Environmental Impact Assessment process. The possibility therefore remains that the structure may support bat activity or roosting features that have not been fully or properly assessed.

Given the protected status of bats and bat roosts, we respectfully request that An Coimisiún Pleanála:

- examine the validity and admissibility of the survey information submitted in respect of Farm Shed B / Structure No. 3;
- require confirmation that all ecological survey work was undertaken with the necessary landowner permissions and legal access arrangements;
- require further independent survey work where necessary; and
- ensure that no reliance is placed on incomplete or potentially compromised ecological data in determining the application.

These matters are material to the proper assessment of ecological impacts arising from the proposed development.

Based on the reasons above, we ask that An Coimisiún Pleanála refuse planning permission to this proposed development.

Regards,

John Killeen & Maura Whelan